

Planning Purbeck's Future



**Core Strategy Pre-Submission - 1 November - 20 December 2010
Consultation Responses
Part 7**



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Foote S (Save Herston Fields)

389, High Street,
Swanage,
Dorset,
BH19 2NP

19th December 2010

Dear Sir,

Reference Purbeck Core Strategy Pre-Submission Consultation

I have submitted detailed responses to this on four separate blocks of forms, but wish to add this letter to that submission, to make some general observations and notes.

Public Consultation Overview

The Pre-Submission Consultation is a complex consultation for anyone outside of the planning business to engage with. It requires a huge amount of background reading in order to even get a basic grasp of how to challenge it. The Core Strategy has taken the planning department at Purbeck District Council over five years to commission and write. Much of this background material is available online, and is reasonably (but not always) easy to find. However, there is a large percentage of the population that cannot access this material online because they either lack the necessary computer skills, or do not have access to the internet. This contributes to making a lot of this consultation largely inaccessible to the public, and this should be taken into consideration when the term "public consultation" is used. I would suggest that this consultation is not "public"

Many people are, to date, unaware of the Core Strategy, and many have claimed to be unaware of the public consultations which have taken place in 2009 and 2010. I have discovered this as a member of the Save Herston Fields Group, who have campaigned to stop the development of Site B on the south-east Purbeck "Where shall we build 2011-2026" consultation. Whilst collecting a petition of over 3000 signatures against the proposed settlement extension and development of this site, many people who signed that petition, or attended public meetings held by our group claimed not to have received these consultation documents. The delivery method was done as a leaflet drop in a free newspaper, so there was no guarantee that the leaflets were actually delivered. A public consultation should be conducted by post to all householders to ensure a high likelihood that they will be received.

Furthermore the consultation offered no "zero option". The public were not able to say that they didn't want any housing at all. Where multiple sites were offered across 5 simultaneous consultations in the whole District, it should be noted that not all of those individual consultations offered a "preferred option", in south-east Purbeck there was a "preferred option". A preferred option introduces a bias into the consultation, which distorts the outcome. The question asked should have been a straight question that

allowed the public to say what they thought, rather than agreeing with what PDC thought. It would seem that the consultation was being presented in a way that would give PDC the answer it was seeking, rather than an alternative answer.

The Core Strategy Document

This is a comprehensive document, but it is full of inconsistencies, ambiguities and contradictions. There are many examples of ambiguous statistics, for instance, which paint a picture that is at odds with some of the important realities on the ground. An example of this is the percentage of second home ownership. The quoted level of second home ownership is given by Parish rather than village (ss1.2.3). In respect of Worth Matravers Parish the figure quoted is 20%, but in the case of the village of Worth Matravers alone the actual figure of home ownership is actually 41%. This paints a different picture altogether. The official figure for Swanage is 12.7%, yet the unofficial figure is probably higher – it could be as high as 20%. There should be a more accurate analysis of important figures like this as they may give a different conclusion to the requirement for housing over the next 20 years.

In addition, it has recently been stated by Government that AONB has the same status as National Parks. This is not addressed at all in the Core Strategy. If this is the case, the rules on housing development become very strict – for instance there is a cap of 20% second home ownership. There is also a very strict limit on new buildings.

The Core Strategy states that it expects population to grow by 8% over the period 2012-2026, but the Habitats Regulations Document states that population growth is expected to be 13%. On a population of 45000 an 8% increase in population is 3600 people, but a 13% increase is 5660. So which figure is correct? This has a great deal of relevance to the number of dwellings required. Currently it stands at 2400 dwellings, with an expected occupancy rate of around 2.3 people per property. If the latter figure is correct then 2400 dwellings are required, but if the former figure is correct, then fewer than 2400 are required. At the end of the day the 2400 figure has been imposed on the District by Government, and little has been done within the CS to suggest that given the “special” nature of Purbeck, this amount of growth is not sustainable. In fact the figure of 2400 includes 300 which were added as a “bargaining tool” when the Western Sector proposal for 2750 houses at Lytchett Matravers and Upton was dropped.

The Core Strategy is presented unlawfully too. It is not complete as there is a document, the Recreation and Open Space Strategy, which has not been presented with it as required by Planning Law. A further 120 dwellings to be built in 2026 to 2027 has been added, and there is no explanation where these houses will be built, and more importantly, the public has not been consulted on these houses!

Danger of overdevelopment

The figure of 2400 houses has been imposed on Purbeck by Central Government through the South-West Regional Spatial Strategy, without thought to the impact it will have on the district, and in particular Swanage. In 1921 the population of Swanage was just over

7000, that figure has grown slowly to a population in 2001 of 10,400. This would seem to be a natural, slow, organic growth, and the influences of population growth should be taken on board. The fact that Purbeck is an AONB, and the Jurassic Coast has the designation of the internationally important World Heritage Site cannot be over stressed. PDC itself recognises that it should 'Keep Purbeck Special'. The Habitat Regulations Assessment acknowledges that "Purbeck District supports one of the most special and heavily protected environments in the country", and this alone is a very good reason to restrict, rather than promote, development in Purbeck.

Many people seek to retire here. These figures are reflected in the age of the population: the elderly are on the increase, the young on the decrease. This distortion is exacerbated by high property prices influenced by an influx of affluent retirees and second home owners, thereby creating a unique set of problems which the Core Strategy will only add to. What is needed is affordable housing for young, local people, and not market housing which will further promote an inward migration of retirees and second home owners.

The Core Strategy would seem to charge into the District imposing a dramatic, and largely unwanted, change on local life. 900 dwellings being built, a 20% increase in population in the space of twenty years, would have a dramatic effect on Swanage. It should be noted that 34% of all new dwellings built in the whole of Purbeck in the past 15 years have been built in Swanage, a trend that the Core Strategy seeks to continue. Yet there is no significant increase in employment proposed. A large tourist influx in the holiday season is composed largely of daytrippers, and Swanage is a cul-de-sac with one road in and out – the A351. The demand by the tourist on the road has not been properly assessed, and it is huge. So why the wish to put 900 homes in Swanage, many of which are likely to become second homes? This is unsustainable, poorly thought out planning, and it is at odds with the following four of nine stated claims of the Spatial Objectives: "Respect the character and distinctiveness of Purbecks settlements and countryside"; "Preserve and enhance Purbecks natural habitat"; "Reduce vulnerability to climate change and dependence upon fossil fuels"; "Conserve and enhance the landscape, historic environment and cultural heritage of the District"

New homes should be built in sustainable places, near centres of employment with existing transport infrastructure! This all requires far more thought and planning than has been suggested, and certainly doesn't warrant the destruction of a nationally important AONB – the very thing that encourages the tourist industry. The strategy suggested by the CS threatens to kill the goose that lays the golden egg. This should never be allowed to happen!

Stephen Foote

Save Herston Fields Campaigner



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

Your Details		Agents Details <i>(where relevant)</i>
Title	Mr	
Name	Stephen Foote	
Job Title <i>(where relevant)</i>		
Organisation <i>(where relevant)</i>	Save Herston Fields	
Address	389, High Street, Swanage	
Postcode	BH19 2NP	
E-mail	stephenfoote@mac.com	
Tel. Number	01929 422457	

Responses should be sent to:

Email: ldf@purbeck-dc.gov.uk

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

Fax: 01929 557348

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

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

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

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

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

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

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

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

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

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

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

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

To offer a more complete verbal explanation to objections

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 (signed) Stephen Foote

Date 20th December 2010

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

Policy : CS Context	Paragraph: 1.1.3	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

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

The Core Strategy has been devised from policies which are now out of date. The new localism bill (December 2010) will need to be taken into account, and more emphasis needs to be placed on local need, rather than criteria imposed by central Government

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).

Delay the implementation of the Core Strategy until new legislation becomes clear

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

Policy : CS Context	Paragraph: 1.1.6	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

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

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

(tick all that apply)

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

(For explanation of terms refer to guidance notes below)

Comments:

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

From "straw polls" conducted at Public Meetings held by the group "Save Herston Fields" it is clear that only 40% of the population are able to access the internet from home, and a lack of computer literacy also denies a large proportion of the population access to the consultation. This is particularly because there is a large elderly population in Purbeck which is acknowledged throughout the CS documents. This effectively means that the public consultations are not easily accessible to a large part of the public who are being consulted, which renders it ineffective

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).

Hold properly accessible public consultations

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

Policy : CS Context	Paragraph: 1.2.3	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

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

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(i.e. the Core Strategy is not founded on a robust and credible evidence base and/or doesn't provide the most appropriate strategy)
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- 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 percentage figures are misleading, and the results are distorted because of the way they are counted. The figure of second homes quoted is for the whole of Purbeck, whereas no mention is made of the particular problems found in particular towns and villages. For instance, by PDC's own figures the number of second homes in Swanage is officially put at 12.7% (and unofficially probably higher), and within the Parish of Worth Matravers the figure is quoted at 20%. The reality is that within the village of Worth Matravers the second-home ownership is much higher - a recent count by local residents puts the figure at 41%. These figures are highly relevant to the proposed scale of south-east Purbeck as they will reflect what the proposed new development is likely to become - that is a large proportion of new houses will be sold to the second home market and this is unnecessary. The bulk of these houses are not NEEDED

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).

Quote statistics which bear more relevance to the reality in order to give a more accurate representation of exactly what is being a) considered and b) needed!

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

Policy : Characteristics Purbeck	Paragraph: 2.2	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

1. Legally compliant <i>i.e. comments on the process of preparing Planning Purbeck's Future</i>	Yes <input 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"/>

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- It is not 'consistent with national policy'

(For explanation of terms refer to guidance notes below)

Comments:

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

Again, the percentage figures being used are mis-leading. If the expected population increase is 8% over 20 years, and the population is currently 45,000, then that would infer a population increase of 3600 people. 2400 dwellings that are proposed would house more than that population, therefore it would seem that in fact 2400 houses are not NEEDED, and far fewer houses could be built

Proposed Changes:

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

Reduce the number of proposed dwellings to a more reasonable figure

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

Policy : Characteristics Purbeck	Paragraph: 2.4	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

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

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Comments:

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

Once again, the figures being presented are distorted. The average income may well be £22,880, but if you remove the top 5% of income earners from this figure you find that 95% of the population actually earns an average of £13,000 pa. This figure paints a completely different picture of the actual NEEDS of the population

Proposed Changes:

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

Show the breakdown of figures to give a more accurate and representative analysis of what the situation is!

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

Policy : Characteristics Purbeck	Paragraph: 2.7	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

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Comments:

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

Most of south-east Purbeck is in AONB. Settlement extensions are being proposed which will have an adverse effect on the AONB. The Government has recently stated that AONB has the same status as National Parks. The AONB status is not being respected by the Core Strategy and the proposals are illegal. The building on settlement extensions is not deliverable because SANGS are not deliverable, the proposal is to build on green spaces which are not replaceable

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).

Delete settlement extensions from any part of Purbeck which is the AONB



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

Your Details		Agents Details <i>(where relevant)</i>
Title	Mr	
Name	Stephen Foote	
Job Title <i>(where relevant)</i>		
Organisation <i>(where relevant)</i>	Save Herston Fields	
Address	389 High Street Swanage	
Postcode	BH19 2NP	
E-mail	stephenfoote@mac.com	
Tel. Number	01929 422457	

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Email: ldf@purbeck-dc.gov.uk

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

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

--

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

Signature (signed) Stephen Foote

Date 18/10/2010

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

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

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

(For explanation of terms refer to guidance notes below)

Comments:

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

The vision is unsound, the proposed overall increase of the size of Swanage (900 dwellings with a proposed population increase exceeding 1500 people) will neither enhance or retain the towns "unique qualities". Some of the proposed development will be on settlement extensions in areas with AONB designation. This designation is in place to PROTECT the greenfields which surround Swanage and give the town its "unique qualities". Furthermore, the burden of development in Swanage over the past 15 years represents 34% of ALL development in the whole of Purbeck, and this trend is proposed to continue under the Core Strategy. This is unsustainable and undeliverable

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).

Respect the unique qualities of Swanage, and the AONB designation and build dwellings in a

more appropriate place.

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

Policy : Spatial Vision	Paragraph: 4.3.1	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

1. Legally compliant <i>i.e. comments on the process of preparing Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	No Comment <input type="checkbox"/>
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(tick all that apply)

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Comments:

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

In refernce to the bullet points: 1) Building large quantities of dwellings will depress the caracter and DECREASE Purbecks distinctiveness 2) It will surpass Purbecks housing NEEDS 3) It will neither conserve nor enhance Purbecks habitats. Purbeck is RURAL 4)N/A 5) It will increase the the burden on roads, and encourage an increase in the use of fossil fuels, due to an increase in cars and commuting. Climate change will likely mean increased flooding, and new buildings will exacerbate the risk of flooding due to increased surface run-off, therefore INCREASES vulnerability to climate change 6) N/A 7) It will do none of these things - remember this is AONB, Workld Heritage site etc, the suggestion that these proposals can enhance the landscape is preposterous in extreme! 8)N/A 9) There is nothing being suggested by the Transport Plan which proves that this is acheivable

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).

Revise the Spatial Objectives to something more realistic and far less ambitious

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

Policy : LOD	Paragraph: 5.2	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

1. Legally compliant <i>i.e. comments on the process of preparing Planning Purbeck's Future</i>	Yes <input 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)

Swanage lacks the transport infrastructure that Wareham has, and its geographical location is unlikely to allow that to change. So why make Swanage a centre for development when it can't support it?

Proposed Changes:

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

Do not allow Swanage to become a focus for development

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

Policy : Development Strategy	Paragraph: 5.6.1	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

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

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

(tick all that apply)

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

(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 public consultations only asked people where development should take place, the public were not offered a "zero" option, where they could say that they didn't want development at all. The consultation also offered a "preferred" option, which instantly brought bias into the procedure. Many members of the public are still unaware (December 2010) of the Core Strategy or any of these consultations because they never received the consultation documents, or didn't understand their importance because they were delivered as a leaflet drop, rather than being sent by post to Council Tax payers. It was also possible for a single person to send in multiple responses to the questionnaires, thus distorting the consultation. In fact the whole consultation was something of a sham for all of these reasons.

Specifically, in the case of Site B, Swanage (what has become known as Herston Fields), we are glad to see that this was not put forward as a site for the Core Strategy, but remain worried that it could be put forward as part of the Site Allocations Plan. The Save Herston Fields group campaigned vigorously to achieve this outcome, with a petition signed by over 3000 people, a facebook group of 450 people, and having held a number succesful, well attended, public meetings. It is important to note that part of site B was, until 2008, in the Herston Conservation

Area, and that at the time of its removal from the Conservation Area, the local population was assured that its removal from the Conservation Area would not mean that it was likely to be developed. Yet less than two years later it was put forward for planning as part of Site B. This site would also be part of a settlement extension, and its development would destroy an important local landscape within the AONB. It should not be allowed to be developed.

It is because of these contentious plans that a number of local people have become actively involved in campaigning against large elements of the Core Strategy, in particular the scale of the proposals. It should also be noted that this is very much a David/Goliath type fight, where members of the public actually NEED to become very informed in the way that Planning works, and also in Planning Law in order to object to the Core Strategy. My final point is that much of these "public consultations", and in particular the responses to this document, the Pre-Submission Consultation, is not actually accessible to the Public in general, as it is too complex.

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).

Re-consult the Public in a more pro-active way, ensure that forms are sent by post, and have a barcoding system to allow some kind of assurance that multiple submissions cannot be made by one individual. Offer the public the chance to opt out of development, rather than telling them "this is what we are going to do, where shall we do it?"

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

Policy : Supply of Housing	Paragraph: 6.1	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

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

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

(tick all that apply)

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

(For explanation of terms refer to guidance notes below)

Comments:

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

Please note that these are comments on the whole of section 6.1

6.1.1 Whilst we acknowledge the need for affordable housing, we would question the numbers that are actually needed. Please note the also the points I have made previously about the average wage figures (that they are distorted, and if you take out the top 5% of earners you find that 95% of the population has an average wage of £13k). With respect to the affordable housing waiting list, of the 1660 people who are on the list only 1210 are actually living in Purbeck with a local connection. The 1660 figure does not represent NEED, but rather DESIRE to live here, and this figure therefore distorts the policy. It is acknowledged by PDC that some of the figures here do represent multiple requests for housing, that is the same person may have a request for housing in Wareham as well as Swanage, and therefore they are counted twice. The actual figure for people in genuine need of affordable housing is likely to be far lower (it is thought around 400) than this figure, yet the Core Strategy is embarking on a scheme which involves building a large number of market houses in order to subsidise the real need for a lower number of affordable houses that is suggested

6.1.2 This is not deliverable, there is no guarantee that building 2400 dwellings throughout the

district can be mitigated without an adverse effect on habitat. With a large number of protected sites, and AONB, the habitats in Purbeck are likely to be severely disrupted by the scale of proposed development

6.1.5 There is land available within the town settlement boundary of Swanage which would allow for a five year supply of deliverable housing, without the need for settlement extensions. The land that is available can be restricted in order to allow a continuous five year plan to operate for the foreseeable future. There is a limit to the number of buildings that can actually be accommodated with the available land without destroying the AONB, and this is not addressed

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).

Be realistic with affordable housing figures, and base the requirement on genuine need aimed specifically at local people with strong local connections. Restrict the amount of market houses in favour of affordable houses, and avoid expansion of the town

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

Policy : Housing Trajectory	Paragraph: 6.3.1	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

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

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

(tick all that apply)

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

(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 public have not ben consulted on the period 2026-2027

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 this paragraph from the Core Strategy

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



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

Your Details	Agents Details <i>(where relevant)</i>	
Title	Mr	
Name	Stephen Foote	
Job Title <i>(where relevant)</i>		
Organisation <i>(where relevant)</i>	Save Herston Fields	
Address	389, High Street, Swanage	
Postcode	BH19 2NP	
E-mail	stephenfoote@mac.com	
Tel. Number	01929 422457	

Responses should be sent to:

Email: ldf@purbeck-dc.gov.uk

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

Fax: 01929 557348

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

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

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

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

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

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

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

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

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

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

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

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

As previously stated

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 (signed) Stephen Foote

Date 19/12/2010

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

Policy : Housing trajectory	Paragraph: 6.3.4	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

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

(For explanation of terms refer to guidance notes below)

Comments:

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

In respect to Swanage, the HRA states there to be a high likelihood that development will have an adverse effect on protected habitats. Proposed SANGS in Swanage are unachievable, partly because there is not the land available, and more importantly because any SANG would not be able to compete with areas which they would (attempt) to replace. The whole of South-East Purbeck is AONB and a SANG would not be able to replace this! ie Godlingstone Heath, Durlston Country Park, the Jurassic Coast. Therefore building 900 dwellings in South-East Purbeck cannot provide SANGS that are required

Proposed Changes:

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

Reduce the number of dwellings being proposed

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

Policy : Affordable Housing	Paragraph: 6.4	Map: 4
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

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

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

(tick all that apply)

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

(For explanation of terms refer to guidance notes below)

Comments:

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

6.4.4 The 1660 figure, by PDC's own admission, includes duplicate requests for housing by the same people for housing in different parts of the District. Therefore the basis for the calculation must be incorrect. The figure also is not based on NEED. The actual number of people in genuine NEED is likely to be closer to 400, and that figure would produce an entirely different result

6.4.5 The thinking behind these figures is unsound. The bulk of housing in the CS (37%) is being allocated in south-east Purbeck, where land prices in the district are at their highest. This will mean that affordable housing is far less affordable than in other parts of the district, solely because land values dictate that this will be the case. Furthermore a 2002 Planning Inspectorate report stated that no building should take place in Purbeck until the issues of traffic congestion on the A351 at Sandford has been resolved. The Core Strategy does not offer an adequate solution to this problem, and yet the CS is still targeting the bulk of housing to be built in the least accessible part of the district.

Proposed Changes:

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

Be realistic with the figures, and base them on NEED rather than DESIRE
Build the bulk of new houses in a place where they will be more affordable, and where they will not have an impact on the A351

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

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

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

(For explanation of terms refer to guidance notes below)

Comments:

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

A general point on the whole of this section: This clearly demonstrates that the majority of employment and employment land is not in south-east Purbeck (where the bulk of housing is being allocated). This is at odds with the stated aims of the CS - to reduce greenhouse gas emissions and carbon footprint, reduce congestion and improve local services (as stated at 4.1.2, 4.1.4 and 4.3.1) This is emphasised At 6.6.4 where the employment land allocated in Swanage, at only 1.2 ha, will not support the level of employment required to support 900 dwellings. Therefore people will be encouraged to commute (which is at odds with the spatial vision), and it will not encourage young families to come to live in Swanage (due to lack of employment prospects). Therefore this is not deliverable or flexible, and the evidence base has been ignored

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).

Be realistic about building houses where access to employment is at its greatest, not at its least!

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

Policy : SDD se Purbeck	Paragraph: 7.2	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

1. Legally compliant <i>i.e. comments on the process of preparing Planning Purbeck's Future</i>	Yes <input 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)

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

(For explanation of terms refer to guidance notes below)

Comments:

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

A general point on the whole of this section: it is clear that south-west Purbeck has much greater opportunities for growth as it already has an integrated transport infra-structure. It has good road access to the wider area and it is connected to the national railway network. Both of these things offer great accessibility. There are also good employment opportunities at Winfrith Technology Park, and much better land supply opportunities, at lower cost, than south-east Purbeck. 7.3 Wareham has a much better local services for the population than Swanage, it has better better transport links, and being the centre of the District it is already a hub. Yet the suggestion is to restrict development in the Wareham area (and this has been the case for the past 20 years), and it is at odds with the Saptial Vision as the the bulk of new building under the CS is to be focussedb away from Wareham. However, the road transport network, particularly at Sandford, has become a bottle-neck, and this will be extremely difficult to resolve without by-passing it. This is unlikely to be acheivable for a number of reasons. By focussing building in south-east Purbeck the effect will be to increase congestion, and these plans are therefore undeliverable and mis-guided

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).

Place new housing near Winfrith and Wool, which has a good transport infra-structure, employment potential, low land prices (compared to other parts of the district), and offers sustainability

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

Policy : Vision for South-east Purbeck	Paragraph: 7.5.1 & 8	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

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

7.5.1- The 2001 census puts the population of Swanage at 10400, not 9900 as stated.
7.5.8: As stated in 7.5.2, Swanage lies in an AONB. The importance of this status is disregarded in the Vision for South East Purbeck as this Vision recommends that green field sites on settlement extensions be exploited, together with the provision of "new" green spaces, which will improve "access to the countryside". In fact what these settlement extensions will do is have a dramatic impact on the AONB, and the important status which Swanage has as the gateway to the Jurassic Coast – a World Heritage Site. Building on settlement extensions is completely at odds with the ideals of both AONB and World Heritage site status. The vision also acknowledges that the A351 becomes an important transport corridor for, effectively, people to commute out of Swanage for employment. There are not going to enough employment opportunities provided in Swanage by the Core Strategy, therefore people will need to commute. This is ridiculous when the overall Vision for Purbeck states that its intention is to reduce carbon footprints for the District. This overdevelopment of South East Purbeck is not sustainable by any measure. The impact on Swanage will be dramatic, and the impact will feed north up the A351 and will impact on Corfe

Castle in particular, as well as Wareham and Sandford. The transport infrastructure will not support this additional housing in Swanage

Proposed Changes:

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

reduce the number of houses proposed for south-east Dorset significantly, if necessary re-allocate them to a different, more sustainable part of the District

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

Policy : Development proposals, see Purbeck	Paragraph: 7.5.10	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

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

Service Provision: Now that a two tier education system has been green-lit, there is even more demand of the transport network as all 13yr old and above children will need to transported to and from Wareham. The "vision" for Swanage to be self-contained is not achieved without a secondary school of some sort. The medical practice may move to an edge of twon site, this strategy is at odds with the preferred central location it currently enjoys. With a lack of understanding of what the future holds in terms of PCT's, NHS re-organisation etc, and a lack of understanding as to the viability of re-building the medical practice using more efficient use of space, it seems sensible to keep the medical centre in a central location. This will also reduce the carbon footprint in line with the aspirations of the CS.

Housing: A petition of over 3000 signatures has already been handed to PDC reflecting strong public support NOT to develop Herston Fields. This action has led to the removal of this site from the Core Strategy, but it may still be re-visited under the Site Allocations PAn. The majority of residents of Herston do not agree with settlement extensions in Herston, and there is a strong feeling against any settlement extensions at all in Swanage. This is supported by a unanimous

negative vote for settlement extensions by Swanage Town Council. The new localism Act, if adopted, should be respected and allow local feelings to be embraced.
Heathland Mitigation: SANGS are undeliverable in Swanage. The whole of Swanage is AONB, so how can a "Site of Alternative Natural Green Space" be found? That is a ridiculous notion!
Transport: As mentioned much in previous submissions, transport is a major weak link. Traffic analysis has been conducted using a standard methodology which does not take into account the vast number of cars coming into Purbeck in the holiday season. The A351 is choked by traffic during these times (which is about 4 months of the year), and nothing being suggested by DCC or PDC or the Core strategy will resolve this issue. Building 900 houses in SE Purbeck will make the problem worse. Section 106 contributions will not make any difference in SE Purbeck.

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).

Again, reduce the housing allocation for SE Purbeck, this will reduce the need for enhanced medical facilities, it will ease the burden on the A351. This strategy is not deliverable

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



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

Your Details		Agents Details <i>(where relevant)</i>
Title	Mr	
Name	Stephen Foote	
Job Title <i>(where relevant)</i>		
Organisation <i>(where relevant)</i>	Save Herston Fields	
Address	389, High Street, Swanage	
Postcode	BH19 2NP	
E-mail	stephenfoote@mac.com	
Tel. Number	01929 42457	

Responses should be sent to:

Email: ldf@purbeck-dc.gov.uk

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

Fax: 01929 557348

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

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

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

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

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

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

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

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

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

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

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

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

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

as previously stated

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 (signed) Stephen Foote

Date 19/12/2010

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

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

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

This policy clearly states "Respect the character and distinctiveness of Purbecks settlements and countryside" Settlement extensions are a contradiction and therefore undeliverable under this manifesto as they will not respect the countryside. Countryside locations are NOT essential, because the housing requirement is being imposed on the District. Countryside locations will destroy the nationally important AONB, which is designed to preserve the countryside.

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).

Delete settlement extensions from areas within the AONB.

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

Policy : AHT	Paragraph: 8.4.1	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

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

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

(For explanation of terms refer to guidance notes below)

Comments:

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

PDC's figures state that there are currently 1660 people on the housing list. Of these only around 1250 actually currently live in Purbeck. How, therefore does the requirement to build 409 affordable houses pa from 2007-2012 (2045 houses), reflect this? Its nonsense. In respect of Policy AH, it should be noted that although there is a desire to have 50% of new builds being affordable, it is unlikely this will be achieved, no local authority anywhere in the country has managed to acheive this rate, it is unlikely that PDC will be able to. A very long hard look is needed at affordable housing and actual need. The suggestion is that the actual number of people in need of housing is only around 25% of the quoted figure, and finding 400 dwellings within the district should be acheivable without resorting to building large quantities of market housing, or reorting to building on settlement extensions

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).

Being more realistic about the requirements for affordable housing

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

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

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

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

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- It is not 'justified'
(i.e. the Core Strategy is not founded on a robust and credible evidence base and/or doesn't provide the most appropriate strategy)
- It is not 'effective'
(i.e. the Core Strategy is not deliverable, not flexible and not able to be monitored)
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(For explanation of terms refer to guidance notes below)

Comments:

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

This policy recognises the importance to Biodiversity and Geodiversity. What should also be recognised is that this represents an extremely complex issue with a very delicate balance. An example of this is Herston Fields, where the number of butterfly species (18) is amongst the highest proportion (39%) found anywhere in Dorset. Butterflies migrate along hedgerows and disruption to these migration routes could have a severe adverse effect on butterfly population. It is recommended by Dorset Butterfly that the Herston site should not be developed as it is of significant importance to the butterfly population. This is a prime example of why settlement extensions should not be allowed in sensitive areas

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).

delete settlement extensions from SE Purbeck from the CS

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

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

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

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

(For explanation of terms refer to guidance notes below)

Comments:

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

Green Infrastructure already exists, yet the CS seeks to destroy these by settlement extensions, and then try to re-create them. This is a ridiculous notion. "Settlement extensions and major employment sites will be expected to contribute towards the delivery of significant areas of new Green Infrastructure and the management of a connected network of new and enhanced open spaces and corridors in accordance with GIS standards" Perhaps someone could explain this in plain English, it is a complete contradiction of common sense, which bears no validity in an AONB. If you build on green fields they are gone. Plain and simple; they cannot be resurrected.

Proposed Changes:

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

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

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

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

Comments:

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

Settlement extensions contradict the mandate offered by this 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).

delete settlement extensions from the CS

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

Policy :	Paragraph:	Map:
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- It is not 'consistent with national policy'

(For explanation of terms refer to guidance notes below)

Comments:

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

Proposed Changes:

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

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



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

Your Details		Agents Details <i>(where relevant)</i>
Title	Ms	
Name	Lesley Kennedy and Stephen Foote	
Job Title <i>(where relevant)</i>		
Organisation <i>(where relevant)</i>		
Address	389, High Street, Swanage	
Postcode	BH19 2NP	
E-mail	Lesley.kennedy02@virgin.net	
Tel. Number	01929 422457	

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.

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

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

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

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

--

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

Signature signed Lesley Kennedy & Stephen Foote

Date 19/12/2010

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

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

1. Legally compliant <i>i.e. comments on the process of preparing Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	No Comment <input checked="" type="checkbox"/>
2. (a) Sound <i>i.e. comments on the content of Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	No Comment <input type="checkbox"/>
(b) If you have chosen No for (a) do you consider Planning Purbeck's Future (Core Strategy) to be unsound because:			
<i>(tick all that apply)</i>			
It is not 'justified' <i>(i.e. the Core Strategy is not founded on a robust and credible <u>evidence</u> base and/or doesn't provide the most appropriate strategy)</i>			<input checked="" type="checkbox"/>
It is not 'effective' <i>(i.e. the Core Strategy is not <u>deliverable</u>, not <u>flexible</u> and not able to be <u>monitored</u>)</i>			<input checked="" type="checkbox"/>
It is not 'consistent with national policy'			<input 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 supports one of the most special and heavily protected environments in the country. Even in the context of south-west England it is exceptional. Tildesley & Associates assessment of development proposals has shown that, without mitigation measures, adverse effects would be likely as a result of the CS alone. Uncertainty over deliverability. More work needed!

Proposed Changes:

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

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

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

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

Development in Swanage will have particular impacts for traffic (Stoborough Heath and Corfe Common SSSI's)

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).

If adverse effects or the integrity of sites cannot be ruled out the plan can only be adopted in accordance with regulation 103, where there are no alternative solutions that would have a lesser effect and there are imperative reasons of overriding public interest sufficient to justify adopting the plan despite its effects on the European site(s). Limit second home ownership, build within settlement boundaries: affordable housing only.

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

Policy :	Paragraph: 3.2	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

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

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(i.e. the Core Strategy is not deliverable, not flexible and not able to be monitored)
- It is not 'consistent with national policy'

(For explanation of terms refer to guidance notes below)

Comments:

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

Western Sector development 2750 dwellings dropped due to PDC's outstanding re[presentations of objection relating to the Western Sector. Bargaining tool was adding 300 dwellings to the already high 2100 dwellings figure for "the rest of Purbeck"

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).

Figure of 2400 dwellings excessive. Mitigation impossible as demands increase

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 checked="" type="checkbox"/>
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Please state the part of that document you are commenting on:

Policy :	Paragraph: 5.5	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

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

5.52: For Swanage there is no specific detail relating to SANGS in the CS
 5.56 Heathland DPD's are yet to be finalised
 5.57 SANGS provision needs more work around Wareham, Swanage and Wool
 5.62 Lack of certainty regarding timely delivery of SANGS

Proposed Changes:

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

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

Policy :	Paragraph: 6.21	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

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

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

(tick all that apply)

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

(For explanation of terms refer to guidance notes below)

Comments:

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

Increased pressure on Poole Harbour

Proposed Changes:

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

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

Policy :	Paragraph: 5.28	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

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

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

(For explanation of terms refer to guidance notes below)

Comments:

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

South-east Purbeck 900 dwellings. Highest figure across "rest of Purbeck" - at end of giant cul-de-sac

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).

Abandon RSS figures, housing figures should be based on need for local people

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



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

Your Details	Agents Details <i>(where relevant)</i>
Title	
Name	Lelsey Kennedy & Stephen Foote
Job Title <i>(where relevant)</i>	
Organisation <i>(where relevant)</i>	
Address	389, High Street
Postcode	BH19 2NP
E-mail	lesley.kennedy02@virgin.net
Tel. Number	01929 422457

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.

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

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

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--

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

Signature Lelsey Kennedy & Stephen Foote
--

Date 19/12/2010

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

Policy :	Paragraph: 5.48	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

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

(For explanation of terms refer to guidance notes below)

Comments:

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

Provision of SANGS to deter people away from heaths largely untested

Proposed Changes:

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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 checked="" type="checkbox"/>
---	--	--

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

Policy :	Paragraph: 7.29	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

1. Legally compliant <i>i.e. comments on the process of preparing Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	No Comment <input checked="" type="checkbox"/>
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(For explanation of terms refer to guidance notes below)

Comments:

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

Development in Swanage which is likely to have the greatest 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).

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 checked="" type="checkbox"/>
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Please state the part of that document you are commenting on:

Policy :	Paragraph: 11.19	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

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

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(For explanation of terms refer to guidance notes below)

Comments:

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

Employment land allocation at Holton Heath and Winfrith resulting in increased commuter traffic from Swanage

Proposed Changes:

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YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

Policy :	Paragraph: 7.0 etc	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

1. Legally compliant <i>i.e. comments on the process of preparing Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	No Comment <input checked="" type="checkbox"/>
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- It is not 'consistent with national policy'

(For explanation of terms refer to guidance notes below)

Comments:

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

7.6 Vulnerability of Studland
 7.9 Effect of trampling
 7.16 Tourism possibly not having a detrimental effect "the housing proposals for Swanage may however present a different outcome"
 7.17 Swanage population 10,040 increases. Proposed mainly focussed at Swanage of 900 dwellings will represent increased population size of 20%
 7.24 SANGS in Swanage relating to proposed growth would have to be at least 15ha, 11.2ha and 19ha, and therefore unacheivable.

Proposed Changes:

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

Policy :	Paragraph:	Map:
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Comments:

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Proposed Changes:

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

Friends, Family and Travellers



3115
09/11/10

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

District Council Planning & Policy
29 NOV 2010
ACKNOWLEDGEMENT

Your Details	Agents Details (where relevant)
Title	
Name	STEVE STAINES
Job Title (where relevant)	
Organisation (where relevant)	FRIENDS, FAMILY & TRAVELLERS / TRAVELLER LAW REFORM PROJECT
Address	PO BOX 223, ELY
Postcode	CB7 9SA
E-mail	Steve@gypsy-travellers.org
Tel. Number	07875 930 065

Responses should be sent to:

Email: ldf@purbeck-dc.gov.uk

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

Fax: 01929 557348

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

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

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<input 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 25.11.2010
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YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

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

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

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Comments:

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See attached sheets

Proposed Changes:

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See attached sheets

Friends, Families and Travellers and Traveller Law Reform Project response to Purbeck Council Core Strategy Consultation November 2010

Policy GT: Gypsies, Travellers and Travelling Showpeople.

Detailed Comments:

We are pleased that a criteria based policy aimed at meeting the needs of the Travelling community is included.

We note that a Dorset wide DPD will be prepared in due course.

We have some concerns about both para 6.6.2 and Table 14 as well as some concerns about some of the criteria in the policy which in our view render the policy unsound.

Para 8.6.2 identifies a need for 20 residential and 21 transit pitches for the district. The GTAA assessed needs in the district for 79 to 83 pitches to 2011. There was considerable discussion at the Examination in Public over the appropriate levels of need in the Dorset authorities. The GTAA was benchmarked and problems identified. The discussion is extensively reported in the Panel report (para 39-43, matter 2E) and the panel concluded in relation to residential provision:

4.94 On residential pitches we agree with the evidence of the Benchmarking Report that the Dorset GTAA housing transfer figure was incorrectly assessed at 105. However we have not had any compelling evidence to suggest this should be at the lower end of the scale. The only reasons given in Dorset CC's evidence is that it would be prudent to apply the lower figure of 14 and the results of the Bournemouth newsletter trawl. On the contrary, we believe evidence suggests there may be a "hidden" demand due to travelling families being unwilling to commit to moving out until a choice of good sites is available. We are far from convinced of the value of the newsletter and consider it an inappropriate means of assessing likely demand for a move out of housing.

4.95 We therefore recommend the high end of the range at 26 pitches divided in proportion to the number of households forecast for each District by 2016, after taking account of the additional households identified in the final Proposed Changes to the RSS net dwelling requirement. (See Recommendation 13)

The RSS Partial Review identified a need for 44 residential and 21 transit pitches in Purbeck (Table 4.3, recommendation 15).

The position as regards the weight to be given to RSSs at the present time is clearly in flux following the SOS's announcement of revocation in the summer and the recent Carla Homes judgement. As a result of the Carla judgement the RSS stands at the time of writing. The GTAA has been benchmarked and also examined in detail by the Panel at the Partial Review. Hence the evidence for need has been tested and adjusted according to the evidence at the time.

In our view a reduction of residential pitch numbers to 20 is unjustified and the council give no reasons in support of the reduction in 8.6.2. It is important that the best available figures are quoted in the core strategy as it is possible that the Dorset wide DPD may not materialise and allocation will fall to individual local planning authorities.

The most recent caravan count statistics give a guide to need in the district, though they are notoriously unreliable. However we can be fairly certain that if numbers of caravans are quoted then they were in the district on the days of the count so to that extent are reliable. In Jan 2010 there were 12 caravans on RSL sites, none on private sites (authorised or unauthorised developments) and 46 caravans camped in an unauthorised manner. The average figure for winter camping is 33 caravans. As most of these caravans belong to New Travellers the number of caravans is a reasonable proxy for the number of families.

It is certainly clear that a proportion of those on camped in an unauthorised manner have a need for a residential pitch.

Needs assessments for Gypsy and Traveller pitches derive from a number of sources:

Demand due to unauthorised families with no authorised site at all.

Demand from overcrowding

Demand from net housing transfer

Demand due to family formation over the plan period.

The GTAA identified demand from overcrowding and family formation as being in the range 14-18 pitches. This would only leave 2-6 pitches available for those who are currently unsited. Clearly the estimated need for 20 residential pitches to 2011 falls short of what is needed.

Policy GT

Whilst most the criteria are acceptable, giving a degree of flexibility we are concerned that two of the criteria are too tightly drawn, are unjustified and as such make the policy unsound.

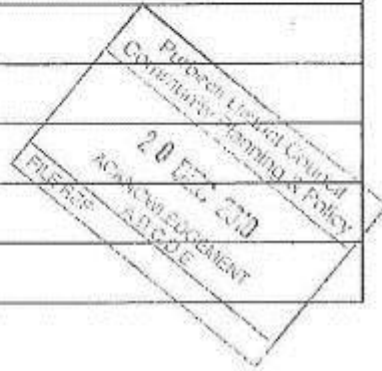
Criteria 5 and 6 require no detrimental impact on the natural environment, landscape or historic environment. Since any development can be held to have detrimental impact of one sort or another on these categories then no development could proceed at all if these criteria were to be applied in the same way to developments other than Traveller sites. The categories of landscape and environment (both natural and historic) which in the view of Circular 1/2006 require special protection are national designations. Para 53 states that local landscape and local nature conservation designation should not be used in themselves

6373
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	ALISON GLOYN-COX
Job Title (where relevant)	
Organisation (where relevant)	
Address	12 BATTLEMEAD
Postcode	BH19 1PH
E-mail	
Tel. Number	01929 425982



Responses should be sent to:

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

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

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<input 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
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Signature	Signature has been blanked out	Date Dec 18th 2010
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YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

Policy : <i>South East Purbeck</i>	Paragraph: <i>7.5 (1 & 2)</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 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 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 Core strategy states that Swanage is the largest town in Purbeck and a vibrant seaside town. You understate many of the components that make this true.

There are in effect 4 first schools as St George's is part of the school community in Swanage. The Middle School should not be omitted. Purbeck View is a substantial provider of special needs education for older children. It is also a substantial employer. Harrow House is a Language school with global reach. It is also developing an important role as a field studies centre for school parties from all over U.K. The town's hospitality groups also cater for many parties of disabled children as well as school parties and students.

There are two swimming pools but in no way are the leisure facilities adequate for this 'vibrant' seaside town.

It beggars belief that the Education Plan can claim that Swanage does not merit a Secondary School.

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).

Purbeck District Council must be more aggressive about changing the closure of the only available secondary school in the town. Failing this it must get behind the plans of Education Swanage to encourage the Free School by facilitating the availability of a suitable site.

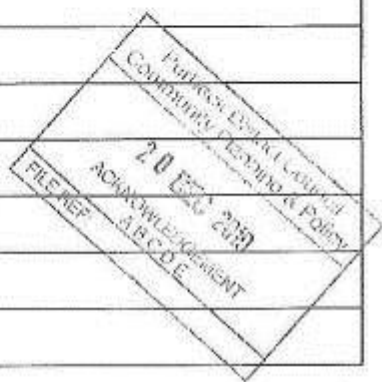
It seems obvious that the Grammar school site could provide this and have enough room for improved Leisure facilities as well as a few houses, affordable and otherwise.

5532
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	L. D. GLOYN-COX	
Job Title (where relevant)		
Organisation (where relevant)		
Address	12 BATTLEMEAD SWANAGE	
Postcode	BH19 1PH	
E-mail	ldgcox@btinternet.com	
Tel. Number	01929-425962	



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

As an elected member of Swunage Town Council I have received many comments and representations regarding the core strategy. It would be a failure of local democracy not to attend.

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 17/12/10
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YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

Policy :	Paragraph: 7.5.1 7.5.2	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

1. Legally compliant <i>i.e. comments on the process of preparing Planning Purbeck's Future</i>	Yes <input 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>(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)

Swanage, the largest town in Purbeck District, is described as a "vibrant seaside town" and the Core Strategy assumes it will remain so for the first quarter of the current century. The Core Strategy is defective in that it has not

1. objectively analysed the Strengths, Weaknesses, Opportunities and Threats (SWOT) of the town,
2. proposed possible countermeasures and policy initiatives and
3. presented them for public consultation.

Proposed Changes:

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

A SWOT analysis should be completed, policy initiatives and countermeasures proposed and be presented for public consultation. Attached is a SWOT analysis for the town and various countermeasures suggested.

SWANAGE

SWOT ANALYSIS

Strengths

- S1. Sandy, "blue flag" beach
- S2. Set in an area of outstanding natural beauty
- S3. Established tourist destination
- S4. Good provision of health facilities
- S5. Tradition of specialist education (EFL/ESL, earth sciences, residential, young persons with disabilities)
- S6. Established diving centre
- S7. Bay protected from prevailing westerly winds
- S8. Good attractions (Durlston Country Park, Heritage Railway, Pier)
- S9. Large number of voluntary groups
- S10. Significant artistic heritage

Weaknesses

- W1. Poor road links which become congested in high season
- W2. Limited access for visitors by sea
- W3. No secondary education
- W4. Shortage of housing for the less well remunerated
- W5. Insufficient employment opportunities to retain young people
- W6. Skewed distribution of population to older age groups
- W7. Bay exposed to easterly winds
- W8. Shortage of bad weather facilities

Opportunities

- O1. Deficiency of secondary education can be remedied by a "free school" (which could specialise in earth sciences)
- O2. Tidal barrier could be used to attract visitors by boat
- O3. Attractive location for well remunerated "out of office" workers (needs high speed broadband)
- O4. Centre can be developed for boutique retail shopping
- O5. Adoption of an innovative spectrum of care for an ageing population
- O6. A community trust to retain facilities and heritage buildings

Threats

- T1. Rising sea levels will further increase the risk of tidal flooding in the commercial centre of the town
 - T2. The beach will progressively disappear and be polluted by visiting boats
 - T3. Loss of secondary education and the lack of "affordable" housing will turn the town into a geriatric ghetto
 - T4. Progressive loss of publicly funded amenities
 - T5. The "wreck to reef" project in Weymouth and the sunken warship near Plymouth will attract divers away from Swanage
- LDGC – 2/12/10

SWANAGE

CONTERMEASURES AND POLICY OPTIONS ARISING FROM THE SWOT ANALYSIS

- W1. Lobby for high speed broadband and promote town as an ideal location for home working
- W2. Use tidal barrier as an access point for sea visitors (which research indicates spend in the locality visited three times the amount spent by visitors by car)
- W3. Support Education Swanage in its efforts to start a “free school” and retain secondary schooling in the town
- W4. Work with other authorities to liberate land in public ownership to build “affordable” housing
- W7. Use tidal barrier as a Cobb (compare Lyme Regis) to provide protection to boats from easterly gales
- W8. Explore the viability of a leisure centre
- O2. A tidal barrier will need to have a lock to stop high tides entering the town centre so it can be used as a floating harbour to generate revenue for the town
- O4. The small lanes in the area between Station Road and the High Street could be paved in local stone and developed as a boutique shopping area to attract visitors who will spend more in the town
- O5. One in five of people in the 80 to 90 age group will suffer from some form of dementia. Old people can live longer in their own homes if there is a suitable spectrum of progressive care. The “106” opportunities should not be blown on “affordable” homes but on health and leisure amenities which will enable people to stay in their own homes for longer. Utilise one of the development sites to be a pole for health care and services.
- O6. A community trust is likely to obtain access to charitable funding which is not available to public bodies, except for educational purposes
- T1. A tidal barrier will be necessary to protect the significant value of property in the town centre
- T2. The beach, which is a major attraction, is at risk in the longer term so the strategy should be to start to develop additional revenue streams for the town as early as possible. A floating harbour behind the tidal barrier could attract boat owners who would shop and eat in the town. On shore showers and toilets would provide a facility to stop the discharge of raw sewage into the sea. Boats anchored in the bay would be prohibited from discharging untreated sewage.
- T3. As W3. “Affordable” housing should be provided on land already in public ownership and based on the top category of need. It is necessary for all the authorities to work together to achieve this.
- T4. Set up a community trust
- T5. Support the local diving community by actively lobbying for new artificial reefs and wrecks.

LDGC – 2/12/10

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

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

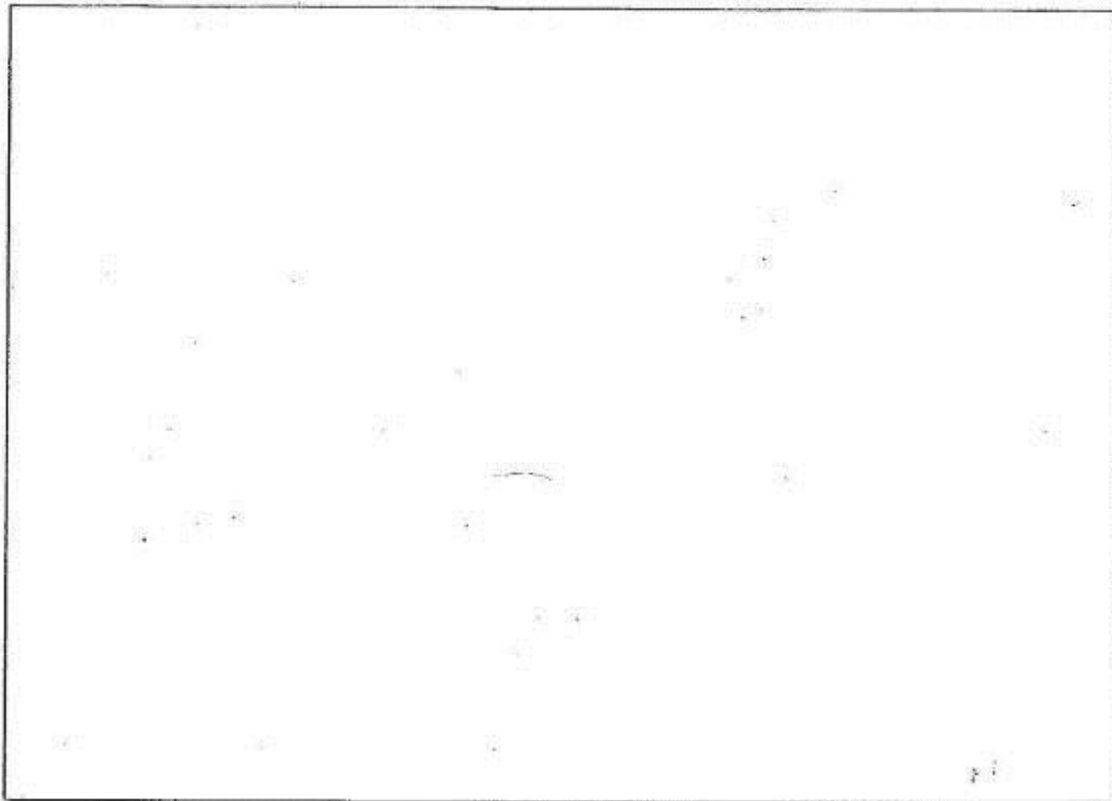
1. Legally compliant <i>(i.e. comments on the process of preparing Planning Purbeck's Future)</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	No Comment <input checked="" type="checkbox"/>
2. (a) Sound <i>(i.e. comments on the content of Planning Purbeck's Future)</i>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	No Comment <input type="checkbox"/>
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It is not 'consistent with national policy'	<input type="checkbox"/>		

(For explanation of terms refer to guidance notes below)

Comments:

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

As presented the provision of affordable housing is significantly dependent on large developments (100 dwellings) along the western settlement boundary of Swanage. Private developers are expected to provide 50 affordable homes in return for building 50 homes for the private market. Experience in Canada and Belgium has shown this method of provision is unsustainable because it causes the developer to increase significantly the price of the private element of the housing stock to finance the project; inflated prices, coupled with the proximity of social rented housing, undermines the marketing of the private sector houses and, hence, the developer often runs into a cash crisis. The sustainable route is to use land in public ownership for affordable housing. There is ample land in public ownership which could be used for affordable housing and the Core Strategy has not properly explored ways of liberating it.



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).

Purbeck District Council should consider all the land in public ownership in SE Purbeck and work in partnership with the other authorities to liberate part of it for affordable housing. Analysis of the current demand for affordable housing shows that of the 1600 on the housing register for all of Purbeck only 6 and 44 fall into the higher categories of need. The gross figures quoted do not reflect genuine local need. Potentially there is sufficient land in public ownership to meet the immediate local needs for affordable housing 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"/>
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Please state the part of that document you are commenting on:

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

1. Legally compliant <i>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"/>
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It is not 'consistent with national policy'	<input checked="" type="checkbox"/>		

(For explanation of terms refer to guidance notes below)

Comments:

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

Flood risk neglects the impact of tidal surge flooding in the commercial centre of Swanage. The risk is much higher than implied and will occur when a high tide with a tidal coefficient of 110 or higher (24 tides in 2010) coincides with a depression of 980mb tracking up the English Channel.

Proposed Changes:

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

A full professional impact study is sought.

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

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

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(tick all that apply)

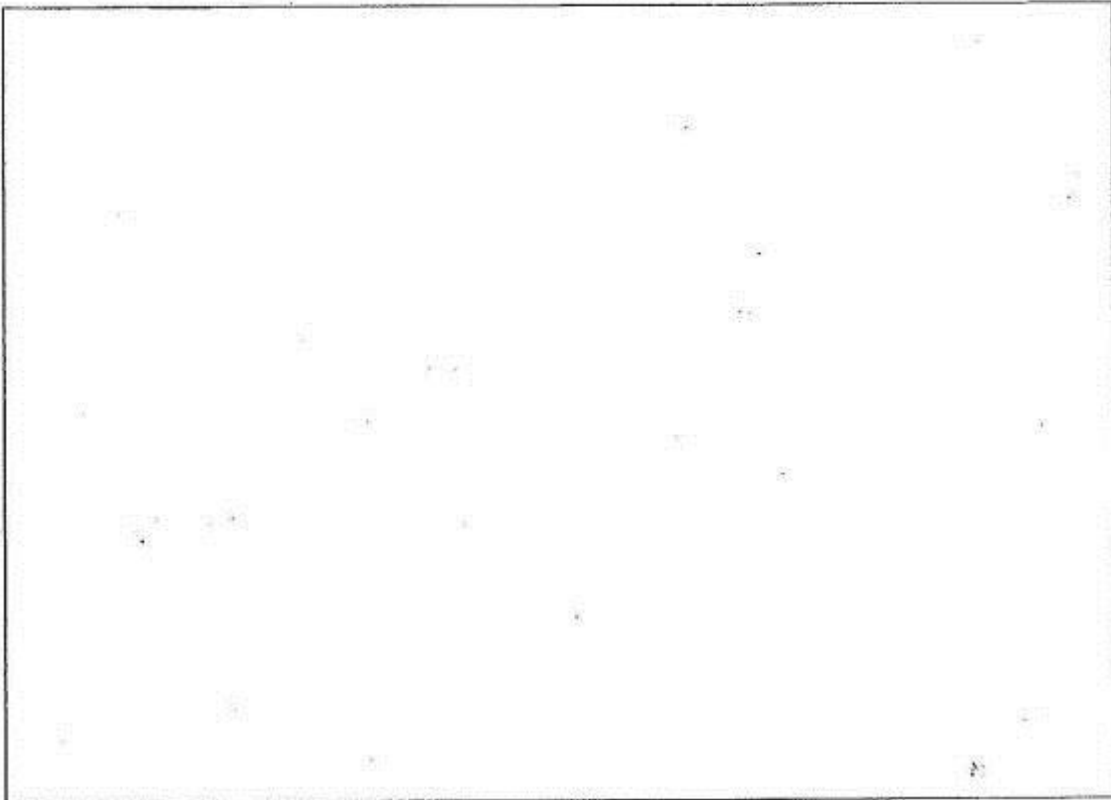
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It is not 'consistent with national policy'	<input checked="" type="checkbox"/>

(For explanation of terms refer to guidance notes below)

Comments:

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

The assumption is made that Swanage will retain its sandy beach. This assumption neglects the effect of the rise in sea level which will result in compression of the inter-tidal zone and the progressive loss of the beach amenity.



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).

Purbeck District Council consults the Coastal Change Pathfinder Group at Dorset County Council and seeks a professional assessment of the effect of rising sea levels on compression of the inter-tidal zone.

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

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

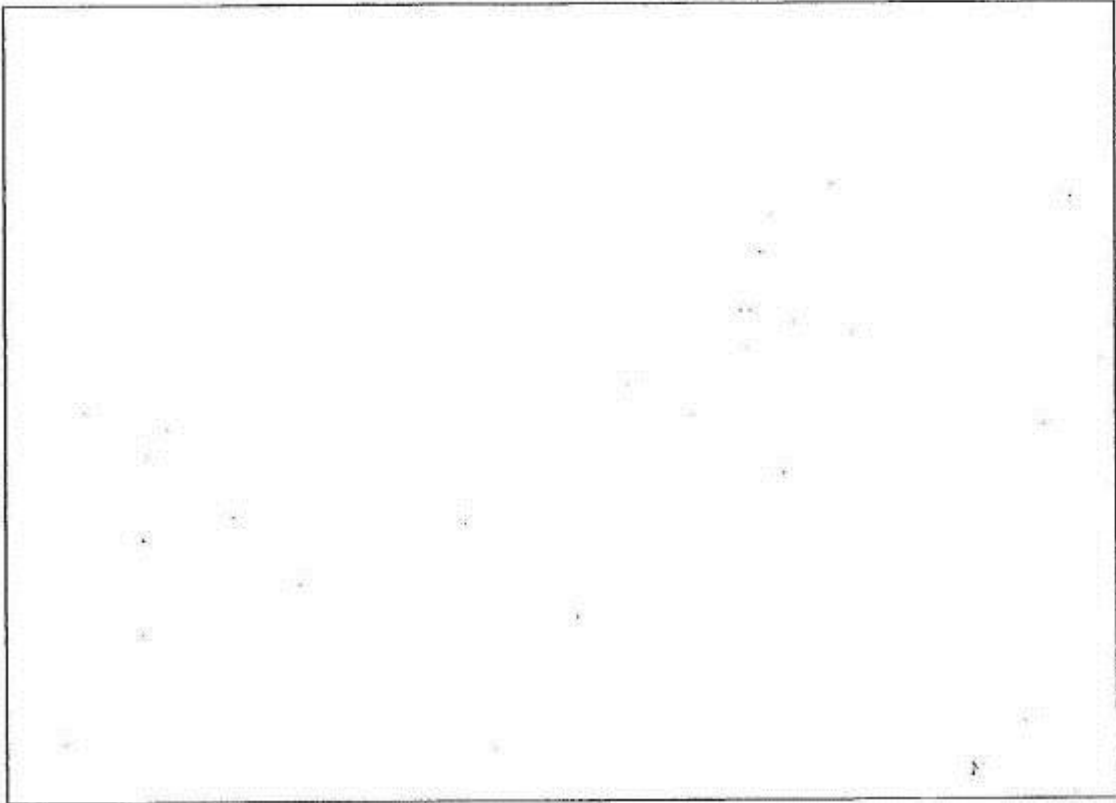
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It is not 'consistent with national policy'			<input checked="" type="checkbox"/>

(For explanation of terms refer to guidance notes below)

Comments:

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

There is an acute shortage of allotments in Swanage with a waiting list of about 80. With an increasing number of dwellings in apartment blocks it is important that this deficiency is remedied. The Core Strategy does not even mention the shortage which officers of Swanage town Council have brought to the attention of Purbeck District Council.



Proposed Changes:

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

The Core Strategy addresses the shortage of allotments 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"/>
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Please state the part of that document you are commenting on:

Policy :	Paragraph: EVIDENCE BASE VOL 6 - SETTLEMENT EXTENSION SITES	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

1. Legally compliant <i>i.e. comments on the process of preparing Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	No Comment <input checked="" type="checkbox"/>
2. (a) Sound <i>i.e. comments on the content of Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	No Comment <input type="checkbox"/>
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It is not 'consistent with national policy'			<input type="checkbox"/>

(For explanation of terms refer to guidance notes below)

Comments:

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

The consultation was based solely on sites put forward by landowners which resulted in a "two horse race". One of the sites recommended, Herston Fields, provoked public outcry because only two years before Purbeck District Council had written that there was no intention of building on the field there that was removed from the Herston Conservation Area. This has effectively left the other landowner in the position of being a monopoly provider of land. The Core Strategy failed to consider land already in public ownership which could have provided sites for social rented 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).

Purbeck District Council should work in partnership with other local authorities to liberate land for development to meet the genuine needs for affordable housing.

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

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

1. Legally compliant <i>a. 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"/>
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It is not 'consistent with national policy'			<input checked="" type="checkbox"/>

(For explanation of terms refer to guidance notes below)

Comments:

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

A significant omission from the policy IAT is the provision of high speed broadband connections which has the potential to promote home working employment in Swanage with minimum added congestion to the inadequate road system. Central government will stimulate connections to the centre of communities but it will be up to the locality to provide onward links to individual houses. The Core Strategy is completely silent on this important matter.

Proposed Changes:

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

Build the provision of high speed broadband connections into the policy and indicate ways in which the onward transmission to individual users can be stimulated. This is a key factor in promoting a community with younger residents who earn average, or above average, levels of remuneration

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

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

1. Legally compliant <i>i.e. comments on the process of preparing Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	No Comment <input checked="" type="checkbox"/>
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It is not 'consistent with national policy'	<input type="checkbox"/>

(For explanation of terms refer to guidance notes below)

Comments:

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

The area bounded by Station Road, Institute Road and Kings Road East in Swanage should be included as a priority area for "boutique" shopping. There is considerable scope to improve the area with enhancements to the street scene.

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).

Make the area a designated zone for small retail development.

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