

Planning Purbeck's Future

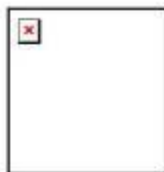


**Core Strategy Pre-Submission - 1 November - 20 December 2010
Consultation Responses
Part 8**

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Hall and Woodhouse



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		
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Job Title <i>(where relevant)</i>		Consultant
Organisation <i>(where relevant)</i>	Hall & Woodhouse Ltd	Southern Planning Practice
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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:

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

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

The representations submitted raise and complex policy issues which require oral examination in order that the Inspector can be properly informed in reaching a decision on the soundness of the Core Strategy.

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

Signature L J Evans
LYNNE EVANS

Date 17 12 2011

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

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

Policy : NE	Paragraph:	Map:
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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)

Please see attached sheet with detailed representations

Proposed Changes:

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

Please see attached sheet which sets out proposed changes

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

Guidance Note for Completing Representation Form

1. Introduction

- 1.1 The Core Strategy is published in order for representations to be made prior to submission to the Secretary of State for examination. The representations will be considered alongside the Core Strategy when submitted, which will be examined by a Planning Inspector in 2011. The Planning and Compulsory Purchase Act 2004¹ (the 2004 Act) states that the purpose of the examination is to consider whether the Core Strategy complies with the legal requirements and is 'sound'.
- If you are seeking to make representations on the **way** in which the Council has prepared the Pre-submission Core Strategy it is likely that your comments or objections will relate to a matter of **legal compliance**.
 - If it is the **actual content** on which you wish to comment or object it is likely it will relate to whether the Core Strategy is **justified, effective or consistent with national policy**.

2. Legal Compliance

- 2.1 The Inspector will first check that the Core Strategy meets the legal requirements under s20(5)(a) of the 2004 Act before moving on to test for soundness. You should consider the following before making a representation on legal compliance:
- The Core Strategy should be within the current Local Development Scheme² (LDS) and the key stages should have been followed. The LDS is effectively a programme of work prepared by the Council, setting out the plans it proposes to produce over a 3 year period. It will set out the key stages in the production of the Core Strategy which the Council proposes to bring forward for independent examination. If the Core Strategy is not in the current LDS it should not have been published for representations.
 - The process of community involvement for the DPD in question should be in general accordance with the Council's Statement of Community Involvement (SCI)³. The SCI is a document which sets out the Council's strategy for involving the community in the preparation and revision of its plans, including the Core Strategy.
 - The Core Strategy should comply with the Town and Country Planning (Local Development) (England Regulations) 2004 as amended⁴. At Pre-Submission the Council must publish the documents prescribed in the regulations, and make them available at their principal offices and their website. The Council must also place local advertisements and notify the statutory bodies (as set out in the regulations) and any persons who have requested to be notified.
 - The Council is required to publish a Sustainability Appraisal report at the Pre-Submission stage of the Core Strategy. This should identify the process by which the Sustainability Appraisal has been carried out, and the baseline information used to inform the process and the outcomes of that process. Sustainability Appraisal is a tool for appraising policies to ensure they reflect social, environmental, and economic factors.
 - The Core Strategy should have regard to national policy set out in Planning Policy Statements/Guidance and Circulars⁵.
 - The Core Strategy must have regard to any Sustainable Community Strategy (SCS) for its area (i.e. county and district). These are the Purbeck Community Plan 2009-2020⁶ and The Community Strategy for Dorset (2007-2016)⁷.

¹ http://www.opsi.gov.uk/ACTS/acts2004/ukpga_20040005_en_1

² <http://www.dorsetforyou.com/lids/purbeck> and can be viewed at District Council offices

³ <http://www.dorsetforyou.com/sci/purbeck> and can be viewed at District Council offices

⁴ <http://www.opsi.gov.uk/si/si2004/20042204.htm> (2004 regulations) and

http://www.opsi.gov.uk/si/si2008/pdf/uksi_20081371_en.pdf (2008 amending regulations)

⁵ <http://www.planningportal.gov.uk/england/professionals/policy/policydocuments/>

Purbeck Core Strategy Pre-Submission Nov-Dec 2010

3. Soundness

3.1 To be sound a Core Strategy should be:

- **Justified**

This means that the Core Strategy should be founded on a robust and credible evidence base involving:

- Evidence of participation of the local community and others having a stake in the area
- Research/fact finding: the choices made in the plan are backed up by facts

The Core Strategy should also provide the most appropriate strategy when considered against reasonable alternatives. These alternatives should be realistic and subject to sustainability appraisal. The Core Strategy should show how the policies and proposals help to ensure that the social, environmental, economic and resource use objectives of sustainability will be achieved.

- **Effective**

This means the Core Strategy should be deliverable, embracing:

- Sound infrastructure delivery planning
- Having no regulatory or national planning barriers to delivery
- Delivery partners who are signed up to it
- Coherence with the strategies of neighbouring authorities

The Core Strategy should also be flexible and able to be monitored by:

- Indicating who is to be responsible for making sure that the policies and proposals happen and when they will happen.
- Being flexible to deal with changing circumstances, which may involve minor changes to respond to the outcome of the monitoring process or more significant changes to respond to problems such as lack of funding for major infrastructure proposals. Although it is important that policies are flexible, the Core Strategy should make clear that major changes may require a formal review including public consultation.
- Ensuring that any measures which the Council has included to make sure that targets are met are clearly linked to an Annual Monitoring Report. This report must be produced each year by all local authorities and will show whether the Core Strategy needs amendment. The monitoring framework is in Appendix 3 of the Core Strategy.

- **Consistent with national policy**

The Core Strategy should be consistent with national policy. Where there is a departure, the Council must provide clear and convincing reasoning to justify their approach. Conversely, you may feel the Council should include a policy or policies which would depart from national policy to some degree in order to meet a clearly identified and fully justified local need, but they have not done so. In this instance it will be important for you to say in your representations what the local circumstances are that justify a different policy approach to that in national policy and support your assertion with evidence.

3.2 If you think the content of a Core Strategy is not sound because it does not include a policy where it should do, you should go through the following steps before making representations:

- Is the issue with which you are concerned already covered specifically by any national planning policy? If so it does not need to be included.
- Is what you are concerned with covered by any other policies in the Core Strategy on which you are seeking to make representations or in any other plan in the Purbeck

⁶ <http://www.dorsetforyou.com/media.jsp?mediaid=149032&filetype=pdf> and can be viewed at District Council offices

⁷ <http://www.dorsetforyou.com/dorsetcommunitystrategy> and can be viewed at District Council offices

Local Development Framework (LDF)⁸. There is no need for repetition between documents in the LDF.

- If the policy is not covered elsewhere, in what way is the Core Strategy unsound without the policy and what should the policy say?

4. General advice

- 4.1 If you wish to make a representation seeking a change to a Core Strategy or part of a Core Strategy you should make clear in what way the Core Strategy or part of the Core Strategy is not sound having regard to the legal compliance check and three tests set out above. You should try to support your representation by evidence showing why the Core Strategy should be changed. It will be helpful if you also say precisely how you think the Core Strategy should be changed. Representations should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further submissions based on the original representation made at Pre-Submission. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.
- 4.2 Where there are groups who share a common view on how they wish to see a Core Strategy changed, it would be very helpful for that group to send a single representation which represents the view, rather than for a large number of individuals to send in separate representations which repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.
- 4.3 Further detailed guidance on the preparation, Pre-Submission and examination of Core Strategies is provided in Planning Policy Statement 12: Local Spatial Planning⁹ and in The Plan Making Manual¹⁰.

⁸ <http://www.dorsetforyou.com/ldf/purbeck>

⁹ <http://www.communities.gov.uk/publications/planningandbuilding/pps12lsp>

¹⁰ <http://www.pas.gov.uk/pas/core/page.do?pageId=51391>



Purbeck Core Strategy: Pre-Submission Core Strategy

Representations by Hall & Woodhouse Ltd

Policy NE: North East Purbeck

The specific reference to the former Greenridge public house should be deleted. The site lies within the centre of Upton and is currently the subject of proposals for its redevelopment. The future of the site is being properly addressed through the development control process. However, until its closure, the site had never been regarded or awarded particular prominence in the settlement. Indeed in the current Local Plan and the settlement analysis of Upton there is no reference to this site. Whilst there is no doubt that the site will be redeveloped, there is no basis to elevate its status above any other potential redevelopment site in the centre of the settlement. There is a danger that this one site is seen as the opportunity to meet all the aspirations of the local community and to transform Upton from its current role and function to a place in 'its own right'. The redevelopment of one site cannot bring about such a transformation.

Planning guidance in PPS12: Local Spatial Planning makes it clear at paragraph 4.5 that Core Strategies should make clear spatial choices about where development should go in broad terms. Paragraph 4.6 indicates that Core Strategies may allocate sites for development but that these sites should be those that are considered central to the achievement of the strategy.

The reference to the former Greenridge public house does not comply with central government guidance and is therefore unsound.

It does not comply for the following reasons:

- The reference to a specific location does not accord with the guidance that Core Strategies should make spatial choices about where development should go in broad terms. The reference to the provision of additional retail within the town centre accords with the guidance but the reference to one specific site does not.
- The site is not actually allocated for a specific form of development. This is considered to be correct as it is not a strategic site which is central to the delivery of the Core Strategy. However, it therefore also follows that there is no sound basis for reference to this specific site to be included within the policy.
- The site is not referenced on Inset Map 2 relating to Upton. Again this is considered correct, as it is not strategic site which is central to the delivery of the Core Strategy. However, it therefore also follows that there is no sound basis for reference to this specific site to be included within the policy.
- As a result of the above, specific reference to the site within a policy and the Core Strategy is therefore superfluous as well as meaningless, and serves no useful purpose.

SOUTHERN PLANNING PRACTICE LTD

Registered Office: Youngs Yard, Churchfields, Twyford, Winchester SO21 1NN
Tel: 01962 715770 Fax: 01962 715880 E-mail: info@southernplanning.co.uk Website: www.southernplanning.co.uk
Registered in England and Wales No. 3862030



Change requested:

Please delete from Policy NE the following: *The re-development of the former Greenridge public house has been identified to be of key importance.*

LJE 17/12/10



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Policy CF: Community Facilities and Services

Safeguarding Existing Facilities and Services

Representations on behalf of Hall & Woodhouse Ltd.

The policy as proposed is not sound. The policy sets out four criteria relating to the reasons when the loss of an existing facility or service might be acceptable. However the way that the policy is worded requires all four of the criteria to be satisfied.

The requirement to meet all four criteria is overly restrictive and onerous and it would often be virtually impossible to satisfy all four criteria in every case. The result of this would be that premises would be left vacant or derelict as a new viable use could not be secured. It is suggested that this is not the intention of the policy. The policy as worded is not therefore effective and is therefore unsound.

Furthermore, the policy does not make sense; for example, if it were demonstrated that the premises or location are unsuitable (criterion 1) then it would be most unlikely that a change of use to another facility or service for which there is a proven local need (criterion 4) would be viable.

The fourth criterion should be deleted. The fact that a Town or Parish Plan includes reference to the desirability of the future provision of a particular service or facility does not demonstrate a proven local need. It is the case that many Parish and Town Plans include objectives for the provision of a range of new facilities and services. No criticism is intended of the inclusion of such objectives but it needs to be made clear that such references are completely different to demonstrating a proven local need.

The retention of the fourth criterion would effectively mean that no change of use or redevelopment of any existing facility or service would be permitted.

Satisfying any one of the four criteria should be sufficient to justify the loss of the facility or service; for example demonstrating that there are alternative facilities available locally (for example other facilities or services available within the same settlement) or that a marketing campaign has demonstrated that there is no current or future need.

Change Requested:

- a) delete criterion 4
- b) amend the wording of criteria 1 – 3 to delete the word 'and' at the end of each clause and substitute with 'or'.

LJE 17 12 10

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Local Development Framework (LDF)
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Core Strategy Pre-Submission Document
Representation Form (Nov/Dec 2010)

	Your Details	Agents Details (where relevant)
Title	Mr & Mrs	Mr
Name	J Hampshire	Malcolm Brown
Job Title (where relevant)		Planning Director
Organisation (where relevant)		Sibbett Gregory
Address	Magpies, Huntick Road, Lytchett Matravers, Poole	3 Winchester Place, North Street, Poole
Postcode	BH16 6BB	BH15 1NX
E-mail		malcolm@sibbettgregory.com
Tel. Number		01202 661177

Responses should be sent to:

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

(For explanation of terms refer to guidance notes below)

Comments:

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

1. Affordable Housing

The amendment to the Policy published on 8 November 2010, increasing the provision of affordable housing from 40% to 50% is considered flawed. The change in policy is based on a Purbeck District Council Viability Report dated October 2010 which is considered to be unrealistic in a number of respects including the following:-

- i. The Report takes a simplistic approach to assessing sales values and does not take into account the likely form of development and local circumstances.
- ii. The Report relies heavily on 'extensive experience' and makes reference to the Bournemouth Affordable Housing Development Plan Document. The latter document is already coming under scrutiny and is being criticised for holding back new housing development due to lack of viability.
- iii. Paragraph 4.36 of the Report assumes agricultural land values of £18,000 per hectare which is

considered to be an underestimate of the existing use value of the land. The land in question can be more accurately described as accommodation land and would be suitable, for example, for grazing of horses. The existing use value would be considered to be considerably in excess of £18,000 per hectare.

- iv. Paragraph 4.35 of the Report assumes a profit margin of 15% of GDV, which is considered to be inadequate. Indeed, our experience is that developers are currently more likely to be seeking a development profit of 25%.
- v. The Report takes no account of the specific site conditions and actual development costs which are likely to be incurred in undertaking the proposed development.
- vi. The policy must be sufficiently viable to encourage the implementation of the development in order to provide the affordable housing which is needed. Background Paper Vol 5 draws attention to the Housing Needs Survey of 2006 which records the District's 'chronic need for affordable housing of 409 affordable homes per annum' and the fact that over the past 5 years, the average annual provision has been about 50 dwellings per annum. This shortfall highlights the need to ensure that planning policies do not unduly restrict the viability of development leading to a shortfall of the provision of affordable housing. The Government's housing policy, as set out in PPG3, warns planning authorities of setting targets which make development unviable.
- vii. The overall viability of the development will also need to take into account other Section 106 agreement contributions which may be required for highways, heathland mitigation and open space.

2. High Street Enhancement Works

The Respondents believe that there is little general support for these enhancements to the High Street which would also detract from the viability of the principal requirement to provide housing, including affordable housing.

3. Health Centre

The Policy makes reference to a possible relocation of the Health Centre. The Stakeholders have no objection to the inclusion of a Health Centre but would expect commercial terms.

4. Haulage Yard

During the consultation process and previously, attention has been drawn to the existing use of Selby's Yard for haulage, industry and storage. The use is long established and following the success of the Freeland Business Park development at Wareham Road, Lytchett Matravers, Selby's Yard is proposed for allocation to provide additional high quality employment space. This proposal has previously been discussed with Richard Wilson, Economic & Community Development Manager. Selby's Yard is located immediately adjoining the proposed housing allocation and would, effectively, form part of a comprehensive development scheme making provision for both housing and employment needs within the Village. It is proposed that the boundary of Selby's Yard is marginally adjusted in order to enable a more efficient layout and maximise the employment opportunity in this location.

The policy currently suggests that there may be a further development within the existing employment site of 0.6 hectares. This reference is now out of date as Freeland Park, which occupies a site of 0.7 hectares, is now fully developed and agreement reached for selling or letting 50% of the units.

5. Green Belt

The existing proposed Green Belt boundary includes Selby's Yard which is an existing brown field site. It is proposed that the Green Belt boundary is realigned to exclude Selby's Yard from the Green Belt area in order to accommodate the existing use and proposed allocation for quality employment development. The

Respondents have urged the Local Planning Authority not to adopt a Green Belt boundary which is so tightly drawn to the proposed urban extension that there is no scope for further development within the plan period should that prove necessary. PPG2 advises that Green Belt boundaries should be related to a timescale which is no longer than that normally adopted for other aspects of the plan. See paragraphs 2.9 and 2.12. In any event, Selby's Yard (the employment site) should be excluded from the Green Belt.

6. Footpath/Right of Way

The policy includes provision for a new footpath/right of way along the eastern boundary of the site. Any footpath should be located outside of the site. There is no objection to a footpath in the Green Belt. Indeed, in accordance with PPG2, a footpath in the Green Belt would facilitate recreational use of the Green Belt.

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).

Amend Inset Map 1 and Map 12 to identify Selbys Yard as an employment site and to exclude this from the Green Belt. Revert to the requirement in the Pre-Submission Consultation of 40% affordable housing, not 50%.

Remove requirement for contribution for recreational open space in the light of the requirement for mitigation of potential impact upon nearby heathland.

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

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

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

(For explanation of terms refer to guidance notes below)

Comments:

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

The objection is to the proposed amendment to Policy AH which seeks to increase the level of affordable housing provision from 40% to 50%. Contrary to the assertions of the Local Authority's Consultants, such an increase would make the development of the site unattractive and therefore, unviable. As the policy was drafted, the 30 units of market housing subsidise the 20 units of affordable housing. The proposal suggests 25 units of affordable housing being subsidised by just 25 units of market housing. History has proved that in every case where the Government has sought to tax development value, land has been withheld from the market and thus affecting the delivery of housing.

It is not good enough for the policy to say that economic viability of provision will be taken into account. A developer is not going to bid for a development site unless he knows for certain what his costs and other commitments are likely to be. It would be too easy for the Local Planning Authority to turn round and suggest that a developer has paid too much for a site, thus causing the development to be unviable. It appears from the evidence base that the current need for affordable housing is such that the policy should encourage rather than discourage the provision of affordable housing. Levels of provision which are too high will discourage provision of both market and affordable housing.

The amendment to the Policy published on 8 November 2010, increasing the provision of affordable housing from 40% to 50% is considered flawed. The change in policy is based on a Purbeck District Council Viability Report dated October 2010 which is considered to be unrealistic in a number of respects including the following:-

- i. The Report takes a simplistic approach to assessing sales values and does not take into account the likely form of development and local circumstances.
- ii. The Report relies heavily on 'extensive experience' and makes reference to the Bournemouth Affordable Housing Development Plan Document. The latter document is already coming under scrutiny and is being criticised for holding back new housing development due to lack of viability.
- iii. Paragraph 4.36 of the Report assumes agricultural land values of £18,000 per hectare which is considered to be an underestimate of the existing use value of the land. The land in question can be more accurately described as accommodation land and would be suitable, for example, for grazing of horses. The existing use value would be considered to be considerably in excess of £18,000 per hectare.
- iv. Paragraph 4.35 of the Report assumes a profit margin of 15% of GDV, which is considered to be inadequate. Indeed, our experience is that developers are currently more likely to be seeking a development profit of 25%.
- v. The Report takes no account of the specific site conditions and actual development costs which are likely to be incurred in undertaking the proposed development.
- vi. The policy must be sufficiently viable to encourage the implementation of the development in order to provide the affordable housing which is needed. Background Paper Vol 5 draws attention to the Housing Needs Survey of 2006 which records the District's 'chronic need for affordable housing of 409 affordable homes per annum' and the fact that over the past 5 years, the average annual provision has been about 50 dwellings per annum. This shortfall highlights the need to ensure that planning policies do not unduly restrict the viability of development leading to a shortfall of the provision of affordable housing. The Government's housing policy, as set out in PPG3, warns planning authorities of setting targets which make development unviable.
- vii. The overall viability of the development will also need to take into account other Section 106 agreement contributions which may be required for highways, heathland mitigation and open space.

If a developer is required to provide (and pay for) an independent Financial Appraisal or Viability Assessment, then either the Local Planning Authority accept that independent Appraisal or they pay their own costs in carrying out a further check.

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).

Revert to the published Affordable Housing Policy AH requiring 40% provision other than in Swanage and Coast Sub-Market Areas. Delete the reference to part units being met through a commuted sum and delete the reference to the developer funding verification of any independent Viability Appraisal which he submits.

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

Policy : ELS: Employment Land Supply	Paragraph: 6.5.2.1	Map: 5
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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 type="checkbox"/>		
• It is not 'effective' <i>(i.e. the Core Strategy is not <u>deliverable</u>, not <u>flexible</u> and not able to be <u>monitored</u>)</i>	<input type="checkbox"/>		
• It is not 'consistent with national policy'	<input type="checkbox"/>		

(For explanation of terms refer to guidance notes below)

Comments:

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

Table 3 is inaccurate and confusing because there is no land available at Wareham Road, Lytchett Matravers. The development is totally complete. There is however, an established employment site in Huntick Road which could be rationalised to provide additional employment.

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).

Table 3 - delete reference to Wareham Road, Lytchett Matravers. Insert reference to Huntick Road, Lytchett Matravers and amend Map 5 to show Huntick Road, Lytchett Matravers, not Wareham Road.

6366
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		
Name	MRS JOAN	HARRIS
Job Title (where relevant)		
Organisation (where relevant)		
Address	69 PRIESTS RD	
Postcode	BH19 2RJ	
E-mail		
Tel. Number	01929 426488	

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.

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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.

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

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

Swanage can't support 200 extra houses. It would lead to congestion, and much more traffic on the roads. Also there isn't any employment in Swanage. We were never asked whether we wanted any new houses.

6369
50/12/10



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 <i>(where relevant)</i>
Title	Mrs	
Name	KATRINA HIGHAM	
Job Title <i>(where relevant)</i>	-	
Organisation <i>(where relevant)</i>	-	
Address	20 BAN ACCORD RD	
Postcode	BH19 2DT	
E-mail	kjh@higham-trenty.com	
Tel. Number	427038	

Responses should be sent to:

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

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

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

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

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

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Signature	Signature has been blanked out	Date 11/12/10
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'Planning Purbeck's Future' (Core Strategy) <input checked="" type="checkbox"/>	Sustainability Appraisal <input type="checkbox"/>	Habitats Regulations Assessment <input type="checkbox"/>
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Please state the part of that document you are commenting on:

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

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

(For explanation of terms refer to guidance notes below)

Comments:

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

The Habitat Regulations Assessment 5.52 states that there is a likelihood that development in Swanage will have an adverse effect on protected habitats. The mitigation proposal for SANGS is not deliverable in Swanage which is situated within an AONB which should be protected at all costs.

Proposed Changes:

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

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



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	KATRINA HIGHAM	
Job Title (where relevant)	-	
Organisation (where relevant)	-	
Address	20 BAN ARCOED RD	
Postcode	BH19 2DT	
E-mail	kjhahighamtwenty.com	
Tel. Number	427038	

Responses should be sent to:

Email: ldf@purbeck-dc.gov.uk

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

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

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

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Comments:

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This policy is unsound because it is unjustified. The allocation of 900 units (ie 37.5% of 2400) is not deliverable. The vast majority (over 90%) would be in Swanage ~~but~~ where there are no jobs therefore creating traffic congestion commencing to work. A Planning Inspectorate Report in 2002 stated that no further building should happen in Purbeck until traffic congestion on the A351 has been resolved.

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).

New housing should be closer to economic growth areas which have been identified as Holtan Heath and Winfrith in the Core Strategy.



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	KATRINA HIGHAM	
Job Title (where relevant)	-	
Organisation (where relevant)	-	
Address	20 BAN ARCOLES RD	
Postcode	BH29 2DT	
E-mail	kjh@highamtwenty.com	
Tel. Number	427038	

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Email: ldf@purbeck-dc.gov.uk

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Signature	Signature has been blanked out	Date 11/12/10
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YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

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

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

It is proposed to allocate 37.5% of the housing provision in SE Purbeck and yet the employment land is less than 3%. The high number of new houses combined with a lack of employment opportunities is not sustainable, and clearly contradicts the stated aim of reducing car usage (paras 4.1.2, 4.1.4 and 4.3.1 of the Core Strategy).

[Empty box for providing details of proposed changes]

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 bulk of new housing should be in the areas identified in the Core Strategy as economic growth areas ie Hottan Heath and Winfrith Newburgh.



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	KATRINA HIGHAM	
Job Title (where relevant)	-	
Organisation (where relevant)	-	
Address	20 BON ACCORD RD	
Postcode	BH19 2DT	
E-mail	Kjh@highamtwenty.com	
Tel. Number	427038	

Responses should be sent to:

Email: ldf@purbeck-dc.gov.uk

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

Fax: 01929 557348

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

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

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

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

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

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

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

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

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

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

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

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

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

Signature	Signature has been blanked out	Date 11/12/10
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YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

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

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

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

(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 people of Swanage were not consulted about whether they wanted 200 new houses. There was no option of fewer houses just where they would 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).

Remove the plan to build 200 houses on settlement extensions in Swanage.



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

Your Details		Agents Details (where relevant)
Title	MRS	
Name	KATRINA HIGHAM	
Job Title (where relevant)	-	
Organisation (where relevant)	-	
Address	20 SON ACCORD RD	
Postcode	BH19 2DT	
E-mail	kjh@highamtweaty.com	
Tel. Number	01929 427038	

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

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YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

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

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

There is a very high level of 2nd home ownership in Swanage which does not seem to have been taken into account. It is a desirable place to live and property prices are very high relative to local incomes and currently unaffordable for many local people.

Proposed Changes:

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

Second home ownership in the Swanage
needs to be limited.

Our ref:
Your ref:

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

Steve Hellier
Network Planning Manager
Highways Agency
Ash House
Falcon Road
Sowton Ind. Estate
Exeter
EX2 7LB

Tel: 01392 312502

14 December 2010

Dear Sirs

PURBECK CORE STRATEGY PRE-SUBMISSION CONSULTATION: NOVEMBER 2010

Thank you for consulting the Highways Agency on the above policy document. We have provided formal representations to previous consultations including the Purbeck Core Strategy in November 2006, October 2007, October 2009 and Settlement Extension sites in July 2010. Comments made within this letter should be read in conjunction with these.

Context

The Agency needs to be satisfied that any proposed development in the Purbeck District takes account of the potential impacts on the Strategic Road Network (SRN). In the Purbeck area the Agency's specific interest relates to the A31/A35 corridor which passes through the north of the district, connecting Weymouth/Dorchester to the west with the Bournemouth/Poole conurbation to the east.

Strategic level modelling of the SRN's performance to 2026 has been undertaken which has shown that the single carriageway section of the A31 east of Bere Regis on the approaches to Bournemouth/Poole operates close to capacity under existing conditions, and demand is forecast to exceed capacity by 2026. The section immediately east of Bere Regis also has a relatively poor accident record.

The Agency's concern also relates to journey time reliability; the effects of accidents and seasonal peaks in demand, which generate significant problems. Notably this affects the single carriageway A31 north of Purbeck. Furthermore, the Inspector's report following the examination in public into the Poole Core Strategy highlighted that the A31 is at capacity and will be unable to accommodate additional traffic without improvements being made.

The Agency would expect to be consulted on future applications as and when they are submitted and such applications should comply with DfT 'Guidance on Transport Assessment' (2007), and DfT Circular 02/2007 'Planning and the Strategic Road Network'. Any developments which come forward that are likely to impact on the SRN should be supported by relevant assessment work to ascertain the scale of the impact on the SRN.

If the SRN currently suffers from capacity constraints, any additional traffic impacting the network can be considered to be material, and require mitigation measures. The Agency would expect that the cumulative impact of all sites on the SRN is taken into consideration in any

future assessment work, and we would advise against a piecemeal approach to assessing development sites.

The Agency's previous responses have highlighted the need for Purbeck District Council to use the emerging transport evidence base (the South East Dorset Multi Modal Transport Study (SEDMMTS) and the Purbeck Transport Strategy (PTS)), in order to satisfy the test of soundness for Core Strategies in PPS12. We are pleased to see that reference is made to the updated Purbeck Transport Strategy (2010) within the Evidence Base for the Core Strategy document. The Agency is aware that the growth assumptions had previously been based on the now abolished Regional Spatial Strategy (RSS) for the south west. Therefore, any revisions to the transport evidence base should arise from a sound foundation.

Vision and Spatial Objective

Within the Vision for Purbeck, we welcome the acknowledgement that there needs to be a reduction in the need to travel between Purbeck and the Poole/Bournemouth conurbation. This will be facilitated through an increase in self-containment and the concentration of employment, shops, services and community facilities.

Furthermore, we support the shift in travel choices and patterns, and we are pleased to see the inclusion of the reconnection of the Wareham to Swanage branch line to the national rail network. Any improvements to public transport are likely to reduce the reliance on private vehicles, and potentially reduce the impact on the SRN in this location, especially with out-commuting from Purbeck to Poole/Bournemouth.

The Agency welcomes the inclusion of a transport related spatial objective. However we request that this objective refers to encouraging sustainable transport modes, with an emphasis on reducing the need to use the private car.

General Location of Development: Policy LD

We are encouraged by the Council's ethos to direct development to the most sustainable locations. However, the Agency remains concerned at the inclusion of Bere Regis and Lytchett Matravers as sites for limited development, due to their function as dormitory settlements for Dorchester / Poole / Bournemouth. Increased housing is likely to result in further commuting via the A31/A35. The Agency would not support anything other than a very limited increase in local service provision. Given the constrained nature of the trunk road in close proximity to Bere Regis, any developments adding additional trips on the SRN will need to fully mitigate their impact.

Spatial Distribution of Development

Policy NW: North West Purbeck

We would point out that Map 6 on page 26 labels the strategic route to the west of Bere Regis towards Dorchester as the A31. This is incorrect and should be amended to read A35.

The Agency would have concerns about the provision of further housing without employment development within Bere Regis, as it is located within close proximity to the SRN and it is not easily accessible by sustainable travel modes. The village has a poor level of public transport services, and suffers from considerable out commuting to Dorchester and Poole. It is therefore

likely that any additional growth could further encourage people to travel by private car impacting the SRN.

We are likely to support the provision of local employment opportunities which would supplement housing growth, as this has the potential to reduce out commuting.

The Agency notes from Section 7.1.8 that transport improvements will be provided through development contributions. We note that several schemes are put forward, including improved signage to remove traffic from the A351, and traffic management/safety improvements along the A35 and C6, as well as improvements in Bere Regis.

It is not clear however whether the A35 refers to the trunked section of the A35 to the west of Bere Regis. Should any improvements be planned for this section of the SRN, the Agency will need to be fully consulted from an early stage.

Any improvements to the A35 would need to be funded by the developer and/or other non Agency sources. We support the proposal that contributions to transport improvements are collected through the S106 process and passed to Dorset Council for implementation of the PTS. These comments also apply to the remaining areas of Purbeck, where a similar approach to the collection of transport contributions is proposed.

Policy SW: South West Purbeck

The Agency would support growth within the boundaries of Wool, given its rail connections to Poole and Dorchester. With regard to Dorset Green Technology Park, it is unclear if this 20 ha refers to the recently granted planning permission, or is additional employment land over and above this. The Agency would expect to be consulted from an early stage, given the potential for additional trips on the SRN.

The Agency's position regarding development at Bovington remains unchanged as of our letter dated July 2010, as we do not expect there to be a significant impacts on the SRN.

We are concerned regarding the delivery of affordable housing at other settlements without a settlement boundary (Coombes Keynes, East Knighton and Moreton). These locations are likely to have limited services, which could lead to out commuting.

The Agency is supportive of the transportation improvements listed in section 7.2.8, especially those relating to improvements at Wool station and the new cycleway from Wool to Dorset Green Technology Park. We recommend the reference to the Workplace Travel Plan for major employers at section 7.3.8, is repeated here.

Policy CEN: Central Purbeck

The Agency continues to support the growth agenda for Wareham, provided that when major proposals come forward, they are able to demonstrate that they do not have a major impact on the A35/A31 corridor.

We are concerned regarding the delivery of affordable housing at other settlements without a settlement boundary (East Stoke, Holton Heath, Organford and Worgret) as these locations are likely to have limited services, which could lead to out commuting.

The Agency is supportive of the transportation improvements listed in Section 7.3.8.



Policy NE: North East Purbeck

The Agency is concerned with the level of proposed dwellings within this area of Purbeck, given its relatively close proximity to the SRN.

The current proposal lacks any new employment provision, therefore does not contribute to a balanced community. The Agency would expect any future development to be well integrated with the existing settlement and provide a mix of uses in order to reduce the potential for in and out commuting.

The Agency is supportive of the transportation improvements listed in section 7.4.8. However, it is unclear whether the improvements to the A35 refer to the Agency's network, or the part which is de-trunked.

The CS also highlights that further strategic transport schemes and their funding may be proposed through SEDMMTS. The Agency endorses this approach, which emphasises the need to use the emerging transport evidence base for the Bournemouth/Poole conurbation to assist in planning for growth in affected areas of the Purbeck district.

Policy SE: South East Purbeck

We continue to encourage new residential development in Swanage and welcome more provision of employment uses to promote self containment.

The Agency's position remains unchanged regarding future growth at Corfe Castle, as this is an unsustainable location for significant development.

The Agency is supportive of the transportation improvements listed in section 7.5.10, particularly the proposed improvements to long distance bus services including service 50 (Swanage – Bournemouth via the chain ferry), as these have the potential to remove from the SRN. We would also the railway reconnection to Swanage, as this could reduce reliance on private vehicles for longer distance journeys.

Development Policies

Policy RES: Rural Exception Sites

The Agency welcomes reference to the provision of sustainable transport for rural sites. The Agency would be concerned with large amounts of development in isolated areas in open countryside, as this would limit the sustainable travel opportunities, which could lead to a rise in the over-reliance in private vehicles, and potential impact on the SRN.

Policy GT: Gypsies, Travellers and Travelling Show People

We have previously sought to ensure that adequate sustainable transport infrastructure is in place prior to the occupation of such sites. We would urge the Council to extend the wording of Policy GT to include reference to this.

Policy E: Employment

New employment uses need to be accessible by sustainable transport modes, we recommend this is included in the policy wording. Furthermore, employment uses should encourage employees to use sustainable transport through the implementation of travel plans.

Policy IAT: Improving Accessibility & Transport

The Core Strategy explains that the Purbeck Transportation Strategy was updated in 2010 to reflect changes to funding priorities, with major road proposals replaced by more sustainable

transport improvements. The Agency supports this approach, which is evident in the area based policies and proposals.

We also welcome the reference to SEDMMTS in this section, however it should be amplified to clarify the role of SEDDMTS in relation to Purbeck specifically. The Agency recommends that the model is utilised at the earliest opportunity, to influence the planning and transport strategy under development in the Purbeck district.

The Agency welcomes the transport related criteria set out in the document which will be used to assess new development proposals. Furthermore, the Agency is pleased to see the targets set in respect of Spatial Objective 9, which are given within Appendix 3. Whilst challenging, we are encouraged at the commitment to both encouraging sustainably located development and a reduction in the need to travel.

Policy ATS: Implementing an Appropriate Transport Strategy for Purbeck

The Agency welcomes reference to the mitigation of the road traffic impacts of development, to be delivered through developer financial contributions towards the implementation of the PTS. It is understood that the document '*Development Contributions towards Transport Infrastructure in Purbeck*' will be formalised as a Supplementary Planning Document (SPD). We would welcome sight of the SPD as and when it becomes available.

Summary and Conclusions

We are pleased to see that the Core Strategy takes into consideration the need for developments to be located in sustainable locations, with adequate links to both public transport and local facilities. The Agency is encouraged with the development policies, particularly IAT and ATS, which clearly identify the importance of determining the impact of development on transportation networks. The focus on sustainable transport improvements is evident throughout the document, and is supported by the Agency.

We trust that the above comments are helpful, and we look forward to further involvement in the delivery of the Purbeck LDF. However, if you wish to discuss the above, please do not hesitate to contact me on 01392 312502.

Yours faithfully

Signature has been blanked out

Steve Hellier
Network Delivery & Development South West - Planning
Email: steve.hellier@highways.gsi.gov.uk

cc Rebecca Collins, GVA Grimley
Jon Lovatt, AECOM
Neil Andrew, Highways Agency Area 3
Paul Willis, Dorset County Council



Department for
Transport

Hobbs C and M



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 & Mrs	
Name	Charles & Michelle Hobbs	
Job Title <i>(where relevant)</i>		
Organisation <i>(where relevant)</i>		
Address	385 High Street, Swanage, Dorset	
Postcode	BH19 2NP	
E-mail	leapofmagic@yahoo.co.uk	
Tel. Number	01929 421775	

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

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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:

If required we are happy to outline our views and opinions should the Inspector deem them useful to this process.

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 Michelle & Charles Hobbs

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

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

Policy : Housing supply	Paragraph: 6.3.4 & HRA 5.52	Map:
----------------------------	--------------------------------	------

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

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

(For explanation of terms refer to guidance notes below)

Comments:

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

It states clearly in the Habitat Regulations Assessment (5.52) in respect of development in Swanage that there is a likelihood that development will have an adverse effect on protected habitats. In order to mitigate such adverse effects there is a proposal for 'Sites of Alternative Natural Green Space'. However this is more than obviously NOT deliverable in Swanage which is situated within an area of outstanding natural beauty. It is imperative to preserve and protect this land at all costs. Once built on we cannot ever reclaim such ecologically rich and beautiful habitats.

Proposed Changes:

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

It should be a requirement that no more building on green field/AONB sites should be permitted. Thus limiting development to infill only with the onus on providing affordable housing for local people.

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

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

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

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

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

(tick all that apply)

- It is not 'justified'
(i.e. the Core Strategy is not founded on a robust and credible evidence base and/or doesn't provide the most appropriate strategy)
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(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 process was flawed due to there being no choice in whether development should go ahead or not in in Swanage, in other words there was no '0' option . It was a prescriptive consultation whereby we were told development was required and where did we want it site A,B,C or D!

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).

Very simply, Swanage residents deserve a new consultation whereby the premise is to consult them with alternative options as to the merits of whether we build '0' housing, limited housing, affordable homes only or the amount projected and thought necessary by PDC. To seek a renewed and revised consultation would surely be of legal and democratic advantage to all concerned, be it local government and residents of Swanage alike.

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

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

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

(For explanation of terms refer to guidance notes below)

Comments:

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

It became apparent that PDC had failed to ensure that consultation leaflets on Autumn 2009 & indeed June 2010 'Have your say' response forms had not been delivered to every household in Swanage. Complete roads ie: Steer Road had not received the response forms and many of the townsfolk remain blissfully unaware to this day of this whole consultation process and indeed the proposed development for Swanage. This surely makes this consultation null and void as PDC have a legal obligation to at least distribute every leaflet printed to every household. The response of those who chased up leaflets was at best 'Oh you haven't received one, have a look on-line or at the local library' this is tantamount to extreme carelessness and disregard for the whole process beginning to end.

Proposed Changes:

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

As the consultation was so flawed and many people in Swanage were unable to voice there opinions and

views on the Core Strategy we MUST start the process again to give everyone the chance to have there views taken into consideration before any final plan is drawn up.

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

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

Policy :	Paragraph:	Map: 13
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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)

This demonstrates that there has been absolutely NO consideration given to the very high levels of second homes. The desirability of the area pushes up house prices. The knock on effect of which is that property for local people is unaffordable.

Proposed Changes:

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

Limit second home ownership.

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:

(tick all that apply)

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

(For explanation of terms refer to guidance notes below)

Comments:

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

Only 2.5% of employment land is in Swanage and 0.28% in Corfe Castle. That is less than 3% in SE Purbeck where it is proposed to allocate 37.5 of the housing provision. This clearly contradicts the stated aim of reducing car usage identified as a priority in the Purbeck Community Plan and a stated aim of the Core Strategy, ref paras 4.1.2 4.1.4 and 4.3.1. The high number of house and the serious lack of employment opportunities points to it being wholly unsustainable

Proposed Changes:

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

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

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

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

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

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

This is not justified as is unsound. Allocation of 900 units (37.5% of 2400) is NOT deliverable. The vast majority (over 90%) would be in Swanage. In 2002 a Planning Inspectorate Report stated that no further building should happen in Purbeck until traffic congestion on the A351 has been resolved. This is to this day still wholly unresolved.

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 my solution would be to build housing closer to the economic growth areas of Holton Heath & Winfrith.

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

Guidance Note for Completing Representation Form

1. Introduction

- 1.1 The Core Strategy is published in order for representations to be made prior to submission to the Secretary of State for examination. The representations will be considered alongside the Core Strategy when submitted, which will be examined by a Planning Inspector in 2011. The Planning and Compulsory Purchase Act 2004¹ (the 2004 Act) states that the purpose of the examination is to consider whether the Core Strategy complies with the legal requirements and is 'sound'.
- If you are seeking to make representations on the **way** in which the Council has prepared the Pre-submission Core Strategy it is likely that your comments or objections will relate to a matter of **legal compliance**.
 - If it is the **actual content** on which you wish to comment or object it is likely it will relate to whether the Core Strategy is **justified, effective or consistent with national policy**.

2. Legal Compliance

- 2.1 The Inspector will first check that the Core Strategy meets the legal requirements under s20(5)(a) of the 2004 Act before moving on to test for soundness. You should consider the following before making a representation on legal compliance:
- The Core Strategy should be within the current Local Development Scheme² (LDS) and the key stages should have been followed. The LDS is effectively a programme of work prepared by the Council, setting out the plans it proposes to produce over a 3 year period. It will set out the key stages in the production of the Core Strategy which the Council proposes to bring forward for independent examination. If the Core Strategy is not in the current LDS it should not have been published for representations.
 - The process of community involvement for the DPD in question should be in general accordance with the Council's Statement of Community Involvement (SCI)³. The SCI is a document which sets out the Council's strategy for involving the community in the preparation and revision of its plans, including the Core Strategy.
 - The Core Strategy should comply with the Town and Country Planning (Local Development) (England Regulations) 2004 as amended⁴. At Pre-Submission the Council must publish the documents prescribed in the regulations, and make them available at their principal offices and their website. The Council must also place local advertisements and notify the statutory bodies (as set out in the regulations) and any persons who have requested to be notified.
 - The Council is required to publish a Sustainability Appraisal report at the Pre-Submission stage of the Core Strategy. This should identify the process by which the Sustainability Appraisal has been carried out, and the baseline information used to inform the process and the outcomes of that process. Sustainability Appraisal is a tool for appraising policies to ensure they reflect social, environmental, and economic factors.
 - The Core Strategy should have regard to national policy set out in Planning Policy Statements/Guidance and Circulars⁵.
 - The Core Strategy must have regard to any Sustainable Community Strategy (SCS) for its area (i.e. county and district). These are the Purbeck Community Plan 2009-2020⁶ and The Community Strategy for Dorset (2007-2016)⁷.

¹ http://www.opsi.gov.uk/ACTS/acts2004/ukpga_20040005_en_1

² <http://www.dorsetforyou.com/lids/purbeck> and can be viewed at District Council offices

³ <http://www.dorsetforyou.com/sci/purbeck> and can be viewed at District Council offices

⁴ <http://www.opsi.gov.uk/si/si2004/20042204.htm> (2004 regulations) and

http://www.opsi.gov.uk/si/si2008/pdf/uksi_20081371_en.pdf (2008 amending regulations)

⁵ <http://www.planningportal.gov.uk/england/professionals/policy/policydocuments/>

Purbeck Core Strategy Pre-Submission Nov-Dec 2010

3. Soundness

3.1 To be sound a Core Strategy should be:

- **Justified**

This means that the Core Strategy should be founded on a robust and credible evidence base involving:

- Evidence of participation of the local community and others having a stake in the area
- Research/fact finding: the choices made in the plan are backed up by facts

The Core Strategy should also provide the most appropriate strategy when considered against reasonable alternatives. These alternatives should be realistic and subject to sustainability appraisal. The Core Strategy should show how the policies and proposals help to ensure that the social, environmental, economic and resource use objectives of sustainability will be achieved.

- **Effective**

This means the Core Strategy should be deliverable, embracing:

- Sound infrastructure delivery planning
- Having no regulatory or national planning barriers to delivery
- Delivery partners who are signed up to it
- Coherence with the strategies of neighbouring authorities

The Core Strategy should also be flexible and able to be monitored by:

- Indicating who is to be responsible for making sure that the policies and proposals happen and when they will happen.
- Being flexible to deal with changing circumstances, which may involve minor changes to respond to the outcome of the monitoring process or more significant changes to respond to problems such as lack of funding for major infrastructure proposals. Although it is important that policies are flexible, the Core Strategy should make clear that major changes may require a formal review including public consultation.
- Ensuring that any measures which the Council has included to make sure that targets are met are clearly linked to an Annual Monitoring Report. This report must be produced each year by all local authorities and will show whether the Core Strategy needs amendment. The monitoring framework is in Appendix 3 of the Core Strategy.

- **Consistent with national policy**

The Core Strategy should be consistent with national policy. Where there is a departure, the Council must provide clear and convincing reasoning to justify their approach. Conversely, you may feel the Council should include a policy or policies which would depart from national policy to some degree in order to meet a clearly identified and fully justified local need, but they have not done so. In this instance it will be important for you to say in your representations what the local circumstances are that justify a different policy approach to that in national policy and support your assertion with evidence.

3.2 If you think the content of a Core Strategy is not sound because it does not include a policy where it should do, you should go through the following steps before making representations:

- Is the issue with which you are concerned already covered specifically by any national planning policy? If so it does not need to be included.
- Is what you are concerned with covered by any other policies in the Core Strategy on which you are seeking to make representations or in any other plan in the Purbeck

⁶ <http://www.dorsetforyou.com/media.jsp?mediaid=149032&filetype=pdf> and can be viewed at District Council offices

⁷ <http://www.dorsetforyou.com/dorsetcommunitystrategy> and can be viewed at District Council offices

Local Development Framework (LDF)⁸. There is no need for repetition between documents in the LDF.

- If the policy is not covered elsewhere, in what way is the Core Strategy unsound without the policy and what should the policy say?

4. General advice

- 4.1 If you wish to make a representation seeking a change to a Core Strategy or part of a Core Strategy you should make clear in what way the Core Strategy or part of the Core Strategy is not sound having regard to the legal compliance check and three tests set out above. You should try to support your representation by evidence showing why the Core Strategy should be changed. It will be helpful if you also say precisely how you think the Core Strategy should be changed. Representations should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further submissions based on the original representation made at Pre-Submission. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.
- 4.2 Where there are groups who share a common view on how they wish to see a Core Strategy changed, it would be very helpful for that group to send a single representation which represents the view, rather than for a large number of individuals to send in separate representations which repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.
- 4.3 Further detailed guidance on the preparation, Pre-Submission and examination of Core Strategies is provided in Planning Policy Statement 12: Local Spatial Planning⁹ and in The Plan Making Manual¹⁰.

⁸ <http://www.dorsetforyou.com/df/purbeck>

⁹ <http://www.communities.gov.uk/publications/planningandbuilding/pps12lsp>

¹⁰ <http://www.pas.gov.uk/pas/core/page.do?pageId=51391>

6357
16/12/10



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

Purbeck District Council
Community Planning & Policy
18 DEC 2010
RECEIVED
ADDRE

	Your Details	Agents Details (where relevant)
Title	Mrs.	
Name	Jennifer Howard	
Job Title (where relevant)		
Organisation (where relevant)		
Address	3 Durberville Drive Swanage Dorset	
Postcode	BH19 1QN	
E-mail	jennifer.howard@ tiscali.co.uk	
Tel. Number	01929 423192	

Responses should be sent to:

Email: ldf@purbeck-dc.gov.uk

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

Fax: 01929 557348

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

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

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

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

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

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

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

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

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

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

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

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

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

Signature	Signature has been blanked out	Date 13.12.2010
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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"/>
--	--	---

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

Policy : Policy S.E. SWANAGE	Paragraph:	Map:
---------------------------------	------------	------

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

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

(For explanation of terms refer to guidance notes below)

Comments:

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

Swanage has a unique character that will be spoiled by 200 new houses. It already has 700 more allocated/planned or built. No more informal countryside will be left. 200 more houses would lead to a heavy increase in traffic on the roads. (already noted by planning inspectors)

We do not want the health centre site changed. It is central for all areas of Swanage and could sustain Extension.

We do not want so-called 'community benefits' of niche business services, shops, new sports hall etc. This is PDC's vision not ours.

The only people to benefit will be those selling the land and those building the houses.

Not effective

No road infrastructure to support planning/building more houses.

Can't put a by-pass around Corfe Castle - so traffic all comes in on the same road.

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).

NO COMMUNITY INVOLVEMENT. CONSULTATION A SHAM
We need a referendum - do people in Swanage want another 200 houses - in addition to the 700 extra already built or planned? DEFINITELY NOT

• Statistical analysis flawed. Only 52 people chose the grammar school site only. This has been presented as the majority choice for a single site - untrue.

• Vision. This is PDC's vision. People in Swanage need to be asked their opinion. Do they want e.g. more niche businesses, services, shops etc? They need to be asked if they agree.

Swanage already has a much higher proportion than its fair share of new houses - 700 have already been built or planned.

Whole plan is unsound and legally flawed.

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

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

Policy: Regional Spatial Strategy 2006-2026	Paragraph:	Map:
--	------------	------

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

1. Legally compliant <i>i.e. comments on the process of preparing Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input 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 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 people of Swanage were not consulted about the number of houses to be built in the region, ^{as a whole} 2,400 is far too many. If the target number were reduced to 2,100 which is more realistic, ^{and is the original number} the extra 200 in Swanage would not be needed. It is not justified because the number needed seems to have been plucked out of the air - it does not have a credible evidence base.

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 total number of houses needed to 2,100 – the original number. Then the extra 200 houses in Swanage would not be needed.
- Have a referendum in Swanage about the number of new houses.

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:

CORE Policy: STRATEGY 6.5	Paragraph:	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

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

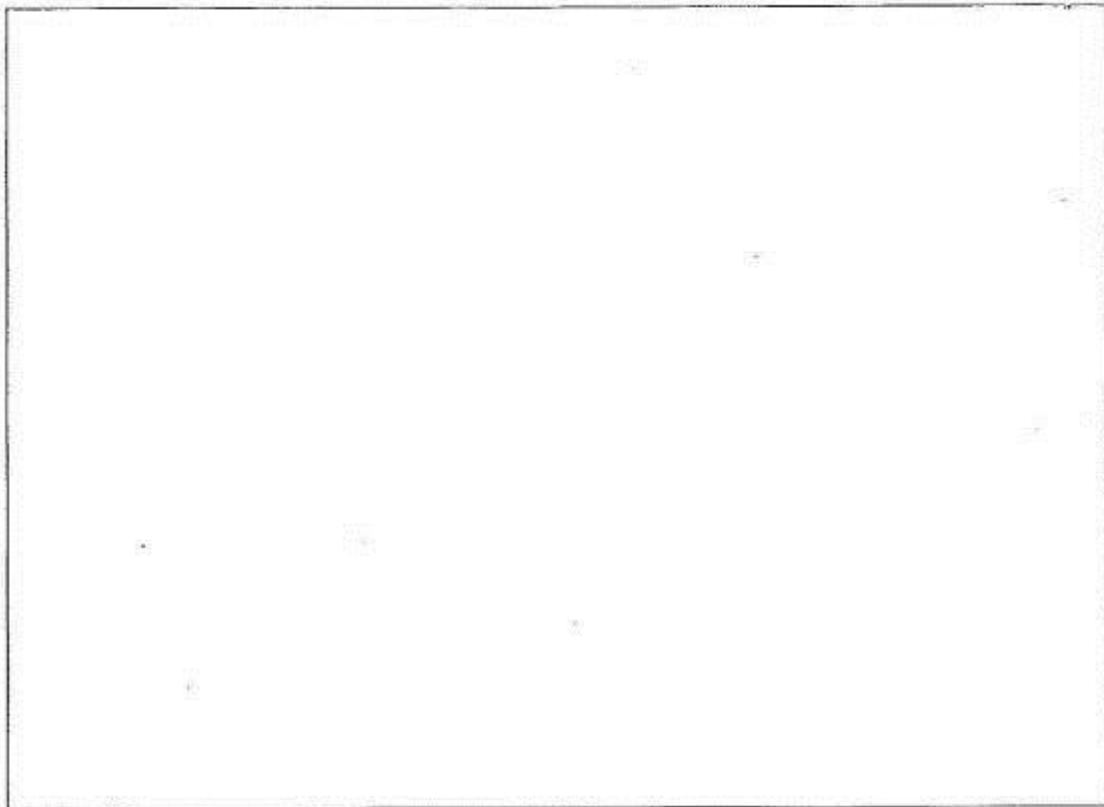
(For explanation of terms refer to guidance notes below)

Comments:

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

High number of new houses and lack of employment opportunities is not sustainable. less than 2.5% of employment land is in Swanage and 3.9% in S.E. Purbeck; yet 37.5% of housing provision has been allocated here. People would have to travel to employment and this would increase car usage.

This contradicts stated aim of reducing car usage in core strategy 4.1.2 4.7.4 4.3.1.



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).

Allocate housing where there is more employment land.

4756
06/11/10



Purbeck District Council
 Local Development Framework (LDF)
 Community Planning & Policy
 25 NOV 2010
 ACKNOWLEDGEMENT
 A B C D E
 FILE REF: Your Details

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

Agents Details (where relevant)

Title	MR	
Name	M. F. HOWARD	NOT THE BERE REGIS PARISH COUNCIL OFFICIAL RESPONSE.
Job Title (where relevant)	PARISH COUNCILLOR	
Organisation (where relevant)	BERE REGIS PARISH COUNCIL	
Address	15 GRIFFINS GDNS BERE REGIS	
Postcode	BH 20 7LA	
E-mail	howard245@btinternet.com	
Tel. Number	01929 472841	

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

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

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

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

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

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

BERE REGIS PARISH COUNCIL ARE SATISFIED THAT ITS VIEWS ARE FULLY REPRESENTED IN THE LDF I.E IT SUPPORTS 50 HOUSING UNITS OVER THE PERIOD TO 2026

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 21/11/2010
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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 : X	Paragraph: 7.1.8	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 checked="" type="checkbox"/>	No <input type="checkbox"/>	No Comment <input type="checkbox"/>
---	--	--------------------------------	--

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

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

(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)

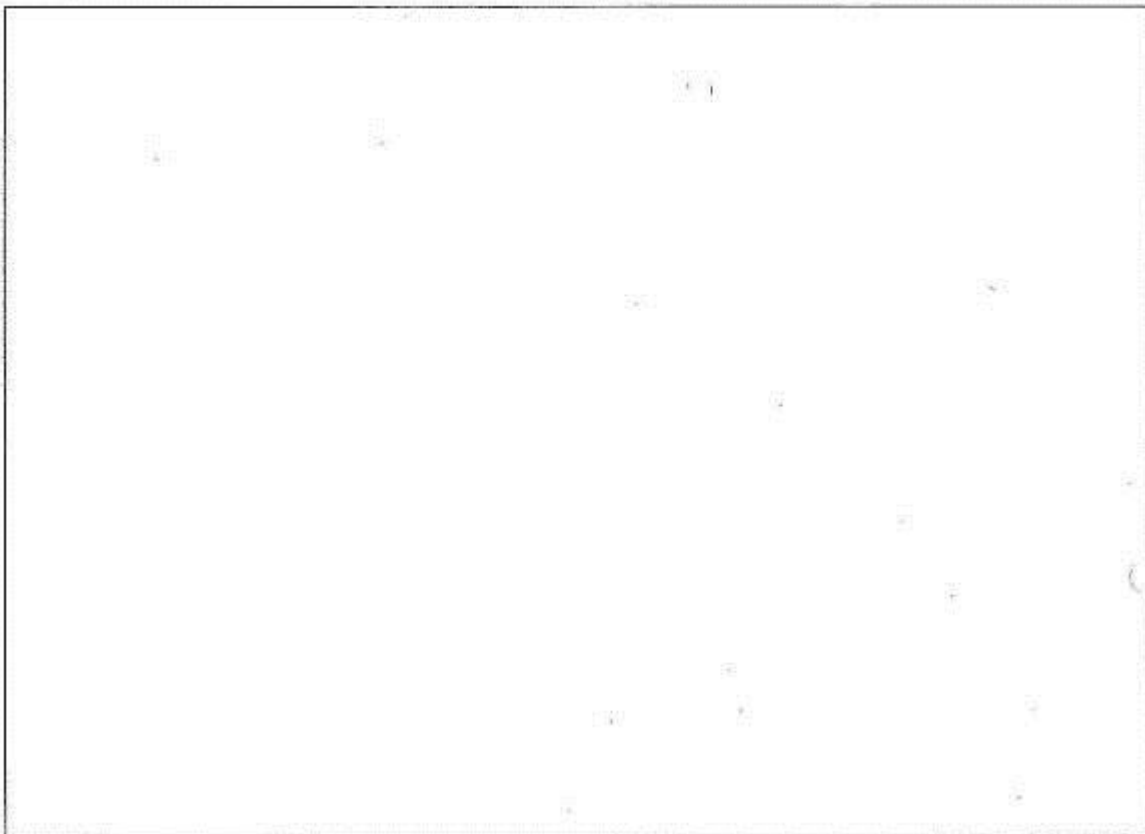
It is not 'consistent with national policy'

(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 BERE REGIS PARISH COUNCIL BELIEVE THE SOUTHERN BERE REGIS BYPASS SHOULD BE CONSTRUCTED BEFORE WOOL TRAFFIC IS REDIRECTED VIA A35 & C6.



Proposed Changes:

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

ON COMPLETION OF THE BERE REGIS SOUTHERN
BYPASS, TRAFFIC FROM POOLE/BOURNEMOUTH TRAVELLING
TO WOOL/LULWORTH AREA SHOULD BE DIRECTED
AWAY FROM THE A351 AND ON TO THE
A35/C6.

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 : <input checked="" type="checkbox"/>	Paragraph: 7.1.8	Map: <input type="checkbox"/>
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

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

(For explanation of terms refer to guidance notes below)

Comments:

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

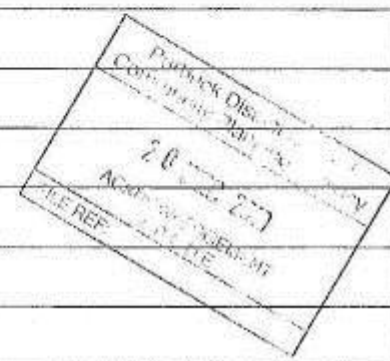
I REMAIN CONCERNED AS A RESIDENT & PARISH COUNCILLOR ABOUT THE PROVISION OF A NEW SCHOOL GIVEN THE DECISION TO MOVE FROM A 3 TIER TO 2 TIER SCHOOLING IN THIS AREA. THIS IS ESPECIALLY SIGNIFICANT GIVEN THE INADEQUACY OF OUR EXISTING FIRST SCHOOL IN TERMS OF SPACE & FACILITIES/ AMENITIES WHEN IT BECOMES A PRIMARY SCHOOL.

6374
20/10/10



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

Your Details	Agents Details (where relevant)
Title	Dr
Name	Martin John Howard
Job Title (where relevant)	
Organisation (where relevant)	
Address	3 D'Urberville Drive
Postcode	BH19 1RN
E-mail	howard.john@talk21.com
Tel. Number	01929 423192



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.

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

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

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

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

The consultation was only where to place 200 houses, not whether we should have 200 more houses in Swanage.

The problem arises from the desire to build too many houses in Purbeck, 2400, which then gives rise to the need to build too many in Swanage.

Swanage is a relatively unspoiled town on the "Jurassic Coast". Further house building will turn it into an urban sprawl destroying its character and removing the areas of countryside which relieve the monotony of housing; towns are not just warehouses for people.

There is hardly any well-paid, year-round employment in the town to support the existing population without adding to the problem. Commuting from the town is difficult because of the limited road network caused by its geographical position. New housing would only be suitable for retired people of which Swanage has more than its fair share.

Finally, in the twenty years I've known Swanage there has been a great deal of building. The centre has changed markedly due to the building of flats and whole estates have sprung up in Henston. I've been told that over one third of the new house building in Purbeck has taken place in Swanage. This reminds me of Swindon where I used to live: does anyone really wish to create a Swindon in 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).

- legally compliant
- Consultation to include whether Swanage wants any more houses
- To make it sound
- change the total number of new-build required back to original total of 2,100. Extra houses are not wanted or needed.

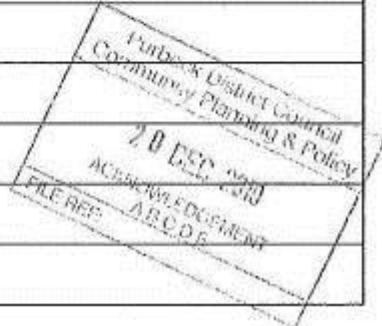
Note: Additional sheets can be photocopied and attached to this form

4008
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	GEOFFREY HUMPHREY	
Job Title (where relevant)		
Organisation (where relevant)		
Address	11 STOWELL CRESCENT WAREHAM	
Postcode	BH20 4PT	
E-mail	—	
Tel. Number	01929 555393	



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.

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

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

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

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

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

Signature	Signature has been blanked out	Date <i>16 DEC 2010</i>
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2. No-one disagrees that more affordable housing should be provided, it is how and where that is for discussion.

Many times the Council has said that new housing should be spread around the District. e.g. the Pre-Submission Core Strategy - Public Consultation Report for the Special Council Meeting on 5 October 2010: "The Council's preferred option of distributing development around the District".

Yet the proposal leaps to provision for 200 houses on one field on one road to meet Wadhams' contribution, out of a total of 440 houses on settlement extensions in Purbeck i.e. 42% on one site in the District, and that in the Green Belt.

Building on Green Belt now is a first step in salami-slicing our countryside, and can only create a precedent for developers to quote in the future for housing or commercial applications.

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).

Plans for any settlement extension into the Green Belt should be withdrawn.

The 200 houses proposed for one site on Worgret Road should be changed to be "spread around" (PDC's words) and could include sites on Worgret Road itself - Magistrate's Court and the wasted space around it and the Police Station - Northport, Sandford, Stoborough, Pound Lane and around the Station.

The "Requirement for affordable housing provision of 50%" must be legally binding and enforced as in the past even 20% has slipped.

Telephone Number: 01929 553225

*Rungwe
11A Sandford Road
WAREHAM
Dorset, BH20 4DG*

19th December 2010

Planning Policy Department
Purbeck District Council
Westport House
Worgret Road
WAREHAM BH20 4PP

Dear Sirs

PURBECK CORE STRATEGY

Local Development Framework - 'Planning Purbeck's Future'

Do we need more houses in Wareham?

Wareham is a small market town surrounded by beautiful countryside appreciated by all, with large areas of "Green Belt" meant to protect us and the environment. The proposed policy in the Draft Core Strategy suggests spreading into Green Belt land off Worgret Road, Wareham. How sacred is Green Belt land from developers' avarice, and planners trying to meet the last Labour Government's building targets (which the new Coalition Government has abolished)? I object most strongly to building on this land. It's easy enough to build but, once built on, the land is lost forever in a "concrete jungle".

Why do we need any houses on this site, which will be overlooking the north section of Wareham bypass and which will be an eyesore on the landscape? When planning permission was sought several years ago for a large housing development at Worgret, Purbeck District Council strongly objected to it because of the blot to the landscape, as well as the fact it would encroach on Green Belt land. Now the Council proposes to break its original integrity and build on Green Belt.

This proposed development will produce many extra vehicles on to the A351, an already busy road which is overloaded almost to saturation point on many occasions. It is a nightmare many times of the day to travel along this road, especially in the summer, so the extra vehicle loading produced by the proposed housing will generate an extra 1,400 vehicle trips per day.

The Middle School site in Wareham is shown as a 'Green Field' site. To lose the Middle School is devastating to many people and a retrograde step by DCC who have just voted to move to a two-tier education system, even though the majority of people in Purbeck are against it. The thought that the Middle School playing field is proposed to be built on is another example of encroachment by a concrete jungle. Is this new 'Plan Option' another example of a pre-determined decision by councils,

even though locals and the Coalition Government are most certainly against development on Green Belt land?

If you allow more housing in Wareham, the chronic congestion on the road network is going to become even more critical. Many visitors come to Purbeck, and who can blame them? However, our roads are not suitable to cope with this large volume. We have been campaigning for a much-needed bypass for many years to no avail. If the proposed development goes ahead, there will be yet more traffic! Every day, the A351 has long queues of traffic moving at a snail's pace, sometimes gridlocked, through Northport, Sandford and Holton Heath towards the Baker's Arms roundabout. The volume of traffic is not sustainable.

Please do not build any new houses and especially NOT on Green Belt land.

Yours faithfully

MAXINE HUMPHRIES (Mrs)

PURBECK CORE STRATEGY

Public Consultation Pre-submission Draft Purbeck Core Strategy

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

Dear Sirs,

I wish to comment as follows on 'Planning Purbeck's Future (Core Strategy)':

The Green Belt

The proposed moving of the Green Belt boundary is a retrograde step which will build housing that will be very visible on the skyline from the present bypass and will be visible from the Wool road on the approach to Wareham Town. What is the justification for moving the Green Belt Boundary? Just to achieve building targets demanded by the previous Government's Regional Spatial Strategy! Please let us maintain our existing Green Belt and not move it every few years as demand may dictate. Unless this strategy is robustly defended the Green Belt designation has little or no value. Further, the Regional Spatial Strategy no longer applies, so the imperative need to build to targets has been removed and the need to build on Green Belt protected land has been removed.

Whilst the Council may have the right to adjust Green Belt boundaries, I feel the moving of the boundary is not justified. Once you start down this route, where will it stop?

Housing

The imperative need to build no longer exists, so let us maintain our existing Green Belt Boundary. Infilling within Purbeck has produced more than enough housing to satisfy previous Spatial Strategy Targets so presumably there is scope to assume this will continue to the end of the present Core Strategy Review period in 2026. The so-called 'windfall rate' of residents and contractors applying for planning has been running at the rate of 136 dwellings per annum (Reference 6.2.1), giving an extra 2,176 dwellings within the LA boundaries up to the year 2026.

Therefore this proposal is not consistent with national policy.

Out of Town Supermarket

It is pleasing to see that the council has rejected the proposal for an Out-of-Town Supermarket. At least this decision will now protect our Centre-of-Town Traditional Shopping Area, and will permit Wareham to continue developing as an ancient Market Town, a policy well defended and sponsored by PDC in the recent past and successfully, one must comment!

Local Highway Network

The A351 County Feeder road into Purbeck has continued to show increasing strain and overloading this last summer, as more people holiday in the UK. Now it is proposed to build 200 Residences in Wareham, 200 in Swanage and 30 in Corfe Castle making a total of 430, thus producing more vehicle journeys. This problem gets worse year by year and no action is taken to reduce the volumes of traffic except some signage to encourage through traffic to continue along the A35 at the Bakers Arms Roundabout (and not making much difference!).

The extra housing now being planned (430 dwellings) within the Isle of Purbeck could produce up to 3,010 extra trips a day, many of which will inevitably spill on to the county feeder road (A351). In fact, the proposed housing in Wareham is located right next to this route, where many trips will end up using the main route to the conurbations of Poole and Bournemouth.

What actions are proposed to alleviate this congestion? Nothing of real substance is mentioned in the Core Strategy.

Summary

I object strongly to building on the Green Belt off the Worgret Road in Wareham. The 200 houses proposed for that site and the lack of infrastructural planning to cope with increasing traffic volumes generated by those dwellings will be intolerable. Also, the windfall buildings sanctioned since the beginning of the present Core Strategy, plus the new buildings and windfall applications estimated to be sanctioned up to 2026, are not covered by a sufficient road planning policy.

Yours faithfully,

Robin M Humphries
11A Sandford Road
Wareham, BH20 4DG
Tel 01929 553225. Email robin.humphries@talktalk.net

Dated 19 December 2010



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

4881
 15/12/10
 Purbeck District Council
 Community Planning & Policy
 15 DEC 2010
 ACKNOWLEDGEMENT
 ARC DE

	Your Details	Agents Details (where relevant)
Title	MRS	
Name	JUDITH	
Job Title (where relevant)	—	
Organisation (where relevant)	—	
Address	24 RABLING RD.	
Postcode	BH19 1EF	
E-mail	randjhurst@aol.com	
Tel. Number	01929 426653	

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

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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 11.12.2010
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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>Vision for Purbeck</i>	Paragraph: <i>4.2.1</i>	Map:
---------------------------------------	----------------------------	------

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

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

900 dwellings (projected pop. 1500) will completely alter the character of Swanage as a town in an area of natural beauty. So much has been built in the town over the past 15 yrs. particularly flats. If this goes on there will be serious consequences such as extremely limited employment, lack of school places, medical facilities, food shops to name but a few. Access to & from the town is already difficult due to volume of traffic and this will only increase.

Proposed Changes:

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

It would be better to build dwellings in areas of economic growth possibilities, already identified in the Core Strategy as Holton Heath & Winfrith.

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

Policy: <i>Spatial Distrib. of develop. SE</i>	Paragraph: <i>7.5.9</i>	Map:
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Do you consider Planning Purbeck's Future (Core Strategy) to be:

1. Legally compliant <i>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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<i>(tick all that apply)</i>			
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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)

Consultation gave no opportunity for any other number of houses than 200. There was no facility for choice.

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).

*200 houses on settlement extension
are not wanted.*

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

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

(For explanation of terms refer to guidance notes below)

Comments:

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

As this is an area of outstanding natural beauty, property here is popular. Therefore much is second homes & the house prices have become unaffordable for local people. Much of any new build will undoubtedly go as second homes.

Proposed Changes:

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

Property must be affordable for local people + second home ownership restricted.

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

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

Policy : ELS	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 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 is not an easily accessible town, with 1 road in & out - A351. This becomes overcrowded for most months of the year due to extended holiday seasons, ferry maintenance & festivals in the area. As there is little employment land in Swanage, to increase this would make the area very congested with traffic trying to go in & out. In return, this would impact adversely on the popularity of the area as a holiday destination.

The environment would ^{NOT} be protected as
at present & would certainly not be enhanced.
A high number of new houses with the lack
of employment opportunities is not
sustainable.

Proposed Changes:

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

Create bulk of new housing in already
identified areas of economic growth,
e.g. Winfrith, Holton Heath.

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

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

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

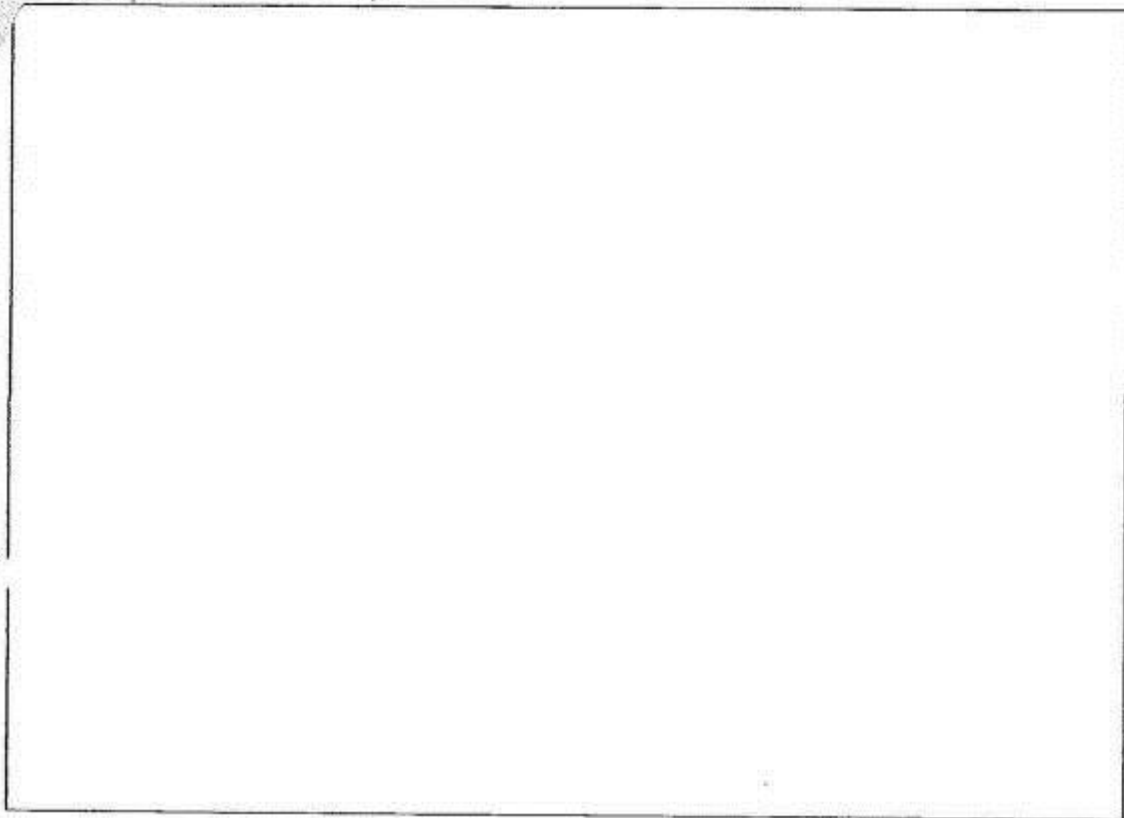
(For explanation of terms refer to guidance notes below)

Comments:

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

Not deliverable,
Report 2002 states no further building
in Swanage until traffic congestion
on A351 resolved.

H.S. para 6.4.5



Proposed Changes:

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

Housing should be close to areas of economic growth in order to minimise traffic congestion.

YOUR COMMENTS – PLEASE USE A SEPARATE SHEET FOR EACH REPRESENTATION

Please select which document you are commenting on:

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

Policy : HS	Paragraph: 6.3.4	Map:
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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'

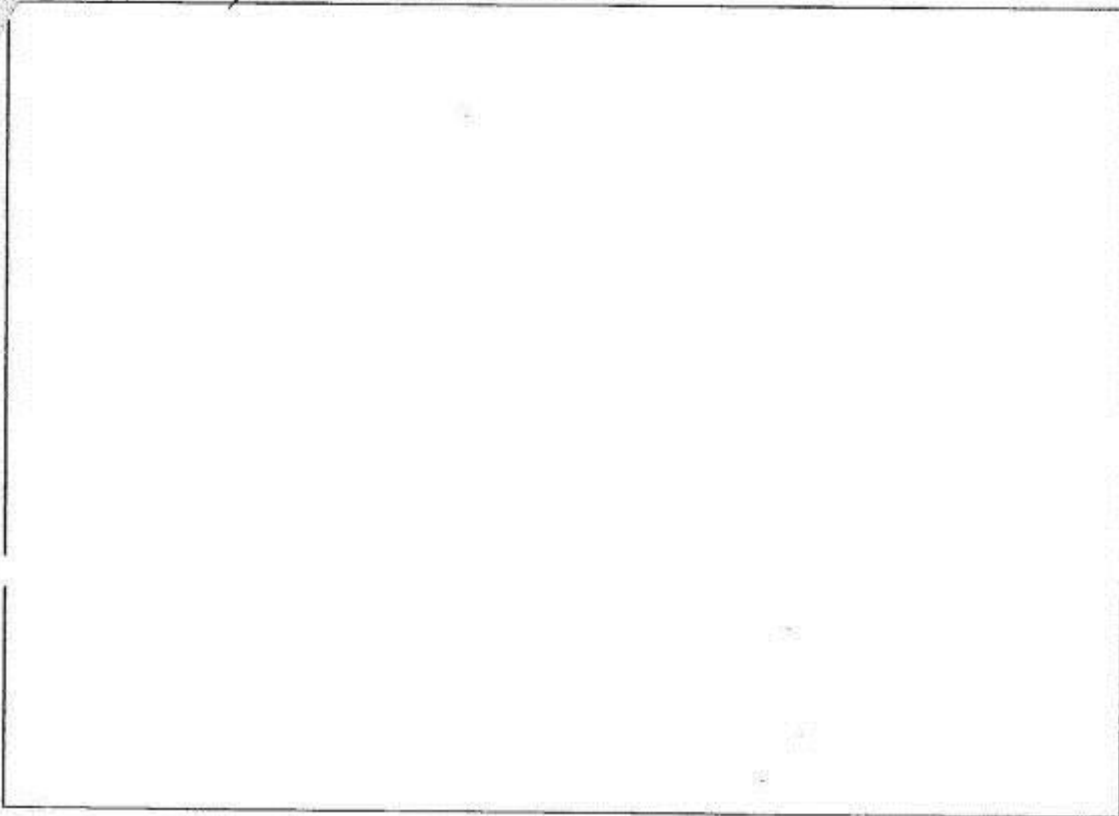
(For explanation of terms refer to guidance notes below)

Comments:

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

Development in Swanage will have an adverse effect on protected habitats. It is not possible to come up with alternative green space in Swanage as it is in an area of outstanding natural beauty. We must save this at all costs, not sacrifice it.

H.S para. 6.3.4.



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).

No more buildings on green field or areas of outstanding natural beauty. Infill should be limited to affordable housing for local people.