



**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	A.N Other	
Job Title ( <i>where relevant</i> )		
Organisation ( <i>where relevant</i> )		
Address	Westport House, Worgret Rd, Wareham	
Postcode	BH20 4PP	
E-mail	ldf@purbeck-dc.co.uk	
Tel. Number	01929 557273	

**Responses should be sent to:**

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

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

**Fax:** 01929 557348

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

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

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:

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

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

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

For further information, visit [http://www.dorsetforyou.com/purbeck\\_consultation](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"/> <b>No</b> , I do not wish to participate at the oral examination	<input checked="" type="checkbox"/> <b>Yes</b> , I wish to participate at the oral examination
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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:

I wish to share my concerns directly with the Inspector

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 ANOther

Date 1/11/10

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

Please select which document you are commenting on:

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

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

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

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

**Comments:**

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

The Core Strategy did not consider large scale housing development at Holton Heath. The option should have been considered rather than distributing development around the District. It has a railway station, abundant employment opportunities and is a brownfield site. It could be combined with the provision of a bypass around Sandford.

**Proposed Changes:**

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

Delete the settlement extensions proposed for Swanage, Wareham, Upton, Lytchett Matravers and Bere Regis and replace them with development at Holton Heath combined with a Sandford bypass.

**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 <b>process</b> 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 <b>content</b> of Planning Purbeck's Future</i>	Yes <input type="checkbox"/>	No <input type="checkbox"/>	No Comment <input checked="" type="checkbox"/>

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

*(tick all that apply)*

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

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

**Comments:**

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

I did not receive a consultation leaflet during the autumn 2009 public consultation. I was therefore not aware of the consultation until it was brought to my attention by a neighbour and have therefore not had the opportunity to be heard.

**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).

Further consultation should be undertaken on the Core Strategy to allow my views (and others) to be fully taken into consideration during preparation of the final plan.

# 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 2004<sup>1</sup> (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 Scheme<sup>2</sup> (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)<sup>3</sup>. 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 County Planning (Local Development) (England Regulations) 2004 as amended<sup>4</sup>. 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 Circulars<sup>5</sup>.
  - 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 2009-2020<sup>6</sup> and The Community Strategy for Dorset (2007-2016)<sup>7</sup>.

<sup>1</sup> [http://www.opsi.gov.uk/ACTS/acts2004/ukpga\\_20040005\\_en\\_1](http://www.opsi.gov.uk/ACTS/acts2004/ukpga_20040005_en_1)

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

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

<sup>4</sup> <http://www.opsi.gov.uk/si/si2004/20042204.htm> (2004 regulations) and [http://www.opsi.gov.uk/si/si2008/pdf/uksi\\_20081371\\_en.pdf](http://www.opsi.gov.uk/si/si2008/pdf/uksi_20081371_en.pdf) (2008 amending regulations)

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

### 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

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

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

Local Development Framework (LDF)<sup>8</sup>. 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 Planning<sup>9</sup> and in The Plan Making Manual<sup>10</sup>.

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

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

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