

Planning Purbeck's Future



**Core Strategy Pre-Submission - 1 November - 20 December 2010
Consultation Responses
Part 6**

Contents

| | |
|--|------------|
| Churchill A | 1 |
| Churchill J E | 5 |
| Clements D | 9 |
| Coal Authority | 20 |
| CPRE | 21 |
| Cross M | 33 |
| Davies P | 36 |
| Denton P | 38 |
| Dorset Area of Outstanding Natural Beauty | 45 |
| Dorset County Council | 56 |
| Dorset Wildlife Trust | 63 |
| English Heritage | 98 |
| Environment Agency | 101 |

Churchill A

6376
20/10/10



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

| Your Details | | Agents Details (where relevant) |
|-------------------------------|--------------------------------------|---------------------------------|
| Title | MRS. | |
| Name | ANN CHURCHILL | |
| Job Title (where relevant) | | |
| Organisation (where relevant) | | |
| Address | 9, OLD FURZEBROOK RD. STOBOROUGH. | |
| Postcode | BH20 5DD. | |
| E-mail | | |
| Tel. Number | 01929 555084. | |



Responses should be sent to:

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

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

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

- Briefings on how to complete these forms and the process involved will be held on:
- 10th November, 7pm, District Council offices, Wareham
 - 18th November, 7pm, Community Hall, The Mowlem, Swanage
 - 1st December, 7pm, District Council offices, Wareham

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

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

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

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

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

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

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

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

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

Signature

Date

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

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

| | | |
|--------------------------------|---------------------|-----------|
| Policy: H.S. HOUSING SUPPLY | Paragraph: 7.3.7 | Map: 9 |
|--------------------------------|---------------------|-----------|

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

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

(For explanation of terms refer to guidance notes below)

Comments:

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

The Green Belt setting of Wareham on its Western edge is very important to the town and there has been great local support recently for rejecting a supermarket development in that area. Therefore I do not think that the immediate proposal for 200 houses on the site is justified without proper consultation with the local community.

The current government has abolished the Regional Development Agencies and the Regional Spatial Strategies which includes their housing targets. The new Localism Bill will enable communities to protect their Green

Belts should they wish. I maintain that there has been insufficient consultation on the allocation of housing sites in the light of the new legislation or enough regard given to land which may become available when the reorganisation of the education system in Purbeck from 3 tier to 2 tier is complete.

Proposed Changes:

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

The document would be sound if new consultations on housing numbers and alternative sites were to take place in the light of the new legislation.



4231
20/12/10

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

| Your Details | Agents Details (where relevant) |
|-------------------------------|---------------------------------|
| Title | Mr |
| Name | J. E. Churchill |
| Job Title (where relevant) | |
| Organisation (where relevant) | |
| Address | |
| Postcode | |
| E-mail | |
| Tel. Number | |

9 Old Ferrybrook Rd.
Stoborough.
BH20 5DD

01929 555084.

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

Responses should be sent to:

Email: ldf@purbeck-dc.gov.uk

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

Fax: 01929 557348

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

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

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

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

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

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

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

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

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

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

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

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

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

| | | |
|-----------|--------------------------------|--------------------|
| Signature | Signature has been blanked out | Date 19th Dec 2010 |
|-----------|--------------------------------|--------------------|

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

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

| | | |
|---------------------------------------|-----------------------------|------------------|
| Policy: <i>H.S. Housing Supply</i> | Paragraph: <i>7.3.7.</i> | Map: <i>9</i> |
|---------------------------------------|-----------------------------|------------------|

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

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

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

(tick all that apply)

It is not 'justified'
(i.e. the Core Strategy is not founded on a robust and credible evidence base and/or doesn't provide the most appropriate strategy)

It is not 'effective'
(i.e. the Core Strategy is not deliverable, not flexible and not able to be monitored)

It is not 'consistent with national policy'

(For explanation of terms refer to guidance notes below)

Comments:

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

Wareham is a unique Saxon walled town of national importance. The views of the town from the west and north west is significant to its setting in the landscape, and the reason and justification for the existing settlement boundary. The regrettable presence of the bypass does not justify the extension of this boundary up to that line, nor does the availability of a willing landowner. Other less sensitive sites should be sought for needed housing.

Proposed Changes:

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

The decision to move the settlement boundary on the Worget road to the line of the bypass is not sound. It should be removed from the submission, with housing allocations in relevant paragraphs and tables amended. This work and any redrafting is for those with the expertise.

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

5369
20/12/10



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

| Your Details | Agents Details (where relevant) |
|----------------------------------|---------------------------------|
| Title | Mr |
| Name | David Clements |
| Job Title (where relevant) | |
| Organisation (where relevant) | |
| Address | 4 Leeson Close Swanage Dorset |
| Postcode | BH19 2SR |
| E-mail | clementsdc@hotmail.com |
| Tel. Number | 01929 422724 |

Responses should be sent to:

Email: ldf@purbeck-dc.gov.uk

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

Fax: 01929 557348

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Signature

Date

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

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

| | | |
|----------|---------------------|------------|
| Policy : | Paragraph: 4.2.1 | Map: 13 |
|----------|---------------------|------------|

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)

For the last fifteen years or so the majority of new dwellings in the Purbeck area have taken place in Swanage. That is approx 34% of new builds in the Purbeck area. An increase of 900 dwellings between 2006 and 2026 would be an unacceptable burden on the town and will do nothing to retain or enhance the unique qualities of the town. The Core Strategy, with its overdevelopment, will destroy the very reason why Swanage is able to exist as a place that attracts visitors. These visitors are the towns main source of income, Swanage being, as Purbeck District itself describes it on Map 13:- Large town but at the end of a giant cul-de-sac (A351). There is very limited opportunity for employment in the town as it is a 'cul-de-sac' at the end of the bottle-neck (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).

It would be more sensible to provide more housing in areas of economic growth identified in the Core

Strategy such as Winfrith and Holton 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: |
|--------------------|-------------------------|------|

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

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

1) The Planning Purbeck's Future Core Strategy Pre-Submission Consultation Document is 116 pages thick and at £12 each copy, is prohibitively expensive for many of the local residents who did not understand the importance of finding out what could happen in the future. Trying to read and understand its contents by members of the public in the few places they were available and in the opening times that each venue offered, did not allow the general public to gain a full understanding of what was being asked of them. With a large elderly population, a great number of residents do not have access to the internet.

2) The consultation document did not offer responders the options of choosing between having 200 new dwellings on an extended settlement or a preference for fewer dwellings or a third option of none at all.

Proposed Changes:

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

Remove the requirement to build 200 dwellings on a settlement extensions

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

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

| | | |
|----------|------------|------------|
| Policy : | Paragraph: | Map: 13 |
|----------|------------|------------|

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

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

(For explanation of terms refer to guidance notes below)

Comments:

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

Although on map 13 it is indicated that there is 'Affordability concerns AND second home concerns as attractive environment'. In practice there has been no consideration given to the high level of second homes at the moment and due to the desirability of the area, this will increase pushing up house prices. Property will therefore be 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).

Limit the ownership of second homes in this AONB to safe guard the environment.

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 : ELS | Paragraph: 6.5 | Map: |
|-----------------|-------------------|------|

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

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

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

(tick all that apply)

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

(For explanation of terms refer to guidance notes below)

Comments:

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

With only 2.5% of employment land in Swanage and 0.28% in Corfe Castle that amounts to under 3% in the South East of Purbeck. Yet the Core Strategy proposes to allocate 37% of its housing provision here. This clearly contradicts the stated aim of reducing the use of cars identified as a priority in the Purbeck Community Plan and a stated aim of the Core Strategy. A high number of new houses combined with a lack of employment opportunities is not sustainable.

Proposed Changes:

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

Provide a greater proportion of housing in areas of greater economic growth that have been identified in the Core Strategy as Winfrith and Holton 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 : HS | Paragraph: 6.4.5 | Map: |
|----------------|---------------------|------|

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

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

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

(tick all that apply)

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

(For explanation of terms refer to guidance notes below)

Comments:

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

Not justified because it is unsound. The allocation of 900 dwellings (37.5% of 2400) is not deliverable. The vast majority (over 90%) are earmarked for Swanage. In 2002 a planning Inspectorate Report stated that no further building should happen in Purbeck until traffic congestion on the A351 has been resolved. This has not happened and has been postponed for the foreseeable future. In May 2008 I received a letter from Benjamin Webb Design and Conservation Officer Planning Policy Purbeck District Council, dated 27th May 2008, in response to a letter I sent regarding Herston Fields being taken out of the Swanage and Herston Conversation Area following a review. Here is a very important paragraph

For most it was indeed the idea that the removal from the Conservation Area was a precursor to development that was the main concern. The fact that this field lies within the AONB-subject to landscape policies within PPS7-and also lies within a defined flood zone means that it is highly improbable that it will ever be developed. Indeed the field currently lies outside the settlement boundary for Swanage, an indication that the Local Authority views this an inappropriate location for development. Should further reassurance be needed the characterisation study for Swanage and Herston noted above has further identified the field as an important feature within the broader context of the settlement and thus not suitable for development.

Although Herston Fields is not now included in the Core Strategy Plan as first intended, it does suggest that different parts of the Planning Department were not communicating effectively with each other because while residents were being assured by someone in the Planning Department the development on that site was unlikely others were suggesting just the opposite.

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).

Future housing should be closer to areas of economic growth that has been identified in the core Strategy as Winfrith and Holton 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 : | Paragraph: | Map: |
| HS | 6.3.4 | |

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 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)

Purbeck District Council's definition for SANGS is shown as Suitable Accesible Natural Greenspaces. Habitat Regulations Assessment 5.48 definition of SANGS is Suitable Alternative Natural Green Space. There is no room for Suitable ALTERNATIVE Natural Green Space as this is not deliverable in Swanage which is situated within an AONB and must be protected at all costs.

Proposed Changes:

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

There should be no more building on green field/AONB sites and limit infill to affordable housing for local people.

The
COAL
AUTHORITY



200 Lichfield Lane
Berry Hill
Mansfield
Nottinghamshire
NG18 4RG
DX: 716177 Legal Mansfield 5

Tel: 01623 637 119 (Planning)
Fax: 01623 637 398

Email: planningconsultation@coal.gov.uk

Web: www.coal.gov.uk/services/planning

Planning Policy Team
Purbeck District Council

08 November 2010

[sent via email: ldf@purbeck-dc.gov.uk]

Dear Steve

Core Strategy – Pre Submission

Thank you for consulting The Coal Authority on the above.

Having reviewed your document, I confirm that we have no specific comments to make on this document at this stage.

We look forward to receiving your emerging planning policy related documents; preferably in an electronic format. For your information, we can receive documents via our generic email address planningconsultation@coal.gov.uk, on a CD/DVD, or a simple hyperlink which is emailed to our generic email address and links to the document on your website.

Alternatively, please mark all paper consultation documents and correspondence for the attention of the Planning and Local Authority Liaison Department.

Should you require any assistance please contact a member of Planning and Local Authority Liaison at The Coal Authority on our departmental direct line (01623 637119).

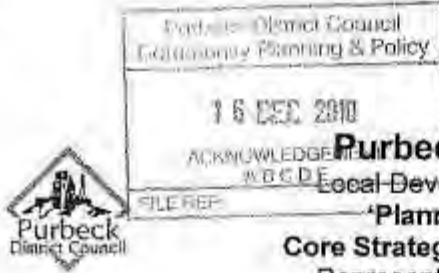
With kind regards

Yours sincerely

Signature has been blanked out

Miss Rachael A. Bust *B.Sc.(Hons), MA, M.Sc., LL.M., AMIEEnvSci., MIPSM, MRTPI*
Deputy Head of Planning and Local Authority Liaison

In line with Government led initiatives the Coal Authority is committed to the delivery of efficient, high quality services supported by information technology. To support this we prefer communication in electronic format wherever possible.



4972
16/12/10

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

| | Your Details | Agents Details (where relevant) |
|-------------------------------|---|---------------------------------|
| Title | MR | |
| Name | BRIXTON | |
| Job Title (where relevant) | RETIRED MANUFACTURING ENGINEERING MANAGER | |
| Organisation (where relevant) | CPRE COMMITTEE MEMBER | |
| Address | 1 WESSEX WAY SWANAGE | |
| Postcode | BH19 1QR | |
| E-mail | c.brixton@hotmail.co.uk | |
| Tel. Number | 01929 423841 | |

Responses should be sent to:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

| | | |
|-----------|--------------------------------|---------------|
| Signature | Signature has been blanked out | Date 15/12/10 |
|-----------|--------------------------------|---------------|

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

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

| | | |
|------------------------|----------------------------|------|
| Policy : NW, | Paragraph: 7.1.8 | Map: |
|------------------------|----------------------------|------|

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

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

Page 28: para 7.1.8
Transport. Last para. S 106 guidance states that contributions should be directly related to the proposed development. In collecting these contributions and passing them to DCC without relating them specifically, a development with little or no requirement for infrastructure provision will be subject to unnecessary increased cost.

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 that S106 contributions are related directly to specific S106 developments.

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

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

| | | |
|-----------------------|----------------------------|------|
| Policy : SW | Paragraph: 7.2.8 | Map: |
|-----------------------|----------------------------|------|

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

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

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

(tick all that apply)

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

(For explanation of terms refer to guidance notes below)

Comments:

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

Page 33: Transport. Last para, S 106 guidance states that contributions should be directly related to the proposed development. In collecting these contributions and passing them to DCC without relating them specifically, a development with little or no requirement for infrastructure provision will be subject to unnecessary increased cost. ~~Transport~~

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 that S106 contributions are related to specific S106 developments.

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

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

| | | |
|------------------------|----------------------------|------|
| Policy : CEN | Paragraph: 7.3.8 | Map: |
|------------------------|----------------------------|------|

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

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

(For explanation of terms refer to guidance notes below)

Comments:

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

Page 39 Housing. The paragraph does not stipulate that Public sector investment and plans must be approved before housing development is commenced. Failure to do this could compromise the best layout for Public Building and housing within the available land.

Proposed Changes:

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

It is suggested that the wording be revised to ensure that finance and master planning is set prior to commencement of housebuilding.

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 : CEN | Paragraph: 7.3.8 | Map: |
|------------------------|----------------------------|------|

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

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

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

(tick all that apply)

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

(For explanation of terms refer to guidance notes below)

Comments:

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

Page 40 : Transport. Penultimate para. S 106 guidance states that contributions should be directly related to the proposed development. In collecting these contributions and passing them to DCC without relating them specifically, a development with little or no requirement for infrastructure provision will be subject to unnecessary increased cost.

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 that S106 contributions are related to specific S106 developments.

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

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

| | | |
|-----------------------|----------------------------|------|
| Policy : NE | Paragraph: 7.4.8 | Map: |
|-----------------------|----------------------------|------|

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

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

(For explanation of terms refer to guidance notes below)

Comments:

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

Page 46 : Transport. Last para. S 106 guidance states that contributions should be directly related to the proposed development. In collecting these contributions and passing them to DCC without relating them specifically, a development with little or no requirement for infrastructure provision will be subject to unnecessary increased cost.

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 that S106 contributions are related to specific S106 developments.

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

| | | |
|---|--|---|
| 'Planning Purbeck's Future' (Core Strategy) <input 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: 7.5.10 | Map: |
|-----------------------|-----------------------------|------|

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

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

Page 53 : Transport. Last para. S 106 guidance states that contributions should be directly related to the proposed development. In collecting these contributions and passing them to DCC without relating them specifically, a development with little or no requirement for infrastructure provision will be subject to unnecessary increased cost.

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 that S106 contributions are related to specific S106 developments.

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

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

| | | |
|----------------------|------------------------------|------|
| Policy: HS | Paragraph: Page 18 | Map: |
|----------------------|------------------------------|------|

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

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

Housing requirements have been modelled from a basic housing needs survey 2006 which used data derived from the DCA needs assessment study undertaken between September 2002 and January 2003. The extent or how locally this survey was conducted has not been made clear. PDC decided to increase these forecast figures up to 2400 to meet an anticipated intervention by the Minister of State, which no longer applies. In addition, the opportunity to revise the figures post scrapping of the RSS has not been taken up. Furthermore with the awaited localisation bill there will be an incentive for a local approach to housing needs assessment which in a large number of settlements is non-existent. PDC have chosen not to separate out the AONB as a distinct entity, which whilst most of policy CO covers the necessary protection; in terms of housing and traveller sites, there is a need for special conditions. As written the policy particularly in SE Dorset is unsound in terms of protecting the AONB, and undeliverable.

Proposed Changes:

P.D.

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).

Immediate interim reduction in housing number allocations particularly within the AONB , to be followed as soon as practicable by local assessments to reflect the real current needs.

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

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

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

| | | |
|-----------------------|----------------------------|------|
| Policy : SE | Paragraph: 7.5.9 | Map: |
|-----------------------|----------------------------|------|

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

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

(For explanation of terms refer to guidance notes below)

Comments:

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

Page 51. Swanage - bullet point 2. The housing requirement has not been derived from a local needs assessment see comment (Policy HS page 18). the criteria for inclusion on the housing register for this area of particularly high demand is not commensurate with those adopted by most National Parks, e.g. 10 years residential qualification. Housing figures having been derived from listings including applicants with no residential or employment qualification are unsound. PPS3 governing rural exception sites - (interpreted as outside the settlement boundary within an AONB) preclude provision of 100% affordable housing under S106 agreements due to high land values.

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).

Revision of housing numbers in accord with an up to date needs assessment from criteria commensurate the location within the Dorset AONB.

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

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

| | | |
|----------------------------|------------------------------|------|
| Policy : RES | Paragraph: 8.6 | Map: |
|----------------------------|------------------------------|------|

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

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

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

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

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

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

(tick all that apply)

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

(For explanation of terms refer to guidance notes below)

Comments:

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

The policy does not state the additional constraints applicable within the AONB (to bring the policy in line with those for National Parks) i.e. Residential pitches are generally considered inappropriate and transit pitches are only acceptable if the objectives of the AONB designation will not be compromised

Proposed Changes:

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

Add paragraph : Within a designated AONB residential pitches are generally considered inappropriate, and transit pitches will be accepted if the objectives of the AONB designation are not compromised

4112
20/12/10



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

| Your Details | | Agents Details (where relevant) |
|-------------------------------|---------------------------|---------------------------------|
| Title | MRS. | |
| Name | HOYRA CROSS | |
| Job Title (where relevant) | RETIRED | |
| Organisation (where relevant) | — | |
| Address | 4 CHURCH CLOSE SWANAGE | |
| Postcode | BA14 1JP | |
| E-mail | — | |
| Tel. Number | 01929-625242 | |

Responses should be sent to:

Email: ldf@purbeck-dc.gov.uk

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

Fax: 01929 557348

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

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

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

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

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

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

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

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

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

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

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

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

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

| | | |
|-----------|--------------------------------|---------------|
| Signature | Signature has been blanked out | Date 11/12/10 |
|-----------|--------------------------------|---------------|

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

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

| | | |
|-----------------|------------|------|
| Policy : S E | Paragraph: | Map: |
|-----------------|------------|------|

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 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)

To build 260 houses on the edge of Swange would encroach on an A.N.O.B+ ruin a beautiful sea side resort. If these were built they must not be for anymore holiday homes, as we already have too many of these making it a dead town in the winter. Such buildups would create too much additional traffic + also the community services such as health, police, etc. would be overstretched. If any additional houses had to be built (which I doubt) they must be for local people with local jobs. Too many character houses have already been demolished & replaced with ugly blocks of flats so I feel the whole strategy is unnecessary & very badly thought out.

Davies P

From: Elizabeth & Peter [mailto:eandpdd@tiscali.co.uk]
Sent: 19 December 2010 18:34
To: email-Enquiries
Subject: Core Strategy - Houses in Purbeck

The deadline for comments on the Core Strategy Pre-Submission and the Schedule of Changes is still Monday 20 December 2010, 4pm.

Would you please pass my comments to this area by the above date/time. Thank you.

Peter E Davies
Flat 1
One Seymer Place
Seymer Road
Swanage
Dorset BH19 2AJ
eandpdd@tiscali.co.uk

I give my comments on the ineffective and unjustified core strategy as under.

An increase of 900 houses will destroy Swanage as "the first Victorian town west of Bournemouth" as I have often heard it described.

Nowhere is consideration given to additional employment within the town - there is insufficient work as it is for current householders.

Local people find it almost impossible to purchase their own homes so we will end up as a town of retirees.

We certainly do not want any more flats - there are too many as it is.

Core Strategy gives Winfrith and Holton Heath as grown areas economically so the bulk of the housing should be in these two areas.

The road system into Swanage is poor and I have seen the problems occurring in Corfe Castle with two lorries trying to negotiate road, pavement and each other.

Now to policy se - paragraph 7.5.9

This is not legally compliant. We were not asked if we wanted 200 houses there was no chance to choose fewer nor was there an option for no housing.

The 200 houses on settlement extensions in Swanage should be deleted.

Now to map 13

I find this unsound ie not justified nor effective and, more important, not legally compliant. We have a vast number of second homes and Swanage is gaining the reputation of being in the housing market only just below Sandbanks. The excellent location of Swanage attracts the wealthier population to purchase houses to the detriment of locals. I would support a limit to second home ownership as also those living outside Purbeck having holiday-to-let properties.

Now to 6.5 policy els: employment and land supply.

2(b) is not justified. With less than 3% employment land in SE Purbeck where 37.5% of the houses are proposed this clearly contradicts reducing car usage, which was identified as a priority in the Purbeck Community Plan as also in paras 4.1.2, 4.1.4 and 4.3.1 of the Core Strategy. The high number of houses and lack of employment is not sustainable. Put the majority of houses identified in the core strategy as Holton Heath and Winfrith.

Now to look at core strategy 6.4.5 policy hs: housing supply

2(b) is simply not justified because it is unsound and with over 90% of housing stock this is untenable. The Planning Inspectorate Report of 2002 stated no further building should happen in Purbeck until traffic congestion on the A351 has been resolved. Again - housing should be within the economic growth areas of Winfrith and Holton Heath.

Finally, core strategy 6.3.4 policy hs: housing supply

Para 2(b) is simply not effective. Habitat Regulations Assessment 5.52 - in respect of development in Swanage - is that development in all likelihood have an adverse effect on protected habitats. The proposal for Sites of Alternative Natural Green Space (SANGS) is not feasible for Swanage which is situated within an Area of Outstanding Natural Beauty which should be protected at all costs. Infill should be limited to affordable housing for local people and there should be no more building on green fields and/or Areas of Outstanding Natural Beauty.

P.E. Davies

Denton P



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

6355
15/12/10

| Purbeck District Council District Council Planning & Policy | |
|---|---------------------------------|
| 15 DEC 2010 ACKNOWLEDGEMENT | |
| Your Details | Agents Details (where relevant) |
| Title | MRS |
| Name | DENTON |
| Job Title (where relevant) | |
| Organisation (where relevant) | The Purbeck Society |
| Address | SOUTH BARN, SOUTHCLIFFERD |
| Postcode | SWANAGE BH19 2JG |
| E-mail | peaniedenton@pymoo.co.uk |
| Tel. Number | 01929 426492 |

Responses should be sent to:

Email: ldf@purbeck-dc.gov.uk

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

Fax: 01929 557348

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

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

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

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

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

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

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

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

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

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

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

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

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

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

| |
|-----------------|
| Date 11.12.2010 |
|-----------------|

YOUR COMMENTS -- PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

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

| | | |
|----------------------------|------------------------|------|
| Policy: [CORE STRATEGY] | Paragraph: 4. 2. 1. | Map: |
|----------------------------|------------------------|------|

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

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

(For explanation of terms refer to guidance notes below)

Comments:

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

The proposal to build 900 dwellings in Swanage with a projected population increase of 1500 will be damaging to the town's special qualities. Already there have been too many new developments in Swanage. This is clearly not sustainable because of the limited opportunities for employment in the town and the poor communication access to the town via Stratford (A351). It would be more acceptable to create more housing in areas of economic growth areas such as Holton Heath and Winfrith.

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

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

| | | |
|----------------|---------------------|------|
| Policy : SE | Paragraph: 7.5.9 | Map: |
|----------------|---------------------|------|

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

| | | | |
|---|---------------------------------|---|--|
| 1. Legally compliant <i>i.e. comments on the process of preparing Planning Purbeck's Future</i> | Yes <input type="checkbox"/> | No <input 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)

Consultation did not ask people if they wanted 200 houses or settlement extensions in Swanage. There was no chance to choose fewer houses nor was there a zero option.

Proposal:
Delete 200 houses or settlement extensions in Swanage

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

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

| | | |
|-----------------------|--------------------------|------|
| Policy: <i>ELS</i> | Paragraph: <i>6.5</i> | Map: |
|-----------------------|--------------------------|------|

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

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

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

(tick all that apply)

It is not 'justified'
(i.e. the Core Strategy is not founded on a robust and credible evidence base and/or doesn't provide the most appropriate strategy)

It is not 'effective'
(i.e. the Core Strategy is not deliverable, not flexible and not able to be monitored)

It is not 'consistent with national policy'

(For explanation of terms refer to guidance notes below)

Comments:

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

*Only 2.5% of employment land in Swanage and 2.8% in Corfe Mote; less than 3% in SE Purbeck where it is proposed to allocate 37.5% of the housing provision.
This contradicts the stated aim of reducing car usage identified as a priority in the Purbeck Community Plan and a stated aim of the Core Strategy, ref. paras 4.1.2, 4.1.4 and 4.3.1. High numbers of new houses and lack of employment opportunities is not sustainable.*

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 : HS | Paragraph: 6-3-4 | Map: |
|----------------|---------------------|------|

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

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

I understand that Habitats Regulations Assessment S.52 states that (in respect of development in Swanage) there is a likelihood that development will have an adverse effect on protected habitats. The mitigation proposal for sites of Alternative Green Spaces (SAGS) is not deliverable in Swanage which with is an AONB which must be protected. There should be no more building of green field (AONB) sites.

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 : H 5 | Paragraph: 6.4.5 | Map: |
|-----------------|---------------------|------|

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

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

(For explanation of terms refer to guidance notes below)

Comments:

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

The allocation of 900 units is not deliverable. The majority (over 90%) would be in Swarope. In 2002 a Planning Inspectorate Report stated that no further building should happen in Purbeck until traffic congestion at Sandford (A351) has been resolved.
Propose:
Any housing should be closer to economic growth areas, Hottan Heath and Winfrith.

Dorset Area of Outstanding Natural Beauty



Dorset AONB Partnership
PO BOX 7318
Dorchester,
Dorset DT1 1XJ

Tel : 01305 228253
Email : j.clarke@dorsetcc.gov.uk
Website : www.dorsetaonb.org.uk

Planning Policy
Purbeck District Council
(ldf@purbeck-dc.gov.uk)

20th December 2010

Dear Sir or Madam,

RE: Planning Purbeck's Future, Core Strategy Pre-Submission Consultation 1 November – 20 December 2010

Thank you for giving the Dorset AONB team the opportunity to comment on the pre-submission of the above document. The AONB team have previously submitted comments, on an earlier draft of the document, dated 10th December 2009.

Background

Areas of Outstanding Natural Beauty (AONBs) are designated under the National Parks and Access to the Countryside Act (1949). They are nationally important protected landscapes that make up our finest countryside. In discharging any function affecting the land in AONBs, The Countryside and Rights of Way Act 2000 places a statutory duty on Purbeck District Council to have regard to the primary purpose of the designation to conserve and enhance natural beauty.

Under this duty of regard, account should also be taken of the needs of agriculture, forestry, other rural industries and the economic and social needs of local communities. Particular regard should be paid to promoting sustainable forms of social and economic development that in themselves conserve and enhance the environment.

Recreation is not an objective of designation, but the demand for recreation should be met where it is consistent with the conservation of natural beauty and the needs of agriculture, forestry and other uses.

General Comments

Landscape/AONB Policy Context

Overall the Dorset AONB team strongly feels that the natural environment/landscape is significantly undervalued throughout the Core Strategy (CS). The European Landscape Convention sets out the approach to landscape and is discussed below. At a National level, the rural environment is a key objective of Planning Policy Statement 7: Sustainable Development in Rural Areas and, in line with this, it is strongly recommended that the theme of natural environment/landscape should be a consistent thread throughout the CS. The landscape is the matrix in which we live and from which comes the ecosystem services essential to our existence. In outstandingly beautiful areas such as Purbeck the landscape itself is a significant economic driver.

With regards the Dorset AONB, there is significant concern for the lack of policy relating to the designation or Protected Landscapes. It is understood that National Policy (NP) regarding Protected Landscapes should not be repeated in the CS however the document should show how the Council intends to interpret the NP at a local level, within the unique context of the Purbeck area of the Dorset AONB, and demonstrate how it intends to fulfil its statutory obligation to the designation.

Setting of the AONB

The Dorset AONB team have significant concerns regarding the revocation of the Regional Spatial Strategy that contained vital policies relating to the protection of AONBs and their setting. It is therefore crucially important that the policies are not "lost" but are reinforced throughout the Core Strategy.

European Landscape Convention

The European Landscape Convention (ELC) was ratified by the UK Government in 2006 and promotes a Europe-wide approach to landscape protection, management and planning. It applies to all landscapes, towns and villages, as well as the open countryside; the coast and inland areas; and ordinary or even degraded landscapes, as well as those that are afforded protection like the Dorset AONB.

Natural England has interpreted the intent of the ELC into generic principles that should be integrated into plans such as the Core Strategy and are summarised as follows.

- A key overarching principle is about getting the right understanding of landscape embedded in the Strategy. The ELC defines landscape as, *"an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors."* *Landscape is the result of the interaction of the interaction of people and place. It is shaped by a host of factors including Natural (geology, landform, air & climate, soils, flora and fauna) cultural and social (land use, settlement, enclosure) and perceptual and aesthetic (sight, sounds, smells, touch, memories, associations)."*
- Another key principle relates to understanding the landscape baseline and promotes the use of key landscape focused documents such as the district and Dorset AONB Landscape Character Assessments, the County Historic Landscape Character Assessment, the Dorset Rural Roads Protocol, and Dorset Landscape Change Strategy etc.
- A further principle raises the importance of **landscape as a cross cutting theme throughout the strategy and as an important element of the decision making process.**

Landscape Character

A key principle of Planning Policy Statement 7: Sustainable Development in Rural Areas is that all development in rural areas should be sensitive to the character of the countryside and local distinctiveness. It goes on to state that local planning authorities should prepare policies and utilise tools such as Landscape Character Assessments (LCAs).

With regards the Isle of Purbeck, nowhere is there the contrast and diversity of such a rich assemblage of landscapes on such a miniature scale. In line with the above there should be a consistent thread of reference to landscape character/local distinctiveness throughout the Core Strategy. It is strongly recommended that a Landscape Policy should demonstrate an understanding of landscape character in decision making as a tool for describing the landscape, identifying the forces for change acting upon it, and guiding positive change. Reference should be made to the County and Dorset AONB Landscape Character Assessments, including a plan showing the District's landscape character areas, and the emerging County Historic Landscape Character Assessment.

Dorset Rural Roads Protocol

The Dorset Rural Roads Protocol (DRRP) should also be referenced, Dorset's rural roads and streets are an integral part of the natural environment/landscape and the DRRP is an exemplary document with the vision that all decisions affecting the highway environment will ensure the conservation and enhancement of the outstanding quality of its landscape and settlements.

The Coast

There is significant concern that the coastal environment, with the exception of the policy on coastal erosion, has not been acknowledged throughout the strategy, including reference to the Purbeck Heritage Coast. The coastline including Poole Harbour and its many bays are a vital resource for Purbeck.

Significant and ground breaking work has been carried out under the C-Scope project with the aim of integrating marine and terrestrial planning. Tools such as the web based planning tool Coastal Explorer and The Dorset Seascape Assessment add huge value to planning and management of the coastline.

The Coastal Corridor Action Plan has also been produced by various partners including Purbeck District Council with the aim to bring together and co-ordinate delivery for the South West Coast Path National Trail and the corridor through which it passes.

The Dorset Trees, Woods and Forest Strategy

Purbeck District Council is a key stakeholder of The Dorset Trees, Woods and Forest Strategy that pulls together the relevant policy to provide a framework to help guide the local authorities within Dorset in making decisions about the planning and management of the tree, woodland and forest resource. The Strategy states that, "The vital contribution of Dorset's trees, woods and forests for landscape, biodiversity, recreation, culture and heritage will only be sustained and improved through an integrated strategic approach. Their environmental, social and economic outputs will be maximised through planned and coordinated management providing opportunities to meet the needs of the future." It is strongly encouraged the Strategy is acknowledged within the relevant themes of the CS as summarised above.

AONB Policy Considerations

The CS refers to relevant issues such as Equine Development however the following are also significant considerations for making decisions within the Dorset AONB.

Tranquillity

In addition to Landscape Character, the protection of tranquillity (refer to National Tranquillity Mapping; CPRE) and remoteness is a key objective of the Dorset AONB Management Plan and should be acknowledged within the Core Strategy. The wildness and remoteness of Purbeck is one of its unique qualities and there is reference to the conservation and enhancement of the remote southern shore of Poole Harbour within the Dorset AONB Management Plan. (See also comments relating to The Coast).

Sensitivity and Adaptation to Change

The Dorset AONB Landscape Character Assessment includes an assessment of landscape condition and decisions should seek to improve this at every opportunity. Where change/development is proposed, the AONB team promotes the use of the Dorset Landscape Change Strategy; Pilot Methodology where appropriate.

Sustainable Development

In terms of planning it should be clear that there is a presumption against proposals for major development (ref.PP57). Any applications for development within the Dorset AONB are subject to the Dorset AONB Planning Protocol and should be accompanied by a high quality landscape and visual impact assessment (LVIA) in line with best practice guidance.

The LVIA should demonstrate a clear understanding of the impacts upon the following:

- Landscape character, including the highways environment where relevant, based on the Dorset AONB Landscape Character Assessment
- Significant views within, into and out of the designation, supported by photomontages
- Tranquillity and remoteness

In order to reduce the impact of the development upon the Dorset AONB consideration should be given for the following:

- Any necessary development should be sensitively located and sympathetic in style, scale and local materials to local character.
- All developments should be of high quality design, material and standards of workmanship.

- All developments should be of sustainable construction and consideration should be given for climate change mitigation and adaptation.

Developments that have a significant adverse impact upon the Dorset AONB will not be supported; any such developments would constitute a contravention of Section 85 of the CROW Act (2000) if approved by PDC.

Mitigation Strategies should adequately reduce any adverse impact and be appropriate to context and respect local landscape character. Where relevant, Restoration Strategies should be considered at the inception of the development proposal and should seek to restore the site to a good condition, appropriate to context, conserving and enhancing local landscape character.

The following comments are made with reference to the specific sections of the Core Strategy document.

1 The Context for Purbeck's Core Strategy

1.2 Important Considerations

1.2.4 Transport Policy may be function of DCC however the Core Strategy still needs to address the impact of transport upon communities and the landscape see comments under 8.22.

2 Characteristics of Purbeck

2.4 Tourism also has significant transport impacts and places significant pressure upon infrastructure.

The reference to the AONB designation in paragraph 2.7 is welcomed however it is strongly felt that the significance of Purbeck's natural environment, as a **key** characteristic of the district, should be acknowledged further for the following reasons.

The landscape of Purbeck (flora, fauna, geology, manmade, historic, cultural and sensory) has been shaped by centuries of interaction between people and place, giving the district its unique sense of place and underpinning its 'quality of life,' contributing to the health and social wellbeing of local communities and boosting the local economy and tourism.

It is appreciated that the above qualities of the natural environment are recognised in Chapter 3 Issues and Challenges however in line with the ELC (see comments above) it is felt that there should be a consistent natural environment "thread" running throughout the document.

With particular regard to the AONB, it would be beneficial to state that it is a nationally important protected landscape for the conservation and enhancement of natural beauty. Furthermore it would be beneficial to show the extent of the AONB on a plan.

3 Issues and Challenges

In line with the comments above, the AONB fully supports the recognition of the protection and enhancement of the natural environment as a main challenge facing Purbeck.

National policy¹ confirms AONBs as having the "highest status of protection in relation to landscape and scenic beauty. The conservation of the natural beauty of the landscape and countryside should therefore be given great weight in planning policies and development control decisions in these areas." With this in mind it suggested whether the bullet point should acknowledge the Dorset AONB and refer to the protection and enhancement of the natural environment and the Districts Protected Landscapes.

¹ Planning Policy Statement 7: Sustainable Development in Rural Areas.

4 Vision and Spatial Objectives

4.2 Vision for Purbeck

Despite the recognition of the natural environment as a Community Plan Priority Area and a priority of the Corporate Strategy, it is not given much emphasis within the overall Vision. Again, it is suggested to include reference to the conservation and enhancement of the AONB (Refer to General Comments).

With regards transport The Vision should address the impacts of tourism and visitor traffic.

4.3 Spatial Objectives

Include reference to the conservation and enhancement of the AONB.

6 Supply of Housing, Employment and Retail Growth

Housing Land Supply/ Employment Land Supply

This chapter demonstrates the consideration of the capacity of settlements through the analysis of Townscape Character, and the mitigation of adverse effects upon protected habitats however there is no reference to the consideration of the conservation and enhancement of the AONB. This is particularly important with regard sites that affect the AONB such as the strategic site at Swanage, and the employment land at Prospect Business Park.

The AONB team wishes to reiterate national policy and highlight that where exceptional circumstances for major development are proven within the designation, development should be carried out to a high environmental standard and any adverse impacts should be appropriately and adequately mitigated. It is vital that any planning application for development must include a significant, appropriate, and adequate mitigation package. (Refer to comments under Sustainable Development)

6.3.4 If housing growth is excessive, especially in a particular location, consideration should also be given for the impacts upon traffic volumes on the local transport infrastructure, as identified under 3.1 Main Challenges.

6.5 Employment Land Supply

Within the employment section there should be reference to Green Travel Plans and enforcement of them, this can be easier to implement across large business parks such as Dorset Green than individual businesses.

7 Spatial Distribution of Development

Overall within each spatial area there should be reference to the natural environment and the consideration of landscape character, also where applicable reference should be made to the conservation and enhancement of the AONB.

7.2 South West Purbeck

Within this chapter it is important to acknowledge the proximity of Wool to the AONB boundary as consideration should be given for the affect of activities within the settlement upon the designation and its setting.

Policy SW: South West Purbeck

The reference to sustainability is fully supported, it is suggested that there should also be consideration for the natural environment and reference should be made to landscape character and the location of development where it is of acceptable landscape and visual impact. Furthermore, where settlements lie within the AONB and its setting consideration should be given for the conservation and enhancement of the designation, reference should be made to the relevant AONB/protected landscape policy. (Refer to General Comments).

7.2.8 Delivery of Proposed Development

Include reference to the natural environment and conservation and enhancement of the AONB and the objectives of the AONB Management Plan and Landscape Character Assessment.

With regards Transport it is appreciated that the bullets are not in order of preference however it would be encouraging to see bullets relating to more sustainable modes of transport at the top. It is emphasised that we should not be encouraging more cars but should be actively promoting a modal shift.

7.3 Central Purbeck

Within this chapter it is important to acknowledge that some settlements lie within the AONB (Stoborough, Corfe Castle), and Wareham is in close proximity to it, as consideration should be given for the affect of activities within the settlements upon the designation and its setting.

Policy CEN: Central Purbeck

It is suggested that there should also be consideration for the natural environment and reference should be made to landscape character and the location of development where it is of acceptable landscape and visual impact. Furthermore, where settlements lie within the AONB and its setting consideration should be given for the conservation and enhancement of the designation, reference should be made to the relevant AONB/protected landscape policy (Refer to General Comments).

7.3.8 Delivery of Proposed Development

Include reference to the natural environment and conservation and enhancement of the AONB and the objectives of the AONB Management Plan and Landscape Character Assessment.

7.4 North East Purbeck

Within this chapter it is important to acknowledge the proximity of the spatial area the AONB boundary as consideration should be given for the affect of activities within the settlement upon the designation and its setting.

Policy NE: North East Purbeck

It is suggested that there should also be consideration for the natural environment and reference should be made to landscape character and the location of development where it is of acceptable landscape and visual impact. Where settlement lies within the setting of the AONB reference should be made to the relevant AONB/protected landscape policy (Refer to General Comments).

7.4.8 Delivery of Proposed Development

Include reference to the natural environment and conservation and enhancement of the AONB and the objectives of the AONB Management Plan and Landscape Character Assessment.

7.5 South East Purbeck

The reference to Swanage and Corfe Castle within the Dorset AONB is welcomed and it should be highlighted that the whole spatial area lies within the designation.

7.5.3 There are specific transport issues at Corfe Castle including traffic congestion and the associated noise and pollution that affects the quality of life for local residents and impacts upon visitor enjoyment. Furthermore there are issues regarding the impact of insensitive traffic management measures (signs/lines etc) that have a negative landscape and visual impact especially within the Conservation Area.

7.5.8 Vision for South East Purbeck

The acknowledgement of the AONB is welcomed, for clarification the AONB should consistently be referred to as the *Dorset* AONB throughout the Strategy.

With regards Swanage, the vision makes reference to the historic character of the town and it is suggested that, for both Swanage and the other settlements, there should also be reference to the landscape

character and visual amenity of its rural setting, including the conservation and enhancement of the special qualities of the AONB.

With regards Corfe Castle, it is appreciated that this is also mentioned within 7.5.10 Delivery of Proposed Development, however there is no mention of the Nordon Park and Ride Scheme that is currently being implemented.

Policy SE: South East Purbeck

It is suggested that there should also be consideration for the natural environment and reference should be made to landscape character and the location of development where it is of acceptable landscape and visual impact. Furthermore, as settlements lie within the AONB, consideration should be given for the conservation and enhancement of the designation, reference should be made to the relevant AONB/protected landscape policy (Refer to General Comments).

7.5.10 Delivery of Proposed Development

Include reference to the natural environment and conservation and enhancement of the AONB and the objectives of the AONB Management Plan and Landscape Character Assessment.

8 Development Policies

It is appreciated that the policies are ordered according to the spatial objective that they fulfil however for ease of use it would be preferable to group the natural environment themed policies together and so on.

In line with the intent of the ELC (see comments above), it would be beneficial to use a consistent language when referring to the planning and management of the landscape. For example the AONB landscape should be discussed in terms of conserve, enhance, restore and create in line with its primary purpose and the council's statutory duty of regard.

8.2 Countryside

It is strongly recommended that this policy is renamed as Development in the Countryside, landscape and countryside are interchangeable terms and it should be clear that the natural environment is considered under the term landscape within a different policy.

8.2.1 It is suggested that it would be prudent to mention the constraints for development within the countryside that affects the AONB for example there is a presumption against major development within the designation. (Refer to General Comments, Sustainable Development)

There is concern for the examples of development, in particular infrastructure, for which it is deemed a countryside location is essential. The adverse impact of vertical structures, such as telecommunications masts, on landscape character is an important issue within the AONB Management Plan and local landscape character assessments. Furthermore the adverse impact of signs and advertisements are an important consideration of The Rural Roads Protocol. Such impacts would ultimately degrade Purbeck's character and undermine the area's economic potential.

8.2.2 Replacement buildings should also respect local character. Furthermore it should be stated that any replacement should be of a similar scale to that which it replaces, unless under exceptional circumstances.

8.2.3 The AONB team welcomes the reference to equestrian development which has a significant impact upon the landscape. FWAG, The British Horse society and South West Protected Landscapes have jointly produced Horses, the Landscape and You an equestrian guide to keeping horses in protected landscapes. The Guide is available to download from the Dorset AONB website; www.dorsetaonb.org.uk

Policy CO: Countryside

It is important to ensure that development in the countryside does not adversely impact upon landscape character; this is particularly true of tourism development, employment, equestrian development and farm diversification activities that can significantly alter the appearance of the landscape. An additional bullet point is suggested below:

Development in the countryside will be permitted where:
It does not have an unacceptable impact on local character and the natural beauty of the protected landscapes such as the AONB. Where impacts are acceptable yet there is residual landscape impact, effort should be made to strengthen local landscape character in order to bear the development better. (Refer to General Comments, Sustainable Development, and Landscape Character etc).

The AONB designation is often misinterpreted as an immediate barrier to develop and the following comment would reflect that appropriate development within the designation can also be beneficial.

Development in the countryside will be promoted where:
It constitutes an enhancement of local character and the natural beauty of the protected landscapes such as the AONB.

8.5 Rural Exception Sites

The reference to environmental designations is supported.

Policy RES: Rural Exception Sites

Affordable housing will be allowed providing that:

It does not have an unacceptable impact on local character and the natural beauty of the protected landscapes such as the AONB. (Refer to General Comments, Sustainable Development, and Landscape Character etc).

8.6 Gypsies, Travellers and Travelling Show People

Policy GT: Gypsies, Travellers and Travelling Show People

These sites can have significant landscape and visual impacts and so the reference to the protection of the natural environment and landscape is fully supported.

8.8 Biodiversity & Geodiversity

Policy BIO: Biodiversity & Geodiversity

There is no mention of the World Heritage Site, an area of international importance, designated for its exceptional geology and geomorphology.

Reference to Dorset Trees, Woods and Forest Strategy (Refer to General Comments, Dorset Trees, Woods and Forest Strategy.)

Ancient woodland is a key habitat for consideration, the sensitive restoration of plantations on ancient woodland sites (PAWS) back to native broadleaved woodland should be promoted this especially pertinent within the wooded pastures that lie parallel to the Purbeck ridge.

8.10 Community Facilities and Services

Should broadband be considered under community facilities?

Policy CF: Community Facilities and Services

Proposals in the open countryside should meet the following criteria:

It does not have an unacceptable impact on local character and the natural beauty of the protected landscapes such as the AONB. (Refer to General Comments)

8.11 Green Infrastructure, Recreation and Sports Facilities

The concept of Green Infrastructure and its benefits is **seriously** undersold here. Furthermore it is difficult to discern that GI is about much more than just recreational facilities.

A vital function of GI is the provision of "ecosystem services," beneficial resources produced by our natural ecosystems, intrinsically linked to landscape character. (Also refer to comments under National Character Areas, Dorset Trees, Woods and Forest Strategy.)

8.11.4 The recognition that Open Space constitutes more than just formal recreational facilities, and includes natural spaces too, is fully welcomed.

It is felt that employment areas should be encouraged to include GI. Green spaces around employment sites also offer the opportunity for sustainable urban drainage such as swales and flood attenuation ponds.

8.15 Sustainable Design

There is concern for the statement that the development will have to pay equal regard to environmental quality and residential amenity. It is agreed there should be adequate regard for each however it is felt that it is not always appropriate or necessary to pay equal regard. With regards the protected landscape of the Dorset AONB, residential amenity should be considered as far as it does not compromise the objectives of the designation.

8.16 Renewable Energy

8.16.6 The AONB team welcomes the reference to the AONB.

The reference to the sensitivity of the AONB should be removed, the designation encompasses a variety of different types of landscape and the sensitivity of each will vary depending on the type of change proposed. The Dorset Landscape Change methodology provides a tool for assessing this.

PPS22 states that policies should set out the circumstances in which particular types and sizes of renewable energy developments will be acceptable in nationally designated areas. The AONB Management Plan sets out the following principles:

- Energy efficiency should be a priority to minimise energy consumption, reduce heat loss and make best use of available resources.
- Forms of renewable energy production that have only positive benefits for the AONB should be actively promoted. e.g. woodfuel from sustainable management of existing woodlands;
- Decisions about other renewable energy proposals should be based on a sound understanding and assessment of their impacts on landscape and natural beauty and the enjoyment of these qualities by the public. This should take into account the differing sensitivity of the AONB's diverse landscapes. It should also be remembered that proposals outside the AONB boundary can also have detrimental effects on the AONB and these should be carefully assessed and considered.
- Decisions should also take into account wider infrastructure needs associated with renewable energy proposals, e.g. additional power lines, as these can also impact on the AONB.

It should be confirmed that the designation should not be "ring fenced" by renewable energy development (RED) and the impact of developments in close proximity to the designations boundary is a material consideration.

For any RED affecting an AONB, a landscape and visual impact assessment should consider alternative options and consider the cumulative impact of the proposed development and any existing and approved RED. It should consider impacts upon tranquillity (esp. noise and light) and consider views into, within and out of the AONB.

REDs should be accompanied by a mitigation strategy that should seek to minimise any potential adverse affects to an acceptable level, it should respond to local landscape character and benefit biodiversity. With regards temporary REDs, a restoration strategy should be included to secure the restoration of the landscape in line with local character and to a good condition.

8.17 Landscape, Historic Environment and Heritage

Overall refer to General Comments for suggested policy approach.

It is appreciated that Landscape and Historic Environment are discussed under the same heading as there is a common regard for their conservation and enhancement. However it is felt that they should be considered separately due their differing scope/scale.

Landscape is the matrix including all elements natural and human (refer to ELC definition of landscape). Historic features and individual natural sites form part of that matrix, and add to its quality, but are sub-elements of the landscape itself.

For example landscape character and the Dorset AONB are usually referred to as being at a "landscape scale" in that they take a holistic approach to landscape and all that it includes, and cover the whole District or a significant portion of it. In contrast, elements such as Listed Buildings, Scheduled Ancient Monuments, Conservation Area Appraisals, Registered Parks and Gardens and Historic Towns Surveys are much narrower in scope, defined at much smaller scale and geographically dispersed.

8.17.2 The Jurassic Coast World Heritage Site is not a landscape designation; it is designated for geology and geomorphology of Outstanding Universal Value (OUV), i.e. its international importance. The AONB is afforded statutory protection under the Countryside and Rights of Way Act 2000, and provides the statutory landscape protection for the setting and presentation of the World Heritage Site.

It is not understood why the AONB and Tree Preservation Orders are referred to under the same bullet point as AONB s are nationally important landscapes protected for their natural beauty and TPOs protect trees and woodland for their amenity value. Such designations are vastly different in scale and scope. See comments above under 8.17.

There should be reference to Parish Plans and Village Design Statements, the objectives of which should be considered in decision making.

8.18 Economy and Employment

Safeguarding Employment Land

The expansion of employment sites should also not have an adverse impact on the local landscape character.

8.19 Tourist Accommodation and Facilities

Tourism and the visitor economy are also inextricably linked to the high quality of the natural environment; many people visit Purbeck to enjoy the high quality and beautiful landscapes and coastline.

There should be reference to the impact of tourism and visitor transport, see comments under 8.22.1.

Policy TA: Tourist Accommodation and Attractions

It is not understood why new sites or extensions to existing chalet and campsites are not permitted within the AONB? With regards the AONB Management Plan policy, providing proposals do not compromise the objectives of the designation, such development might not be considered unacceptable.

8.22 Improving Accessibility

There is no mention of the National Cycle Network or the South West Coast Path National Trail that are important recreational assets.

8.22.1 There is concern for the intention to provide additional road access capacity into Purbeck which is fundamentally at odds with sustainable development, the focus should be on reducing road capacity and encouraging people to use alternative forms of sustainable transport, as demonstrated under point 8.22.3.

There should be consideration for Visitor Transport Schemes either within this section or under 8.19 Tourist Accommodation. Tourism depends on travel and there should be significant emphasis on reducing the need to travel by car by promoting park and rides schemes and car free hubs (places to explore without the car), plus tourism enterprises should be encouraged to be much "greener" in transport terms.

Many of the public car parks are owned by the Council and a Purbeck wide parking strategy would help to reduce traffic and encourage a modal shift.

8.22.6 Opportunities **should** be part of travel plans and Community Transport Schemes for **all** new development and **existing** communities.

There should be further consideration for the impacts of transport infrastructure and reference to the relevant guidance such as the following:

- Manual for Streets 2 (Chartered Institution of Highways and Transportation)
- Dorset Rural Roads Protocol (Dorset County Council and Dorset AONB)
- Coastal Car Park Design Guide (South West Coast Path – East Devon and Dorset)

Policy IAT: Improving Accessibility & Transport

The final bullet point should reflect that development should be in line with the Dorset Rural Roads Protocol.

Yours sincerely,

Signature has been blanked out

Jennifer Clarke
Dorset AONB Landscape Planning Officer

Dorset County Council

Planning Purbeck's Future - Core Strategy Pre Submission

Dorset County Council Response – subject to Cabinet approval

Contact Details

Title: Mrs
Name: Gemma Yardley
Job Title: Senior Planning Officer – Spatial Planning
Organisation: Dorset County Council
Address: Environment Directorate, County Hall, Dorchester, Dorset
Postcode: DT1 1XJ
Email: g.l.yardley@dorsetcc.gov.uk
Telephone: 01305 224602

Oral Examination

Yes the County Council may wish to participate at the oral examination.

The County Council is responsible for providing key elements of infrastructure some of which are critical to delivery of the Core Strategy.

20th December 2010.

Representations

1. Purbeck Transportation Strategy

Policy ATS: Implementing an Appropriate Transport Strategy for Purbeck and Implementation Plan

Legally compliant – Yes

Sound – Yes

Comments:

The review of the Purbeck Transportation (PTS) is supported and the County Council is committed to the delivery of the PTS.

The PTS is identified as infrastructure provision that is critical to the delivery of the proposals of the Core Strategy. County and District Council officers have worked closely in preparing the PTS.

A strategic transport assessment has shown that the level and distribution of development proposed for Purbeck up to 2027 can generally be accommodated on the network by delivery of the transport schemes in the PTS. Given that no public sector funding is envisaged, the total cost of the schemes will be paid for by the financial contributions received from the development. Site specific transport requirements which arise from the development will also be paid for by the developer, for example access to the site by public transport, walking, cycling and junction improvements.

The PTS and developer contributions approach to transport is supported. However, there are a number of risks associated with its delivery of the PTS:

- the PTS is a 'pooled' developer contributions scheme to mitigate the cumulative impacts of development on the transport network. Such

developer contributions approaches must be replaced by a Community Infrastructure Levy before 2014 or the monies will no longer be collectable;

- the rate of collection of the development contributions is dependent upon the rate of development coming forward and could be slower than anticipated if development rates are slow;
- the delivery of the PTS is to some extent reliant on the operational decisions of commercial operators.

Proposed Changes:

No change requested in respect of the PTS. A commitment to the Community Infrastructure Levy in the Core Strategy is necessary to ensure the continued collection of monies to implement the PTS.

2. Developer Contributions and Community Infrastructure Levy

Policy DEV: Development Contributions and Implementation Plan

Paragraphs: 9.2-9.7

Legally compliant – Yes

Sound – No. The plan is not effective.

Comments:

Infrastructure needed to support the delivery of the Core Strategy will rely largely upon developer contributions to bring it forward. The proposed approach, stated in paragraph 9.2, not to introduce a Community Infrastructure Levy is likely to affect the deliverability of the Core Strategy as alternative funding streams have not been identified. Monies currently collected through developer contributions for critical elements of infrastructure such as the PTS and for heathland mitigation measures will no longer be collectable after 2014 unless the local authority has a Community Infrastructure Levy in place.

Purbeck DC state that they have chosen not to introduce a Community Infrastructure Levy and will concentrate infrastructure provision through developer contributions on affordable housing, transport, heathland mitigation and recreation and open space. This approach has implications for the County Council and delivery of services to new households and a potentially growing population, in terms of:

- the 'pooling' of developer contributions for cumulative impacts such as transport and heathland mitigation will not be possible after 2014 unless a community infrastructure levy is approved.
- the concentration on the four elements does not take account of the full impacts of development on local infrastructure and services. The County Council may lose the opportunity to gain part of the levy to fund impacts upon its services.

Purbeck DC is advised that a clear commitment to preparing a charging schedule for a Community Infrastructure Levy should be given to ensure continuation of existing developer contributions resulting from cumulative impacts. It is recognised that there is a limit to how much a developer can be expected to pay in terms of a levy. However, the County Council should work with Purbeck DC to ensure that relevant elements of infrastructure that are the responsibility of the County Council services are included as part of a thorough assessment of the impact of development proposed through the Core Strategy. The Implementation Plan would be an appropriate starting point. This should include transport, education, adult social care, waste facilities, green infrastructure, adult learning and library facilities. The Community Infrastructure Levy is a gap funding measure and so will take account of

existing funding streams. The final calculation of the levy should take into account economic viability and council priorities and so may mean not all services will benefit. But a full assessment should be carried out in the first place. This will enable other opportunities for funding, such as the new homes bonus, to be directed in an effective manner to infrastructure and services needed by new households and potentially a growing population.

It is relevant to note that the planning system is entering a period of radical reform under the Coalition Government and it is important that local authorities do not preclude options, such as CIL, which may prove increasingly necessary to the delivery of key infrastructure. The Core Strategy thus needs to ensure it is sound in terms of providing certainty as to how it can be delivered.

Proposed Changes:

Purbeck DC should make clear its commitment to prepare a charging schedule for a Community Infrastructure Levy. Also, a commitment to work with the County Council and other relevant service and infrastructure providers to carry out a comprehensive assessment of infrastructure, funding requirements, economic viability and priorities in determining the levy.

3. Employment Land

Policy ELS: Employment Land Supply

Legally compliant – Yes

Sound - No comment

Comments:

Policy ELS 'Employment Land Supply' proposes that provision is made for a minimum of 11.5 hectares of employment land up to 2027. However, it goes on to identify a supply of available employment land of 35.75 hectares. Whilst this would offer a level of flexibility in terms of a range and location of sites, there is the potential for significant over development if all these sites are built. This could have implications for housing needs and transport. Purbeck DC should be advised that careful monitoring and phasing is required to prevent such over development taking place.

Proposed Changes:

A clearer approach to monitoring and phasing of employment land should be stated.

4. Minerals and Waste Considerations

Development Management Policies

Legally compliant – Yes

Sound – No Comment

Comments:

The Core Strategy identifies specific new development areas for housing at Wareham, Upton and Lytchett Matravers, further housing allocations at Swanage, Bovington and Bere Regis and employment development at Holton Heath and Dorset Green (Winfrith). These sites have been assessed for possible impacts on minerals and waste sites identified in the Bournemouth, Dorset and Poole Minerals and Waste Plan (1999); the Bournemouth, Dorset and Poole Waste Plan (2006); the Minerals Site Allocations Document Discussion Paper (2008), and current minerals and waste sites. The proposals for housing and employment allocations identified in the Core Strategy will not have any significant impact on minerals and waste interests.

implementation of the following policies in the Purbeck Core Strategy could lead to new development in the countryside and potentially may cause unacceptable impacts on existing or proposed minerals or waste operations:

- Policy CO: Countryside
- Policy RES: Rural Exception Sites
- Policy GT: Gypsies, Travellers and Travelling Show People
- Policy CF: Community Facilities and Services
- Policy REN: Renewable Energy
- Policy TA: Tourist Accommodations and Attractions
- Policy EMP: Employment

These policies set out the criteria under which various types of new development in the countryside would be acceptable. The policies are not unreasonable or unacceptable but make no reference to potential impacts to existing or proposed minerals or waste operations. Any development in the countryside, particularly new development but also extensions to existing development, has the potential to cause unacceptable impacts on existing or proposed minerals or waste operations. There is also the potential to cause sterilisation of the undeveloped mineral resource. These points are particularly relevant in the Purbeck DC area, given its relatively small size, relatively high concentration of mineral operations, the mineral resources found there and the many competing land uses that typify the Purbeck area (e.g. residential, tourism, MoD, environmental/landscape designations).

Policies IAT 'Improving Accessibility and Transport' and ATS 'Implementing an Appropriate Transport Strategy for Purbeck' promote sustainable forms of travel. Whilst the need to limit transport and travel by road in Purbeck is supported, it must be noted that minerals must be worked where they are found. It is agreed that transport by means other than road is desirable, but for financial and other reasons is often not possible for minerals operators. This issue will be addressed through the emerging Minerals Core Strategy, which strongly encourages sustainable transport and recognises the impacts of mineral movements. Some acknowledgement of minerals as a special case in terms of transport needs should be made in the supporting text of the Purbeck Core Strategy.

Proposed Changes:

The Core Strategy should make clear reference to the documents making up the development plan for Purbeck, including the Bournemouth, Dorset and Poole Minerals and Waste Plan (1999) and the Bournemouth Dorset and Poole Waste Plan (2006). It should also be noted that work is also underway to prepare a Minerals Core Strategy which will replace the Local Plan by 2011.

In addition, the introduction to Chapter 8 Development Policies should make reference to the need to avoid impacts on existing or proposed minerals/waste sites, and to avoid the unnecessary sterilisation of mineral resources. This reflects the relatively high concentration of mineral operations and the mineral resources found there. Acknowledgement of minerals as a special case in terms of transport needs, for the reasons identified above, should also be made in the supporting text.

5. Mineral Safeguarding Areas

Policy CZ: Consultation Zones

Legally compliant – Yes

Sound – No Comment

Comments

Policy CZ 'Consultation Zones', as originally published, referred to and identified incorrect mineral consultation areas. This version of the Core Strategy did not therefore comply with the statutory development plan (the Bournemouth, Dorset and Poole Minerals and Waste Local Plan (1999)) and so was not sound. Following a meeting between County and District Council officers, this issue was addressed and a Schedule of Amendments published on 8 November identifies the mineral consultation zones, primarily covering ball clay but also others, identified in the Bournemouth, Dorset and Poole Minerals and Waste Local Plan (1999). However, whilst the maps of the mineral consultation zones are satisfactorily included, the accompanying policy has not been amended to reflect these changes and so further changes are required for clarity.

Furthermore, the Bournemouth, Dorset and Poole Minerals Core Strategy is currently being prepared and includes a review of the approach to mineral safeguarding across the Mineral Planning Authority areas. The emerging Minerals Core Strategy includes a revised mineral safeguarding policy and map, which will supersede the current (1999) map when the Minerals Core Strategy is adopted (currently scheduled for 2011).

Proposed Changes:

Policy CZ should be amended as follows to make reflect the changes made to the Proposals Map:

Development proposals that fall within the following Consultation Zones will be referred to the following bodies (or any subsequent renaming) to ensure that the proposals will not harm their operations:

- Minerals: Mineral Planning Authority (Dorset County Council), Kaolin and Ball Clay Association (for proposals affecting the Ball Clay resource).
- Hazardous Installations: Health and Safety Executive
- Pipelines: Health and Safety Executive
- Sewage works and other sources of unpleasant emissions: Wessex Water

The Minerals Consultation Zone, which includes but is not limited to Ball Clay, Purbeck Stone and aggregates, has been amended and is shown on the Changes to the Proposals Map in Appendix 4. All other consultation zones will be carried forward from the Purbeck Local Plan Final Edition (2004)

Also, the supporting text for Policy CZ should make reference to the emerging Minerals Core Strategy and the revised policy and map on mineral safeguarding.

6. Green Infrastructure and Minerals Sites

Policy BIO: Biodiversity and Geodiversity

Policy GI: Green Infrastructure, Recreation and Sports Facilities

Legally compliant – Yes

Sound – No comment

Comments:

Policy BIO: Biodiversity and Geodiversity covers the importance of protecting, managing and enhancing Purbeck's natural environment. Policy GI: Green Infrastructure, Recreation and Sports Facilities seeks on- and off-site provision of recreation facilities and green infrastructure. The development and restoration of minerals sites can make a valuable contribution to the achievement and

implementation of Policies BIO and GI, and this should be explicitly referenced in the Purbeck Core Strategy.

Proposed Changes:

Reference should be made in the text relating to the relevant policies to the valuable contribution that the development and restoration of minerals sites can make to the achievement and implementation of Policies BIO and GI.

7. Wareham Settlement Extension

Policy CEN: Central Purbeck and Implementation Plan

Legally compliant - Yes

Sound – No Comment

Comments:

Policy CEN 'Central Purbeck' proposes a mixed use settlement extension along Worgret Road to the west of Wareham town centre including 200 homes, open space, various transport improvements and access, community, education, health care, police and fire facilities. This includes the Purbeck School, Wareham Middle School and The Lady St Mary's First School which are subject to change due to the Purbeck Schools Review. Other public sector property is also located in this area and so there is the opportunity to rationalise and reorganise to create improved facilities for all services and land parcels for new development.

The Purbeck Schools Review is now confirmed in favour of the County Council's decision to move from a three tier to two tier pattern of provision. The County Council is therefore in position to support, in principle, the delivery of a mixed use settlement extension at Wareham along Worgret Road.

8. Bere Regis School

Policy NW: North West Purbeck and Implementation Plan

Legally compliant – Yes

Sound – No Comment

Comments:

The Purbeck Schools Review requires the expansion of Bere Regis First School to a primary school. Purbeck DC considers that the current site is not ideally located and there is community support to relocate the school closer to the centre of the village. Funding is uncertain but landowners associated with potential housing sites are willing to provide land for a school.

The Purbeck Schools Review is now confirmed in favour of the County Council's decision to move from a three tier to two tier pattern of provision. The County Council is discussing the possibility of providing a new school (as a Primary) linked to housing development opportunities in the area.

Proposed Change

Update references.

9. James Day Care Home

Policy SE 'South East Purbeck' and Implementation Plan

Legally compliant – Yes

Sound – No Comment

Comments:

The issue of how to replace this recently closed care home is currently being considered. The County Council has formed a joint planning group to work together with the local community to consider options for future care provision for older people in Swanage and the Isle of Purbeck. The Cabinet at its meeting on 15th December agreed to approve the proposal to move ahead with exploring an interim solution for the future care provision for older people in Swanage, and to note that failure to secure a satisfactory interim arrangement will necessitate consideration of disposal options.

Proposed Change:
Update references.

Dorset Wildlife Trust



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

| Your Details | Agents Details <i>(where relevant)</i> |
|---|--|
| Title | Ms |
| Name | Imogen Davenport |
| Job Title <i>(where relevant)</i> | Director of Conservation |
| Organisation <i>(where relevant)</i> | Dorset Wildlife Trust |
| Address | Brooklands Farm, Forston, Dorchester |
| Postcode | DT2 7AA |
| E-mail | idavenport@dorsetwildlifetrust.org.uk |
| Tel. Number | 01305 264620 |

Responses should be sent to:

Email: ldf@purbeck-dc.gov.uk

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

Fax: 01929 557348

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

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

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

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

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

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

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

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

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

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

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

| | |
|--|---|
| <input 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:

Should the Inspector decide that any of the issues Dorset Wildlife Trust has commented on can not be dealt with by written representations, we would be happy to participate.

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 Imogen Davenport

Date 20/12/10

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

| | | |
|--|--|---|
| 'Planning Purbeck's Future' (Core Strategy) <input 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: 6.6.3 | Map: |
|----------|---------------------|------|

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

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

Paragraph 6.6.3

Regarding the employment allocation at Admiralty Park, paragraph 6.5.3.2 points out the existence of a Site of Nature Conservation Interest (SNCI) and states that there is an aim to protect and enhance the nature conservation interest, which is welcomed. Paragraph 6.6.3 states a need for further ecological assessment work at Holton Heath (and Dorset Green Technology Park) and states that "subsequent plans and briefs will ensure that the nature, scale and location of employment allocations at Holton Heath and Dorset Green Technology Park will be such as to enable the Council to ascertain that there will not be an adverse effect on the integrity of any European site". However this statement does not pick up the need to also ensure the protection and enhancement of the SNCI.

Proposed Changes:

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

We recommend that the last sentence of 6.6.3 is amended to:
"...not be an adverse effect on the integrity of any European site and that other nature conservation interests are protected and enhanced."

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

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

| | | |
|----------------|------------|------|
| Policy : SW | Paragraph: | Map: |
|----------------|------------|------|

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

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

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

(tick all that apply)

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

(For explanation of terms refer to guidance notes below)

Comments:

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

Policy SW: South West Purbeck

The policy mentions open space for heathland mitigation at Bovington but not at Wool. Given that the vision for south west Purbeck in 7.2.7 identifies this as a need for Wool and Map 7 shows concern over visitor pressure on Winfrith Heath, this is an omission which should be corrected.

A further concern about this policy is the allocation of "up to 20 hectares" of employment land at Dorset Green Technology Park. 20ha is greater than the amount of land required for the whole of Purbeck in Policy ELS: Employment Land (11.5ha). Paragraph 6.6.3 mentions the need for ecological assessment at this site in relation to employment allocations to ensure no adverse effect on integrity of any European nature conservation sites (this text tying in with the recommendation of the Habitats Regulations Assessment paragraph 10.11). Furthermore in 7.28, concerns are raised about the deliverability of the full 20ha due to the development partner's proposals for large-scale housing growth which does not fit with the Core Strategy.

Proposed Changes:

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

We would therefore recommend that the policy wording should be more specific that this allocation is subject to assessment, for example:
"Further assessment of the feasibility for allocation within the existing employment site of up to 20 hectares at Dorset Green Technology Park."

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

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

| | | |
|----------|---------------------|------|
| Policy : | Paragraph: 7.3.3 | Map: |
|----------|---------------------|------|

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

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

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

(tick all that apply)

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

(For explanation of terms refer to guidance notes below)

Comments:

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

Paragraph 7.3.3

DWT welcomes the amendment to the Green Belt Boundary at Holton Heath, to take account of deletion of housing proposals at this location.

Proposed Changes:

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

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

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

| | | |
|-----------------|------------|------|
| Policy : CEN | Paragraph: | Map: |
|-----------------|------------|------|

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

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

(For explanation of terms refer to guidance notes below)

Comments:

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

Policy CEN: Central Purbeck

The policy identifies provision of up to 4 hectares of employment at Admiralty Park. Dorset Wildlife Trust is concerned about the implications of this for the Site of Nature Conservation Interest (SNCI) which lies in close proximity to the existing buildings at Admiralty Park. The SNCI supports acid grassland and heathland interests. We are also aware that there are other areas of ecological value which currently lie outside the SNCI boundaries – these were identified through ecological surveys carried out for the applicants as part of the former proposals for housing at Holton Heath. We are concerned about the SNCI and other biodiversity habitats in their own right, but also about the role this land plays in supporting the ecological function of nearby internationally designated heathlands. The Habitats Regulations Assessment (HRA) in 10.4 points out that The Inspector's Report of the Inquiry into the Purbeck Local Plan in 2002 raised concerns about the direct loss or compromising of further land of nature conservation interest (SNCI and pSNCI); and by the effects of development causing further fragmentation of heathland habitat with the consequence of isolating and making more vulnerable, populations of certain key heathland species.

Proposed Changes:

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

We would therefore recommend that the policy wording should be more specific that this allocation is subject to assessment, for example:
“Further development within the existing employment sites of up to 8 hectares at Holton Heath Industrial Estate and assessment of the feasibility of allocating 4 hectares at Admiralty Park.”

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

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

| | | |
|--------------------|------------|------|
| Policy : NE | Paragraph: | Map: |
|--------------------|------------|------|

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

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

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

(tick all that apply)

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

(For explanation of terms refer to guidance notes below)

Comments:

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

Policy NE: North East Purbeck

DWT welcomes the proposed inclusion of public open space as part of the allocation at Policeman's Lane, Upton. We would point out again that concerns have been raised to DWT by members of the public regarding hedgerows and ditches at Policeman's Lane which could be of wildlife value. It has also been mentioned that the site floods in winter, which given the location close to Poole Harbour SPA could also have a wildlife value. We would suggest that further work is needed to assess the ecological value of any habitats on site and use by birds prior to any decision on whether it is justified to allocate it for 70 dwellings.

DWT welcomes the proposed extension of Upton Country Park, to provide additional open space and green infrastructure.

Proposed Changes:

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

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

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

| | | |
|----------------|------------|------|
| Policy : CO | Paragraph: | Map: |
|----------------|------------|------|

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

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

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

(tick all that apply)

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

(For explanation of terms refer to guidance notes below)

Comments:

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

Policy CO: Countryside

DWT welcomes the wording which seeks to ensure that equestrian development does not have an adverse ecological impact.

Proposed Changes:

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

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



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

| | Your Details | Agents Details (where relevant) |
|----------------------------------|---------------------------------------|--|
| Title | Ms | |
| Name | Imogen Davenport | |
| Job Title (where relevant) | Director of Conservation | |
| Organisation (where relevant) | Dorset Wildlife Trust | |
| Address | Brocklands Farm, Forston, Dorchester | |
| Postcode | DT2 7AA | |
| E-mail | idavenport@dorsetwildlifetrust.org.uk | |
| Tel. Number | 01305 264620 | |

Responses should be sent to:

Email: ldf@purbeck-dc.gov.uk

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

Fax: 01929 557348

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

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

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

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

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

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

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

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

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

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

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

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

Yes, I wish to participate at the oral examination

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

Having said this, should the Inspector decide that any of the issues Dorset Wildlife Trust has commented on can not be dealt with by written representations, we would be happy to participate, and if there are oral sessions on policy BIO in particular we would wish to be present.

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 Imogen Davenport

Date 20/12/10

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

| | | |
|--|--|---|
| 'Planning Purbeck's Future' (Core Strategy) <input 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 : BIO | Paragraph: | Map: |
|-----------------|------------|------|

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

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

(For explanation of terms refer to guidance notes below)

Comments:

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

Policy BIO

We strongly support this policy which we believe to be fundamentally sound. We support the references in this policy to Strategic Nature Areas, Nature Map, 'Wild Purbeck', Sites of Nature Conservation Interest (SNCIs), Local Nature Reserves (LNRs) and Regionally Important Geological & Geomorphological Sites (RIGS), as well as the reference to incorporation of biodiversity elements into development and the inclusion of the Nature Map (Map 15).

However there is an important element missing from this policy and which in our view is required by PPS9, Biodiversity and Geological Conservation. Paragraph 11 of PPS9 requires Local Authorities, through policies in plans, to conserve habitats of principal importance: these are habitats listed by the Secretary of State under Section 41 of the Natural Environment and Rural Communities Act 2006 (which supercedes S.74 of the CROW Act referred to in PPS9). Paragraph 16 covers species of principal importance and requires local authorities to "take measures to protect the habitats of these species from further decline through policies in local development documents". Paragraph 10 of PPS9 also covers Ancient Woodland

and veteran trees and it would also be helpful to mention these in Policy BIO. Finally BIO refers to the District Design Guide; we would point out that, in terms of biodiversity, this Guide covers birds and bats in built design which, whilst helpful, is not sufficient to cover the whole range of biodiversity protection, management and enhancement measures which should be sought.

Proposed Changes:

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

We would suggest that the following amendments to the list in BIO:

- "Resisting development that could adversely affect Sites of Nature Conservation Interest (SNCI), Local Nature Reserves (LNR), Ancient Woodland and other habitats of principal importance for biodiversity;
- Seeking development proposals that incorporate biodiversity elements protection, management and enhancement;"

And that supporting text is added (see DWT's comment on 8.8.2-4).

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

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

| | | |
|----------|---------------------------|------|
| Policy : | Paragraph: 8.8.2-8.8.4 | Map: |
|----------|---------------------------|------|

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

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

Paragraphs 8.8.2-8.8.4

These paragraphs helpfully explain Strategic Areas, Wild Purbeck and RIGS. However there is no text to introduce SNCIs, LNRs or the Nature Map. Explanatory text is also needed on habitats and species of principal importance (see DWT's comments on Policy BIO).

Proposed Changes:

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

We suggest that 8.8.2 is amended to include:

"Species and habitats of local importance are identified within the Dorset Biodiversity Strategy and

Biodiversity Action Plan for Purbeck. Other local biodiversity interests lie within Sites of Nature Conservation Interest (SNCIs), Local Nature Reserves and habitats and species of principal importance to biodiversity, including Ancient Woodland and veteran trees.”

And that 8.8.3 is amended to include:

“Strategic Nature Areas shown on Map 15 (Nature Map) and are a positive tool for coordinating activities that secure the retention and enhancement of features of interest as well as activities for the benefit of locally important species”.

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

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

| | | |
|----------|---------------------|------|
| Policy : | Paragraph: 8.8.5 | Map: |
|----------|---------------------|------|

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

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

Paragraph 8.8.5

This paragraph states "Further information on addressing biodiversity and geodiversity in scheme proposals is included in the District Design Guide." However this guide covers only birds and bats in built design in terms of biodiversity and building materials in terms of geodiversity. The District Design Guide would need to be significantly added to in order to fully address biodiversity and geodiversity, including incorporation, creation and management of habitats and features of value to species and incorporation and study of geological exposures where relevant. There are many sources of ecological advice – perhaps the most locally relevant reference would be the county-wide advice-notes at <http://www.dorsetforyou.com/351345>.

Proposed Changes:

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

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

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

| | | |
|----------|------------------------|------|
| Policy : | Paragraph: 8.8.6.2. | Map: |
|----------|------------------------|------|

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

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

Paragraph 8.8.6.2

DWT welcomes the undertaking to carry out a final Appropriate Assessment prior to adoption of the core strategy.

Proposed Changes:

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

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 : DH | Paragraph: | Map: |
|----------------|------------|------|

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

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

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

(tick all that apply)

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

(For explanation of terms refer to guidance notes below)

Comments:

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

Policy DH

DWT strongly supports policy DH in principle, subject to any comments on the detailed wording which Natural England might make.

Proposed Changes:

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

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

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

| | | |
|----------------|------------|------|
| Policy : GI | Paragraph: | Map: |
|----------------|------------|------|

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

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

(For explanation of terms refer to guidance notes below)

Comments:

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

Policy GI: Green Infrastructure, Recreation and Sports Facilities

The policy should recognise the multifunctional nature of green infrastructure to a greater extent. The supporting text (paragraph 8.11.1) has welcome references to health benefits, biodiversity and climate change adaptation, however green infrastructure also provides many other benefits, depending on location, such as to air quality, flood amelioration and water quality, transport routes and quality of life. It is important also to remember that it is the overall green infrastructure network which provides these functions – individual elements will fulfil a sub-set of functions and so there will be sites which do not have public access, for example, but are nonetheless crucial as part of the network.

Proposed Changes:

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

We suggest that the wording of Policy GI is amended to read (2nd paragraph):
“...and the management of a connected, coherent and functional network of new and enhanced green spaces and corridors ...”

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



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

| | Your Details | Agents Details (where relevant) |
|----------------------------------|---------------------------------------|--|
| Title | Ms | |
| Name | Imogen Davenport | |
| Job Title (where relevant) | Director of Conservation | |
| Organisation (where relevant) | Dorset Wildlife Trust | |
| Address | Brocklands Farm, Forston, Dorchester | |
| Postcode | DT2 7AA | |
| E-mail | idavenport@dorsetwildlifetrust.org.uk | |
| Tel. Number | 01305 264620 | |

Responses should be sent to:

Email: ldf@purbeck-dc.gov.uk

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

Fax: 01929 557348

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

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

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

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

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

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

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

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

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

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

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

| | |
|--|---|
| <input 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:

| |
|---|
| Should the Inspector decide that any of the issues Dorset Wildlife Trust has commented on can not be dealt with by written representations, we would be happy to participate. |
|---|

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 Imogen Davenport |
|----------------------------|

| |
|---------------|
| Date 20/12/10 |
|---------------|

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

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

| | | |
|----------------|------------|------|
| Policy : SD | Paragraph: | Map: |
|----------------|------------|------|

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

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

(For explanation of terms refer to guidance notes below)

Comments:

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

Policy SD: Sustainable Design

The requirement to demonstrate support for biodiversity is supported. However this should go further than just birds and bats (as outlined in our comments on the design guidance under paragraph 8.8.5).

Proposed Changes:

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

We suggest that policy SD is amended as follows:

- "Demonstrate support for biodiversity through sensitive landscaping to retain, manage, create and enhance wildlife habitats and through in-built features, for example to provide appropriately, configured and located nesting and roosting opportunities for bats and birds."

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 : REN | Paragraph: | Map: |
|-----------------|------------|------|

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

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

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

(tick all that apply)

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

(For explanation of terms refer to guidance notes below)

Comments:

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

Policy REN: Renewable Energy

In biodiversity terms the policy only mentions international nature conservation sites. However PPS22 also requires avoidance of harm to nationally important nature conservation sites (SSSIs and NNRs are covered by paragraph 11). Though in terms of local nature conservation sites, PPS22 says they "should not be used in themselves to refuse planning permission for renewable energy developments", it then adds that "planning applications for renewable energy developments in such areas should be assessed against criteria based policies set out in local development documents, including any criteria that are specific to the type of area concerned". In other words the nature conservation policy (BIO) should be applied, and criteria for renewable energy policies can cover these interests.

Proposed Changes:

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

We recommend that for avoidance of doubt, the relevant bullet of the policy is amended as follows:

- “It would not have an adverse impact upon the integrity of internationally protected habitats unless there is no alternative solution and there are imperative reasons of overriding public interest, and that there are no other unacceptable ecological impacts.”

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

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

| | | |
|----------|--------------------------|------|
| Policy : | Paragraph: Appendix 2 | Map: |
|----------|--------------------------|------|

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

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

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

(tick all that apply)

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

(For explanation of terms refer to guidance notes below)

Comments:

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

Appendix 2 – Glossary and Abbreviations

The glossary lists SNCIs as being identified by Dorset Wildlife Trust; though DWT administer the SNCI process this is not correct as the Panel selecting sites includes Dorset County Council (who chair it), Natural England, Dorset Environmental Records Centre and independent ecologists.

Proposed Changes:

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

The definition would read more accurately as:

"SNCIs: Sites of Nature Conservation Interest. In Purbeck SNCIs have been identified by the Dorset SNCI Panel. These sites are of considerable nature conservation value at a local level. Some may include habitats

of comparable quality to SSSIs but are of a smaller area or of a more fragmented nature.⁷⁷

Purbeck Core Strategy – Text version of comments by Dorset Wildlife Trust with suggested amendments marked up
20/12/10

Paragraph 6.6.3

Regarding the employment allocation at Admiralty Park, paragraph 6.5.3.2 points out the existence of a Site of Nature Conservation Interest (SNCI) and states that there is an aim to protect and enhance the nature conservation interest, which is welcomed. Paragraph 6.6.3 states a need for further ecological assessment work at Holton Heath (and Dorset Green Technology Park) and states that "subsequent plans and briefs will ensure that the nature, scale and location of employment allocations at Holton Heath and Dorset Green Technology Park will be such as to enable the Council to ascertain that there will not be an adverse effect on the integrity of any European site". However this statement does not pick up the need to also ensure the protection and enhancement of the SNCI.

We recommend that the last sentence of 6.6.3 is amended to:

"...not be an adverse effect on the integrity of any European site and that other nature conservation interests are protected and enhanced."

Policy SW: South West Purbeck

The policy mentions open space for heathland mitigation at Bovington but not at Wool. Given that the vision for south west Purbeck in 7.2.7 identifies this as a need for Wool and Map 7 shows concern over visitor pressure on Winfrith Heath, this is an omission which should be corrected.

A further concern about this policy is the allocation of "up to 20 hectares" of employment land at Dorset Green Technology Park. 20ha is greater than the amount of land required for the whole of Purbeck in Policy ELS: Employment Land (11.5ha). Paragraph 6.6.3 mentions the need for ecological assessment at this site in relation to employment allocations to ensure no adverse effect on integrity of any European nature conservation sites (this text tying in with the recommendation of the Habitats Regulations Assessment paragraph 10.11). Furthermore in 7.2.8, concerns are raised about the deliverability of the full 20ha due to the development partner's proposals for large-scale housing growth which does not fit with the Core Strategy. We would therefore recommend that the policy wording should be more specific that this allocation is subject to assessment, for example: "Further ~~development~~ assessment of the feasibility for allocation within the existing employment site of up to 20 hectares at Dorset Green Technology Park."

Paragraph 7.3.3

DWT welcomes the amendment to the Green Belt Boundary at Holton Heath, to take account of deletion of housing proposals at this location.

Policy CEN: Central Purbeck

The policy identifies provision of up to 4 hectares of employment at Admiralty Park. Dorset Wildlife Trust is concerned about the implications of this for the Site of Nature Conservation Interest (SNCI) which lies in close proximity to the existing buildings at Admiralty Park. The SNCI supports acid grassland and heathland interests. We are also aware that there are other areas of ecological value which currently lie outside the SNCI boundaries – these were identified through ecological surveys carried out for the applicants as part of the former proposals for housing at Holton Heath. We are concerned about the SNCI and other biodiversity habitats in their own right, but also about the role this land plays in supporting the ecological function of nearby internationally designated

heathlands. The Habitats Regulations Assessment (HRA) in 10.4 points out that The Inspector's Report of the Inquiry into the Purbeck Local Plan in 2002 raised concerns about the direct loss or compromising of further land of nature conservation interest (SNCI and pSNCI); and by the effects of development causing further fragmentation of heathland habitat with the consequence of isolating and making more vulnerable, populations of certain key heathland species.

We would therefore recommend that the policy wording should be more specific that this allocation is subject to assessment, for example:

"Further development within the existing employment sites of up to 8 hectares at Holton Heath Industrial Estate and assessment of the feasibility of allocating 4 hectares at Admiralty Park;

Policy NE: North East Purbeck

DWT welcomes the proposed inclusion of public open space as part of the allocation at Policeman's Lane, Upton. We would point out again that concerns have been raised to DWT by members of the public regarding hedgerows and ditches at Policeman's Lane which could be of wildlife value. It has also been mentioned that the site floods in winter, which given the location close to Poole Harbour SPA could also have a wildlife value. We would suggest that further work is needed to assess the ecological value of any habitats on site and use by birds prior to any decision on whether it is justified to allocate it for 70 dwellings.

DWT welcomes the proposed extension of Upton Country Park, to provide additional open space and green infrastructure.

Policy CO: Countryside

DWT welcomes the wording which seeks to ensure that equestrian development does not have an adverse ecological impact.

Policy BIO

We strongly support the references in this policy to Strategic Nature Areas, Nature Map, 'Wild Purbeck', Sites of Nature Conservation Interest (SNCIs), Local Nature Reserves (LNRs) and Regionally Important Geological & Geomorphological Sites (RIGS), as well as the reference to incorporation of biodiversity elements into development and the inclusion of the Nature Map (Map 15).

However there is an important element missing from this policy and which in our view is required by PPS9, Biodiversity and Geological Conservation. Paragraph 11 of PPS9 requires Local Authorities, through policies in plans, to conserve habitats of principal importance; these are habitats listed by the Secretary of State under Section 41 of the Natural Environment and Rural Communities Act 2006 (which supercedes S.74 of the CROW Act referred to in PPS9). Paragraph 16 covers species of principal importance and requires local authorities to "take measures to protect the habitats of these species from further decline through policies in local development documents". Paragraph 10 of PPS9 also covers Ancient Woodland and veteran trees and it would also be helpful to mention these in Policy BIO. Finally BIO refers to the District Design Guide; we would point out that, in terms of biodiversity, this Guide covers birds and bats in built design which, whilst helpful, is not sufficient to cover the whole range of biodiversity protection, management and enhancement measures which should be sought.

We would suggest that the following amendments to the list in BIO:

- “Resisting development that could adversely affect Sites of Nature Conservation Interest (SNCI), and Local Nature Reserves (LNR), Ancient Woodland and other habitats of principal importance for biodiversity;
- Seeking development proposals that incorporate biodiversity elements protection, management and enhancement in accordance with the District Design Guide;”

And that supporting text is added (see DWT’s comment on 8.8.2-4).

Paragraphs 8.8.2-8.8.4

These paragraphs helpfully explain Strategic Areas, Wild Purbeck and RIGS. However there is no text to introduce SNCIs, LNRs or the Nature Map. Explanatory text is also needed on habitats and species of principal importance (see DWT’s comments on Policy BIO).

We suggest that 8.8.2 is amended to include:

“Species and habitats of local importance are identified within the Dorset Biodiversity Strategy and Biodiversity Action Plan for Purbeck. Other local biodiversity interests lie within Sites of Nature Conservation Interest (SNCIs), Local Nature Reserves and habitats and species of principal importance to biodiversity, including Ancient Woodland and veteran trees.”

And that 8.8.3 is amended to include:

“Strategic Nature Areas shown on Map 15 (Nature Map) and are a positive tool for coordinating activities that secure the retention and enhancement of features of interest as well as activities for the benefit of locally important species.”

Paragraph 8.8.5

This paragraph states “Further information on addressing biodiversity and geodiversity in scheme proposals is included in the District Design Guide.” However this guide covers only birds and bats in built design in terms of biodiversity and building materials in terms of geodiversity. The District Design Guide would need to be significantly added to in order to fully address biodiversity and geodiversity, including incorporation, creation and management of habitats and features of value to species and incorporation and study of geological exposures where relevant. There are many sources of ecological advice – perhaps the most locally relevant reference would be the county-wide advice-notes at <http://www.dorsetforyou.com/351345>.

Paragraph 8.8.6.2

DWT welcomes the undertaking to carry out a final Appropriate Assessment prior to adoption of the core strategy.

Policy DH

DWT strongly supports policy DH in principle, subject to any comments on the detailed wording which Natural England might make.

Policy GI: Green Infrastructure, Recreation and Sports Facilities

The policy should recognise the multifunctional nature of green infrastructure to a greater extent. The supporting text (paragraph 8.11.1) has welcome references to health benefits, biodiversity and

climate change adaptation, however green infrastructure also provides many other benefits, depending on location, such as to air quality, flood amelioration and water quality, transport routes and quality of life. It is important also to remember that it is the overall green infrastructure network which provides these functions – individual elements will fulfil a sub-set of functions and so there will be sites which do not have public access, for example, but are nonetheless crucial as part of the network.

We suggest that the wording of Policy GI is amended to read (2nd paragraph):

“...and the management of a connected, coherent and functional network of new and enhanced open green spaces and corridors ...”

Policy SD: Sustainable Design

The requirement to demonstrate support for biodiversity is supported. However this should go further than just birds and bats (as outlined in our comments on the design guidance under paragraph 8.8.5). We suggest that policy SD is amended as follows:

- “Demonstrate support for biodiversity through sensitive landscaping to retain, manage, create and enhance wildlife habitats and through in-built features, ~~which~~ for example to provide appropriately, configured and located nesting and roosting opportunities for bats and birds.”

Policy REN: Renewable Energy

In biodiversity terms the policy only mentions international nature conservation sites. However PPS22 also requires avoidance of harm to nationally important nature conservation sites (SSSIs and NNRs are covered by paragraph 11). Though in terms of local nature conservation sites, PPS22 says they “should not be used in themselves to refuse planning permission for renewable energy developments”, it then adds that “planning applications for renewable energy developments in such areas should be assessed against criteria based policies set out in local development documents, including any criteria that are specific to the type of area concerned”. In other words the nature conservation policy (BIO) should be applied, and criteria for renewable energy policies can cover these interests. We recommend that for avoidance of doubt, the relevant bullet of the policy is amended as follows:

- “It would not have an adverse impact upon the integrity of internationally protected habitats, unless there is no alternative solution and there are imperative reasons of overriding public interest, and that there are no other unacceptable ecological impacts.”

Appendix 2 – Glossary and Abbreviations

The glossary lists SNCl as being identified by Dorset Wildlife Trust, though DWT administer the SNCl process this is not correct as the Panel selecting sites includes Dorset County Council (who chair it), Natural England, Dorset Environmental Records Centre and independent ecologists.

The definition would read more accurately as:

“**SNCl**s: Sites of Nature Conservation Interest. In Purbeck SNCl have been identified by the Dorset Wildlife Trust SNCl Panel. These sites are of considerable nature conservation value at a local level. Some may include habitats of comparable quality to SSSIs but are of a smaller area or of a more fragmented nature.”



ENGLISH HERITAGE

SOUTH WEST REGION

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

Our ref: HDP 5190
Telephone 0117 975 0675
Email rohan.torkildsen@english-heritage.org.uk

3 December 2010

Dear Sirs

Purbeck District Council Core Strategy Pre Submission Consultation

Thank you for providing English Heritage the opportunity to comment on the latest version of the Core Strategy.

This letter supplements the comments previously raised by English Heritage which I will attach for you information. As you know we consider your Core Strategy has many strengths and we broadly welcome the strategic spatial approach employed and the promotion of sustainable spatial planning practice. We also recognise the positive revisions made following the previous consultations and welcome, for example, the retail policy that seeks to retain historic settlement character and setting; high quality sustainable, sensitive and responsive design and the use of traditional materials.

Unfortunately there remain a number of outstanding concerns still to be addressed.

PP55 *Planning for the Historic Environment* published in March this year helps to further clarify how Purbeck's Core Strategy and perhaps other associated plans for the area should respond to its heritage assets. It is an important reference in the Plans assessment. It will be important to demonstrate an appropriate response to PPS 5 and the following points in this letter to achieve a clear, effective and sound Core Strategy. I sincerely hope we can support you to do so.

1. The reassurance provided by paragraph 8.17.4 in the Core Strategy is welcomed as is the commitment to protecting, conserving and enhancing heritage assets provided by policy LHH. However this relates to proposals for development. A historic environment strategy in the Core Strategy needs to be more proactive.
2. The Core Strategy and its historic environment strategy should develop a clear view of what needs to be achieved in relation to Purbeck's cultural heritage and consider how it can be delivered (para 43 PP55 Practice Guide).



29 QUEEN SQUARE BRISTOL BS1 4ND

Telephone 0117 975 0700 Facsimile 0117 975 0701
www.english-heritage.org.uk

Please note that English Heritage operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available

3. Your evidence base needs to demonstrate an understanding of the condition of Purbeck's heritage assets. The national Heritage @ Risk register includes information relating to Purbeck's Grade 1 and II* listed buildings, Conservation Areas, Historic Parks and Gardens, Scheduled Monuments and Places of Worship. This in turn will help to direct a proactive and positive strategy which may in turn help target heritage regeneration and/or form the basis of external funding bids, for example.
4. The Core Strategy should set out strategic place shaping ambitions particularly in relation to the quality of streets, spaces and the public realm. Your historic environment strategy could do so recognising that the setting and integrity of Purbeck's towns, villages, countryside and landscape setting can be seriously affected by insensitive transport works.
5. The Dorset Rural Roads Protocol demonstrates an appreciation of the relevance of promoting good practice. Its main principle of ensuring the local setting and distinctiveness of the rural environment guides the design local road management decisions could be acknowledged and built upon in Purbeck's Core Strategy. The variety of national good practice guidance such as Manual for Streets, Transport Management and Streetscape (DoT 2008), Civilised Streets (CABE 2008) and Streets for All (EH 2007), can all help signpost the means to inform the delivery of high quality places and spaces. The Core Strategy should emphasise the importance of a high quality public realm and street design and promote a commitment to it.
6. The Spatial Distribution of Development (section 7) sets out the issues, aspirations and spatial policies for the NW, SW, Central, NE and SE areas of Purbeck. However, contrary to the title this section also sets out the spatial ambitions for various other matters including service provision, transport and *heathfield mitigation*. Therefore there doesn't appear to be a reason why spatial heritage concerns couldn't also be included and mapped in section 7.
7. As previously mentioned, paragraph 8.17.4 is very much welcomed but it relates to a *Development Policies* section rather than a *Spatial Strategy* section. It also needs further elaboration to indicate how its ambitions are to be achieved. Perhaps you might set out how you intend to tackle the following:
 - heritage assets at risk;
 - an update and accessible Historic Environment Record;
 - a local list;
 - up to date Conservation Appraisal and Management Plans (We note this is an indicator);
 - village design statements;
 - areas for heritage led regeneration;
 - public realm improvements in historic areas;
 - appropriate highway works;
 - the conservation of the setting and integrity of heritage assets at Holton Heath and Winfrith;
 - identifying areas of potential archaeological interest
 - how Green Infrastructure planning; a community Infrastructure Levy and/or S106 can contribute to maintaining enhancing heritage assets
8. Reference is made to a separate *Heritage Strategy*. How has it informed the Core Strategy, what is its role; and does it form part of the LDF? I note it also relates to landscape and natural environment matters so its actions in relation to the historic environment are limited. Nevertheless these may be included within the Core Strategy or reference made to them.
9. The above bullet points (paragraph 7) provide a series of potential additional indicators. There appears to be very few indicators for objective 7 and the historic environment compared to objective 3 relating to the natural environment. This additional source should be considered.

2



29 QUEEN SQUARE BRISTOL BS1 4ND

Telephone 0117 975 0700 Facsimile 0117 975 0701

www.english-heritage.org.uk

Please note that English Heritage operates an access to information policy

Correspondence or information which you send us may therefore become publicly available

10. Policy LHH includes a series of exemptions. If they merely repeat PPSS and the Practice Guide should they be included in the Core Strategy; and if they aren't consistent shouldn't they be?
11. Could we repeat our previous advice that guidance on the preparation of green infrastructure plans emphasises the importance of considering the natural and historic environment, many features of which will be affected and can be included, and therefore managed via Green Infrastructure Planning. The emerging SE Dorset Green Infrastructure Plan provides a useful local reference.

I sincerely hope the above advice will help to address our outstanding concerns. Perhaps we could meet to try and resolve these prior to any formal submission. I look forward to hearing from you in due course.

Yours faithfully,

Signature has been blanked out

Rohan Torkildsen
West Territory Planning Advisor (South West, West Midlands)



29 QUEEN SQUARE BRISTOL BS1 4ND

Telephone 0117 975 0700 Facsimile 0117 975 0701

www.english-heritage.org.uk

*Please note that English Heritage operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available*

Environment Agency



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

| | Your Details | Agents Details (where relevant) |
|----------------------------------|--|---------------------------------|
| Title | Ms | |
| Name | Katherine Burt | |
| Job Title (where relevant) | Planning Liaison Technical Specialist | |
| Organisation (where relevant) | Environment Agency | |
| Address | Rivers House, Sunrise Business Park, Highley Shaftesbury Road, Blandford Forum | |
| Postcode | DT11 8ST | |
| E-mail | swx.planning-liaison@environment- agency.gov.uk | |
| Tel. Number | 01258 483374 | |

Responses should be sent to:

Email: ldf@purbeck-dc.gov.uk

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

Fax: 01929 557348

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

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

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

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

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

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

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

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

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

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

| | |
|--|---|
| <input checked="" type="checkbox"/> 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:

| |
|--|
| We do not necessarily wish to participate at the examination, however, we would be available if the Inspector requests our attendance. |
|--|

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

| |
|-----------|
| Signature |
|-----------|

| |
|-----------------------|
| Date 20 December 2010 |
|-----------------------|

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

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

| | | |
|-----------------|------------|------|
| Policy : BIO | Paragraph: | Map: |
|-----------------|------------|------|

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

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

In our previous letter (ref WX/2006/000006/CS-01/IS4-L01) dated 27 October 2010 we highlighted that the Biodiversity Policy BIO lacks any reference to the water environment and should specifically mention wetland interests i.e. watercourses, ponds, reedbeds etc.

We note section 8.8.5 states that further information on addressing biodiversity and geodiversity in scheme proposals is included within the District Design Guide however it does not cover any of our concerns.

Engineered river channels, ordinary watercourses, ponds and wetlands are one of the most severe examples of the destruction of ecologically valuable habitat. This is contrary to PPS1 and PPS9 and to the UK Biodiversity Action Plan. The Water Framework Directive and associated South West River Basin Management Plan seeks to ensure that water bodies are restored to a natural state when development opportunities arise.

Therefore we consider the proposed changes given below are necessary to make the BIO policy sound. We do not regard them as overcomplicating the policy.

Proposed Changes:

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

We recommend Policy BIO should be changed to the following:

Purbeck's biodiversity and geodiversity will be protected, managed and enhanced through:

- The promotion of Strategic Nature Areas as identified on the Nature Map (Map 15);
- Efforts to enhance, link and create habitats to enable adaptation to climate change;
- The achievement of the 'Wild Purbeck' project;
- Resisting development that could adversely affect Sites of Nature Conservation Interest (SNCI), Local Nature Reserves (LNR), the UK Biodiversity Action Plan habitat, and wetland interests (i.e. watercourses, ponds, reedbeds etc);
- Seeking development proposals that incorporate biodiversity elements in accordance with the District Design Guide; and
- Maintaining regionally important geological and geomorphological sites (RIGS) for their scientific and educational value.

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 : CEN | Paragraph: | Map: |
|---------------------|------------|------|

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

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

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

(tick all that apply)

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

(For explanation of terms refer to guidance notes below)

Comments:

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

The settlement extension to Wareham - Land at Worgret Road is shown to lie entirely within Flood Zone 1, therefore we have no objection 'in principle' to the development. Given the size of the site we envisage the development brief will include consideration of a strategy for the inclusion of Sustainable Drainage Systems (SUDS), to ensure sufficient land is set aside to allow balancing ponds, swales, and other above ground surface water drainage features to be included within any development proposal. We have no further comments over and above those already provided to Purbeck District Council as part of the 'Where shall we build in Wareham?' consultation (June 2010).

Proposed Changes:

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

N/A

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

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

| | | |
|----------------|------------|------|
| Policy : FR | Paragraph: | Map: |
|----------------|------------|------|

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

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

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

(tick all that apply)

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

(For explanation of terms refer to guidance notes below)

Comments:

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

We note that the addendum (Core Strategy Pre-Submission Addendum) includes a revised Flood Risk Policy. We have already had an opportunity to comment on the wording of this Policy as part of ongoing discussions with the District Council in respect of the annual update of their Level 1 Strategic Flood Risk Assessment (SFRA). We have no objection to the proposed wording of the policy.

Proposed Changes:

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

N/A

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 : GP | Paragraph: | Map: |
|----------------|------------|------|

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

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

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

(tick all that apply)

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

(For explanation of terms refer to guidance notes below)

Comments:

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

We are pleased to note the revision to the paragraph regarding groundwater protection policy (section 8.13) as per our previous response.

Proposed Changes:

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

It may also be useful to add that any development should follow the policy and advice as set out in Planning Policy Statement 23: Planning and Pollution Control (PPS23). Also, any development should have no detrimental impact on licensed supplies or any other private supplies or water features.

pumping of nearly a tonne of water per week and the subsequent removal and treatment of the wastewater. The estimate of the water industry greenhouse emissions in 2005/2006 were a little over 4 million tonnes of CO2 equivalent (UK water industry Sustainability Indicators 2005/2006). It is therefore important that we ensure water consumption is reduced.

Code for Sustainable Homes Level 3 would achieve a reduced water demand to 105 litres per person per day.

Proposed Changes:

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

We recommend that Policy SD should be amended to read:

The achievement of high quality sustainable design will be given significant weight. In assessing the sustainability and design quality of applications for development and other works, the Council will expect conformity to be shown with national policies for sustainable development, the Design Supplementary Planning Document, Policy LHH Landscape, Historic Environment and Heritage, and, where relevant, Dorset County Council's Residential Car Parking Strategy. Regard will also be had to the District's Townscape Character Appraisals. The Council will expect proposals for development and other works to:

- Demonstrate a positive approach to the spatial, visual and functional integration with, and enhancement of, context. Special emphasis is placed upon reflecting the diverse but localised traditions of building material usage found across the District;
 - Demonstrate regard for neighbour amenity by avoidance or mitigation of the overshadowing and overlooking of adjoining properties, or affliction of other identifiable nuisances where these would cause significant and measurable harm;
 - Demonstrate support for biodiversity through sensitive landscaping and through in-built features, which provide appropriately, configured and located nesting and roosting opportunities for bats and birds;
 - Demonstrate compliance with national standards for Lifetime Homes where consistent with townscape character;
 - Demonstrate that at least 10% of the energy in new development of more than 10 dwellings or 1,000m² (net) of non-residential floor space comes from decentralised and renewable or low-carbon sources, unless, having regard to the type of development involved and its design, it is demonstrated not to be feasible or viable;
 - Demonstrate that every effort is made to achieve a significant carbon reduction in all new built development, at least matching the national targets set out in 'Building a Greener Future' and applied by Building Regulations.
 - Achieve a score of at least 14 points ('gold' or 'silver' standard) measured against 'Building for Life' standards where development consists of ten or more dwellings;
 - Achieve a BREEM 'Very Good' rating or higher for new build industrial and commercial development up to 1,000m² (net) floor space, and as a minimum an 'Excellent' rating for larger developments.
- * Demonstrate that water efficiency measures have been successfully incorporated in all residential development, achieving a Code for Sustainable Homes Standard, or equivalent, of Level 3 or better.