

Planning Purbeck's Future



Core Strategy Pre-Submission Consultation - 1 November - 20 December 2010
Summary of Representations



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| Name | Plan sound? | Comment on soundness | Proposed Change |
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| Ms Kennedy & Mr Foote | Unsound | Concerns about biodiversity. Tyldesley & Associates' assessment has shown that, without mitigation measures, there would be adverse effects. There is uncertainty over deliverability. | |
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Council Response to comments on General Issues:

ISSUES: The comments revolve around the protection of Purbeck's heritage.

COUNCIL RESPONSE: The Core Strategy delivers the spatial aspects of the community plans and parish/town plans, whilst balancing local housing/employment needs with the protection of the countryside and built heritage.

ACTIONS: None required.

| Name | Plan sound? | Comment on soundness | Proposed Change |
|-------------|--------------------|---|--|
| | | Worth Matravers which is higher than portrayed. This is relevant because it shows what new development is likely to become: 2nd homes, which are unnecessary. | exactly what is being a) considered; and b) needed. |
| Mr Tasker | Unsound | With Localism Bill, PDC is not powerless to influence planning. | Join with other affected councils to press for change. |

Council Response to comments on 1. The Context for Purbeck's Core Strategy:

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| <p>ISSUES: Comments relate to other strategies and national policy; and a desire to mention specific settlements' problems with second homes.</p> <p>COUNCIL'S RESPONSE: The Core Strategy is a strategic document that should be consistent with current national policy (but not repeat it) and should not make non-essential references to strategies. It should be an overarching document for the district, so it is not the role of the Core Strategy to go into detail on specific parish-related issues.</p> <p>ACTIONS: None required.</p> |
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Chapter: 2. Characteristics of Purbeck

Para/Policy/Map: 2.1

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|---------------------------|--------------|--|---|
| SW RP Planning Consortium | Sound | Useful to show growth of the over 80s in next 20 years to help underline need for more care & accommodation for elderly in the district. | Show growth of over 80s in next 20 years. |
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Para/Policy/Map: 2.1 - 2.8

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|------------------------|----------------|--|---|
| JS Bloor (Newbury) Ltd | Unsound | Whilst paragraph 2.1 recognises links to conurbation, there is no reference to patterns of travel in district. | Summarise established out-commuting patterns in Purbeck, emphasising economic influence of the conurbation & importance of spatial relationship with it for working, shopping, higher order services, etc. Summarise principal patterns of movements into district, given attractiveness of its many natural & cultural assets for tourism & recreation activities. |
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Para/Policy/Map: 2.2

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| Save Herston Fields | Unsound | Population growth infers an increase of 3600 people. Therefore 2400 houses are not needed & fewer could be built. | Reduce number of dwellings to a more reasonable figure. |
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Para/Policy/Map: 2.4

| | | | |
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| Purbeck Society | Unsound | Figures for average income are distorted & therefore so is average house price. Consequently need for affordable housing is even more critical. Figures for 2nd/holiday homes are given district-wide, but policies should deal with problems in specific communities. | Give more balanced view of problem & formulate policies to deal with issues that affect particular communities. |
| Save Herston Fields | Unsound | Figures are distorted. 95% of population earns £13,000 a year. This portrays a different picture. | Show a breakdown of figures to give a more accurate picture. |

Para/Policy/Map: 2.6

| | | | |
|------------------------------------|--|---|--|
| Jurassic Coast World Heritage Team | | Wych Farm is now 2nd largest onshore oil field in Europe. | |
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| <i>Name</i> | <i>Plan sound? Comment on soundness</i> | <i>Proposed Change</i> |
|-----------------------------|--|---|
| Para/Policy/Map: 2.7 | | |
| Dorset AONB Partnership | Significance of natural environment is not acknowledged as key characteristic of district. | Natural Environment should be thread running throughout document. |

Council Response to comments on 2. Characteristics of Purbeck:

ISSUES: Comments include the need for consideration of growth of over 80s and recognition of patterns of travel. Objectors to development in Swanage have highlighted issues of population, earnings, house prices and second home ownership.

COUNCIL'S RESPONSE: The needs of older age groups are worth mentioning to highlight the challenge of an aging population. Whilst travel patterns are not shown visually, the socio-economic links with the conurbation are already mentioned in the chapter. Recognition of travel patterns is already provided in context maps. Population growth data are provided independently by ONS and are relied upon nationally. Average earnings are sourced from the Dorset Data Book and therefore are considered accurate, however this could be clearly referenced. Figures on average earnings, house prices and second home ownership are provided to give an overview of the district. It is agreed that the chapter would benefit from expansion in order to draw out key differences between spatial areas.

ACTIONS: Mention growth of the over 80s. Expand chapter 2 to draw out the key social, environmental and economic differences between the five spatial areas and illustrate how the spatial areas have been divided. Add references in footnotes to show data sources.

Chapter: 3. Issues and Challenges

Para/Policy/Map: 3.1

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|------------------------------------|---|---|
| Dorset AONB Partnership | No reference to AONB | Acknowledge Dorset AONB & refer to protection & enhancement of natural environment & District's protected landscapes. |
| SW RP Planning Consortium | Sound Notes in particular some of the issues and challenges. | |
| ZBV (Winfrith) Ltd | Agree with Council's interpretation of main issues facing Purbeck. | |
| Jurassic Coast World Heritage Team | Threat not coastal erosion, but threat to defended sections of coast from increasing erosional forces acting on sea defences. Erosion of bulk of coast is "a good thing". | |

Council Response to comments on 3. Issues and Challenges:

ISSUE: Minor comments raised including the omission of reference to AONB.

COUNCIL'S RESPONSE: The importance of the natural environment and value of the landscape are mentioned - AONB is cited frequently throughout the Core Strategy. There would be benefit in drawing out the key challenges posed by climate change to help set the context for the plan.

ACTIONS: Expand chapter 2 with climate change challenges including coastal erosion, flood risk and habitat adaptation.

Chapter: 4. Vision and Spatial Objectives

Para/Policy/Map: 4

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| Highways Agency | Lack of reference to sustainable transport modes. | Transport-related spatial objective should refer to encouraging sustainable transport modes with an emphasis on reducing need of private car. |
| Highways Agency | Welcome acknowledgement of reduction in need to travel between Purbeck & Poole/Bournemouth conurbation, facilitated through an increase in self-containment & concentration of employment, shops, services & community facilities. Support shift in travel choices & patterns, & inclusion of reconnection of Wareham to Swanage branch line to the national rail network. Support improvements to public transport & potentially reduce impact on SRN in this location, especially with out-commuting from Purbeck to Poole/Bournemouth. Welcome inclusion of transport related spatial objective. | |

Para/Policy/Map: 4.1

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| Natural England | Key environmental issues treated as bolt on, rather than being integral to plan. Vision needs to go further than "valued". | Refer to enhancement of all natural habitats. |
| Royal Mail | Support, particularly the reference to important role that community facilities & services have for achieving sustainable communities. | |
| RSPB | Welcomes references to habitats & climate change & spatial objectives 3 & 5. However, no practical expression in CS relating to climate change. | |

Para/Policy/Map: 4.1.3

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| Jurassic Coast World Heritage Team | Wording of spatial interpretation of Purbeck Community Plan Priority Areas omits reference to protecting natural environment. | Amend to "protected, enhanced & appreciated" |
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| Name | Plan sound? | Comment on soundness | Proposed Change |
|------------------------------------|--------------------|---|---|
| Para/Policy/Map: 4.2 | | | |
| Bloor Homes Ltd | Unsound | Paragraph 4.2 states that new housing will meet local needs first. PDC cannot control the market. | Delete 'in meeting local needs first' |
| Dorset AONB Partnership | | Lack of emphasis on natural environment considering it is in Community Plan Priority Area & priority of Corporate Strategy. Lack of emphasis on tourism & visitor traffic. | Emphasise natural environment, & tourism & visitor traffic. |
| SW RP Planning Consortium | Unsound | Local is not defined & is unrealistic to achieve without putting onerous restrictions on new dwellings. | Delete reference to meeting local needs first. |
| Jurassic Coast World Heritage Team | | Geodiversity not referred to. | Amend to: "continue to value its unique & internationally important wildlife & geodiversity...." |
| Para/Policy/Map: 4.2.1 | | | |
| Purbeck Society | Unsound | Constructing number of houses proposed would be contrary to Vision. | |
| Redwood Partnership | Unsound | Last paragraph fails to recognise the need to balance housing with employment growth. | Amend last para to: "...need to travel will be reduced by increased self-containment to balance housing & jobs growth & concentrate housing, employment, shops, services & community facilities at locations that are accessible by wide range of transport methods to encourage shift in travel choices & patterns...' |
| Redwood Partnership | | Support first four paragraphs, in particular first sentence of second para relating to local & wider housing needs. | |
| Save Herston Fields | Unsound | Increasing Swanage by 900 dwellings will neither enhance nor retain its unique qualities. AONB designed to protect green fields surrounding Swanage. Swanage has experienced 34% of Purbeck's development in last 15 years & is unsustainable. Development undeliverable. | Respect unique qualities of Swanage & AONB & build dwellings in more appropriate place. |
| Weld Estate | | Vision is commendable. Support aspiration to support well-paid & diverse employment & recognition that agriculture, farm diversification & estate management should play role in this. | |

| Name | Plan sound? | Comment on soundness | Proposed Change |
|---------------------|--------------------|--|--|
| ZBV (Winfrith) Ltd | Unsound | Promotion of sustainability & delivering sustainable development should be at heart of vision. Greater recognition of need to deliver growth & to improve role of towns & key service villages (particularly Wool as well served by public transport & close to employment opportunities). This should include strengthening new services, encouraging economic development & providing new housing where needed. Requires more sustainable pattern of development & consider new housing next to existing business/employment locations to improve access to jobs, services, retail facilities & homes. | Specific wording suggested which include reference to "regeneration of existing employment sites" |
| Mr & Mrs Warrington | Unsound | Only limited employment in Swanage. 900 dwellings will not enhance town's unique qualities nor attract tourists. Margate & Rhyl have suffered demise through unemployment. | Put housing in Holton Heath & Winfrith, or places with easier access to areas of employment such as Poole/Bournemouth, Dorchester, Weymouth & Wimborne. Delete proposal for 200 houses in settlement extensions. |
| Mr Clements | Unsound | Majority of new housing has been in Swanage - approximately 34% of new builds. Increase of 900 dwellings unacceptable burden. Negative impact on tourism. Limited employment. | Put housing in areas of economic growth such as Winfrith and Holton Heath. |
| Mrs Castle | Unsound | 900 dwellings too much. Swanage has had most development in Purbeck over last few years. Limited employment in Swanage. | Put housing growth in Holton Heath & Winfrith. |
| Mrs Denton | Unsound | 900 dwellings in SE Purbeck is too high. Concerns over poor accessibility. Not enough employment to support housing proposals. Concerns over congestion on A351. | Housing should be near employment land at Holton Heath & Winfrith. |
| Mrs Hurst | Unsound | Concerns over congestion/traffic & poor accessibility. Housing should be near employment. 900 dwellings will completely alter character of Swanage. Too much development in the past. Lack of school places, medical facilities & food shops. | Build dwellings in areas of economic growth i.e. Holton Heath & Winfrith |
| Ms McMorrow | Unsound | 900 dwellings is unfair burden on Swanage. 34% of district's building is on Swanage. Not sustainable. Limited employment. | Put housing in economic growth areas such as Holton Heath and Winfrith. |

| Name | Plan sound? | Comment on soundness | Proposed Change |
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| Para/Policy/Map: 4.3 | | | |
| Dorset AONB Partnership | | No reference to conservation & enhancement of AONB. | Include reference to conservation & enhancement of AONB. |
| Redwood Partnership | Sound | Support objectives 2 & 8. | |
| Wyatt Homes | Sound | The spatial objectives come together to form a suitably aspirational and achievable vision. | |
| Jurassic Coast World Heritage Team | | Geodiversity not referred to. | Include reference to geodiversity. |
| Para/Policy/Map: 4.3.1 | | | |
| Purbeck Society | Unsound | Building a large number of houses will conflict with Objective 1 & development has already harmed quality of some parts of Swanage. Objective 2 will only be met if housing construction is limited to affordable housing for local people. Objectives 3 & 7 would be compromised by large-scale building. Objective 5 would not be achieved if housing at end of a cul-de-sac results in increased traffic. No evidence to support Objective 9. | Remove plans for a settlement extension in Site Allocations Plan. Instead, promote policy for small developments of up to 20 houses within existing settlements. Promote development elsewhere, notably at Dorset Green. |
| Save Herston Fields | Unsound | Re bullet points: 1) large quantities of dwellings will harm character & distinctiveness. 2) Development will surpass housing needs. 3) It will neither conserve nor enhance habitats. 5) It will increase commuting & burden on roads, therefore contributing to climate change & increased flooding, exacerbated by surface run-off from houses. 7) Given designations, suggestion that proposals will enhance landscape is preposterous. 9) Nothing is suggested by Transport Plan to prove this is achievable. | Revise Spatial Objectives to something more realistic & far less ambitious. |
| Weld Estate | | Agree with spatial objectives | |
| ZBV (Winfrith) Ltd | | Support identified spatial objectives. Council should commit to exploring opportunities to improve function/role of existing towns & key service villages (particularly Wool). Opportunity | Amend as follows: "To plan for managed growth to meet future housing & employment needs and prioritise the location of new development in line with |

| Name | Plan sound? Comment on soundness | Proposed Change |
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| | for greater achievement of sustainable pattern of development, in particular locating new housing next to existing employment/business locations (such as DGTP). | principles of sustainable development". Amend Objective 8 as follows: "Promote & support a prosperous local economy & direct new business development towards sub-regional employment locations". |

Council Response to comments on 4. Vision and Spatial Objectives:

ISSUES: Comments raised about the need for specific mention of sustainable transport modes, tourism traffic, enhancement of all natural habitats, lack of control over housing market, and lack of employment in Swanage. Perception of too much development in Swanage, and insufficient development at Wool.

COUNCIL'S RESPONSE: Vision and Spatial Objectives have been consulted on and refined over the last five years. However, minor amendments suggested to the vision are welcomed. Specific objections (for example, objections to development in Swanage) are dealt with in the appropriate sections.

ACTIONS: Replace 'Purbeck will continue to value its unique and internationally important habitats' with 'Local Organisations will continue to enhance Purbeck's exceptional landscape and internationally important habitats'. Insert 'to reduce dependence on the private car' after 'a shift in travel choices and patterns'.

Chapter: 5. General Location of Development

Para/Policy/Map: 5.2

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| Save Herston Fields | Unsound | Swanage lacks Wareham's transport infrastructure & its location is unlikely to allow that to change, so should not be centre for development. | Do not allow Swanage to become focus for development. |
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Para/Policy/Map: 5.6

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| Redwood Partnership | Unsound | Evidence base demonstrates that to meet district's housing needs, additional development needed at Wool. Plan considers changes to Green Belt to be strategic, but there is no strategic development plan policy requiring review of Green Belt boundaries in these locations. Selection of strategic allocations in CS should consider wider issues such as size of settlement extension, location & mix of land uses proposed. Narrow interpretation of what constitutes strategic, therefore five-year housing supply heavily reliant on Green Belt sites. Does not reflect housing needs across majority of district, which lies outside Green Belt, does not deliver flexible or responsive supply of land as required by PPS3. Housing needs, environmental constraints, limited opportunities for new development, & findings of additional growth scenarios in line with Habitats Regs, all support growth in Wool. Suggest allocation for 50 dwellings at East Burton Rd (Wool) & 1000 dwellings to be agreed through Site Allocations Plan/Area Action Plan. | Amend para 5.6.2 to include a settlement extension at East Burton Road & further requirement for settlement extension of 1000 dwellings through Site Allocations Plan or Area Action Plan. |
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Para/Policy/Map: 5.6.2 - 5.6.3

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| Scott Estate | Unsound | Narrow interpretation of 'strategic' in terms of identified sites & not deliverable or flexible. No strategic development plan policy requiring review of Green Belt boundaries. Strategy should have taken wider issues into account such as size of settlement extension, its location & mix of uses proposed. Overdependence on early development within Green Belt. | Land at Washpond Lane, Swanage, to be identified as strategic allocation, contributing to deliverable extension to Swanage & providing flexible, responsive supply of land for housing. |
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| ZBV (Winfrith) Ltd | Unsound | Housing growth over proposed 2400 level necessary & | Council to consider/assess options for |
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| Name | Plan sound? Comment on soundness | Proposed Change |
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| | <p>achievable. Higher levels of growth provide opportunity to increase supply of homes locally, to tackle affordability & support planned economic growth. Proposed housing growth insufficient to address long-term challenges facing Purbeck (affordable housing for first time buyers & retaining those who already live in District, especially college leavers). GOSW has indicted that level of housing growth should more closely reflect original housing target set by 2008 proposed changes to SW RSS (i.e. 5150 new homes). Council should consider options for this. Potential to accommodate significant new housing growth (alongside employment growth & improvements in community/social facilities infrastructure) within Wool/East Burton. Benefits from direct main-line rail access to London & nearby settlements. Good road linkages to Dorchester & Wareham/Poole. Development land available & developer interest in accommodating new growth without impact on European Protected Sites.</p> | <p>accommodating increased housing growth within District (over & above 2,400 target) to meet long term housing need. Accommodate significant new housing growth (alongside employment growth and improvements in community/social facilities infrastructure) at Wool/East Burton.</p> |

Para/Policy/Map: LD: General Location of Development

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| Ashvilla Estates Ltd | <p>Unsound Question identification of Upton at top of settlement hierarchy as parts of settlement within 400m of heathland & fewer facilities than some key service villages.</p> | <p>Move Upton to second tier of settlement hierarchy. Insert new text "new development should be concentrated within & adjoining the settlement boundary of towns to ensure that it reflects other policies & spatial vision of CS".</p> |
| Birchmere Ltd | <p>Unsound Policy not based on robust & credible evidence & not justified. Section 5 refers to development, but actually refers to "residential development". This should not be applied to employment development, as would conflict with Council's support for additional employment development at existing employment locations & support for growth at employment hub at Holton Heath (Policy ELS). Holton Heath falls into "Other villages without a Settlement Boundary" which is lowest tier in settlement boundary. Conflicts with identification of Holton Heath as major employment hub, as application of Policy LD would direct employment</p> | <p>Clarification of residential intention of policy - either title to include "residential development" or amend policy to include text to clarify intention to locate employment development at sub-regionally important locations which are not at top of settlement hierarchy.</p> |

| Name | Plan sound? | Comment on soundness | Proposed Change |
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| | | development to other higher tier locations as preference. Ignores sustainability credentials of area, which has railway station linking with major local centres & London. | |
| Bloor Homes Ltd | | No clarification of where strategic locations for development are to be located. Fails to recognise changes to Green Belt & settlement boundaries required to accommodate them. States that land outside defined settlements is countryside, but that is where settlement extensions are to be located. Therefore, policy needs to refer to settlement extensions or it will conflict with other policies in plan (CO). | Text of second paragraph of policy to be reworded to read 'New development should be concentrated within or adjacent to settlement boundary of towns & key villages'. |
| CG Fry & Son Ltd | Unsound | No evidence to designate Upton a town. It reflects the hierarchy set out in draft RSS but this has not been reappraised in light of local evidence. Policy indicates that settlement boundaries will be reappraised in the Site Allocations Plan, until which time current local plan boundaries will be used. However, boundaries would be inconsistent with settlement boundaries brought about by settlement extensions. | Upton should not be categorised as town. Policy should indicate that where changes to settlement boundaries will also involve a review of Green Belt boundary in CS. |
| Highways Agency | | Concerns about Bere Regis & Lytchett Matravers development as leads to further commuting via A31/A35. Concerns about high growth. Would not support anything other than very limited increase in local service provision. Given constrained nature of trunk road in proximity to Bere Regis, impacts of additional trips on the SRN will need to be mitigated. | Impact of additional trips on SRN to be mitigated. |
| JS Bloor (Newbury) Ltd | Unsound | Should clarify that policy applies only in lower overall growth scenario for Purbeck & that revision would be required in event that higher growth strategy is pursued. Policy does not refer to a Green Belt review & does not recognise importance of SANGs. A higher growth scenario at Lytchett Minster could be sustainable. | Clarify that policy applies only in a lower overall growth scenario for Purbeck & that revision would be required in the event that one or more of the strategic locations identified in paragraph 6.1.3 are pursued. Land at Lytchett Minster should be included in the plan for strategic growth. |
| Redwood Partnership | Unsound | Policy fails to provide strategic guidance beyond outdated local plan boundaries. Waiting until Site Allocations Plan to revise settlement boundaries is at odds with housing | Wool/East Burton/Dorset Green area to be identified as a key location for further development in settlement hierarchy by amending Policy LD as |

| Name | Plan sound? Comment on soundness | Proposed Change |
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| Royal Mail | <p>trajectory, which anticipates building of strategic sites in 2013. CS fails to address immediate shortage of housing land & does not provide flexible & responsive supply of specific, developable sites for at least 15 years from date of adoption. Settlement hierarchy should reflect potential of settlements to accommodate sustainable growth. Background Paper Vol 10 of evidence base summarises advantages of Wool. Compared with other key service villages being allocated growth, Wool has high level of services, good transport links, significant employment & fewer constraints, so should be identified for growth. East Burton should not be listed as separate from Wool as it has a close relationship with Wool & is located in proximity to Dorset Green.</p> | <p>follows: Towns & other key locations for growth: Swanage, Wareham, & Wool/East Burton/Dorset Green Technology Centre area. To ensure flexible & responsive supply of land & to make clear spatial choices needed in CS, Policy LD should include clear reference to location of all settlement extensions needed to implement plan, including an allocation at land off East Burton Rd, Wool, & a further requirement to deliver settlement extension of 1000 dwellings to west of Wool through Site Allocations Plan or Area Action Plan.</p> |
| Scott Estate | <p>Unsound Swanage at top of settlement hierarchy & one of most sustainable locations for development. Policy LD fails to provide strategic guidance for general location of development beyond settlement boundaries. Only development within settlement boundaries possible in short-term, leading to overdependence on development within Green Belt.</p> | <p>Policy to include clear reference to location of all settlement extensions necessary to implement the plan, including land at Washpond Lane.</p> |
| The Charborough Estate | <p>Unsound Criticise settlement hierarchy, as villages without settlement boundary will be treated as open countryside, preventing residential or employment development on greenfield sites adjoining settlements or employment sites such as DGTP or Holton Heath.</p> | <p>Policy to include reference to areas within & adjoining settlement boundaries as further category after towns for "strategic employment locations" (Holton Heath & DGTP). Also after local service villages, amalgamation of remaining settlements as "Other Villages". In other villages mention of appropriate infill, redevelopment or conversion of sites which have been identified as part of Neighbourhood Plan for village.</p> |
| Trustees of W H Drax 1962 Discretionary Settlement | <p>Sound Support for Bere Regis as Key Service Village.</p> | <p>Additional support suggested: "Due to its more remote location vis a vis other larger settlements, it is important to ensure that Bere Regis is able to maintain & enhance its range of services & facilities -</p> |

| Name | Plan sound? Comment on soundness | Proposed Change |
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| Weld Estate | Policy should be more flexible to work around area constraints. Wool should be classified as more than key service village - it has 4th largest population in Purbeck & this should be recognised. Overly restrictive approach will not allow longevity planning & might result in piecemeal development rather than sound & sustainable masterplanning. | which in large part serve residents that would otherwise need to travel large distances. As such, proposals which help to ensure long term vitality of community will be supported". |
| Wyatt Homes | Sound Upton should be categorised as a town, as supported through evidence base & national policy. | |
| ZBV (Winfrith) Ltd | Unsound Wool should aspire to become a town & this should recognised within settlement hierarchy. | Wool should be identified as having potential to accommodate new housing growth - & potential as town considered. |

Council Response to comments on 5. General Location of Development:

ISSUES: Comments are raised by supporters or objectors of specific sites, who wish to see the hierarchy altered to support their particular point of view. Concern raised that the main employment sites lie within lower tier centres identified in the settlement hierarchy and so are not identified as the most appropriate locations for development.

COUNCIL'S RESPONSE: Comments have brought attention to the issue of how employment and other development fits in to this particular policy and it is agreed that changes are required to the policy to add clarity. The hierarchy of towns and villages has been established through the Settlement Strategy, as part of the evidence base for the Core Strategy. This Strategy is updated on a regular basis, and will continue to be updated to reflect changes in population and any other factors that would be relevant in assessing the role of towns and villages.

ACTIONS: Alter policy to allow for employment growth at existing employment sites that do not fit within the settlement hierarchy. Refer to then need to amend settlement boundaries at Upton, Lytchett Matravers and Wareham to allow settlement extensions to come forward.

Chapter: 6. Housing

Para/Policy/Map: 6.1

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| Dorset AONB Partnership | No reference to conservation & enhancement of AONB. | Include reference to conservation & enhancement of AONB especially at Swanage. |
| Natural England | Strategy takes little account of environmental effects in appropriate level of housing growth. | Re-appraise housing growth in Purbeck with more consideration to environmental matters & less consideration to strategic growth plans for south east Dorset. |

Para/Policy/Map: 6.1 - 6.4

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| CG Fry & Son Ltd | Unsound | Basis for providing 2400 dwellings not properly explained or justified. Policy states provision for 2400 dwellings to meet housing needs over plan period, but evidence base (Volume 5: Housing Supply, para. 5.4) acknowledges this level of provision will not meet needs, being below ONS projections & insufficient to meet affordable housing needs. ONS figure of 4000 more up-to-date & needs consideration. It is not discounted in evidence & HRA is inconclusive. HRA only assesses a ltd number of scenarios rather than looking at incremental increases in growth across district. GOSW advised LPA that higher growth scenarios should be tested & this was reiterated by Planning Inspector in February 2010. Purbeck has not pursued this. In 2009, 2400 figure was presented as minimum, but now this is absolute figure - unsound & contrary to government policy. No provision to respond to changing circumstances e.g. if one or more sites do not come forward, leading to housing provision falling short of this figure. Policy relies on Character Area Development Potential from yr 1 onwards - this is alternative name for windfall. Para 59 of PPS3 does not allow use of windfall in first 10 years without robust evidence of genuine local circumstances. LPA does not provide this evidence. PPS3 (June 2010) removes gardens from definition of previously developed land & removes 30dph from minimum | Review of overall provision of dwellings to consider what minimum number can secure stated objectives. Removal of reliance on Character Area Potential figures, particularly for last 10 years. More detailed assessment of potential of individual settlements to accommodate further development, & to increase number of dwellings through larger settlement extensions at Lytchett Matravers (from 50 to 100, 150 or 200). |
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| Name | Plan sound? | Comment on soundness | Proposed Change |
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| | | density, meaning stricter tests & less land coming forward. Therefore, Character Area Potential should be revised. No explanation or evidence provided to show why only 50 dwellings are proposed in Lytchett Matravers. If evidence base says that village should become more self-sufficient & sustainable, 50 dwellings insufficient. | |
| Para/Policy/Map: 6.1.1 | | | |
| Save Herston Fields | Unsound | Understands need for affordable housing but need from desire must be separated (1210 of the 1660 do not live in Purbeck or have a local connection). The figure is more like 400. | Be realistic with affordable housing figures and base the requirement on genuine need aimed specifically at local people with strong local connections. Restrict the amount of market houses in favour of affordable ones, avoiding the expansion of Swanage. |
| Mr Tasker | Unsound | Waiting list not accurate as people outside area can put name down. 50% affordable housing means wide discrepancy in housing quality. BHM model covers wider area & should not be used to inform Swanage. | Prefabricated eco homes for local people & knowledge-based workers with no need for pepper potting. |
| Para/Policy/Map: 6.1.1 - 6.1.5 | | | |
| ZBV (Winfrith) Ltd | Unsound | Concern at the target of just over 2400 new homes to 2026. Significantly below level set out in RSS (for 5150 new homes) & below Government Household Projections (2009) for 4000 new homes to 2026. | Consider/assess options for accommodating increased housing growth within District (over & above 2,400 target) to meet long term housing need. Potential to accommodate significant new housing growth (alongside employment growth & improvements in community/social facilities infrastructure) at Wool/East Burton. |
| Para/Policy/Map: 6.1.2 | | | |
| Save Herston Fields | Unsound | No guarantee that impact on habitats can be mitigated. | Be realistic with affordable housing figures & base requirement on genuine need aimed specifically at local people with strong local connections. Restrict amount of market houses in favour of affordable ones, avoiding expansion of Swanage. |
| Para/Policy/Map: 6.1.2 & 6.3.4 | | | |
| Purbeck Society | Unsound | There is no evidence that in Swanage and SE Purbeck | Remove reference to 2400 houses & focus on |

| Name | Plan sound? | Comment on soundness | Proposed Change |
|--|--------------------|--|---|
| | | suitable mitigation can be put in place. Evidence is to the contrary. | provision for limited affordable housing for locals only, for which appropriate mitigation possible. |
| Para/Policy/Map: 6.1.3 | | | |
| Mr Tasker | Unsound | Does not consider lower level of growth | Use Localism Bill to control development. |
| Para/Policy/Map: 6.1.5 | | | |
| Save Herston Fields | | Land available within Swanage's settlement boundary, so no need for settlement extensions. This land could be restricted to allow for a continuous five-year supply. There is limit to no. of buildings that can be accommodated with available land without destroying AONB. This is not addressed. | Be realistic with affordable housing figures & base requirement on genuine need aimed specifically at local people with strong local connections. Restrict amount of market houses in favour of affordable ones, avoiding expansion of Swanage. |
| Para/Policy/Map: 6.2 | | | |
| Redwood Partnership | Unsound | Character Area Potential has effect of building significant windfall allowance into land supply, contrary to paras 58 & 59 of PPS3. Insufficient evidence of genuine local circumstances to prevent specific sites being identified & no testing to support 47 dwellings per annum - 50% discounting is too low. | No allowance should be made for Character Area Potential. Delete section 6.2 & updated housing supply table & housing trajectory. |
| Trustees of W H Drax 1962 Discretionary Settlement | Unsound | Plan is over-reliant on windfall sites for meeting its housing requirements & no robust evidence provided to justify this. | |
| Para/Policy/Map: 6.2.1 - 6.2.3 | | | |
| Scott Estate | Unsound | Character Area Development Potential contrary to PPS3, as windfall should not be included within first ten years of land supply. Unacceptably high proportion of District's future land supply coming from unidentified sites. | Section 6.2 of CS to be deleted & housing trajectory & supply tables to be updated accordingly. |
| Para/Policy/Map: 6.3 | | | |
| Redwood Partnership | Unsound | Housing trajectory flexible & responsive to allow continuous delivery of housing for 15 years from adoption. No evidence to demonstrate that 100% of commitments will be complete | Allocations of land at East Burton Road, Wool & settlement extension to west of Wool. |

| Name | Plan sound? | Comment on soundness | Proposed Change |
|---------------------------------------|--------------------|---|--|
| Weld Estate | | by 2013, contrary to para 58 of PPS3. Beyond first five years, trajectory relies on high proportion of windfall & non-specific sites. No contingency. Reliance on subsequent DPDs (e.g. Site Allocations Plan) could result in risk to housing delivery. Strategic allocation at Wool needed to ensure specific, deliverable sites. There should not be phasing for settlement extensions as would not conform to broader policy which requires sites to come forward in tandem. Phasing would compound problems with housing stock shortages. | |
| Para/Policy/Map: 6.3.1 | | | |
| Save Herston Fields | | No explanation as to where extra 120 dwellings will go & public has not been consulted on it. | |
| Para/Policy/Map: 6.3.1 - 6.3.4 | | | |
| Scott Estate | Unsound | Housing trajectory not flexible, responsive supply of housing to enable continuous delivery of housing for 15 years from adoption as required by PPS3. No evidence that existing commitments will be complete by 2013. No contingency planning to identify different delivery options if actual delivery rate is lower than expected. Reliance on DPDs to deliver proposed allocations & delays could represent risk to housing strategy. | Identify Washpond Lane in housing trajectory. |
| Para/Policy/Map: 6.3.3 | | | |
| Messrs & Mmes Rees & Redfern | | Paragraph erroneously includes Wool & Corfe Castle & needs removal. | Delete reference to Wool & Corfe Castle from this paragraph. |
| Para/Policy/Map: 6.3.4 | | | |
| Purbeck Society | Unsound | Graph shows 40% more completions than commitments which suggests another 1000 houses that people are not being told about. | |
| Save Herston Fields | Unsound | HRA states high likelihood development would have adverse effect on protected habitats. SANGs in Swanage | Reduce number of dwellings being proposed. |

| Name | Plan sound? | Comment on soundness | Proposed Change |
|---------------------|--------------------|---|---|
| | | unachievable because land not available & would not compete with areas it would attempt to replace. | |
| Mr & Mrs Hobbs | Unsound | HRA (para 5.52) states development in Swanage will have adverse effect. Mitigation in form of SANGs. SANGs not deliverable due to AONB. | No more building on greenfield/AONB. Limit development to infill affordable housing for local people. |
| Mr & Mrs Warrington | Unsound | HRA (5.52) states likelihood of development in Swanage having adverse effect. Mitigation proposed is SANGs, but not deliverable in Swanage due to AONB. | No more building on greenfield/AONB & limit infill to affordable housing for local people. |
| Mr Clements | Unsound | SANGs should be "Suitable Alternative Natural Green Space" rather than "Suitable Accessible Natural Green Space". No space for SANGs in AONB. | No building on greenfield/AONB. Limit infill to affordable housing for local people. Amend definition of SANGs. |
| Mr Davies | | Para 2b not effective. HRA para 5.52 states development in Swanage likely to have adverse impact. SANGs proposal not feasible because of AONB. | Infill should be limited to affordable housing for local people. No building in AONB. |
| Mrs Castle | | HRA (5.52) states development in Swanage would have adverse effect. Mitigation proposals of SANGs not deliverable in Swanage, which is in AONB. | No building on greenfield sites or in AONB. Limit infill to affordable housing for local people. |
| Mrs Higham | Unsound | HRA states likelihood that development in Swanage will have adverse effect. Mitigation for SANGs not deliverable in Swanage due to AONB. | No more building on greenfield/AONB. Infill limited to affordable housing for local people. |
| Mrs Hurst | Unsound | Concerns for protected habitats. Not possible to find alternative green space. AONB should be protected. | No building on green fields in AONB. Infill should be limited to affordable housing for local people |
| Mrs Luker | | AONB will be lost & no provision of SANGs to replace it. Impact on biodiversity & habitat. Negative impact on tourism. | No more building on greenfield/AONB. Affordable housing for local people only. |

Para/Policy/Map: 6.4

| | | | |
|---------------------|----------------|--|--|
| Save Herston Fields | Unsound | Majority of employment & employment land is not in SE Purbeck. Contrary to aims of plan to reduce greenhouse gas emissions, congestion & improving local facilities. 1.2ha of allocated employment land will not support 900 dwellings & people will be encouraged to commute. | Be realistic about building houses where access to employment is at its greatest, not least. |
|---------------------|----------------|--|--|

Para/Policy/Map: 6.4.4

| Name | Plan sound? | Comment on soundness | Proposed Change |
|---------------------|--------------------|--|---|
| Purbeck Society | Unsound | Housing register figure is unreliable. | Define real housing need in SE Purbeck, estimated to be around 40-50, & use this as a basis for planning. |
| RSPB | | If housing goes beyond 2,400, further mitigation would be required. "Due to environmental constraints" is unhelpful & inaccurate. Other factors at play such as funding arrangements for affordable homes. | |
| Save Herston Fields | Unsound | This figure does not represent actual need. | Be realistic with figures & base them on need rather than desire. Build bulk of new houses in place where they would be more affordable & without impact on A351. |

Para/Policy/Map: 6.4.5

| | | | |
|--------------------------------------|----------------|---|---|
| Purbeck Society | Unsound | Vast majority of housing in Purbeck would be in Swanage. In 2002 the Planning Inspectorate report stated that no more development should occur until traffic congestion has been resolved. This has yet to occur. | Reassess definition of need & recast allocation policy. |
| Save Herston Fields | Unsound | 37% of housing is being allocated in SE Purbeck where land prices are highest. Because of land values this means that affordable housing will be less affordable. Planning Inspector said in 2002 that no more development should take place in Purbeck until congestion on A351 is resolved. Core Strategy does not adequately address this problem, yet housing is being directed to least accessible part of district. | Be realistic with figures & base them on need rather than desire. Build bulk of new houses in a place where they would be more affordable & with no impact on A351. |
| Swanage Town & Community Partnership | Unsound | Not enough employment to support housing proposals. Concerns over congestion on A351. Would require development outside of settlement boundary contrary to requirements of Policies LD and CO. Difficult to quantify real need for housing rather than demand for housing. No SANGs identified & development of greenfield land could lead to loss of recreational provision | Reduce number of dwellings for SE Purbeck with no settlement extensions. Housing should be near employment land. |
| Mr & Mrs Hobbs | Unsound | 900 units not deliverable. In 2002, Planning Inspector stated no further development in Purbeck until traffic congestion on | Put bulk of housing in Holton Heath & Winfrith. |

| Name | Plan sound? | Comment on soundness | Proposed Change |
|---------------------|--------------------|--|---|
| | | A351 resolved. | |
| Mr & Mrs Warrington | Unsound | 900 dwellings is unsound - not deliverable. Planning Inspector (2002) stated no new development in Purbeck until A351 congestion resolved. A351 is one long car park with air & noise pollution. | Put housing development in Holton Heath & Winfrith. |
| Mr Clements | | 900 dwellings not deliverable. Planning Inspector (2002) stated no further building in Purbeck until A351 problems resolved. | Housing growth in Winfrith & Holton Heath |
| Mr Davies | Unsound | Planning Inspector (2002) stated no further building in Purbeck until congestion on A351 resolved.. | Put housing in Holton Heath & Winfrith |
| Mr Leadbetter | Unsound | 900 units not deliverable. Concerns about traffic congestion. Planning Inspector (2002) referred to not further building in Purbeck until A351 congestion sorted. | Put housing in economic growth areas such as Holton Heath & Winfrith. |
| Mr Saddington | | No consultation with Swanage regarding new housing. Jobs not available. Area would be spoiled, especially AONB. | |
| Mrs Castle | | 900 houses not deliverable. Planning Inspectorate (2002) stated no further development in Purbeck until traffic congestion on A351 resolved. | Build new housing in Holton Heath & Winfrith. |
| Mrs Denton | Unsound | 900 dwellings not deliverable. In 2002, Planning Inspector advised no further building should happen in Purbeck until traffic congestion at Sandford has been resolved. | Housing should be near employment land at Holton Heath and Winfrith |
| Mrs Harris | | Swanage can't support 200 extra houses. Concerns about congestion and more traffic. Lack of employment. Residents not consulted. | |
| Mrs Hurst | Unsound | 2002 report states there should be no further building in Swanage until traffic congestion on A351 is resolved | Housing should be close to areas of economic growth in order to minimise traffic congestion |
| Mrs Marlow | Unsound | 900 units not possible. | Housing should be closer to economic growth areas such as Holton Heath & Winfrith. |
| Mrs Saddington | | No consultation about building of new houses in AONB. Impact on health & hospital. Blot on landscape. Health Centre should not move. | |

Para/Policy/Map: HS: Housing Supply

| Name | Plan sound? | Comment on soundness | Proposed Change |
|------------------------|--------------------|--|--|
| Ashvilla Estates Ltd | Unsound | CS fails to deliver sufficient levels of housing. SHMA set level of 409 new affordable homes per annum & recent ONS household population projections suggests need for 4000 homes rather than 2400 proposed. Provision should be made for 5150 in line with RSS. Settlement hierarchy fails to provide sufficient focus to Wareham & Swanage in terms of distribution of development. Too much emphasis given to weight of environmental constraints, including AONB, in spite of weight of evidence relating to economic & social need. Jobs & homes imbalance results in local people being unable to buy local housing & out-migration can make it difficult for local firms to recruit skilled staff. Wareham most sustainable location for development. | Amend policy to provide at least 5150 dwellings in period to 2026. No allowance should be made for windfalls. Additional development should be directed to Wareham & Swanage as principal towns in District. Land should be allocated for at least 700 dwellings to west of Wareham (including 200 within bypass). |
| Bloor Homes Ltd | | If a food store were identified in CS, it is doubtful there would be room for settlement extension of 200 dwellings identified in housing supply. | |
| CPRE | Unsound | Housing requirements have been modelled on 2006 DCA needs assessment & extent to how local this survey was is unclear. PDC increased figures to 2400 on an anticipated intervention by Minister of State & this no longer applies. Revising figures post-scrapping of RSS has not happened. A housing needs assessment is non-existent in large number of settlements & there will be incentive to have a local approach with Localism Bill. | Immediate interim reduction in housing number allocations, particularly within AONB, to be followed as soon as practicable by local assessments to reflect real current needs. |
| JS Bloor (Newbury) Ltd | Unsound | The policy should include strategic growth at Lytchett Minster. | Set out clear process & timetable for considering potential for higher levels of housing growth in Purbeck & benefits of doing so in context of Purbeck & wider housing market area. Robust & credible delivery plan for higher levels of growth is required, supported by comprehensive SA & HRA progressed as part of a multi agency, joined-up approach, so that delivery issues including consideration of strategic mitigation proposals are tackled. |
| Mr & Mrs Nash | Unsound | There should be a settlement extension at Wool. | Amend policy by inserting into line dealing with SW Purbeck reference to settlement extension at Wool |

| Name | Plan sound? | Comment on soundness | Proposed Change |
|---------------------------|--------------------|--|--|
| Planning Perspectives LLP | Unsound | Request that former gas depot on North Street in Wareham is included in commitments/character area potential. | to put 25 houses in column 2012-2016 & 25 houses in column 2017-2021. Change third sentence to: 'Housing development will be directed to the most sustainable locations, prioritising previously developed brownfield sites & in accordance with Policy LD: General Location of Development. |
| Redwood Partnership | Unsound | Does not take into account evidence of current & future need & demand for housing & affordability levels, availability of suitable land identified in SHLAA & government ambitions to increase housing supply & affordability. Relies on a small no of Green Belt sites. Reliance on windfall or subsequent DPDs for significant proportion of supply. Policy contrary to PPS3 paras 32, 33, 52 - 55 and 57 - 62, in particular regarding supply of land from yrs 1-15 of plan. Reducing house building to 80 per year would be lowest rate for over 20 years & result in overcrowding, sub-standard housing, social exclusion, homelessness & out-migration of younger families. Western Sector identified in RSS is unsuitable but council should look for alternative site. Wool could support additional growth in line with Habitats Regs. Review of CS should not be deferred. | Increase overall level of housing provision to around 4000 dwellings 2006-2016. Additional strategic allocations & specific sites to be identified within housing supply, including land off East Burton Rd in Wool as a strategic site allocation for 2012-2016 & a further 1000 homes as settlement extension to west of Wool. |
| RSPB | | No reference to IPF (heathland mitigation) & requirement to exclude further housing development within 400m of European site. No reference to heathlands. | Include reference to main requirements of IPF. Include overview of IPF (heathland mitigation). |
| Save Herston Fields | Unsound | Most of SE Purbeck is AONB & Government has stated AONB has same status as national parks. Therefore, settlement extensions are illegal & SANGs are undeliverable. | Delete settlement extensions from AONB. |
| Scott Estate | Unsound | Not consistent with PPS3. Level of housing does not take account of future need & demand for housing & affordability levels (PPS3 paras 32 and 33). Fails to provide land to ensure overall housing provision can be met (contrary to PPS3 para 52). Does not identify broad locations or specific | Overall level of housing provision should be increased in line with identified housing needs. Additional strategic allocations & specific sites should be identified within the housing supply, including identification of Washpond Lane Swanage |

| Name | Plan sound? | Comment on soundness | Proposed Change |
|--------------------------------------|--------------------|--|--|
| | | <p>sites to enable continuous delivery of housing for at least 15 years from adoption (contrary to PPS3 para 53). Fails to identify sufficient deliverable sites for first five years from adoption (contrary to PPS3 para 54). Fails to identify further supply of specific sites for years 6-10 & 10-15 (contrary to PPS3 para 55). No mechanism presented to manage supply of land to ensure continuous supply of deliverable sites (contrary to PPS3 para 58). Insufficient evidence to demonstrate that existing commitments will be delivered within timescale envisaged (contrary to PPS3 para 58). Significant windfall allowance incorporated in first ten years of land supply (contrary to PPS3 para 59). No evidence of contingency planning or risk assessment to identify different delivery options & management strategies to ensure housing delivery at expected rate (contrary to PPS3 para 62). Not flexible, as relies on small no. of sites currently within Green Belt & does not identify sites elsewhere to ensure delivery of CS objectives in relation to housing provision.</p> | as a strategic site. |
| Studland Parish Plan | Unsound | No readily available evidence base for numbers of houses proposed for district. | |
| Swanage Town & Community Partnership | Unsound | Not enough employment to support housing proposals. Concerns over congestion on A351. Would require development outside of settlement boundary contrary to requirements of Policies LD and CO. Difficult to quantify real need for housing rather than demand for housing. No SANGs identified. Development of greenfield land could lead to loss of recreational provision | Reduce number of dwellings for SE Purbeck with no settlement extensions. Housing should be near employment land. |
| Swanage Town Council | Unsound | 900 dwellings in SE Purbeck will not protect environment. Inconsistent with Policies CO & LHH. Contradicts para 8.17.1 re identity of Purbeck. Cumulative impact threatens historic appearance of settlements, especially with scrapping of policy QL30 (2004 Local Plan). | Reduce number of dwellings. Retain & extend Policy QL30. |
| The Charborough Estate | Unsound | No evidence that housing provision figure is result of any analysis of migration, affordability, housing waiting list or | Allow modest amounts of market housing within small villages & more flexibility for more greenfield |

| Name | Plan sound? | Comment on soundness | Proposed Change |
|--|--------------------|---|---|
| | | other factors. Concern that CS would result in very significant reduction in overall scale of housing on annual basis, compared with what has been built in Purbeck over last decade. No sound evidence that reduction would meet needs of local community for open market & affordable housing in light of in-migration pressures. | locations especially at Wareham, where sites at Carey & Tatinoby Farm should be allocated as mixed use development sites. |
| Trustees of W H Drax 1962 Discretionary Settlement | Unsound | Level of windfall sites identified in NW Purbeck difficult to realise as density of development requirements have been reduced & private gardens no longer assessed as previously developed land. | Unless it can be adequately demonstrated that deliverable, achievable sites are available within the plan period, windfall allowance should be removed, pending a suitable evidence base. |
| Wareham Town Trust | | Decision to allocate land at Worgret Road for development of 200 homes made without any clear justification. Decision to allocate the site for 100 additional homes, following deletion of supermarket proposal appears to have been made on impulse & is deeply flawed. | In response to the published Localism Bill, which favours a locally driven approach, stop work on Core Strategy & reconsider. |
| Weld Estate | | Agree with policy. | |
| Welfare Dwellings Residential Care | Unsound | Distribution of housing development unsound. Proposes 200 dwellings in Wareham, which is unlikely to come forward in short-term. Swanage can deliver housing sooner. | Amend housing table to enable additional housing in Swanage rather than Wareham. |
| Wyatt Homes | Sound | Support that the housing trajectory showing Upton coming forward within the early (1-5yrs) part of housing supply. | |
| ZBV (Winfrith) Ltd | Unsound | Concern at target of just over 2400 new homes to 2026. Significantly below level set out RSS (for 5150 new homes) & below Government Household Projections (2009) for 4000 new homes to 2026. | Consider/assess options for accommodating increased housing growth within District (over & above 2,400 target) to meet long term housing need. Accommodate significant new housing growth (alongside employment growth & improvements in community/social facilities infrastructure) at Wool/East Burton. |
| Messrs & Mmes Rees & Redfern | Unsound | Section 1.1.5 of Sept 09 version of CS said that council would plan for 2400 dwellings in line with government targets & revert to 2100 if government reduces this number. Current version of plan maintains 2400 & gives no explanation for this. Preferably, this should be reduced to 2100, or council should be allowed discretionary leeway of | Revise housing number to 2100 to reflect locally agreed number. |

| Name | Plan sound? | Comment on soundness | Proposed Change |
|------------------------------|--------------------|--|---|
| | | 300 dwellings from 2100 to 2400 depending on requirement. Without revising housing numbers to reflect locally agreed number of 2100, CS is unsound. | |
| Messrs & Mmes Rees & Redfern | Sound | Support no settlement extension at Wool. | |
| Mr Boxall | | Not enough job provision in Swanage for dwellings proposed. Concerns about lack of infrastructure such as roads and public transport. | Build housing in economic growth areas such as Holton Heath and Winfrith. |
| Mr Tritte | Unsound | Council is confusing affordable housing need with demand, & grossly overstates number of units required, which leads to far more market housing than necessary. | |
| Mrs Howard | Unsound | Swanage was not consulted on the number of houses to be built as a whole. 2400 are too many and should be reduced to 2100; therefore a settlement extension in Swanage would not be required. The number has been plucked out of the air and does not have a credible evidence base. | Reduce housing provision to 2100 and have a referendum in Swanage about the number of new houses. |
| Ms Zyga | Unsound | Para 5.52 of HRA says that it is likely development would have adverse impact on protected habitats. SANGs not deliverable in Swanage, which is AONB & should be protected. | No more building on AONB. Delete proposal for 2400 homes. Revert to draft RSS target of 2100 dwellings. |

Council Response to comments on 6. Housing :

ISSUES: The main arguments in this section can be roughly divided into two types: Swanage residents who propose development elsewhere, especially in the Wool area, and developers who state that there is an insufficient amount of development. Arguments are made in favour of more/fewer than 2400 houses or stating that 2400 houses are not justified in light of localism. Comments are made that there is no evidence to justify 50 dwellings in Lytchett Matravers, that the need for affordable housing should be separated from desire, and that there is no guarantee that the impact upon habitats can be mitigated. Comments from residents in Swanage state that sufficient land exists within Swanage to meet its housing needs. Various settlements are put forward for development by all representors. There are concerns that housing is being put in areas with little employment, or with traffic congestion (in particular on A351) or in areas that will impact on landscape. Developers draw attention to PPS3 in respect of reliance on Character Area Potential, delivery of housing during the first 5 years and years 5-15 of the plan and the housing trajectory being inflexible. It has also been pointed out that gardens are now removed from definition of brownfield, so they should not be included in Character Area Potential, and that building outside settlements is contrary to Core Strategy policies LD, CO and LHH. A minor amendment is required to 6.3.3 to remove reference to Wool and Corfe Castle.

COUNCIL'S RESPONSE: The Council has agreed on 2400 dwellings, with their location and distribution clearly supported through public consultation. The Strategic Housing Market Assessment considered housing need by the approach advised by government, so changing it would be inappropriate. There are insufficient known sites within the settlement boundaries to provide at least 10 years housing supply (as required by PPS3), which is why settlement extensions are required. Ecological constraints limit the level of housing growth achievable - studies indicate that 2400 dwellings can be achievable in the District provided suitable mitigation measures are put in place. With regard to Wool, there is no evidence to suggest that large-scale housing growth would be sufficient to unlock economic development. Locating growth next to employment land is only one aspect of sustainability and, whilst desirable, is not always possible. The Council's strategy is to focus development on population centres and maximise potential to link these to employment sites through the Purbeck Transport Strategy. The proposed settlement extensions will not cause unacceptable landscape impacts and combined with good design can ensure good integration of new developments in their surroundings. The policy complies with PPS3 - Character Area Potential is not the same as windfall and has a robust methodology approved by SHLAA Panel. The Panel also agreed that it would be impossible to contact the landowners of small sites to check developability. Whilst gardens have been removed from the definition of brownfield land, PPS3 nonetheless still advocates the best use of land and therefore subdivision of plots is still acceptable. There are sufficient deliverable sites in the first 5 years of the plan and sufficient developable sites in years 5-15. The housing trajectory incorporates greenfield sites which provide greater flexibility. The policy could potentially cause confusion with Core Strategy policies LD, CO, CEN and NE in terms of allocating land for settlement extensions, so it is recommended that LD, CEN and NE are reworded for clarity. It is agreed that references to allocations at Wool and Corfe Castle are erroneous and need removal from the plan.

ACTIONS: Delete Wool and Corfe Castle from para 6.3.3. For clarity, update policies LD, CEN and NE to make it clear settlement boundaries will be amended to accommodate settlement extensions.

Chapter: 6. Employment

Para/Policy/Map: 6.5

| | | | |
|-------------------------|----------------|---|--|
| Dorset AONB Partnership | | No reference to conservation & enhancement of AONB. No reference to Green Travel Plans. | Include reference to conservation & enhancement of AONB, especially at Prospect Business Park & reference to Green Travel Plans. |
| Mr & Mrs Hobbs | Unsound | Only 2.5% of employment land in Swanage & less than 3% of SE Purbeck where proposal is for 37.5% of housing provision. Contradicts aim of Purbeck Community Plan & Core Strategy (paras 4.1.2, 4.1.4, & 4.3.1) | Put bulk of housing in Holton Heath & Winfrith. |
| Mr & Mrs Seaman | | New jobs identified are not near Swanage. Limited space in Swanage. Adverse impact on natural environment. New homes often become 2nd homes, putting prices even higher. | Put new housing in areas where job growth is identified. |
| Mr Clements | | Swanage has only 2.5% of employment land. Under 3% of employment land in SE Purbeck. Housing provision in Swanage unsustainable with lack of employment facilities. | Housing growth in Winfrith & Holton Heath. |
| Mr Davies | | Less than 3% employment land in SE Purbeck where 37.5% of houses are proposed. Contradicts Purbeck Community Plan & paras 4.1.2., 4.1.4. & 4.3.1. of Core Strategy. | Put housing in Holton Heath & Winfrith |
| Mr Saddington | | 37.5% allocation of new housing at Swanage is outrageous. Concerns about jobs. Concerns about congestion on A351. | |
| Mrs Castle | | Less than 3% of employment land in Swanage less than 3.5% in SE Purbeck, which is to have 37.5% of housing provision. Contradicts aim of reducing car usage (as in Purbeck Community Plan & Core Strategy pars 4.1.2./4.1.4. & 4.3.1). Not sustainable. | Build new housing in Holton Heath & Winfrith. |
| Mrs Denton | Unsound | Not enough employment to support housing proposals. Contradicts stated aim of Core Strategy set out in paras 4.1.2, 4.1.4 and 4.3.1. | Housing should be near employment land at Holton Heath and Winfrith. |
| Mrs Higham | Unsound | 37.5% of housing in SE Purbeck, but employment land less than 3%. Not sustainable & contradicts aim of reducing car usage (paras 4.1.2., 4.1.4 & 4.3.1. of Core Strategy). | Put bulk of housing in Holton Heath & Winfrith Newburgh. |

| Name | Plan sound? | Comment on soundness | Proposed Change |
|----------------|--------------------|--|--|
| Mrs Howard | | High housing numbers and lack of employment opportunities is unsustainable - 37.5% of housing growth is being directed to SE Purbeck, but 3% of employment land is there. This contradicts aims of reducing car usage (paras 4.12, 4.14, 4.3.1). | Allocate housing where there is more employment land. |
| Mrs Hurst | | Concerns over congestion/traffic, especially on A351. Not enough employment to support housing proposals. 900 dwellings in SE Purbeck is too high. Housing should be near employment. Negative impact on environment & on tourism. | Create growth in areas of economic growth i.e. Holton Heath & Winfrith |
| Mrs Lawton | Unsound | Concerns about lack of employment in Swanage & limited road network. | Put housing in Holton Heath & Winfrith. |
| Mrs Luker | Unsound | Holton Heath & Winfrith are identified as places for economic growth, so no reason to develop in Swanage. Inadequate road network. Concerns about traffic congestion in Corfe Castle. | Put housing growth in Holton Heath & Winfrith. |
| Mrs Saddington | | Should not increase number of people in area with few work opportunities. | |

Para/Policy/Map: 6.5.2.1

| | | | |
|---------------|----------------|--|---|
| Birchmere Ltd | Unsound | Object to inclusion of 4ha of available land at Admiralty Park. Not based on detailed evidence that land is available or suitable. Owner intends to promote only small scale low density buildings within existing attractive setting. Intensification of site could conflict with desire to conserve character & market appeal. | Amend final column: "Indicative Availability" (ha). Footnote to be added to state that land availability at identified sites has not been subject of detailed work, but will follow in Site Allocations review. |
|---------------|----------------|--|---|

Para/Policy/Map: 6.5.3.2

| | | | |
|---------------|----------------|--|---|
| Birchmere Ltd | Unsound | Admiralty Park has Certificate of Lawful Use & no need to be included within CS for allocation, as refurbishment of existing buildings is lawful. CS is not allocating employment sites, but setting strategic setting for employment provision, focussing development at existing employment locations & identifying range of sites that could make up supply. Para 6.5.3.2 is incorrect in stating that CS provides opportunity to formally allocate sites. Sentence relating to land availability | Amend paragraph to delete final sentence relating to land availability at Admiralty Park, delete reference to need for allocation to allow refurbishment of buildings at Admiralty Park & delete reference to need for CS to allocate employment sites. |
|---------------|----------------|--|---|

| Name | Plan sound? | Comment on soundness | Proposed Change |
|-------------------------------|--------------------|---|--|
| | | at Holton Heath also incorrect. | |
| Para/Policy/Map: 6.5.4 | | | |
| ZBV (Winfrith) Ltd | | Strongly support level of employment land/development at Dorset Green Technology Park (DGTP). However, CS needs to recognise that major investment is needed to regenerate site, to improve quality of on-site business accommodation & to rebrand site as low carbon (green) business location, to upgrade existing infrastructure, to encourage existing firms to remain at site & to attract new businesses to DGTP. Recommend initiating an AAP for Wool, East Burton and DGTP. | Recognise current commercial challenges associated with site & urgent need for regeneration. Acknowledge that ZBV and HCA are formulating a Masterplan for regeneration of DGTP. |
| Para/Policy/Map: 6.6 | | | |
| Natural England | | 6.6.3 proposes additional amount of employment land over & above 8ha at Holton Heath & 4ha at Admiralty Park. Unclear how this relates to HRA & fragmentation. If there is to be further allocation of employment land at Holton Heath, Habitats Regulations issues are relevant, as well as enhancement & long-term conservation management of undeveloped land between Holton & Sandford Heaths, with broad heathland corridor encompassing SSSI at Black Hill. | |
| Para/Policy/Map: 6.6.2 | | | |
| Weld Estate | | Object to suggestion that Winfrith is remote, given its proximity to Wool, which could expand in harmony with DGTP. | |
| Para/Policy/Map: 6.6.3 | | | |
| Dorset Wildlife Trust | Unsound | Para does not pick up need to ensure protection & enhancement of SNCI. | Amend: "...not be an adverse effect on the integrity of any European site & that other nature conservation interests are protected & enhanced" |
| RSPB | | Supports mitigation. | |
| Para/Policy/Map: 6.6.4 | | | |
| Mr Tasker | Unsound | Not enough employment. Concerns about A351, especially | Only permit housing in proportion to employment for |

| Name | Plan sound? | Comment on soundness | Proposed Change |
|---|--------------------|--|--|
| | | through Corfe Castle. | non-knowledge based workers. |
| Para/Policy/Map: ELS: Employment Land Supply | | | |
| Birchmere Ltd | Unsound | Agree with general objectives & identification of 11.5ha of new employment land. Disagree with reference to most sustainable locations in accordance with Policy LD which would identify Holton Heath as low tier settlement , not reflecting status as key employment site. Policy lacks clarity. | Include reference to provision for minimum of 11.5ha of employment land over plan period. New employment development to be concentrated at existing employment sites, most notably DGTP. Potential supply of approx 35ha of employment land identified at existing employment locations & suitable allocations at these & potentially other locations should be made as part of subsequent Site Allocations process, with objective to ensure sufficient flexibility & choice of sites to cater for employment growth & to meet needs generated by housing growth. Travel Plans required alongside planning applications for new employment development. |
| Dorset County Council | | There is more available land than needed & therefore potential for significant over-development with implications for housing needs & transport. Careful monitoring & phasing are required to prevent this taking place. | A clearer approach to monitoring & phasing of employment land should be stated. |
| Mr & Mrs Hampshire | Unsound | Table 3 inaccurate & confusing because no land available at Wareham Road, Lytchett Matravers. The development is complete. Current established employment site in Huntick Road could be rationalised & provide additional employment. | Delete reference to Wareham Road in table 3. Insert reference to Huntick Road, Lytchett Matravers & amend map 5 accordingly. |
| Trustees of W H Drax 1962 Discretionary Settlement | Sound | Employment allocation at Bere Regis supported. | |
| Weld Estate | | Support development of DGTP. Existing employment sites should be focus of Purbeck's employment effort. | |
| Welfare Dwellings Residential Care | Unsound | Fails to consider tourist contribution & growth in services industries. Too much focus on B Class uses. Should consider jobs for local people. A site with accommodation & | Non-B Class Uses to be added as category in appropriate locations. |

| Name | Plan sound? | Comment on soundness | Proposed Change |
|-------------------------------|--------------------|---|--|
| ZBV (Winfrith) Ltd | | employment (e.g. care homes) should be considered. Broad support for approach of policy ELS in terms of directing new economic development to sub-regional employment sites. Level of growth recommended by SWRDA workspace strategy (20ha) is considered a reasonable scale of business development. Other recommendations made by SWRDA report are not included, & ought to be. Support "open book" viability appraisal to understand costs associated with delivery of new development. | As per SWRDA report, ensure planning applications determined through existing LP/CS. Once Masterplan is available, show commitment for initial phase of development & supporting facilities for employees & nearby communities such as conference facilities, catering, hotel, gym & leisure. Residential development in & around DGTP site. Reduction in transport contributions (could be prohibitive). Work with DGTP Masterplanning team to commence work on Area Action Plan for Wool area. |
| Mr & Mrs Warrington | Unsound | Only 2.5% of employment land in Swanage & less than 3% in SE Purbeck, although housing allocation is 37.% of total. Contradicts aim of reducing care using (see Purbeck Community Plan and Core Strategy paras 4.1.2, 4.1.4 & 4.3.1. Not sustainable. | Put housing development in Holton Heath & Winfrith. |
| Para/Policy/Map: Map 5 | | | |
| Birchmere Ltd | Unsound | Object to identification of specific land availability at Admiralty Park, no evidence to indicate availability, given landowners objectives for site & environmental sensitivity & designations. | Delete reference to quantum of available land at Admiralty Park |

Council Response to comments on 6. Employment :

ISSUES: A number of comments have been raised by objectors to housing growth in South East Purbeck and the linkage to employment growth. Likewise, there is concern that limited housing growth in south west Purbeck will not support economic growth at DGTP. Comments from the landowner of Admiralty Park/Holton Heath Industrial Estate and from Natural England question the level of development that would be appropriate on the site. Dorset County Council have concerns over the possible over-supply of employment land and need for phasing of development.

COUNCIL RESPONSE: It is recognised that employment growth in South East Purbeck is restricted by location, working population size and landscape concerns. The current employment allocation at Prospect Business Park is targeted at meeting the needs of local businesses who wish to expand and it is unrealistic to expect inward investment. It is intended that a flexible approach should be applied in order to address the future employment needs of the area. This could include improvement and intensification of existing employment areas, encouragement of employment within the town centre and within areas of mixed use development. Improvements are also being made to public transport to improve access to employment opportunities elsewhere. The amount of employment land that can be suitably developed at Holton Heath needs agreement between Natural England and the landowner. The policy can be improved by making it clear that the Core Strategy does not allocate employment land, but merely highlights the location of existing employment land and that it is the role of a subsequent plan(s) following work on stage 3 of the Employment Land Review to allocate employment land.

ACTIONS: To simplify some text throughout. Remove the table from Policy ELS: Employment Land Supply. Amend paragraph 6.5.3.2 to remove reference to 'allocation of site'.

Chapter: 6. Retail

Para/Policy/Map: 6.7

| | | | |
|-----------|----------------|--|--|
| Mr Taylor | Unsound | The RIA was conducted by a company which has a bias towards the major supermarkets. This is reflected in bias of questions which were not supported by secondary questions exploring the response given. | As there is no quantitative requirement, only a possible qualitative need, all reference to qualitative should be deleted from para 6.7.3.1. |
|-----------|----------------|--|--|

Para/Policy/Map: 6.7.1

| | | | |
|-----------------------------------|----------------|---|---|
| Purbeck Environmental Action Team | Unsound | Hierarchy of centres identified in 2008 Retail Study questioned on basis of growth in internet shopping & expansion of Sainsbury store in Wareham. Recommendation that growth should be met by one or more additional supermarkets does not consider other options. | Paragraph 6.7.1 to be deleted & replaced with: "The Retail Study (2008) recommended a hierarchy of centres & identified a need for additional retail floor space of 4000sqm over plan period based on projections for future population of whole of Purbeck". |
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Para/Policy/Map: 6.7.3.1

| | | | |
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| Purbeck Environmental Action Team | Unsound | Necessity of trips to Dorchester & Poole to larger food stores (as identified in the Retail Study of 2008) is challenged on basis that people are making trips to larger centres for comparison shopping &/or work & that these trips would be made anyway regardless of more supermarket provision in Wareham. No mention made of possible environmental disbenefits of construction of large building & hard-standing, or of associated energy requirements. | Delete words "with associated environmental benefits". |
|-----------------------------------|----------------|--|--|

Para/Policy/Map: 6.7.3.2

| | | | |
|-----------------------------------|--|---|--|
| Purbeck Environmental Action Team | | Paragraph understates level of local opposition to new supermarket at Wareham. This, & council decision not to have supermarket, should be represented. | Delete text & refer to public debate in specially convened council meeting attended by over 350 members of public, where feelings of local people were expressed & Council voted overwhelmingly to reject new supermarket in Wareham. This represents a continuation of previous policy by Council to reject plans for out-of-centre |
|-----------------------------------|--|---|--|

Name **Plan sound? Comment on soundness**

Proposed Change

supermarkets in Wareham.

The District Council has made a clear decision to put the character and setting of Wareham and the negative impact that an out-of-centre supermarket would have on the town's character and setting and on the local economy and vibrancy of the town centre, ahead of the perceived qualitative need for additional comparison shopping of consumer goods within the wider Purbeck area as identified in the consultation documents.

The decision not to make an allocation for a food store within the Core Strategy or the subsequent Site Allocation Plan does not represent an omission by the Council, but a positive decision to foster retail growth through other channels."

Mr Tasker **Sound** Prevents out-of-town stores.

Para/Policy/Map: RFS: Retail Floor Space Supply

Scott Estate **Unsound** Does not meet needs identified in evidence base for 2,000sqm of additional convenience floor space. NLP 2008 & 2010 studies form credible evidence base & should be taken into account.

Policy RFS should include provision of 2,000sqm (net) of additional convenience floor space.

W M Morrison Supermarkets plc **Unsound** No provision for additional convenience floor space over plan period. Explanation that Council has decided not to propose new food store in CS is unsound as current CS will not ensure that District has good access to shopping facilities geared to weekly bulk food shopping trip & because it will perpetuate high level of predominantly car-borne trips to main food shopping facilities outside District. PPS4 seeks to provide for distribution of shopping facilities to allow genuine choice for whole community. CS fails to provide for choice of main food shopping facilities & does not address need for large food store. CS does not include

Facilitate provision of main food store in Wareham or Swanage, but restrictions imposed on proportion of floor space dedicated to sale of comparison goods. If council is unable to identify suitable, available & viable site for new food store, then CS should make high level commitment to delivery of food store & leave allocation of this facility to Site Allocations DPD or future planning application.

| Name | Plan sound? | Comment on soundness | Proposed Change |
|-----------------------|--------------------|--|--|
| | | evidence that new food store would result in adverse impact on town centre of Swanage or Wareham. CS will not deliver more sustainable patterns of development. | |
| Wyatt Homes | Sound | Support Upton as "Local District Centre" status. | |
| WYG Planning & Design | | Policy RFS only makes provision for 2000sqm of comparison floor space, when evidence base suggests 2000sqm of convenience floor space will also be required in plan period. Not consistent with PPS 12 which requires Core Strategies to be based upon robust & credible evidence base. | Amend Policy RFS to be in accordance with evidence base & guidance in PPS4. |
| ZBV (Winfrith) Ltd | Unsound | There is opportunity & need to improve range of services/facilities provided within Wool which should be promoted through emerging policy. Options for strengthening links between DGTP site & Wool & for improving the overall range of facilities & services available to residents & workforce. | Policy should support provision of new facilities at Wool in order to improve self containment & to support existing & future residents/workers. |

Council Response to comments on 6. Retail :

ISSUES: Comments vary depending upon the point of view of supermarket operators/landowners and objectors to the principle of a new supermarket. Concern raised by supermarket promoters is that Policy RFS does not meet the identified needs in the evidence base for an additional 2000sqm of convenience retail floorspace and the policy does not provide for a choice in main food shopping facilities. Objectors challenge the credibility of the evidence base.

COUNCIL RESPONSE: There is considerable concern that an out of town supermarket would have a negative impact upon the character and setting of Wareham, plus the potential to impact upon the economy of the town centre cannot be ruled out. Purbeck District council has resisted out of town centre shopping at its market towns and this is valued by the local community. Therefore, in order to continue to protect the local distinctiveness of the Purbeck's market towns, no allocation for a food store will be proposed through the Core Strategy or a subsequent plan(s).

ACTIONS: Amend the Policy RFS: Retail Floor Space text to reflect the food and non food shopping needs identified. Any new floor space will be provided at the centres in accordance with Policy LD: General Location of Development and that sites will be identified through subsequent plans.

Chapter: 7. North West

Para/Policy/Map: 7.1

| | |
|-------------------------|---|
| Bere Regis First School | Support housing in Bere Regis with upgrade to school & move to heart of community, away from C6 traffic. Support doctors' surgery & essential facilities. |
| Ragamuffins Pre-School | Support move to more central location in village away from busy road, provided provision is made for preschool to move with school & full financial support is given. |

Para/Policy/Map: 7.1.8

| | | |
|---------------------------|--|--|
| Bere Regis Parish Council | Sound Require new school, because of decision to move from three-tier to two-tier & inadequacy of existing First School in terms of space & facilities. Southern Bere Regis bypass should be constructed before Wool traffic is re-directed via A35 & C6. | On completion of Southern Bere Regis bypass, Wool/Lulworth traffic to be re-directed via A35 & C6. |
| CPRE | Unsound Section 106 agreements should be directly related to proposed development. By passing them to DCC without relating them specifically, a development with little or no requirement for infrastructure provision will be subject to unnecessary increased cost. | Ensure that S106 contributions are related directly to specific S106 developments. |
| Highways Agency | Transport section not clear whether A35 refers to trunked section of A35 to west of Bere Regis. Should any improvements be planned for this section of SRN, Highway Agency consultation required. | |
| Natural England | Lack of environmental content or reference to rural parts of NW Purbeck. No reference to green infrastructure provision. Wording too general. Wording "alternatively where suitable mitigation for individual development sites cannot be secured, contributions from all housing development will be used to implement mitigation measures" is misleading & possibly not compliant with Habitats Regulations. | Summarise specific heathland mitigation for NW Purbeck. Reference to Green Infrastructure with overview of needs & opportunities in each area. |
| RSPB | Supports heathland mitigation. | |

| Name | Plan sound? | Comment on soundness | Proposed Change |
|--|--------------------|---|--|
| Trustees of W H Drax 1962 Discretionary Settlement | Sound | | Amend 4th sentence of para 7.1.8: both landowners with interests at Bere Regis have declared their interest in providing land for new school as part of overall strategy for village that includes allocation(s) totalling 50 dwellings. |
| Mr Howard | Sound | Lack of reference to Bere Regis southern bypass in relation to A35 & C6. Concerns about new school provision & 2-tier schooling. | Bere Regis southern bypass to be constructed before Wool traffic redirected via A35 & C6. |
| Para/Policy/Map: Map 6 | | | |
| Highways Agency | | Strategic route west of Bere Regis should be labelled A35 not A31. | Amend map accordingly. |
| Jurassic Coast World Heritage Team | | Flood risk should be included on map as example of how plan is considering risks of climate change. | Include areas at risk of flooding. |
| Para/Policy/Map: NW: North West Purbeck | | | |
| Bere Regis First School Govenors | | Support provision of new school. | |
| Dorset County Council | | Following Purbeck Schools Review, DCC is discussing possibility of providing a new (primary) school linked to housing development in Bere Regis. | Update references accordingly. |
| Highways Agency | | Concerns about housing in Bere Regis without employment because puts pressure on SRN through private cars out-commuting. Support collection of transport contributions. | |
| RSPB | | Supports ref to new public open space at Bere Regis. Should also apply to other development in NW. | |
| RSPB | | Objects to pending resolution of outstanding issues identified in HRA in relation to Dorset Heaths & Poole Harbour sites. Concerns re wastewater capacity of STWs. | |
| Trustees of W H Drax 1962 Discretionary Settlement | Sound | Development proposals for Bere Regis strongly supported. | Amend fifth paragraph of policy: proposals that also provide 50 dwelling allocation on one or more sites as part of overall strategy for village will considerably..... |

Council Response to comments on 7. North West :

ISSUES: There is general support for this policy, especially for a new school, with omissions noted regarding heathland mitigation, green infrastructure, and bypass.

COUNCIL'S RESPONSE: General support for small-scale development in Bere Regis noted. Due to lack of funding, a bypass is not deliverable in the plan period, and has been removed from Purbeck Transportation Strategy (Council, 7 Sept 2010). It is agreed that reference to green infrastructure would be a useful addition. The Heathland DPD and IPF provide the mitigation measures to support housing growth. As the settlement extension has been passed to a subsequent plan, it will be the role of that plan to identify suitable measures to mitigate the impact of the new housing, when the location and ownership of the site is known. Sewage treatment works issues will be considered through Natural England's proposal for new policy covering Poole Harbour.

ACTIONS: Make clear in chapter 2 and Vision for North West Purbeck the key landscape, heritage, coastal and environmental differences between spatial areas. Clarify which section of A35 is being referred to in para 7.1.8. Give some reference to green infrastructure with overview of needs and opportunities in each area. Consider insertion of Natural England policy on Poole Harbour.

| <i>Name</i> | <i>Plan sound? Comment on soundness</i> | <i>Proposed Change</i> |
|-------------------------------|--|--|
| Chapter: 7. South West | | |
| Para/Policy/Map: 7.2 | | |
| Natural England | Lack of environmental content or reference to rural parts of SW Purbeck. No reference to green infrastructure provision. Wording too general. Wording "alternatively where suitable mitigation for individual development sites cannot be secured, contributions from all housing development will be used to implement mitigation measures" is misleading & possibly not compliant with Habitats Regulations. | Summarise specific heathland mitigation for SW Purbeck. Reference to Green Infrastructure with overview of needs & opportunities in each area. |
| Save Herston Fields | Unsound Growth opportunities are much better for SW Purbeck given transport infrastructure & opportunities at DGTP. | Place new housing near Winfrith & Wool, which has good transport infrastructure, employment potential, lower land prices & sustainability. |
| Para/Policy/Map: 7.2.7 | | |
| Mr & Mrs Nash | Unsound Vision for SW Purbeck is weak & provides no incentive to enhance role of Wool as key service village. Limits development to infilling & upgrading First & St Mary's schools, but proposes further development of DGTP. Development at Wool, like Lytchett Matravers, would promote sustainable development. | |
| Redwood Partnership | Sound Vision for SW Purbeck does not recognise full potential of Wool & Winfrith to accommodate balanced housing & employment growth. Wool has range of services, good transport links & is expanding its role as employment centre so should be identified for further development. Reference should also be made to transport improvements for area proposed in PTS. | Identify Wool/Winfrith area as sustainable location for further development to meet Purbeck's identified housing needs & support expansion of Dorset Green Technology Park. Reference should be made to transport improvements for area proposed in PTS. |
| Weld Estate | Vision underplays relative importance of settlement & role it could fulfil in meeting community needs & compliance with sound, sustainable planning. Wool's connectivity/accessibility is superior to Swanage & at least equal, if not better, than Wareham. | |
| Messrs & Mmes | Paragraph erroneously includes Wool & needs removal. | Delete reference to Wool from this paragraph & |

| Name | Plan sound? | Comment on soundness | Proposed Change |
|-------------------------------|--------------------|---|--|
| Rees & Redfern | | | include words that large scale development in Wool in period 2005-10, further green field development in Wool & surrounding area would be unsustainable & unreasonable & will not take place. While infill & brownfield development will be allowed, Wool will be given a breathing space in duration of CS to assimilate recent large addition to its population. |
| Para/Policy/Map: 7.2.8 | | | |
| CPRE | Unsound | Section 106 agreements should be directly related to proposed development. By passing them to DCC without relating them specifically, a development with little or no requirement for infrastructure provision will be subject to unnecessary increased cost. | Ensure that S106 contributions are related directly to specific S106 developments. |
| Dorset AONB Partnership | | Lack of reference to natural environment & conservation & enhancement of AONB & objectives of AONB Management Plan & Landscape Character Assessment. Transport is lower down list. | Make reference to natural environment & conservation & enhancement of AONB & objectives of AONB Management Plan & Landscape Character Assessment. Put transport at top of list. |
| Highways Agency | | Support list of transportation improvements. Recommend reference to Workplace Travel Plan in para 7.3.8 is repeated here. | Mention Workplace Travel Plan for major employers. |
| Mr & Mrs Nash | Unsound | Paragraph states Purbeck Gate development has met Wool's requirement for plan period, but it is nearing completion & does not provide for rest of plan period. | |
| Purbeck Society | Unsound | There are greater opportunities for growth than in SE Purbeck. | Promote Dorset Green as a site for a new sustainable settlement with housing & employment. |
| Redwood Partnership | Unsound | No evidence to support that Purbeck Gate development at Wool has met Wool's growth requirements for plan period. It was originally identified in 1997 to meet housing requirements to 2011. Critical need for additional housing in Wool. | Reword as follows: "Recognising need for additional housing in Wool area, & in view of its range of services, good transport links, expanding role as an employment centre, & potential to accommodate development within environmental constraints, Wool/East Burton/DGTC area is identified as key location for further development. Land at East Burton Rd is allocated in CS for 50 dwellings, & a |

| Name | Plan sound? | Comment on soundness | Proposed Change |
|--|--------------------|--|---|
| ZBV (Winfrith) Ltd | Unsound | Regeneration of DGTP needs to include options for bringing forward viable & sustainable regeneration. | further settlement extension of 1000 dwellings to west of Wool will be delivered through Site Allocations Plan or Area Action Plan. Core objectives for site should include promotion of site for new business development, achieving a mix of development uses in order to improve access to jobs, homes, leisure, shops, community facilities & social infrastructure. |
| Para/Policy/Map: Map 7 | | | |
| Redwood Partnership | Unsound | Map should identify East Burton, given its links with Wool & Dorset Green. | Include settlement boundary for East Burton, including allocation for 50 dwellings at Land off East Burton Road, Wool. Plan should indicate further requirement to deliver a settlement extension of 1000 dwellings to west of Wool, along with improved linkages between Wool, East Burton & DGTC. |
| Jurassic Coast World Heritage Team | | Flood risk should be included on map as example of how plan is considering risks of climate change. No reference to relevant Shoreline Management Plan. | Include areas at risk of flooding & reference to Shoreline Management Plan. |
| Para/Policy/Map: SW: South West Purbeck | | | |
| Dorset AONB Partnership | | Lack of reference to Wool's proximity to AONB boundary. Lack of reference to natural environment & landscape character | Include reference to Wool's proximity to AONB boundary, natural environment & landscape character. |
| Dorset Wildlife Trust | Unsound | Object to "up to 20ha" of employment land at DGTP when amount of employment land required is only 11.5ha. | "Further assessment of feasibility for allocation within existing employment site of up to 20 hectares at DGTP" |
| Highways Agency | | Support growth within boundaries of Wool. References to Dorset Green unclear whether they relate to 20ha recently granted planning permission or additional land. Concerns about delivery of affordable housing at settlements without a settlement boundary as limited facilities leads to out-commuting. | Recommends the reference to the Workplace Travel Plan for major employers is repeated here. |
| Mr & Mrs Nash | Unsound | Wool is fourth largest settlement in district. Development | Amend Policy SW for allocation of settlement |

| Name | Plan sound? Comment on soundness | Proposed Change |
|---------------------|---|---|
| Redwood Partnership | <p data-bbox="521 137 1323 352">here would give a good balance of employment to residential uses, plus there is more retail & social infrastructure than other villages. Lytchett Matravers has proposal for 50 new dwellings in Green Belt, but no proposals for Wool, which is not in Green Belt. Several possible sites identified in SHLAA for Wool.</p> <p data-bbox="349 445 1379 1182">Unsound Housing needs much higher than 355. HMA (p81) highlights Wool area as having District's highest level of future housing need at 90 dwellings pa. Providing only 5% is unacceptable. Wool area should be expanded because of good transport links; it is not in AONB, Green Belt, nor environmental constraints that limit elsewhere in Purbeck; it has a good range of services & facilities; employment growth at Dorset Green could provide 4000 jobs; it would allow a balance of jobs with homes, services, facilities, & transport improvements needed; suitable sites are available. Encloses a prepared document called Wool - Vision for a Sustainable Community & masterplan. Enquiry by Design exercise in 2008 highlighted need to improve links & better integration between Wool, East Burton & Dorset Green. Wool is only location in district that could support additional growth in line with Habitats Regs. Developing land at East Burton Rd would have no major impact. This allocation was in previous drafts of CS & there is no evidence to support its removal. Copy of a previous public display prepared for site is supplied.</p> | <p data-bbox="1402 137 2170 427">extension of approximately 50 dwellings on land to south of village. Minimum of 40% dwellings affordable to local people. New public open space to mitigate potential impact on nearby heathland. Provide improvements to walking, cycling & public transport access to site. Contributions for open space/recreation provision. Protection of existing trees and hedges.</p> <p data-bbox="1402 445 2170 1222">Suggests wording so that Wool & Bovington area (including East Burton & DGTP) will provide main focus for service provision, where new housing development will be managed through extension of settlement boundaries to meet housing needs. Winfrith Newburgh & West Lulworth to provide focus for service provision in rural areas. Development outside settlement boundaries to be strictly controlled. Role of Wool & East Burton to be supported through allocation of a settlement extension at East Burton Rd, to include approx 50 dwellings including affordable housing, new open space to mitigate potential impacts on nearby heathland, contributions for transport and open space/recreation provision, highway junction improvements, improvements to walking & cycling links, contributions to facilities. Additional provision for 1000 dwellings to west of Wool, incorporating public open space & additional facilities & infrastructure, delivered through Site Allocations Plan or Area Action Plan.</p> |
| RSPB | Object to policy pending resolution of outstanding issues identified in HRA. Concerns re wastewater capacity of STWs. | |
| RSPB | Support provision of mitigation for Bovington | |
| Think Global Group | In conflict with strategic housing growth as Area Action Plan has been dropped. There are confusing & inconsistent | Remove all hints of Area Action Plan. Remove paragraph 5.62. |

| Name | Plan sound? | Comment on soundness | Proposed Change |
|--------------------|--------------------|--|---|
| Think Global Group | | statements relating to Bovington. No need for any further affordable housing at Bovington. Challenge to paragraph 7.2.3 suggesting that Wool Parish Action Plan confirmed that Bovington does not want any improved community facilities. | New statement reflecting the real views of local people, removing facilities from top of the wish list. |
| ZBV (Winfrith) Ltd | Unsound | Support recognition of potential to deliver 20ha of new employment land/development at DGTP. Policy should recognise DGTP's important transition point. Major new investment critically required to regenerate DGTP. Should recognise that DGTP Masterplan is key tool in ensuring role as strategic employment site. Regeneration of DGTP will improve local employment opportunities & add to vibrancy & vitality of Purbeck's economy. Current policy approach for no new housing growth in Wool will not support regeneration of DGTP. Policy should support further employment growth at DGTP & significant new housing growth within Wool/East Burton & DGTP area. New residential development would improve access for workforce to new homes within area & reduce inward commuting. Increase self sufficiency of Wool & new growth would reinforce viability of existing shops & services. | Policy should also support significant new housing growth within Wool (including at DGTP site). |
| Mrs Narraway | Sound | Support no settlement extension at Wool. | |

Council Response to comments on 7. South West :

ISSUES: Views differ depending upon the interests of the commentator concerning growth levels. Concern from landowners that level of housing development proposed in the SW spatial area will not support the economic growth potential. Points are raised about the level of development that can be successfully mitigated to satisfy The Habitats Regulations. Omissions include lack of reference to environment, rural aspects of the area and GI provision.

COUNCIL RESPONSE: Support was given both district-wide and locally to proposals to distribute new housing development around the district and the council has agreed upon this as its strategy. There is no evidence to suggest that large-scale housing growth would be sufficient to unlock economic development at Wool. Locating growth next to employment land is only one aspect of sustainability and, whilst desirable, is not always possible. The Council's strategy is to focus development on population centres and maximise potential to link these to employment sites through the Purbeck Transport Study. Economic growth proposed at Dorset Green Technology Park is made largely on the basis of the opportunity for inward investment. It is agreed that reference to green infrastructure would be a useful addition. As there are no settlement extensions identified, it is the role of the Heathland DPD and IPF provide the mitigation measures to support housing growth.

ACTIONS: Make clear in chapter 2 and Vision for South West Purbeck the key landscape, heritage, coastal and environmental differences between spatial areas. Give some reference to green infrastructure with overview of needs and opportunities in each area.

Chapter: 7. Central

Para/Policy/Map: 7.3

| | | | |
|-------------------------|----------------|---|---|
| Dorset AONB Partnership | | Lack of reference to AONB. | Make reference to fact of some settlements lying within AONB (e.g. Stoborough, Corfe Castle) & some in close proximity (e.g. Wareham) |
| Natural England | | Lack of environmental content or reference to rural parts of central Purbeck. No reference to green infrastructure provision. Wording "alternatively where suitable mitigation for individual development sites cannot be secured, contributions from all housing development will be used to implement mitigation measures" is misleading & possibly not compliant with Habitats Regulations. Concern about whether mitigation can be achieved in Wareham due to position in relation to heaths. | Summarise specific heathland mitigation for central Purbeck. Work on mitigation to be done at early stage & to be in place before occupation of new housing. Reference to Green Infrastructure with overview of needs & opportunities in each area. |
| Save Herston Fields | Unsound | Wareham's local services much better than Swanage, has better transport links & is already a centrally located hub, yet it is proposed to continue to restrict development here. At odds with Spatial Vision because bulk of new housing in plan is being focussed away from Wareham. Focussing development in SE Purbeck will increase congestion. | Place new housing near Winfrith & Wool, which has good transport infrastructure, employment potential, lower land prices & sustainability. |

Para/Policy/Map: 7.3.3

| | | | |
|-----------------------|----------------|--|-------------------------|
| Birchmere Ltd | Unsound | Objection to statement that Green Belt was removed at Holton Heath to accommodate strategic housing proposals. This area was never included in Green Belt. | Delete paragraph 7.3.3. |
| Dorset Wildlife Trust | Sound | Support amendment of Green Belt boundary at Holton Heath | |

Para/Policy/Map: 7.3.6

| | | | |
|----------------------------------|----------------|---|--|
| Wareham St Martin Parish Council | Unsound | Need to provide affordable housing at settlements such as Sandford & across Wareham St Martin parish. | Some development to take place in Sandford, Stoborough, & Ridge. |
| Weld Estate | | Support for enhancing Wareham as important service | |

| Name | Plan sound? | Comment on soundness | Proposed Change |
|---------------------------------------|--------------------|---|---|
| | | centre to help meet community aspirations. Accessible from all parts of district therefore logical to develop its role. | |
| Para/Policy/Map: 7.3.7 | | | |
| Purbeck Society | | There are greater opportunities for growth than in SE Purbeck. | Promote growth in central Purbeck particularly at Holton Heath including improvements to A351, development of the station as a park & ride facility & project the Swanage - Wareham rail service. |
| Mr Churchill | Unsound | Current settlement boundary is significant to setting of Wareham. Regrettable presence of bypass does not justify expansion of settlement & nor does willingness of a landowner. Less sensitive sites should be sought. | Remove references to settlement extension at Wareham. |
| Mr Tasker | Sound | Combined Heath & Power saves wastage transmitting electricity down long cables. Agree with concerns about housing mix, quality & quantity within constraints of A351 at Corfe Castle. | |
| Para/Policy/Map: 7.3.7 - 7.3.8 | | | |
| Mr Taylor | Unsound | The consultation 'Where shall we build in Wareham 2012-2016?' contained a statement that Wareham Town Council supported Option A. At the time, Town Council had not made a final decision. | Decisions regarding building within Wareham & retail shopping contained within Core Strategy is suspect - as public was given wrong information when asked for opinions. |
| Para/Policy/Map: 7.3.8 | | | |
| Arne Parish Council | | Support extension of settlement at Wareham to A351 as this is definitive boundary. Support increase from 40% to 50% affordable housing. | |
| Birchmere Ltd | Sound | Support this section which details client's desire to bring forward additional employment development as part of existing Holton Heath Industrial Estate. | |
| CPRE | Unsound | Re housing: it does not stipulate that public sector investment & plans must be approved before housing development is commenced. Failure to do this could compromise best layout for public building & housing within available land. Re transport: Section 106 agreements | Revise wording to ensure that finance & masterplanning are set prior to commencement of house building. Ensure that S106 contributions are related directly to specific S106 developments. |

| Name | Plan sound? | Comment on soundness | Proposed Change |
|--|--------------------|--|--|
| Dorset AONB Partnership | | <p>should be directly related to proposed development. By passing them to DCC without relating them specifically, a development with little or no requirement for infrastructure provision will be subject to unnecessary increased cost.</p> <p>Lack of reference to natural environment, conservation & enhancement of AONB & objectives of AONB Management Plan & Landscape Character Assessment.</p> | Make reference to natural environment, conservation & enhancement of AONB & objectives of AONB Management Plan & Landscape Character Assessment. |
| Highways Agency | | Supportive of transportation improvements. | |
| Purbeck Society | Unsound | X43 bus & Durlston bus seasonal only. No evidence to support provision of finance for a daily all year service on either route. Therefore not deliverable, effective transport modes. No mention of restored Swanage rail link & none for its potential projection to Holton Heath, Poole & Bournemouth & direct connections further east & north. | Promote expansion of bus & rail services. |
| Wareham St Martin Parish Council | | Support increase from 40% to 50% affordable housing. | |
| Para/Policy/Map: CEN: Central Purbeck | | | |
| Ashvilla Estates Ltd | Unsound | Policy should be amended to require 1000 homes at Wareham. SANG should be considered at Worgret Manor Farm. Current CS would not comply with Habitats Regulations, since measures to avoid or mitigate effects of new housing on Dorset Heaths SPA not demonstrated. | Amend policy to require 1000 homes at Wareham, including allocation of 200 homes inside bypass & further allocation of 500 homes at Worgret Manor to west of Wareham, including provision of strategic Frome Valley SANG to serve development at Wareham. 50% of these dwellings should be affordable homes. |
| Birchmere Ltd | Unsound | Object to wording for role of Sandford & to the quantum of employment land coming forward. Object to proposal for Green Belt Extension south of A351 & object to land east & west of Blackhill Road as Green Belt, on grounds that this was never part of Green Belt. No need for expansion of industrial estate when this has been supported by Council elsewhere in document. | Amend to: "Further employment development within the Holton Heath area". References to Green Belt Extension south of A351 should be deleted along with any corresponding text/maps. |

| Name | Plan sound? | Comment on soundness | Proposed Change |
|---------------------------|--------------------|--|--|
| Bloor Homes Ltd | | Need for vision to reference residential development. Requirement for new open space at Worgret Road may not be achievable within settlement extension itself. Highway junction improvements may not be necessary. Playing fields on adjacent sit could be used for open space recreation if surplus to school requirements. Bloor Homes will undertake their own viability testing for affordable housing as they have not been consulted previously. Further to removal of minimum density standards in PPS3, Bloor Homes may wish to deliver less than 200 dwellings on their site. | |
| Dorset AONB Partnership | | Lack of reference to natural environment & landscape character, acceptable landscape & visual impact. | Make reference to natural environment & landscape character, acceptable landscape & visual impact. |
| Dorset County Council | | Following Purbeck Schools Review, DCC is now in a position to support, in principle, delivery of a mixed use settlement extension at Wareham along Worgret Road. | |
| Dorset Wildlife Trust | Unsound | Concerns about 4ha employment at Admiralty Park & impact on SNCI, as well as areas of ecological value outside SNCI boundaries. HRA (10.4) refers to 2002 Inspector's Report re direct loss of SNIC & SNCI & further fragmentation. | Change to: "Further development within the existing employment sites of up to 8 ha at Holton Heath Industrial Estate & assessment of feasibility of allocating 4ha at Admiralty Park". |
| Environment Agency | Sound | No objection to development at Wareham, provided SuDs considered. | Development brief for Wareham to include SuDs - balancing ponds, swales & above ground surface water drainage features. |
| Highways Agency | | Concerns regarding the delivery of affordable housing in other settlements without a settlement boundary as this could lead to out-commuting. | |
| Highways Agency | | Supports growth at Wareham provided proposals demonstrate no major impact on A35/A31 corridor. Concerns about delivery of affordable housing at settlements without settlement boundary as limited facilities leads to out-commuting. | |
| Planning Perspectives LLP | Unsound | Proposed settlement extension at Worgret should not prejudice redevelopment of Wareham's North Street gas depot for housing. | Under the 'Wareham' heading, the introductory text should be amended to: 'The role of Wareham will be supported by prioritising the opportunities for |

| Name | Plan sound? | Comment on soundness | Proposed Change |
|---------------------------------------|--------------------|---|--|
| Property Development Partnerships Ltd | | Wareham Town Council's Recreation Ground more appropriate site for development. Closer to town centre. No need to reduce Green Belt. Could meet Policy MN13 of 2004 Local Plan. | sustainable development on brownfield land & the mixed-use settlement extension along Worgret Road. Identify Wareham Recreation Ground for development. |
| Re-Nu Power | Unsound | Green Belt alteration is not justified as per PPG2 (paras 2.6 and 2.7). Parish boundaries are largely definable on the ground and have endured without disagreement. The existing outer edges of the western boundary are not under threat from encroachment and is a sufficient distance from the conurbation. Land already designated open countryside is protected from inappropriate development, so designating it Green Belt would be superfluous. The council has not demonstrated that exceptional circumstances exist to alter the western boundary, particularly in the context of PPG2's five criteria. No structure plan/RPG/RSS policy backing for the proposed alterations. | Delete proposal to extend the Green Belt, particularly along its western boundary. |
| Royal Mail | | Essential that growth at Wareham is planned for in a timely manner & does not compromise or prejudice Royal Mail operations. | |
| RSPB | | Need further measures to ensure effective mitigation, including SANGs provision at Wareham. Object to policy pending resolution of the outstanding issues identified in HRA in relation to Dorset Heaths & Poole Harbour sites. Concerns re wastewater capacity of STWs. Concerns about deliverability of SANGs at Wareham. Support ref to open space as mitigation. | |
| Scott Estate | Unsound | Does not consider qualitative need for 2,000sqm food store at Wareham, which is necessary for town to achieve enhanced role as shopping centre for District. | Policy should include provision of a food store up to 2000sqm net floor space at Wareham. |
| The Charborough Estate | Unsound | Wareham not allocated enough new housing & sites at Carey and Tantinoby should be locations for additional settlement extensions. Additional employment land should | Housing growth at Wareham to be split between Worgret Road, Carey & Tatinoby. More employment land to be located at Wareham & land at Carey to be |

| Name | Plan sound? | Comment on soundness | Proposed Change |
|------------------|--------------------|---|---|
| | | be located at Carey as part of mixed use development at North Wareham. Opportunity to provide SANG on north-west side of Wareham. | allocated for employment as part of mixed use scheme (housing, employment and SANGs) for north west Wareham. |
| Commander Baynes | Unsound | School facilities should all be located on northern side of Worgret Road & the public service facilities relocated on existing Purbeck School site. | |
| Mr & Mrs Salter | Unsound | Although Pre-Submission Draft no longer supports supermarket on edge of Wareham, CS evidence base not changed to reflect this. Disagrees with Retail Impact Assessment. Questions availability of Wareham Middle School for possible supermarket. Believes Wareham Town Council were wrongly quoted as supporting option that included supermarket. Previous opposition to supermarket from Planning Inspectors. Proposal is based on RSS, now dropped. No "no supermarket option" to comment on. | |
| Mr Humphrey | Unsound | Supports need for affordable housing, but the council supports spreading development around the district. Therefore, building 200 dwellings out of the 440 in the Core Strategy in one site is not spreading development evenly. Objects to building in the Green Belt. | Withdraw settlement extension from the Green Belt. Development should be spread around central Purbeck to include Worgret road, Magistrates' Court/Police Station, Northport, Sandford, Stoborough, Pound Land and the train station. The requirement for 50% affordable housing should be legally binding because previous targets have slipped. |
| Mr Humphries | | Disagrees with settlement extension proposed for Wareham. Need to retain existing Green Belt designation. Questions level of housing requirements identified for plan period and inability of A351 route to cope with increased trips as a result of the growth level proposed. | Remove proposed settlement extension from Wareham & allow future growth through 'windfall'. |
| Mrs Humphries | | Objects to building on Green Belt in the beautiful countryside. Questions need for housing. Development at Worgret Road would be an eyesore. The council has previously objected to development at Worgret Road and is now breaking its integrity. Concerns over traffic on the A351 and congestion. Objects to DCC decision to move to two- | |

| Name | Plan sound? | Comment on soundness | Proposed Change |
|------------------------------------|--------------------|---|---|
| | | tier school system. Asks if the decision to build has been pre-determined, despite locals and the government being against Green belt development. A bypass is much needed [does not specify where]. | |
| Para/Policy/Map: Map 8 | | | |
| Birchmere Ltd | Unsound | Object to identification of Available Employment Land as no evidence to support this. Inappropriate to highlight whole of Holton Heath industrial estate as available land since only some areas are undeveloped. Admiralty Park should be identified as part of employment hub at Holton Heath. Object to route of cycle path as depicted on grounds of multiple ownership & designations. | Delete Available Employment Land from key & replace with "employment land". Include Admiralty Park in employment hub. Amend map to depict cycle route running alongside A351 route. |
| Jurassic Coast World Heritage Team | | Flood risk should be included on map as example of how plan is considering risks of climate change. No reference to relevant Shoreline Management Plan. | Include areas at risk of flooding & reference to Shoreline Management Plan. |
| Para/Policy/Map: Map 9 | | | |
| Bloor Homes Ltd | Unsound | Policy seeks to safeguard all open space, sport and recreation areas, yet Map 9 shows Wareham school playing fields within the town's settlement extension & these may be useful to local residents. Developers should not be expected to provide open space when existing playing fields are being identified for development. | Ensure conformity between policies within the plan. |
| Jurassic Coast World Heritage Team | | Pale blue is similar colour to EA's colour for flood risk. Could confuse. Furthermore, flood risk should be included on map as example of how plan is considering risks of climate change. No reference to relevant Shoreline Management Plan. | Include areas at risk of flooding & change colour of land at Worgret Rd. Include reference to Shoreline Management Plan. |

Council Response to comments on 7. Central :

ISSUES: Views differ depending upon the interests of the commentator concerning the amount and location of housing and employment development. The Highways Agency and Dorset County Council support the level of growth proposed at Wareham. However, Natural England is concerned about housing growth in Wareham and lack of certainty over mitigation measures. Omissions raised are lack of environmental content or reference to rural aspects of area, lack of reference to GI provision and the decision not to allocate a supermarket at Wareham. A number of comments concern proposed changes to the Green Belt boundary. Concern over waste water capacity of sewage treatment works (STW).

COUNCIL RESPONSE: The Council has agreed on 2400 dwellings, with their location and distribution clearly supported through public consultation. The level of housing growth is limited by ecological constraints. Public consultation indicated that the strategy of distributing new housing development around the district was clearly preferable to the concentration of growth at Wareham. The Council decided not to allocate a supermarket at Wareham following extensive public consultation. There is concern that an out of town supermarket would have a negative impact upon the character and setting of Wareham and the potential to impact upon the economy of the town centre cannot be ruled out. The Council has resisted out of town shopping in its market towns and this is valued by the local community in order to continue to protect the local distinctiveness of the Purbeck's market towns. Compliancy with Habitats Regulations requires further investigation of mitigation measures that can be included within the Core Strategy to accompany the proposed settlement extension. Further thought is needed to the Green Belt boundary at Holton Heath to consider allowing economic growth but not leading to fragmentation of habitat. It is agreed that reference to green infrastructure would be a useful addition. Sewage treatment works issues will be considered through Natural England's proposal for new policy covering Poole Harbour.

ACTIONS: Amend paras 7.3.1, 7.3.4 and opening sentence of Policy CEN to reflect comments and improve clarity of document. Need to ensure that reference to Heathland Mitigation in para 7.3.8 is compliant with Habitats Regulations. Identify heathland mitigation measures for each settlement extension. Make clear in chapter 2 and Vision for Central Purbeck the key landscape, coastal and environmental differences between spatial areas. Give some reference to Green Infrastructure with overview of needs and opportunities in each area. Consider insertion of Natural England policy on Poole Harbour.

Chapter: 7. North East

Para/Policy/Map: 7.4

| | | |
|--|--|---|
| <p>CG Fry & Son Ltd Unsound</p> | <p>Why only 50 dwellings at Lytchett Matravers? Spatial Options background paper vol 4 found no. of benefits to more development at Lytchett Matravers, but did not pursue as not in accordance with RSS. RSS now has limited weight, so strategy unsound. Volume 10 of evidence base states LM lacks services & facilities, but paragraph 7.4.6 of CS indicates that LM will act as focal point for smaller settlements nearby & develop role to provide everyday facilities. How can one development of 25 market houses make meaningful contribution to improving role of LM as key service village? Inadequate contribution to overall housing needs or affordable housing needs & not meaningful contribution to strengthening & improving role as key service village. Sites A, B & C should be included as evidence supports this (see Vol 6). No discernable difference between sites A, B, C and D. Report states no constraint to allocating additional sites either individually or combined on accessibility or highways grounds & no constraints, either individually or in combination, on integrity of Dorset Heathlands. PPG2 would allow for release of more than one site in Green Belt. Only releasing required land is unsound as site may not come forward.</p> | <p>Further development needs to be allocated in Lytchett Matravers to 100, 150 or 200 dwellings. Site A &/or B &/or E should be allocated for development with consequential amendments to Green Belt boundaries.</p> |
| <p>Natural England</p> | <p>Lack of environmental content or reference to rural parts of NE Purbeck. No reference to green infrastructure provision. Wording too general. Wording "alternatively where suitable mitigation for individual development sites cannot be secured, contributions from all housing development will be used to implement mitigation measures" is misleading & possibly not compliant with Habitats Regulations.</p> | <p>Summarise specific heathland mitigation for NE Purbeck. Reference to Green Infrastructure with overview of needs & opportunities in each area.</p> |

Para/Policy/Map: 7.4.10

| | | |
|----------------------------|---|---|
| <p>CPRE Unsound</p> | <p>Section 106 agreements should be directly related to</p> | <p>Ensure that S106 contributions are related directly to</p> |
|----------------------------|---|---|

| Name | Plan sound? | Comment on soundness | Proposed Change |
|------------------------------------|--------------------|---|---|
| | | proposed development. By passing them to DCC without relating them specifically, a development with little or no requirement for infrastructure provision will be subject to unnecessary increased cost. | specific S106 developments. |
| Para/Policy/Map: 7.4.7 | | | |
| Messrs Omond, Bierton & Lees | Sound | Support allocation at Policeman's Lane. | |
| Para/Policy/Map: 7.4.8 | | | |
| CPRE | Unsound | Section 106 agreements should be directly related to the proposed development. By passing them to DCC without relating them specifically, a development with little or no requirement for infrastructure provision will be subject to unnecessary increased cost. | Ensure that S106 contributions are related directly to specific S106 developments. |
| Dorset AONB Partnership | | Lack of reference to natural environment, conservation & Landscape Character Assessment. | Make reference to natural environment, conservation & Landscape Character Assessment. |
| Highways Agency | | Support transportation improvements, but it is unclear if A35 improvements refer to Agency's network or part that is de-trunked. | |
| Para/Policy/Map: Map 10 | | | |
| Romany Works Business Park | | Romany Works Business Park is not annotated on the map. This should be rectified to ensure consistency with Map 5 to show that the site is one of those that will be developed at a later date. | Amend Map 10 by annotating, in pink, the site of Romany Works Business Park. |
| Jurassic Coast World Heritage Team | | Flood risk should be included on map as example of how plan is considering risks of climate change. No reference to relevant Shoreline Management Plan. | Include areas at risk of flooding & reference to Shoreline Management Plan. |
| Para/Policy/Map: Map 11 | | | |
| Wyatt Homes | Sound | Support map showing rounding off of the settlement. No conflict in Green Belt policy. Appropriate scale for Upton. | |
| Jurassic Coast World Heritage | | Flood risk should be included on map as example of how plan is considering risks of climate change. No reference to | Include areas at risk of flooding & reference to Shoreline Management Plan. |

| Name | Plan sound? | Comment on soundness | Proposed Change |
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| Team | | relevant Shoreline Management Plan. | |
| Para/Policy/Map: Map 12 | | | |
| CG Fry & Son Ltd | Unsound | Map unsound for reasons set out in response to para 7.4. | Amend map to show allocations in Lytchett Matravers of 100, 150 or 200 dwellings. Site A &/or B &/or E should be allocated for development with consequential amendments to Green Belt boundaries. |
| Jurassic Coast World Heritage Team | | Flood risk should be included on map as example of how plan is considering risks of climate change. | Include areas at risk of flooding |
| Para/Policy/Map: NE: North East Purbeck | | | |
| Dorset AONB Partnership | | Lack of reference to natural environment, landscape character & location of development. | Make reference to natural environment, landscape character & location of development. |
| Dorset Wildlife Trust | | Supports public open space at Policeman's Lane Upton. Potential wildlife value due to proximity to Poole Harbour SPA. Further ecological work required. Supports extension of Upton Country Park. | |
| Hall & Woodhouse Ltd | Unsound | No basis on which to elevate status of Greenridge above other potential redevelopment sites in settlement. PPS12 (paras 4.5 - 4.6) states that Core Strategies should make clear spatial choices about where development should go in broad terms & may allocate sites for development, but these should be central to achievement of strategy. | Delete "The re-development of the former Greenridge public house has been identified to be of key importance". |
| Highways Agency | | Concerns over no. of dwellings proposed given proximity to SRN. Lack of new employment does not contribute to balanced communities. Development should be well integrated within existing settlements & provide mix of uses. | |
| Mr & Mrs Hampshire | Unsound | Little general support for High Street enhancement works, which would detract from viability & therefore provision of affordable housing. Stakeholders have no objection to inclusion of health centre, but would expect commercial terms. Haulage yard (Selby's Yard) should form part of | Amend maps 1 & 12 to identify Selby's Yard as employment site & exclude from Green Belt. Remove requirement for contribution for recreational open space in light of requirement for mitigation of potential impact upon nearby heathland. |

| Name | Plan sound? | Comment on soundness | Proposed Change |
|--|--------------------|--|---|
| | | settlement extension. Policy suggests further development within it of 0.6ha, but this is now out of date as Freeland Park, occupying 0.7ha, is fully developed. Green Belt boundary should be aligned to exclude Selby's Yard in accordance with PPG2 (paras 2.9 & 2.12) advice on longer timescales for Green Belt. Any footpath should be located outside site. | |
| P.L.A.C.E. | Unsound | Site & adjacent land susceptible to flooding. Would prejudice wildlife, erode Green Belt & detract from rural character of area. Important gap between Upton & Lytchett Minster with important views. Site unable to cope with increase in traffic. In 2009 there was 52.1% support from local residents for settlement extensions in NE Purbeck, but in summer 2010 only 21% of Upton residents supported development of Policeman's Lane site. | Remove Policeman's Lane allocation from Core Strategy |
| RSPB | | Support reference to open space at Upton & Lytchett Matravers. | |
| RSPB | | Object to policy pending resolution of outstanding issues identified in HRA. Concerns re wastewater capacity of STWs. | |
| Trustees of Sir TE Lees' Estate Settlement | Unsound | Core Strategy needs strategic growth site (i.e. the Western Sector) to provide sufficient housing. | Include Western Sector strategic allocation. |
| Wyatt Homes | Sound | Support the 8 development requirements & preparation of a development brief. Support addressing of housing need & examination of Green Belt. | |
| Miss Burbidge | Unsound | Objects to the Huntick Road site being identified for settlement extension. 50 dwellings at this site too high density & traffic congestion a problem. Land at Deans Drove/Foxhills Lane is appropriate for development as history of being zoned for planning & has established drainage. Wide verges would be suitable for children to walk to school. | Development should be split between different sites. |

Council Response to comments on 7. North East :

ISSUES: Different views have been put forward from different parties on housing targets. Suggestions that more Green Belt should be released for future requirements, e.g. to include Selby's Yard. There is lack of environmental content or reference to parts of NE Purbeck and no reference to GI. Policy wording is possibly not compliant with Habitats Regulations. Comments on non-specific use of S106 contributions, viability of development at Lytchett Matravers, and concerns from action group at Upton re developability of site and lack of public transport. Concern over waste water capacity of sewage treatment works (STW). Lack of clarity on which part of A35 will be improved.

COUNCIL'S RESPONSE: The Council has agreed on 2400 dwellings, with their location and distribution clearly supported through public consultation. Government guidance set out in PPG2 advises that Green Belt should not be released for settlement extensions surplus to requirements. However, realignment of the Green Belt boundary to include previously developed land at Selby's Yard, Lytchett Matravers, within the proposed settlement extension, warrants further investigation. Compliancy with Habitats Regulations requires further investigation of mitigation measures that can be included within the Core Strategy to accompany proposed settlement extensions. Contributions from new development (S106) must be spent off-setting the external effects of the development. Reference to A35 improvements needs clarification. Policy does not need to mention non-essential strategies. Recent evidence (2010) shows that the thresholds and percentage of affordable housing are viable in Lytchett Matravers and flexibility is provided by Policy AH for developers to challenge this through submitting their own viability report. Evidence shows that the Upton site is developable, subject to further detailed investigations. STW issues will be considered through Natural England's proposal for new policy covering Poole Harbour. It is agreed that reference to green infrastructure would be a useful addition.

ACTIONS: Clarify that A35 improvements are between Poole and Bere Regis (para. 7.4.8). Identify heathland mitigation measures for each settlement extension. Make clear in chapter 2 and Vision for North East Purbeck the key landscape, heritage, coastal and environmental differences between spatial areas. Consider insertion of Natural England policy on Poole Harbour. Consider inclusion of Upton town square.

Chapter: 7. South East

Para/Policy/Map: 7.5

| | | | |
|---------------------|----------------|--|--|
| Natural England | | Lack of environmental content or reference to rural parts of SE Purbeck. Southern shores of Poole Harbour & hinterland of heaths very important for wild landscape & quiet nature - unlike farmed landscapes elsewhere. Vision for Wild Purbeck is recognised within Policy BIO but not in visions. Important omission because of policy for dealing with planning issues such as campsites & re-use of buildings. No reference to green infrastructure provision. Wording too general. Wording "alternatively where suitable mitigation for individual development sites cannot be secured, contributions from all housing development will be used to implement mitigation measures" is misleading & possibly not compliant with Habitats Regulations. No indication of how harm to AONB can be avoided. | Summarise specific heathland mitigation for SE Purbeck. Reference to Green Infrastructure with overview of needs & opportunities in each area. Indicate mitigation of adverse effects on AONB. |
| Mr & Mrs Hobbs | Unsound | No consideration given to problems of 2nd home ownership. Desirability of area pushes up prices leading to lack of affordable housing. | Limit 2nd home ownership. |
| Mr & Mrs Warrington | Unsound | No consideration given to high level of 2nd homes. This pushes up prices & property therefore unaffordable for local people. Worth Matravers is typical example. | Limit 2nd home ownership. |
| Mr Clements | Unsound | Red arrow on Map 13 shows affordability concerns & 2nd home concerns. | Limit 2nd home ownership. |
| Mr Davies | | Vast number of 2nd homes. | Limit 2nd home ownership & holiday lets. |
| Mrs Castle | Unsound | 2nd homes have caused high house prices & led to unaffordable property for local people. | Limit 2nd home ownership. |
| Mrs Denton | Unsound | Number of second homes not been taken into consideration. This leads to high prices and fewer affordable housing for local first-time buyers. | Limit second home ownership |
| Mrs Gloyn-Cox | Unsound | Leisure facilities not inadequate for "vibrant seaside town". Swanage needs secondary school. It already has good | Provide site for Free School on Grammar School site with improved leisure facilities & some |

| Name | Plan sound? | Comment on soundness | Proposed Change |
|------------------------------------|--------------------|--|---|
| Mrs Hurst | | school provision with 1st schools, middle school, Purbeck View & Harrow House. Concerns over 2nd homes/holiday homes. | affordable & market housing. Property must be affordable for local people & 2nd home ownership restricted. |
| Ms McMorrow | Unsound | No consideration to high level of 2nd homes. Property unaffordable to local people. | Limit 2nd home ownership. Stop selling off social housing. Increase rental housing. |
| Para/Policy/Map: 7.5.1 | | | |
| Purbeck Society | Unsound | Population of Swanage is underestimated. | Planning for future should be based on more accurate information, especially with regard to housing provision. |
| Save Herston Fields | Unsound | Swanage's population is 10,400 (2001 census), not 9,900. | |
| Jurassic Coast World Heritage Team | | "World Heritage Coast" should be "World Heritage Site" or "Jurassic Coast" or "Jurassic Coast World Heritage Site" or "Dorset & East Devon Coast World Heritage Site" | Amend to one of the following: "World Heritage Site" or "Jurassic Coast" or "Jurassic Coast World Heritage Site" or "Dorset & East Devon Coast World Heritage Site" |
| Para/Policy/Map: 7.5.10 | | | |
| Dorset AONB Partnership | | Lack of reference to natural environment, conservation & enhancement of AONB & objectives to AONB Management Plan & Landscape Character Assessment. | Make reference to natural environment, conservation & enhancement of AONB & objectives to AONB Management Plan & Landscape Character Assessment. |
| Highways Agency | | Supportive of transportation improvements listed. | |
| Purbeck Society | Unsound | Only limited potential for additional employment in Swanage. Directing development to end of a cul-de-sac is against national & PDC policy to reduce car journeys. | Recognise pressures large numbers of houses would put on A351. Direct development to Dorset Green (e.g. new village). |
| Save Herston Fields | Unsound | Introduction of a two-tier education system means all 13+yr old children to be transported to Wareham. Secondary school is needed in Swanage. Without knowing future of PCTs & NHS reorganisation it is more sensible to keep medical practice where it is. This will reduce carbon footprint. Strong local feeling against development at Herston, shared by Town Council. SANGs undeliverable in | Reduce housing allocation for SE Purbeck to reduce need for enhanced medical facilities & ease burden on A351. |

| Name | Plan sound? | Comment on soundness | Proposed Change |
|--------------------------------|--------------------|---|---|
| Swanage Town Council | Unsound | Swanage - as it is AONB this is ridiculous notion. Traffic analysis has not taken into account holiday makers & 900 houses will make problem worse. Focus is only on Prospect Business Park. Steps required to improve quality of town centre such as Commercial Lane as per SS24 of 2004 Local Plan. No reference made to role of broadband, maritime economy, facilities for fishing, diving & visitors arriving by sea. No reference to wet weather facility incorporating sporting facilities as per section C1 of M&CTI Swanage Strategic Plan 2007 - 2027. | Reference to enhancement of parts of Swanage town centre, superfast broadband, protection of beach & promotion of maritime economy, tourism, retail, & heritage attractions. Refer to wet weather attractions, including sporting facilities. |
| Para/Policy/Map: 7.5.2 | | | |
| Swanage Town Council | Unsound | Fails to recognise need to protect local beaches. SMP advises "hold the line" but sea levels will compress inter tidal zone, making beach smaller. | Address erosion of main beach by presenting options in additional paragraphs in section 7.5 & relevant policies (CE & SE) |
| Para/Policy/Map: 7.5.3. | | | |
| Dorset AONB Partnership | | Lack of reference to transport issues, noise, pollution, visitor enjoyment, & insensitive traffic management measures. | Make reference to transport issues, noise, pollution, visitor enjoyment, & insensitive traffic management measures. |
| Para/Policy/Map: 7.5.4 | | | |
| Purbeck Society | Unsound | Misleading paragraph as does not mention emphasis that Swanage Community Strategic Plan puts on affordable housing. | Set out need for small number of affordable units as opposed to implied support of more market housing. Stress need for balanced housing stock. Plan should indicate there is current over-provision of two-bed flats. Should clarify that proposed 50:50 market/affordable split will do nothing to redress present imbalance. |
| Para/Policy/Map: 7.5.8 | | | |
| Dorset AONB Partnership | | AONB referred to, but not "Dorset AONB". Lack of reference to landscape character, visual amenity & special qualities of AONB re Swanage. No mention of Norden Park & Ride. | Refer to "Dorset AONB". Make reference to landscape character, visual amenity & special qualities of AONB re Swanage. Refer to Norden Park & Ride. |

| Name | Plan sound? | Comment on soundness | Proposed Change |
|---------------------|--------------------|---|---|
| Purbeck Society | Unsound | The amount of building proposed for Swanage will compromise Vision by destroying green space, putting more pressure on countryside & potentially restricting access to it. New green space is finite & therefore not deliverable. | Formulate a policy to differentiate between housing need & demand. |
| Save Herston Fields | Unsound | Vision disregards importance of AONB & gateway to World Heritage site. Building settlement extensions at odds with AONB & World Heritage site status. Not be enough employment opportunities so people will need to commute along A351 - at odds with Vision for Purbeck to reduce carbon footprints in district. Transport infrastructure will not support it. | Reduce number of houses proposed for SE Purbeck significantly. If necessary, reallocate them to a different, more sustainable part of district. |
| Scott Estate | Sound | Vision for SE Purbeck supported | |
| Weld Estate | | Comments on self-sufficiency of Swanage & Vision would ensure it retains sense of vitality. However, residential expansion is out of tune with sustainable development. | |
| Mr Murray | Unsound | Suggests development outside settlement boundary can enhance landscape. Attached illustrations show development preferred by Dorset AONB. | Delete sentence that makes reference to areas of new green space, access to countryside & improving setting of town within AONB. |
| Ms Watts | | Ignores unique quality of Swanage, of internationally-recognised beauty & environmental & historic importance. Swanage is located at end of cul-de-sac. Planning Inspectorate report (2002) concluded no additional building on A351 until traffic congestion resolved. Improvement to A351 corridor would change nature of landscape. | |

Para/Policy/Map: 7.5.9

| | | | |
|------------------|----------------|---|---|
| Purbeck Society | Unsound | Justification for settlement extensions based on false premises of housing need rather than demand. Suitable SANGs cannot be delivered. Opposition showed that this was untenable & settlement extension at Swanage was withdrawn from plan at consultation. Would be inconsistent with national policy (abolished RSS targets) & unjust to add a settlement extension through Site Allocations Plan. | Encourage limited no. of affordable homes for local people & address "need" rather than "demand" as expressed through applications on housing register. |
| Swanage and Isle | | Affordable housing in Swanage & villages essential. People | Leave CS as it is; plenty of people support it. |

| Name | Plan sound? | Comment on soundness | Proposed Change |
|------------------------------------|--------------------|--|---|
| of Purbeck Liberal Democrats | | are being misled by vocal objectors 'watering down' Core Strategy, so people do not realise that only 200 new units would be in settlement extensions & that it would be over a 15-year period. People also worried that affordable homes would be purchased under Right to Buy scheme. | |
| Jurassic Coast World Heritage Team | | No mention of Shoreline Management Plan policy which will result in change, including loss of property/infrastructure over time. | Refer to Shoreline Management Plan policy. |
| Mr & Mrs Seaman | | 900 houses has not been justified. | If jobs are created then housing can be provided in response to demand. |
| Mr Scott | | Very little consultation prior to notification. | |
| Mrs Denton | | Concerns over second homes/holiday homes. More affordable housing needed. | Delete 200 houses on settlement extensions in Swanage. Limit second home ownership. |
| Ms McMorrow | | Concerns about impact on countryside, AONB & Green Belt. | |
| Ms Watts | | No evidence for this level of housing, which will increase population of Swanage by 2,000 in 15 years. Large numbers of 2nd homes. Average house price too high. Inadequate infrastructure & employment opportunities. Prospect Business Park under-occupied. Changes to local schools mean no secondary provision. Increase in population will turn Swanage into dormitory town & haven of 2nd homes for wealthy. Vulnerable to destruction by traffic, car parks, pollution and effect of 2nd homes. | GOSW to prevent destruction of Swanage. |

Para/Policy/Map: Map 13

| | | | |
|------------------------------------|--|---|---|
| Jurassic Coast World Heritage Team | | Flood risk should be included on map as example of how plan is considering risks of climate change. No reference to relevant Shoreline Management Plan. | Include areas at risk of flooding & reference to Shoreline Management Plan. |
|------------------------------------|--|---|---|

Para/Policy/Map: SE: South East Purbeck

| | | | |
|------|----------------|--|---|
| CPRE | Unsound | It is unsound & undeliverable in terms of protecting AONB. Housing requirement not derived from local needs assessment. Criteria for inclusion on housing register not commensurate with those adopted by most national parks, | Immediate interim reduction in housing number allocations, particularly within AONB, to be followed as soon as practicable by local assessments to reflect current needs. |
|------|----------------|--|---|

| Name | Plan sound? | Comment on soundness | Proposed Change |
|-------------------------|--------------------|---|--|
| Dorset AONB Partnership | | such as 10 years residential qualification. Lack of reference to natural environment, landscape character, landscape & visual impact. Lack of reference to conservation & enhancement of designation, lack of reference to relevant AONB/protected landscape policy. Lack of reference to whole area being in AONB. | Make reference to natural environment, landscape character, landscape & visual impact. Make reference to conservation & enhancement of designation, lack of reference to relevant AONB/protected landscape policy. Highlight fact that whole area is in AONB. |
| Dorset County Council | | DCC Cabinet agreed to approve proposal to explore interim solution for future care provision for older people in Swanage & to note that failure to secure a satisfactory interim arrangement will necessitate consideration of disposal options. | Update references. |
| Highways Agency | | Encourage new residential development in Swanage & welcome more employment to promote self-containment. Supportive of transportation improvements listed. Maintains that significant growth at Corfe Castle would be unsustainable. | |
| Purbeck Society | Unsound | Unreasonable to expect older population to travel further to edge of/out of town health centre. Existing one is only 25 years old & well-located, with potential for extension or redevelopment. Plan does not mention this & is therefore unsound. Due to problems of finding suitable site, plan may not be deliverable. Settlement extensions in AONB not sustainable & not deliverable. | Plan to be flexible & recognise needs of local population & potential for present site to accommodate present & future health care requirement. Plan to recognise pressures on funding in short/medium term. Incremental improvements more deliverable than multi-million pound facility on new site. Remove plans to deliver settlement extensions through Site Allocations Plan. |
| Royal Mail | | Essential that growth at Swanage is planned for in a timely manner & does not compromise or prejudice Royal Mail operations. | |
| RSPB | | Object to policy pending resolution of outstanding issues identified in HRA. Concerns re wastewater capacity of STWs. | |
| RSPB | | Support SANGs at Swanage & elsewhere. | |
| Scott Estate | Unsound | Statement that 900 dwellings are needed in SE Purbeck is | First two paragraphs of Policy SE to be amended as |

| Name | Plan sound? Comment on soundness | Proposed Change |
|-------------------------|--|--|
| | incorrect, as much more is needed. Current households on Housing Register are 954, & Fordham Research 2008 forecasts future need of 129 households in Swanage area per annum. | follows: Swanage will provide a main focus for service provision, where new housing will be managed through extension of settlement boundaries to meet housing needs. Settlements of Corfe Castle & Langton Matravers will provide focus for service provision in rural areas. Development outside settlement boundaries will be strictly controlled. Role of Swanage will be supported through allocation of settlement extension at Washpond Lane to include approx 120 dwellings, including affordable housing. |
| Studland Parish Council | Concerns about lack of employment & traffic using A351 through Corfe Castle & B3351 through Studland. | |
| Studland Parish Plan | Unsound Concerns over congestion/traffic, especially A351. | |
| Swanage Town Council | Unsound Level of housing not deliverable nor appropriate due to lack of local transport infrastructure. 900 dwellings impractical. Insufficient evidence to support fact that transport improvements are adequate to deal with additional dwellings. PTS will not address congestion issue as major road schemes are removed. In autumn 2009, Highways Agency objected to Option B, which concentrated development in Swanage, due to lack of employment opportunities & out-commuting. Pre-submission draft similar to Option B. Support mainline train services to Swanage, but this may not ease congestion. Dwellings undeliverable without impact on habitats. Insufficient heathland mitigation & no detail of SANGs. "Where shall we build in Swanage & Corfe Castle 2012-2026?" referred to opportunities to improved public access west of town, but suitability as SANG is in doubt due to other uses on site. HRA (para 5.48) states SANGs "largely untested" & para 11.25 states not possible to conclude that increased traffic levels will not have adverse impact. | Reduce number of dwellings to approx 600 dwellings in South East Purbeck with only 251 in Swanage itself (in additional to those completed or with planning permission). |
| Weld Estate | Policy for concentrated growth in Swanage does not take | Focus for Swanage should be consolidation of |

| Name | Plan sound? | Comment on soundness | Proposed Change |
|------------------------------------|--------------------|---|--|
| | | into account relative isolation & constraints, so should not be expanded. Instead, development should be focussed on main arterial routes i.e. Wareham & Wool, which would link with DGTP. | current position & inward investment to ensure it remains vibrant. |
| Welfare Dwellings Residential Care | Unsound | Previous consultations showed 85% support for Site D (Grammar School site) & overall rating of least impact in background paper. Owners support housing & care home for local needs & local employment. Concerns over lack of housing coming forward, & lack of affordable housing. | Revert to version of CS that was taken to Special Council Meeting on 5 Oct 2010. |
| Dr Howard | Unsound | Swanage is relatively unspoiled. Further development will cause urban sprawl & destroy character. Lack of employment means more commuting. Housing would be occupied by retirees, of which Swanage has more than its fair share. A great deal of development in Swanage in last 20 years. | Change housing total to 2100, as extra homes are not wanted or needed. |
| Dr Langley | Unsound | Most employment development potential is in Poole/Bournemouth, Winfrith & Holton Heath, but 37.5% of housing in SE Purbeck. Balance incompatible with national guidance. SA fails to pick up on this. | Remove 200 dwellings settlement extension in Swanage. |
| Mr & Mrs Burt | | Council's preferred option was 206 dwellings, now risen to 900 dwellings. Concerns about lack of space & employment. Concerns about traffic. | |
| Mr & Mrs Leslie | | Concerns over 2nd homes/holiday homes, Negative impact on character of area, concerns over lack of infrastructure. Objects to change from 200 dwellings on edge of Swanage to 900+. No industry or employment to support people. Many unsold homes on market. School pupil numbers are falling so who will need the houses? | |
| Mr & Mrs Spindler | | Swanage lacks services to cope with additional development. Pressure on local doctors. Grammar School site should not be developed. Northbrook Road floods in the dip. Flooding of D'urberville Drive will occur. Concerns over lack of infrastructure & lack of facilities/services to cope with additional development. | No development in Swanage |

| Name | Plan sound? | Comment on soundness | Proposed Change |
|-----------------------|--------------------|--|---|
| Mr & Mrs Winterbottom | | Grammar School site should not be developed. Overall costs & traffic/movement consequences make scheme unrealistic. Support new school. Need realistic & ambitious scheme to re-locate medical centre with ferry & helicopter access. Minibus link needed for access to medical centre. Infilling & selected local sites could allow low cost/rental housing | Use infilling & local sites for low-cost/rental housing. |
| Mr Davies | | 900 houses will destroy Swanage. Concerns about insufficient employment. Too many flats. Road system poor, especially in Corfe Caste. | Develop Winfrith & Holton Heath. |
| Mr Gladney | | Negative impact on environment & on character of area. Concerns over congestion/traffic, poor accessibility & lack of infrastructure to cope with additional development. | No new homes unless local jobs are created in Swanage. Housing Association should buy the 200 homes currently for sale & offer them to people working in Swanage. No new homes until road network is improved. Take World Heritage site into consideration. |
| Mr Gloyn-Cox | Unsound | Area bounded by Station Rd, Institute Rd & Kings Rd East should be included as priority area of "boutique" shopping, with enhancements to street scene. | Designate zone for small retail development. |
| Mr Leadbetter | | Oppose 200 dwellings on outskirts of Swanage. Negative impact on environment & character of area. Negative impact on Jurassic Coast. | |
| Mr McMillan | Unsound | 900 new dwellings will detract from Swanage's ambience. Congestion on A351, few employment opportunities in town. Building on AONB not supported. No consideration given to high level of 2nd homes & desirability of area for retirement, which have increased house prices & made property unaffordable for local people. HRA states likelihood that development in Swanage will have adverse effect on protected habitats. SANGs not deliverable. | Build homes in economic growth areas, such as Holton Heath & Winfrith. Limit 2nd home ownership. No building on green field/AONB sites & limit infill to affordable housing for local people. |
| Mr Morton | Unsound | Green Belt land should not be used. Grammar School site should be developed. | |
| Mr Oldham | Unsound | Limited job opportunities. Swanage is cul-de-sac. Concerns about A351 & lack of public transport. | Develop in Upton & surrounding area. |

| Name | Plan sound? | Comment on soundness | Proposed Change |
|---------------|--------------------|--|--|
| Mr Pipe | Sound | Full provision for secondary education of all Swanage children required. Travel to Wareham reduces community spirit, wastes time & is unsustainable. | Current Middle School site or Grammar School site should be reserved for secondary school. St Mark's First School should be expanded by converting Jubilee Rd into two closes, providing space for extra classrooms across the road & direct link to present school playing field. |
| Mr Saddington | Unsound | Too many 2nd homes. Building more housing would increase 2nd homes. | |
| Mr Seal | Unsound | Concerns about infrastructure. In 2009 Highways Agency objected to option focussing housing in Swanage & only 8.9% of replies favoured growth in Swanage. Council has ignored this. | Spread growth around district. |
| Mr Tasker | Unsound | Dwellings proposed without employment or transport links. Too many 2nd homes & holiday homes. | Provision of more amenities & employment in Swanage. Join together with other coastal towns to reduce 2nd home ownership & holiday homes. |
| Mr Trite | Unsound | Concerns over congestion/traffic, including on A351. Concerns over lack of infrastructure. Negative impact on character of area. Grammar School site should not be developed. Support Town Council, who would support smaller necessary developments in variety of locations after consultation with locals. However, residents have not had opportunity to make views known. Herston Fields should not be developed & Grammar School should return to educational use. PDC has previously said that if infilling were accepted, settlement extensions would not be necessary. Swanage has experienced too much development already. | |
| Mrs Bridle | Unsound | 260 houses in outskirts of Swanage (AONB) would become 2nd homes & be detrimental to town. Concerns about traffic & general infrastructure. Concerns about lack of amenities. | |
| Mrs Cross | Unsound | 260 houses on edge of Swanage would encroach on AONB & seaside resort. Too many holiday homes. Concerns about traffic. Concerns about loss of character houses. | Only houses for local people with local jobs. |
| Mrs Howard | Unsound | Concerns over second homes/holiday homes, Negative | Hold a referendum. |

| Name | Plan sound? | Comment on soundness | Proposed Change |
|---------------------|--------------------|---|---|
| | | impact upon character of area, concerns over lack of infrastructure. Health centre site does not need changing. Community benefits are PDC's vision, not the people's. The only benefits will be for the landowners and developers. Concerns over traffic around Corfe Castle. Statistical analyses were flawed. Swanage has already had a much higher proportion of development than its fair share. | |
| Mrs Lucas | | Concerns about AONB. Lack of consultation with residents. Concerns about parking & increase in traffic, especially in Northbrook Rd. | |
| Mrs Paxton-Brunning | Unsound | No reference to new World Heritage Centre at Durlston, which will increase traffic on A351. Concerns about impact on AONB. | |
| Mrs Saddington | | Too many 2nd homes in Swanage. | Keep price of property affordable to local families. |
| Mrs Wadsworth | Unsound | Lack of logic in choosing Swanage for 900 new homes because of location & geographical context in AONB. Not enough work to support affordable housing. Road, health, and education infrastructure currently adequate, but additional housing could not be catered for. Unrealistic to state that rail link is likely. Currently no real alternatives to ferry link & A351 to Wareham. | 200 new dwellings for Isle of Purbeck. |
| Ms Barrow | Unsound | New homes not justified. Not enough infrastructure. Concerns over employment. Swanage would become dormitory town. Need to retain greenfields & open spaces. Impact on AONB & on Jurassic Coast. Impact on hospitals, schools. Concerns about traffic. | 200 dwellings should be built nearer facilities. |
| Ms Lewis | Unsound | Most employment development potential is in Poole/Bournemouth, Winfrith & Holton Heath, but 37.5% of housing in SE Purbeck. Balance incompatible with national guidance. SA fails to pick up on this. | Remove 200 dwellings settlement extension in Swanage. |
| Ms Stephenson | | Swanage infrastructure can't accommodate housing increase. Concerns over congestion/traffic. Not enough employment to support housing proposals. New 2-tier education system will increase numbers of children being | Housing should be near employment land at Holton Heath. |

| Name | Plan sound? | Comment on soundness | Proposed Change |
|--------------|--------------------|---|---|
| | | transported to Wareham. | |
| Ms Sutcliffe | Unsound | Concerns over congestion/traffic & on A351. Concerns over 2nd homes/holiday homes. Not enough employment to support housing proposals. Building on greenfields is not supported. Grammar School site should be developed. Do not accept that existing health centre cannot be expanded; Localism should lead to more & improved consultation. Concerns over impact on biodiversity. | Further consultation, re-examining housing numbers, reconsidering settlement extension options & tackling 2nd homes issue. Limit development to infill sites or those very close to |
| Ms Zyga | Unsound | Building in AONB not supported. Housing should be near employment. Negative impact on character of area. Concerns that proposals take no account of impacts on internationally renowned flora & fauna. Swanage already experienced too much development. No explanation for 200 dwellings. | Size of Swanage must not be increased nor have 900 new homes, & AONB must be protected. Locate development in areas of economic growth at Holton Heath & Winfrith. Delete extending of settlement boundary & 200 homes. Only infilling to be permitted. |

Council Response to comments on 7. South East :

ISSUES: Comments from local residents and community groups consider the amount of housing, impact upon the AONB, lack of transport infrastructure and employment opportunities, second homes, the effectiveness of heathland mitigation and concerns over the consultation process.

COUNCIL'S RESPONSE: Consultation on possible sites to deliver the proposed 200 dwellings settlement extensions has increased the opposition to the housing target set by the Core Strategy. Criticism over the consultation process is unjust, as ample opportunities have been provided and a large number of comments received throughout the process. The Council has agreed on 2400 dwellings, with their location and distribution clearly supported through public consultation. In autumn 2009, two-thirds of respondents supported proposals to distribute new housing development around the District, including a 200 dwelling settlement extension to Swanage, as part of a total of 954 dwellings for SE Purbeck. This housing is essential to meet the aims of the Swanage Community Strategic Plan by providing new affordable housing, supporting new employment development at Prospect Business Park, maintaining the viability of shops, schools and other services and facilitating the delivery of new community facilities. The Highways Agency and Dorset County Council have indicated that the level of development can be accommodated through improvements to transport infrastructure. Settlement extensions will be reconsidered through the Swanage Area Action plan or a neighborhood plan drawn up by the local community. Whichever method is adopted, the plans will undergo further consultation and include much greater detail on provision of green infrastructure, heathland mitigation, town centre proposals, healthcare, recreation facilities, AONB etc. Additional sites have been put forward for possible settlement extensions and a number of smaller settlement extensions can be considered to deliver the 200 dwellings. The Heathland DPD and IPF provide the mitigation measures to support housing growth. As the settlement extension has been passed to a subsequent plan, it will be the role of that plan to identify suitable measures to mitigate the impact of the new housing, when the location and ownership of the site is known. It is agreed that reference to green infrastructure would be a useful addition.

ACTIONS: Update population data and information on school review and care home. Insert 'affordable' in para 7.5.4. Make clear in chapter 2 and Vision for South East Purbeck the key landscape, heritage, coastal and environmental differences between spatial areas. Consider insertion of Natural England policy on Poole Harbour. Give some reference to green infrastructure with overview of needs and opportunities in each area. Explore the potential for a new secondary school.

Chapter: 8. Countryside

Para/Policy/Map: 8.2.1

Dorset AONB Partnership

Lack of reference to constraints within countryside that affect AONB. Lack of reference to telecommunications masts, local landscape character assessment, adverse impact of signs, use of Rural Roads Protocol.

Refer to development in countryside that affects AONB. Make reference to telecommunications masts, local landscape character assessment, adverse impact of signs, use of Rural Roads Protocol.

Para/Policy/Map: 8.2.2

Dorset AONB Partnership

Lack of reference to replacement buildings respecting local character & being of similar scale to original.

Make reference to replacement buildings respecting local character & being of similar scale to original.

Para/Policy/Map: 8.2.3

Dorset AONB Partnership

Support reference to impact of equestrian development.

Para/Policy/Map: CO: Countryside

CPRE

Unsound

The AONB is not treated as distinct entity. In terms of housing & traveller sites there is need for special conditions.

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

Dorset AONB Partnership

Name "Countryside" is misleading. Lack of reference to vertical structures (e.g. telecommunications masts). Lack of reference to AONB and promoting development that enhances AONB.

Rename "Development in the Countryside". Additional bullet point: "it does not have an unacceptable impact on local character & natural beauty of protected landscapes such as AONB. Where impacts are acceptable yet there is residual landscape impact, effort should be made to strengthen local landscape character in order to bear the development better" & development will be promoted where "it constitutes an enhancement of local character & natural beauty of protected landscapes such as AONB".

Dorset Wildlife Trust

Sound

Supports wording to ensure equestrian development has no adverse ecological impact.

| Name | Plan sound? | Comment on soundness | Proposed Change |
|-------------------------|--------------------|--|--|
| NFU | | An objective required for investment in core agriculture because of importance of food production & management of environment. Policy CO should not prohibit development within countryside, as mix of housing & employment essential for sustainability of rural communities. | |
| Rempstone Estate | Unsound | Fails to recognise existing tourist developments in countryside & makes no provision for better use & upgrading of such sites. Missed opportunity to achieve sustainable tourist development in popular tourist area & fails to recognise that such assets contribute to thriving countryside & rural economy. | New bullet point: "It comprises the upgrading or expansion of an established tourist asset accompanied by environmental enhancement, or" |
| RSPB | | Only equestrian development has caveat re ecological impact | Impact on ecological features should apply to all development in countryside, not just equestrian. |
| Save Herston Fields | Unsound | Policy aims to respect countryside but settlement extensions will not achieve that. Countryside locations not essential because housing requirement is being imposed on district. Settlement extensions will destroy AONB. | Delete settlement extensions from areas within AONB. |
| Swanage Railway Co. Ltd | Unsound | Allowing development where a countryside location is essential is not flexible enough because some uses more suited for countryside due to other constraints e.g. railway facilities that have to be located near to tracks. | Development in the countryside will be permitted where: A countryside location is essential, or in exceptional circumstances it can be demonstrated that no other alternative to an appropriate development is available & where it comprises brownfield site that can be brought back into use for appropriate activities or use without compromising other policies within the Core Strategy. In exceptional circumstances it comprises use that can only be located in a rural area due to constraints relating to existing infrastructure of that use. |
| The Charborough Estate | Unsound | Too restrictive as would prevent development in countryside & villages without settlement boundary. Requirements set out for barn conversions are unreasonable, as do not favour market housing use, nor is tourism identified as a priority use. | Policy needs to encourage appropriate re-use or redevelopment of rural buildings, a flexible range of land uses & balanced approach to sustainability issues in rural areas. |
| Weld Estate | | Object to sequential hierarchy. Inflexible - applications | Change wording so that successful application |

| Name | Plan sound? Comment on soundness | Proposed Change |
|-------------|--|---|
| Weld Estate | <p>should be judged on merits. Tourist accommodation should be favoured over affordable housing, given its economic benefits. Policy presents hurdle in achieving council's vision as risks overlooking tourist accommodation & farm diversification. Lack of consideration of transport & infrastructure in policy - applications for development in countryside should not be held back just because of lack of transport options. Policy lacks consideration of renewable energy & green waste treatment.</p> <p>Support broad-minded approach that allows businesses to operate in rural premises, particularly for reuse of traditional structures.</p> | <p>should demonstrate that intended use class is character-appropriate with site & works in harmony with wider setting. Preference given to uses that fulfil the criteria but also bring employment prospects & contribute positively to local economy. If site unsuitable for employment usage (whether use class types A or B) then should be considered for tourist & general accommodation.</p> |

Council Response to comments on 8. Countryside :

ISSUES: Comments consider the policy is too restrictive, prohibits essential development and does not recognise existing tourism and new attractions. All development should have ecological considerations, not just equestrian. Importance of AONB needs recognition.

COUNCIL'S RESPONSE: Development in the countryside needs to be strictly controlled to achieve sustainability objectives, but the policy does allow for affordable housing and essential development. Policy is generic to all areas outside defined settlement boundaries, backed up by national policy and it is therefore unnecessary to specifically highlight the AONB. Policy does not prohibit essential development or expansion of tourist facilities. Ecological impact of all development warrants consideration. It is recognised that the policy on re-use of rural buildings is restrictive and more flexibility could be built in.

ACTIONS: Increase flexibility on types of uses appropriate to re-use of rural buildings. Update policy to include reference to environmental (including ecological) impacts of all development.

Chapter: 8. Housing Mix

Para/Policy/Map: 8.3

| | | | |
|------------------|----------------|---|---|
| CG Fry & Son Ltd | Unsound | No evidence to support 90:10 tenure split - would not create & maintain balanced communities. Market conditions & lack of HCA grants mean that LPAs across region are reducing amount of social rent to intermediate to improve attractiveness & viability. Splits of 60:40 common. Current market conditions & their impact on viability & scheme delivery will last for substantial proportion of plan period. Therefore policy should be more flexible & less inspirational. Policy should be delegated to forthcoming SPD to draw out issues. | Delete policy AHT for more detailed consideration in SPD. If policy is to remain, it should be redrafted so that proportion of social rented housing is maximised, having regard to current market assessments as well as market conditions & scheme viability. |
|------------------|----------------|---|---|

Para/Policy/Map: AHT: Affordable Housing Tenure

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|---------------------------|----------------|--|--|
| Bloor Homes Ltd | Unsound | Text is unclear as it gives a likely split, yet states that tenure will be subject to negotiation. No evidence base to support the 90:10 split. | Change the wording to "The tenure of affordable housing will be negotiated on a site-by-site basis to reflect identified local need. The Council will aim to achieve the following mix: 33% intermediate housing to rent or purchase 66% social rented housing" |
| Redwood Partnership | Unsound | Proposed tenure mix lacks sufficient flexibility & difficult to attain with current economy & spending cuts. Government policy is changing & more flexible approach required to ensure plan is consistent with national guidelines & initiatives. | Delete percentage tenure mix requirements. |
| Scott Estate | Unsound | Proposed tenure mix lacks flexibility & difficult to attain with current economic climate. Government policy to affordable housing is changing & more flexible approach required. | Delete percentage tenure mix requirements. |
| SW RP Planning Consortium | Unsound | 90% social rented housing would not lead to mixed & balanced communities. This percentage not desirable if Registered Providers bring forward their own medium-sized sites, which could be 100% affordable housing. Recent ministerial announcements put more emphasis on providing intermediate housing. Better to set tenure split in affordable | Amend wording to: "Affordable housing provision tenure will be negotiated on a site-by-site basis to reflect identified local need and viability, but it is likely to be split as follows: 75% social rented housing & 25% intermediate housing to rent or purchase" |

| Name | Plan sound? Comment on soundness | Proposed Change |
|--------------------|---|---|
| Weld Estate | housing SPD in future. Evidence base uses tenure split of 75:25 & has not tested 90:10. This may not be viable. Reconsultation needed in light of government's "Draft Statutory Guidance on Social Housing" which encourages councils to tailor affordable housing to their specific needs. | CS should only deal with most fundamental questions on affordable housing, rather than housing mix, etc. as this should be subject to separate examination. |
| ZBV (Winfrith) Ltd | Unsound Should support other forms/tenure of housing. In particular, low cost or discounted market housing for sale & discounted market rent. These currently fall outside definition of affordable housing but could help to widen life style choices & allow an opportunity for people to enter property market. Any such discount should remain in place in event of a future sale. Given high levels of 2nd/holiday homes within District, Council may also consider giving support to new housing schemes which commit new residential accommodation to those living or working within District in advance of general market. This would prioritise housing for local market. | Consider other forms/tenure of housing such as low cost or discounted market housing for sale & discounted market rent. |

Council Response to comments on 8. Housing Mix :

ISSUES: No evidence to support tenure split; not flexible; split would not lead to mixed and balanced communities; restrictive in not considering other forms/tenures of housing.

COUNCIL'S RESPONSE: The Strategic Housing Market Assessment recommends a 70:30 split, but the Council considers a 90:10 split to be more workable. Policy is flexible through stating that it can be negotiated. The split is designed to tackle an identified need and is therefore appropriate. A forthcoming Affordable Housing Supplementary Planning Document will look closely at alternative forms of housing.

ACTIONS: None required

Chapter: 8. Affordable Housing

Para/Policy/Map: 8.4

| | | | |
|------------------|----------------|--|-------------------------|
| CG Fry & Son Ltd | Unsound | <p>Upwards of 40% affordable housing will lose balance between different tenure types, eroding balance between different size types of market & affordable housing. Viability report has unrealistic assumptions in terms of developers' return, contractors' return, market values (sales values) & build costs. Density presumptions over-optimistic: 32dph more realistic. Landowners disincentivised to bring land forward &/or range of anticipated community infrastructure improvements cannot be funded &/or proportion of affordable housing must drop. Scenarios do not test sensitivity with contractors' margin, market/sales values &/or build costs. Lenders demanding, with developers needing to show profits of between 20 & 25%. 20% more robust baseline than 15% reflected in report. Contractors' profits generally 7%, not 6% as stated in report. Lytchett Matravers less attractive than other rural fringe settlements, therefore sales values over-optimistic. Smaller economies of scale & high design & materials standards mean higher build costs than quoted in report. Planning obligations of £15k per dwelling are underestimation. Using worked example with alternative assumptions, a lower residual land value can be demonstrated, which is insufficient incentive for landowners to bring sites forward. Larger scheme would bring about greater economies of scale & more affordable units overall. Model needs soundly-based, locally-informed inputs.</p> | Review minimum targets. |
|------------------|----------------|--|-------------------------|

Para/Policy/Map: 8.4.1

| | | | |
|---------------------|----------------|--|--|
| Save Herston Fields | Unsound | <p>Of 1660 people on housing waiting list, only 1250 live in Purbeck. Therefore, requirement to build 409 affordable dwellings between 2007-2012 (2045 houses) does not reflect this. A quarter of amount is 400 dwellings & would be achievable without settlement extensions or large quantities</p> | Be more realistic about requirements for affordable housing. |
|---------------------|----------------|--|--|

| Name | Plan sound? | Comment on soundness | Proposed Change |
|--|--------------------|--|---|
| | | of market housing. 50% affordable housing is not likely to be achieved. Desire & need for affordable housing need to be separated. | |
| Para/Policy/Map: AH: Affordable Housing | | | |
| Bloor Homes Ltd | Unsound | PPS3 (paragraph 29) requires targets, not a minimum. The Core Strategy policy says 'at least'. | Amend the policy wording (text suggested) which sets out targets. |
| Mr & Mrs Hampshire | Unsound | Changing affordable housing requirement in Lytchett Matravers from 40% to 50% is flawed because the viability report is simplistic, not taking local circumstances & likely form of development into account. Relies heavily on 'extensive experience', citing Bournemouth's affordable housing DPD, which has come under scrutiny. Para 4.36 of report underestimates existing use value of land. Para 4.35 assumes 15% profit margin, whereas 25% is more realistic. Report does not take into account actual development costs. Policy must be sufficiently viable to allow development & in turn create affordable housing. Viability will also need to take into account other Section 106 contributions. If developer is required to provide (& pay for) independent financial appraisal or viability assessment, then either LPA should accept the appraisal or pay their own costs to carry out check. | Revert to 40% affordable housing, not 50%. Delete reference to part units being met through commuted sum & delete reference to developer funding verification of any independent viability appraisal they submit. |
| Planning Perspectives LLP | | Support that exceptions can be made to provision of affordable housing depending on viability assessment. | |
| Planning Perspectives LLP | Unsound | 40% threshold is onerous and the council should revert to the local plan threshold. | The opening part of the policy should be amended to read as per local plan policy MN4 to revise the threshold for the provision of affordable housing. |
| Studland Parish Plan | Unsound | 100% affordable houses does not seem to have been considered as an option. | PDC should examine a wider range. |
| SW RP Planning Consortium | Unsound | Threshold too low. Officer time better spent negotiating higher levels of affordable housing on bigger schemes, rather than using time for fewer returns. Low threshold would result in individual dwellings where occupants feel | Viability assessments should be carried out by an appropriate & independent assessor within parameters agreed by council. Amend policy to that developments of 2 or more dwellings, or a site area |

| Name | Plan sound? Comment on soundness | Proposed Change |
|------------------------|--|--|
| | isolated. Unclear whether different thresholds have been tested in different parts of district, or if a threshold of two has only been tested once. South Hams attempted 50% affordable housing & this has rarely been achieved. Viability assessment recommends flexibility, but policy sets minimum requirements. These should be starting points of negotiation. Requirement to make developers pay for viability assessments independently verified is unnecessary expense & could delay processing of applications. Development should come forward at start of development on stalled sites to bring forward affordable housing & offer some cross subsidy from developer. | of 0.05 hectares or more should aim to provide a significant affordable housing contribution. Starting points for negotiation to be at least 50% in Swanage & coast sub-market areas & at least 40% elsewhere' |
| Swanage Town Council | Unsound Delivery dependent on large-scale development. May in fact restrict provision of affordable housing as developers will put up cost of private housing to fund it, thereby reducing affordability. | Local authority land to be marketed for high levels of affordable housing, rather than relying on other development. Refer to Purbeck Locality Review to identify assets & use as evidence base in Core Strategy. |
| The Charborough Estate | Unsound Policy will result in split in larger new developments, whereby 50% would be social rented stock & 50% executive housing in order to make development viable. This could result in people on middle incomes being squeezed out of property market locally. Smaller infill may not be viable & instead single dwelling development may result, which would not provide affordable element. | Policy should require healthy mix of social rented, shared ownership controlled price open market & uncontrolled open market. Employ threshold of 5 or more dwellings for providing social rented housing, with fewer than 5 dwellings, or less than 0.15ha required to provide for 50% of either shared ownership or market housing of modest size (& therefore cheaper than average for District). |
| Weld Estate | Policy is untenable. Developers would avoid Purbeck. Landowners would not release land. Poor quality construction & design. Policy is cumbersome, ill informed & ineffective fiscal/market control & deficit in meeting housing needs. Leads to loss of construction-related jobs & restriction of employment in area & stagnated economic growth. Questions over viability. Open book approach unfair & against free market conditions. | |
| ZBV (Winfrith) Ltd | Unsound Future policy regarding delivery of affordable housing should encourage, not restrain, residential development. | Consider & support other forms/tenure of housing such low cost or discounted market housing for sale |

| Name | Plan sound? Comment on soundness | Proposed Change |
|--------------|---|--|
| | <p>Targets should be flexible & take into account site costs & circumstances & overall scheme viability. Council's intention to increase proportion of affordable housing by lowering thresholds (on developments of two or more units) will impact on viability of small scale infill development, thus reducing likelihood of such schemes coming forward. Requirement to provide 90% of all affordable housing as 'social rented' will impact on viability & deliverability of new residential development within District. Other forms of tenure fall outside definition of affordable housing, but should be included.</p> | <p>& discounted market rent to widen life style choices & allow opportunity for people to enter property market. Any such discount to remain in place in event of future sale. Given high levels of second/holiday homes, Council to consider giving support to new housing schemes which commit new residential accommodation to those living or working within District.</p> |
| Mr Gloyn-Cox | <p>Unsound Provision dependent on large developments along western boundary of Swanage. Developers expect to provide 50% affordable, but this increases price of private element, leading to inflated prices. Mixing private & social rented undermines marketing. Housing register does not reflect local need.</p> | <p>Use land in public ownership for affordable housing.</p> |
| Mr Seal | <p>Unsound Unrealistic for developers to provide 50% affordable housing. Would ruin balance of town & tourist income. Council hasn't considered public land for small amounts of affordable housing. Current demand of 1600 on register is crude number made from people outside district. Only four are in "extreme need" & 44 in next category.</p> | |

Council Response to comments on 8. Affordable Housing :

ISSUES: Concerns made about the assumptions used in the Three Dragons viability report, objections to thresholds and their tenure splits. There are concerns that the housing waiting list reflects desire rather than need, that the policy conflicts with PPS3 para 29, and that a large percentage of affordable housing means that market housing will be more expensive leading to middle income households being squeezed out of the market because developers will build executive homes to compensate for deficit in profit due to supplying smaller affordable homes. There are also concerns that a low threshold will result in individual, isolated affordable dwellings.

COUNCIL'S RESPONSE: The viability report is based on a number of variables, but Three Dragons, who produced it, have had their methodology successfully tested at previous inquiries and appeals. Furthermore, the policy is flexible in that a developer can present their own evidence contending the viability of a proposal in light of individual circumstances. The thrust behind the Core Strategy is to provide as much affordable housing as possible, which is why the thresholds are set where they are. Tenure splits are designed to tackle an identified need and housing need is assessed through the Strategic Housing Market Assessment using the government's advised approach. PPS3 para 29 requires councils to set affordable housing targets - this policy's wording of 'at least' is effectively setting targets and therefore is not contrary to the PPS. Prices paid for property depends on market forces at the time - housing needs assessments will gauge the property mix required at different sites. Lowering thresholds will maximise the delivery of affordable housing across the District meeting local needs and helping provide balanced communities, particularly in rural areas.

ACTIONS: None required.

Chapter: 8. Rural Exception Sites

Para/Policy/Map: RES: Rural Exception Sites

| | | | |
|---------------------------|----------------|--|---|
| CPRE | Unsound | PPS3 precludes rural exception sites within an AONB under S106 agreements due to high land values. | Revision of housing numbers in accord with up-to-date needs assessment from criteria commensurate with location within Dorset AONB. |
| Dorset AONB Partnership | | Reference to environmental designations supported. | |
| Highways Agency | | Welcome reference to provision of sustainable transport for rural sites, but would be concerned with large amounts of development in isolated areas in countryside, leading to more private car use. | |
| SW RP Planning Consortium | Unsound | Applying policy to settlements of 3000 population or fewer too restrictive. In current economic climate cross-subsidy of social rented schemes & open market housing will be necessary. | Amend policy to allow for cross-subsidy of social rented schemes with open market housing. |
| Weld Estate | | Incentives for landowners to sell land for RES not sufficient to induce delivery. Only practical way is to allow a proportionate amount of market housing alongside, otherwise such stringent policy may be considered protectionist & not in long term best interests of communities. | |
| Weld Estate | | Difficult to imagine situations where RES have been shown to work effectively on basis that land vendor thinks proceeds generated through sale truly represent best value. | |

Name **Plan sound? Comment on soundness**

Proposed Change

Council Response to comments on 8. Rural Exception Sites :

ISSUES: Concern that applying policy to settlements of 3000 or fewer is too restrictive and that economic conditions necessitate the need for cross-subsidy of market housing. Highways Agency concerned about increased car use from new affordable housing in rural settlements.

COUNCIL'S RESPONSE: It has been noted that the reference to 3000 population is not in line with PPS3 (reference to Statutory Instrument 1997/621) and will be updated accordingly. Market housing would be contrary to sustainability objectives - rural exception sites are to meet an identified affordable housing need and are permissible through national policy (PPS3). Traffic issues would be looked at in detail at a planning application stage on a site by site basis.

ACTIONS: Remove reference to population fewer than 3000 in line with the PPS3 reference to Statutory Instrument 1997/621, which excludes only Wareham, Swanage and Upton as eligible for a rural exception site.

Chapter: 8. Gypsies and Travellers

Para/Policy/Map: 8.6.1

Mr & Mrs Salter Supports production of a local energy plan.

Para/Policy/Map: 8.6.2

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|---------------------------------|----------------|--|---|
| Friends, Families of Travellers | Unsound | Considers the reduction of residential pitch numbers to 20 to be unjustified. The RSS Partial Review identified a need for 44 residential & 21 transit pitches in Purbeck & no reason is given for the reduction of these. These should be used to ensure conformity with an evidenced based assessment of need. | Para 8.6.2, and Table 14: replace the pitch numbers with those included in the EiP Panel Report (i.e. 44 residential pitches and 21 transit pitches). |
|---------------------------------|----------------|--|---|

Para/Policy/Map: GT: Gypsies, Travellers and Travelling Show People

| | | | |
|---------------------------------|----------------|--|---|
| CPRE | Unsound | Policy does not state additional constraints applicable within AONB (to bring it in line with those for national parks). For example residential pitches are generally considered inappropriate & transit pitches only acceptable if objectives of AONB will not be compromised. | Add paragraph: 'Within a designated AONB, residential pitches are generally considered inappropriate & transit pitches will be accepted if objectives of AONB designation are not compromised.' |
| Dorset AONB Partnership | | Reference to protection of natural environment & landscape is supported. | |
| Friends, Families of Travellers | Unsound | Two of the criteria (5 & 6) are drawn too tightly, as these require no detrimental impact on landscape (natural or historic). As any development could be held to have detrimental impact, such criteria could prevent any development if these were to be applied in the same way. Circular 1/2006 required only national designations to have special protection & para 53 states that local landscape and local nature conservation designation should not be used in themselves to refuse planning permission for sites. This could open the door to racially or anti-Traveller motivated objections& as they stand could mean that any application could be rejected. | Delete criteria 5 and 6 as being superfluous and & replace by referencing to 1/2006 or, if it is desired to keep them, add the word 'unacceptably' before the word detrimental in each criterion. |
| Highways Agency | | Highways Agency has previously sought to ensure that | Extend wording to reflect that Agency has previously |

| Name | Plan sound? Comment on soundness | Proposed Change |
|-------------|---|---|
| | adequate sustainable transport infrastructure is in place prior to occupation of sites. | sought to ensure that adequate sustainable transport infrastructure is in place prior to occupation of sites. |
| RSPB | Support inclusion of need to ensure that G&T sites must not have detrimental impact on natural environment. | |
| Weld Estate | Neutral, subject to consideration of site location. | |

Council Response to comments on 8. Gypsies and Travellers :

ISSUES: The level of pitches identified is questioned as this is lower than the targets included in the RSS partial review. Two of the criteria (5 and 6) are drawn too tightly and could prevent any development if applied rigidly. Also the guidance provided by Circular 1/2006 should be followed, whereby only national designations are required to have special protection. Highways Agency indicated that it would seek to ensure that adequate sustainable transport infrastructure is in place prior to the occupation of sites.

COUNCIL RESPONSE: The level of pitches included is considered by PDC to accurately reflect the needs and requirements identified and justified by DCC, as part of a joint approach with all Dorset Authorities. Circular 1/2006 has now been revoked as national guidance and the constraints identified are being applied consistently across Dorset as part of the approach jointly agreed between the Dorset Local Authorities.

ACTIONS: Add text to policy to reflect the need for sites to be accessed by sustainable transport.

Chapter: 8. Needs of Different Household Groups

Para/Policy/Map: 8.7

SW RP Planning Consortium

This should be given policy status given high need for elderly care & accommodation in district. The list of care solutions should be expanded to include Continuing Care Retirement Communities (CCRCs) which are a successful & popular care solution for many elderly people.

Create new policy on needs of different household groups. List of care solutions should be expanded to include Continuing Care Retirement Communities (CCRCs) which are a successful & popular care solution for many elderly people.

Weld Estate

Village rental accommodation meets needs of population living & working in countryside. Rural Estates have key role in providing housing stock for community & employees. Such housing often overlooked by authorities. Rural Exception Sites not a solution.

More localised rental housing to come forward on tenanted basis. Lulworth Estate's hybrid rental scheme to be included in CS.

Council Response to comments on 8. Needs of Different Household Groups :

ISSUES: A separate policy is required; new rental accommodation should be allowed.

COUNCIL'S RESPONSE: A separate policy is not required because needs of different household groups can be accommodated through existing policies in the plan. Building non-affordable housing in the open countryside would be contrary to national policy.

ACTIONS: None required.

Chapter: 8. Biodiversity and Geodiversity

Para/Policy/Map: 8.8.1

Jurassic Coast World Heritage Team "Habitats" should be "biodiversity & geodiversity" or "wildlife & geodiversity". Biodiversity & geodiversity are not under pressure from coastal erosion.

Para/Policy/Map: 8.8.2

Dorset Wildlife Trust Support paras 8.8.2 - 8.8.4. However, no text to introduce SNCIs, LNRs or Nature Map. Explanatory text needed on habitats & species of principal importance.

Amend: "Species & habitats of local importance are identified within the Dorset Biodiversity Strategy & Biodiversity Action Plan for Purbeck. Other local biodiversity interests lie within Site of Nature Conservation Interest (SNCIs) Local Nature Reserves & habitats & species of principal importance to biodiversity, including Ancient Woodland & veteran trees". Amend 8.8.3: "Strategic Nature Areas shown on Map 15 (Nature Map) & are a positive tool for coordinating activities that secure retention & enhancement of features of interest as well as activities for benefit of locally important species".

Para/Policy/Map: BIO: Biodiversity & Geodiversity

Dorset AONB Partnership Lack of reference to World Heritage Site, Dorset Trees, Woods & Forest Strategy, & ancient woodland.

Refer to World Heritage Site, Dorset Trees, Woods & Forest Strategy & ancient woodland. Refer to PAWs (Plantations on ancient woodland sites).

Dorset County Council Development & restoration of minerals sites can make a valuable contribution to achievement & implementation of this policy, but is not mentioned in the policy.

Make reference to valuable contribution that development & restoration of minerals sites can make to achievement & implementation of this policy.

Dorset Wildlife Trust **SoundUns** Strongly supports policy. Omission re conserving habitats of principal importance (section 41 of NERC 2006). Para 16 covers species of principal importance, para 10 covers ancient woodland & veteran trees. District Design Guide very helpful, but not sufficient to cover whole range of biodiversity protection, management & enhancement.

Change wording: "Resisting development that could adversely affect Sites of Nature Conservation Interest (SNCI), Local Nature Reserves (LNR), Ancient Woodland & other habitats of principal importance for biodiversity; Seeking development proposals that incorporate biodiversity elements,

| Name | Plan sound? Comment on soundness | Proposed Change |
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| Environment Agency | Unsound Lacks reference to water environment & wetland interests i.e. watercourses, ponds, reed beds etc. Lacks consideration of Water Framework Directive & SW River Basin Management Plan | protection, management & enhancement" & add supporting text. Suggested rewording for Policy BIO. |
| RSPB | No reference to Regional Habitat Creation Programme (RHCP), which is necessary to offset effects of coastal squeeze. | Make reference to Regional Habitat Creation Programme (RHCP). |
| RSPB | Strongly support policy & Nature Map | |
| Save Herston Fields | Unsound The large number of butterflies at Herston fields is not recognised. | Delete settlement extensions from SE Purbeck. |
| Weld Estate | SNCIs locally administered with no statutory provisions but in Purbeck they overlap fairly well with SSSIs, so should not be treated as separate. | |
| Jurassic Coast World Heritage Team | Lack of reference to importance in allowing natural processes to continue along coast in order to protect those wildlife & geological features maintained by active erosion, as reflected in Shoreline Management Plan policy. | Reference to importance in allowing natural processes to continue along coast in order to protect those wildlife & geological features maintained by active erosion, as reflected in Shoreline Management Plan policy. |

Para/Policy/Map: Map 15

Jurassic Coast World Heritage Team
Lack of reference to World Heritage Site or AONB. No reference to these on Nature Maps.

Council Response to comments on 8. Biodiversity and Geodiversity :

ISSUES: Concerns include lack of reference to local sites & other local biodiversity such as woodlands & wetlands.

COUNCIL'S RESPONSE: Concerns raised by Dorset Wildlife Trust, Environment Agency and other representors are acknowledged, and can be included in Core Strategy.

ACTIONS: Alter wording to refer to other habitats of importance.

Chapter: 8. Biodiversity - Heathlands

Para/Policy/Map: 8.8.5

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| Dorset Wildlife Trust | Design Guide only covers birds & bats in built design. | Suggest incorporating advice from http://www.dorsetforyou.com/351345 . |
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Para/Policy/Map: 8.8.6

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| Natural England | Lack of clarity about mechanism for delivering mitigation, with all responsibility given to Heathlands DPD. Heathlands DPD cannot deal with mitigation for larger allocations. No reference to mitigation of recreational effects on Poole Harbour SPA/Ramsar & on Isle of Portland to Studland Cliffs SAC & Durlston to St Aldhelms Head SAC. No reference to water quality & Habitat Regulations. Assurances from EA & Wessex Water insufficient. Recommendations within HRA about water abstraction | Allocations need specific mitigation. Include mitigation for recreational effects on Poole Harbour SPA/Ramsar & on Isle of Portland to Studland Cliffs SAC & Durlston to St Aldhelms Head SAC. Policy that links provision of housing with provision of essential infrastructure & provides basis for development contributions towards this, if required. |
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Para/Policy/Map: 8.8.6.1

| | | |
|------|---|-----------------------------|
| RSPB | Object until issues identify in HRA are resolved. | Need to resolve HRA issues. |
| RSPB | Support intention not to allow further housing dev until implementation of mitigation measures. | |

Para/Policy/Map: 8.8.6.2

| | | |
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| Dorset Wildlife Trust | Sound Welcomes undertaking to carry out final Appropriate Assessment prior to adoption of CS. | |
| Trees for Dorset | Area of woodland to north of River Frome exceeds that to south. This woodland is not suitable for heathland mitigation as it is not accessible. | |
| ZBV (Winfrith) Ltd | Opportunity for SANG to SW of Wool in conjunction with regeneration of DGTP site. Potential to provide for recreational requirements associated with substantial new housing growth within Wool & DGTP site. SANG proposal is still being drawn up, but is land owned by ZBV & therefore deliverable. | Provision of SANG to west of Wool to support regeneration of DGTP site. |

| Name | Plan sound? Comment on soundness | Proposed Change |
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| Para/Policy/Map: DH: Dorset Heaths International Designations | | |
| Arne Parish Council | Unsound Concern that few areas are available for affordable housing provision within Arne due to 400m buffer zone around designated heathland. Parish Council favour development of several sites within this area. | Residential development that would involve a net increase in dwellings only after each site has been independently & individually investigated for impact & proven through credible evidence to have adverse effect upon integrity of the Dorset Heaths' international designations. |
| Bloor Homes Ltd | Unsound Impact of first sentence to be addressed to ensure development (& plan) can be delivered. Wording would be preferable that indicates that mitigation measure proposed would ensure that Dorset heathlands are not harmed, particularly since Policy DEV states that heathlands contribution is compulsory. | Change policy wording (text suggested) to ensure development can be delivered. |
| Dorset Wildlife Trust | Sound Supports in principle, subject to any comments that NE make. | |
| Rempstone Estate | Unsound Policy restrictive regarding tourist development. Makes no reference to existing tourist development & no recognition that cost of adoption of mitigation strategy for heathlands will fall upon landowners. | Policy to include consideration to upgrading or augmenting existing tourist assets in Dorset Heaths. |
| RSPB | Strong support. | |
| Wareham St Martin Parish Council | Unsound Concern at restriction placed upon affordable housing development by 400m buffer zone around heathland at Sandford | Residential development that would involve a net increase in dwellings only after each site has been independently & individually investigated & proven through credible evidence to have adverse effect upon integrity of Dorset Heath's international designations. |
| Weld Estate | Policy uses "one size fits all" approach, but urban & rural heaths experience different pressures. | More flexible & discretionary policy for house building near heathland, especially rural heaths. |
| ZBV (Winfrith) Ltd | Broad support for approach outlined. In view of proximity of DGTP to Dorset Heaths the proposed Masterplan will include strategy for ensuring that new development respects & maintains Dorset Heaths (including SANG to south). | |

Council Response to comments on 8. Biodiversity - Heathlands :

ISSUES: Concerns include the restrictive nature of policy and clarity over mechanisms for the delivery of mitigation. The 400metre buffer is absolute and affordable housing cannot be considered as an exception.

COUNCIL'S RESPONSE: New development must show that it will not have an adverse impact upon heathland sites and can be mitigated and the wording of the policy makes this clear. Delivery of housing may become uncertain unless mitigation measures through the IPF and Heathland DPD are put in place from contributions from new development. Concerns raised by Natural England are acknowledged, but the proposal for contributions to mitigation of Poole Harbour SPA/Ramsar and SACs must be commensurate to ensure development remains viable and not at the cost of losing affordable housing, which is equally important to the sustainability of Purbeck.

ACTIONS: Consider Poole Harbour policy as suggested by Natural England. Indicate delivery of mitigation is essential part of strategic site allocations in Chapter 7.

Chapter: 8. Retail Provision

Para/Policy/Map: RP: Retail Provision

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| Scott Estate | Unsound | Does not take account of evidence base & does not provide for an additional food store. | Amend to: With exception of new food store at Wareham, retail development outside of defined town centres at Swanage & Wareham & local centre at Upton that adversely affects their vitality or viability will not be permitted. |
| Weld Estate | | Support. | |
| WYG Planning & Design | | Object to 'development outside of the town centres of Swanage and Wareham and the Local district Centre of Upton that adversely affect their vitality or viability will not be permitted'. This approach is contrary to guidance in PPS 4 which notes that where not possible to locate main town centre uses (including retail development) within an existing centre, the relevant tests set out in PPS4 should be adhered to. | Policy RP should be redrafted to reflect PPS4. |
| ZBV (Winfrith) Ltd | Unsound | Under-provision of key services/facilities at Wool. | Recognise & promote opportunity (& need) to improve range of services at Wool. Options for strengthening links between Wool & DGTP to be explored. |
| Commander Baynes | Unsound | Concerns that change of uses permitted within Primary Shopping Areas of Wareham & Swanage within Class A would enable development of a supermarket. | |

Name **Plan sound? Comment on soundness**

Proposed Change

Council Response to comments on 8. Retail Provision :

ISSUES: Comments are concerned with the omission of a new supermarket at Wareham.

COUNCIL RESPONSE: Maintaining the vitality and viability of the town centres is considered to be a prime objective. There is considerable concern that an out of town supermarket would have a negative impact upon the character and setting of Wareham, plus the potential to impact upon the economy of the town centre cannot be ruled out. The Council has resisted out of town shopping in its market towns and this is valued by the local community. Therefore, in order to continue to protect the local distinctiveness of the Purbeck's market towns, no specific allocation for a food store will be proposed through the Core Strategy and instead, opportunities to increase food shopping within town centres will be considered through future plans.

ACTIONS: Consider how to meet future food shopping needs without harming the vitality and viability of the town centres, this could be appropriately dealt with through a subsequent plan/plans.

Chapter: 8. Community Facilities and Services

Para/Policy/Map: 8.10

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| The Theatres Trust | Sound | "Cultural facilities" requires explanation. | Delete "cultural facilities" and include "performance arts, art galleries, concert halls and public art". |
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Para/Policy/Map: CF: Community Facilities and Services

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| Bloor Homes Ltd | Unsound | The words "Planning permission for" confuses the sentence. | Delete "Planning permission for". |
| Dorset AONB Partnership | | Lack of reference to broadband. Lack of reference to impact on local character & natural beauty of protected landscapes. | Make reference to broadband & to impact on local character & natural beauty of protected landscapes. |
| Hall & Woodhouse Ltd | Unsound | Four criteria for safeguarding existing facilities & services too restrictive. The fourth criterion should be deleted because reference in town or parish plan does not necessarily prove local need. | Delete criterion 4. Replace "and" at end of each clause with "or". |
| Royal Mail | | Support. | |
| Weld Estate | | Support but should bear in mind expected long-term growth at Wool. | Consider facilities & services for long-term growth in settlements likely to experience significant expansion in long term. |
| ZBV (Winfrith) Ltd | Unsound | When considering the need for new facilities, full consideration is given to potential for new development to come forward. | Promote greater self-containment amongst District's towns & villages. Opportunities to improve & enhance community facilities & services within these settlements to be positively encouraged. |

Council Response to comments on 8. Community Facilities and Services :

ISSUES: Concerns about lack of reference to specific types of cultural facilities, lack of reference to broadband and impact on protected landscapes. More reference needed to self-containment through additional services and facilities, but criterion regarding town or parish plan should be removed.

COUNCIL'S RESPONSE: It is acknowledged that more detailed reference to cultural facilities is useful. Broadband and self-containment will be mentioned in the preamble to Policy E. Mentioning protected landscapes would strengthen the policy. Aspirations in town and parish plans are important and should remain in the policy wording.

ACTIONS: More detailed reference to cultural facilities (listing the different types) in 8.10 and refer to impact on landscape and local character in policy wording. Refer to broadband and self-containment in Policy E.

Chapter: 8. Green Infrastructure, Recreation and Sports

Para/Policy/Map: 8.11

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|-------------------------|--|--|---|
| Dorset AONB Partnership | | GI seriously undersold & too much focus on recreation. Lack of reference to "ecosystem services". Lack of reference to employment areas being encouraged to include GI. Lack of reference to sustainable drainage opportunities. | Refer to ecosystem services. Make reference to employment areas being encouraged to include GI. Make reference to sustainable drainage opportunities. |
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Para/Policy/Map: 8.11.4

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|----------------------|----------------|--|--|
| Swanage Town Council | Unsound | Insufficient prominence to additional allotment sites. Swanage waiting list more than 70 households. Lytchett Minster & Upton in similar position. Report in West Kirby highlights benefits of allotments. | 8.11 to include paragraph highlighting importance of increasing allotments across Purbeck. |
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Para/Policy/Map: GI: Green Infrastructure, Recreation and Sports Facilities

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|---------------------------|----------------|--|---|
| Dorset County Council | | Development & restoration of minerals sites can make a valuable contribution to achievement & implementation of this policy, but is not mentioned in the policy. | Make reference to valuable contribution that development & restoration of minerals sites can make to achievement & implementation of this policy. |
| Dorset Wildlife Trust | | Policy should recognise multifunctional nature of GI to greater extent, e.g. air quality, flood amelioration, water quality, transport routes & quality of life. | Add: "& management of a connected, coherent & functional network of new & enhanced green spaces & corridors" |
| RSPB | | Support. | |
| Save Herston Fields | Unsound | Green infrastructure already exists & CS seeks to destroy it with settlement extensions & then recreate them, which is ridiculous & should not happen in AONB. Once a field is gone, it is gone. | |
| Sport England | Sound | Supportive of council's comprehensive Sport & Recreation Audit, but suggest updating it. Supportive of Recreation Strategy currently being prepared, which would enable robust Recreation & Open Spaces Contributions SPD. | Update Sport & Recreation Audit. |
| SW RP Planning Consortium | Unsound | Policy requests that all new developments provide green infrastructure, but does not allow for consideration of | |

| Name | Plan sound? | Comment on soundness | Proposed Change |
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| Trees for Dorset | | existing provision in the locality of the site. It should only be required where there is a shortfall. No mention of trees which will provide an increasingly important role in present environment of climate change. | Add: 1. Aim for retention of all mature trees on development site with only those deemed dangerous on arboricultural inspection exempt. 2. Planting of new trees on development sites with back-up care. Suggest 2 per 10 new houses. This would retain & add visual amenity, provide shade, & maintain biodiversity & buffer against hard-standing run-off from increasing storm levels. |
| Weld Estate | | Support policy provided that contributions would not be additional to existing S106 requirements & that value of contributions is proportionate to scheme. | |
| ZBV (Winfrith) Ltd | Unsound | Support existing facilities, but CS should acknowledge opportunity to provide replacement facilities through new development (where new development involves loss/replacement of existing facility). | Include wording: "All designated open space, sport and recreation areas will be protected. Any loss of these uses will only be permitted where there is a proven excess of such provision and the proposed loss will not result in a current or future short-fall in the plan period; or where suitable alternative provision can be made to off-set any facilities lost". |
| Commander Baynes | Unsound | Need to conserve Green Belt. | This should involve looking at all development options to see how it could be done & the document should explain. |
| Mr Gloyn-Cox | Unsound | Shortage of allotments with 80 on waiting list. Exacerbated by apartment blocks. No mention of shortage in Core Strategy. | Address shortage of allotments in Swanage. |

| <i>Name</i> | <i>Plan sound?</i> | <i>Comment on soundness</i> | <i>Proposed Change</i> |
|--|--------------------|--|--|
| Chapter: 8. Flood Risk | | | |
| Para/Policy/Map: 8.12.1 | | | |
| Swanage Town Council | Unsound | Issue of tidal flooding ignored. SFRA does not set out requirement to consider infrastructure to prevent tidal surge. 2010 had 24 tides with tidal coefficient of 110 or higher. Depression from English Channel, easterly gales, spring tides, & climate change need to be considered. | Refer to tidal flooding & mitigation. Risk assessment of tidal surge flooding required. |
| Para/Policy/Map: 8.12.2 | | | |
| Jurassic Coast World Heritage Team | | Lack of reference to national coastal erosion risk mapping. | Make reference to national coastal erosion risk mapping. |
| Para/Policy/Map: FR: Flood Risk | | | |
| Environment Agency | Sound | No objection. Have had opportunity to comment on annual update of SFRA. | |
| RSPB | | Support. | |
| Weld Estate | | Support. | |
| ZBV (Winfrith) Ltd | Unsound | Recognise the need to ensure that new development proposals reduce the overall and local risk of flooding, it is also vital that future policy can recognise that there may be significant benefits associated with bringing forward new development in areas that currently experience flooding. The Council should utilise the Exceptions Test in accordance with PPS25, which recognises that some development might be necessary to allow wider sustainable development objectives to be met. In such cases, development will need to meet an Exceptions Test. | Future policy should recognise the opportunity to apply the Exceptions Test (as detailed in PPS25) to bring forward necessary/important development within the District. |
| Mr Gloyn-Cox | Unsound | Neglects impact of tidal surge flooding in centre of Swanage. Risk is much higher than implied & will occur when a high tide with tidal coefficient of 110 or higher (24 tides in 2010) coincides with depression of 980mb tracking up English Channel. | Impact study required |

Name **Plan sound? Comment on soundness**

Proposed Change

Council Response to comments on 8. Flood Risk :

ISSUES: There are concerns over lack of reference to tidal flooding and tidal surge, as well as concerns that the policy will prevent necessary and important development from being brought forward. Reference to national coastal erosion risk mapping suggested.

COUNCIL'S RESPONSE: This policy was written with the assistance of the Environment Agency. Reference to tidal flooding is set out in Purbeck's Strategic Flood Risk Assessment (SFRA). The Shoreline Management Plan will be dealing in more detail with coastal erosion and tidal flooding, and any relevant recommendations will be included in plans. Regarding the comment that sufficient development would not be brought forward, the SFRA explains that Purbeck has sufficient developable land outside areas at risk of flooding, and there is no need to build in such areas.

ACTIONS: No action required.

Chapter: 8. Groundwater Protection

Para/Policy/Map: GP: Groundwater Protection

| | | | |
|--------------------|--------------|--|--|
| Environment Agency | Sound | Support revision. Suggest additional wording. | Should refer to PPS23: Planning & Pollution Control (PPS23) and ensure development has no impact on licensed supplies or any other private supplies or water features. |
| RSPB | | Object until Wessex Water can guarantee supply of water of sufficient quantity & quality to new housing without detrimental impacts on Poole Harbour & other European sites. | |
| Weld Estate | | Support. | |

Council Response to comments on 8. Groundwater Protection :

ISSUES: RSPB has concerns over The Habitats Regulations, and suggestion by Environment Agency to include reference to PPS23 - Planning and Pollution Control.

COUNCIL'S RESPONSE: Lack of reference to PPS23 is noted and can be included in the supporting text. The objection by the RSPB needs further investigation, although Natural England and the Environment Agency have not objected. In fact, the Environment Agency supplied much of the wording for this policy.

ACTIONS: Make reference to Planning and Pollution Control (PPS23) in supporting text, and liaise with RSPB, Environment Agency and Natural England to ensure that this policy is acceptable in terms of Habitats Regulations.

Chapter: 8. Coastal Erosion

Para/Policy/Map: 8.14

| | | |
|----------------------|--|--|
| Swanage Town Council | Fails to recognise need to protect local beaches. SMP advises "hold the line" but sea levels will compress inter tidal zone, making beach smaller. | Address erosion of main beach by presenting options in additional paragraphs in section 8.14 & relevant policies (CE & SE) |
|----------------------|--|--|

Para/Policy/Map: CE: Coastal Erosion

| | | |
|--------------|--|--|
| Weld Estate | No comments. | |
| Mr Gloyn-Cox | Unsound Assumption made that Swanage will retain its sandy beach. This neglects effect of rise in sea level which will result in compression of inter-tidal zone and loss of beach. | Consult Coastal Change Pathfinder Group at DCC & seek professional assessment of effect of rising sea levels on compression of inter-tidal zone. |

Council Response to comments on 8. Coastal Erosion :

ISSUES: Concerns about erosion of main beach in Swanage and compression of inter-tidal zone.

COUNCIL'S RESPONSE: The concern is being addressed by the Shoreline Management Plan. Relevant recommendations will feed into future Core Strategy documents. The SFRA makes reference to wider problems in Swanage. This is updated on a regular basis as additional information comes to light.

ACTIONS: None required.

Chapter: 8. Sustainable Design

Para/Policy/Map: 8.15

| | | | |
|------------------|----------------|--|--|
| CG Fry & Son Ltd | Unsound | First three bullet points repeat national policy from PPS1 & PPS3. Level of CO2 reduction proposed in bullet point five can be achieved solely by energy efficiency measures, subject to high overall development quality approach, rather than just on-site renewables or low-carbon sources. | Review extent to which bullet points repeat national policy & delete where possible. Reword fifth bullet point to encompass wider range of options to secure stated objective. |
|------------------|----------------|--|--|

Para/Policy/Map: SD: Sustainable Design

| | | | |
|-------------------------|----------------|---|---|
| Bloor Homes Ltd | Unsound | Unfair for council to make expectations of what new developments should demonstrate or achieve. Should be aims. Bullet point 6 repeats Building Regulations. Bullet point 7 may not be easily measured, particularly with outline applications. | Reword the introductory paragraph to make it clear this is aim of Council, not requirement. Delete bullet point 6. Amend bullet point 7 to read 'Demonstrate how they aim to achieve a score of 14 points ('gold' or 'silver') measured against 'Building for Life' standards where development consists of ten or more dwellings'. |
| Dorset AONB Partnership | | Should not state "pay equal regard". | Replace with "adequate regard". Residential amenity should be considered as long as does not compromise AONB. |
| Dorset Wildlife Trust | Unsound | Needs to go further than just birds and bats (see comments under para 8.8.5.) | Amend: "Demonstrate support for biodiversity through sensitive landscaping to retain, manage, create & enhance wildlife habitats & through in-built features, for example to provide appropriately, configured & located nesting & roosting opportunities for bats & birds". |
| Environment Agency | Unsound | Omits water efficiency measures in residential developments, despite being objective in SA & recommended in HRA. | Sets out amended wording for Policy SD. |
| RSPB | | Support. | |
| Scott Estate | Unsound | Support approach to this policy, but needs rewriting to remove undue burden on developers. | Introductory paragraph to clarify that policy is an aim, not requirement. Delete bullet 6. Rewrite bullet 8 to read 'Demonstrate how they aim to achieve a |

| Name | Plan sound? Comment on soundness | Proposed Change |
|---------------------------|---|---|
| SW RP Planning Consortium | Unsound "Enhancement of context" suggests improving land around a development site, which is unreasonable. Car parking requirements of Lifetime Homes standard are land intensive & can reduce overall number of units. Council should await Government's announcement on standards for affordable housing before setting its own standards. | Breeam 'Very Good' rating or higher for new build commercial development up to 1000m2 (net) floor space & as minimum an excellent rating for larger development. Make policy more flexible in respect of parking requirements of Lifetime Homes. |
| Weld Estate | Support, but should be mindful that affordable housing could be "Guinea Pig" of housing sector, making it vulnerable to changes in approach & unsound technologies. Furthermore, increased standards add to construction costs, making it less affordable. | |
| WYG Planning & Design | Requirement of achieving a BREEAM rating of 'excellent' for commercial development of 1000sqm or above would be prohibitive in terms of bringing new development forward. | Suggestion that threshold should be lowered to requirement for a BREEAM rating of 'very good' for commercial development of 1000sqm or above, in order to ensure sustainable economic development. |
| ZBV (Winfrith) Ltd | Support. | |

Council Response to comments on 8. Sustainable Design :

ISSUES: The principal concern is that the policy requires high standards of design which developers may be unable to meet.

COUNCIL RESPONSE: For clarity, splitting the policy into two separate policies may help. In terms of possible repetition of national guidance, there may be some similarities in emphasis of bullet points, e.g. bullet point 5 relates to energy use rather than energy efficiency. In regard to Lifetime Homes standards the policy does provide some leeway in terms of existing townscape character. 'Enhancement of context' does not suggest a need to improve land around a site but rather considers the contribution a site will make to its surroundings. The policy may be read as applicable to more than bats and birds – the latter in terms of construction, others in terms of landscaping. It is reasonable to expect that a developer could supply sufficient information with an outline application to demonstrate their strategy for meeting Building for Life requirement. Removing the requirement for 'excellent' performance against BREEAM because it might not be viable would miss the opportunity of achieving higher standards where it was. Water efficiency measures are mentioned in paragraph 8.15.2 as an example of a sustainable development objective, but these objectives are not mentioned in the policy. However, they do warrant inclusion in the policy so that housing development can aspire to them. Water efficiency in commercial development is already part of BREEAM.

ACTIONS: Split into two separate policies - (i) Design and (ii) Sustainable Design in order to differentiate between general design principles and sustainable design. Insert bullet so that development should demonstrate a positive approach to delivery of sustainable development objectives (which would include water efficiency). With regard to BREEAM, add the following sentence: 'Where viability constraints of the proposal would preclude the additional costs of achieving an 'excellent' rating the onus will be upon the applicant to demonstrate this (using an open book method if deemed necessary by the Council)'. Amend policy reference to bats and birds in line with Dorset Wildlife Trust comments.

Chapter: 8. Renewable Energy

Para/Policy/Map: 8.16.6

Dorset AONB Partnership Support reference to AONB.

Para/Policy/Map: REN: Renewable Energy

| | | | |
|-------------------------|----------------|--|---|
| Dorset AONB Partnership | | Lack of reference danger of not developing within a designated landscape, but surrounding it, & other aspects of renewable energy development in AONB. | Need to confirm that designations should not be "ring fenced" by renewable energy development & impact of dev in close proximity to designation boundary is material consideration. For RED affecting AONB, landscape & visual assessment required. Mitigation strategy required. |
| Dorset Wildlife Trust | Unsound | In biodiversity terms, policy only mentions international nature conservation sites. | Amend: "It would not have an adverse impact upon the integrity of internationally protected habitats unless there is no alternative solution & there are imperative reasons of overriding public interest, & that there are no other unacceptable ecological impacts" |
| Weld Estate | | Support. | |
| ZBV (Winfrith) Ltd | | Support. | Future planning policy to recognise opportunity to deliver new renewable energy projects at DGTP site. |

Council Response to comments on 8. Renewable Energy :

ISSUES: Concerns include more emphasis required on the setting of designated landscapes, cumulative impact and lack of reference to nature conservation apart from international sites.

COUNCIL'S RESPONSE: DCC's Landscape Change Strategy already touches on the setting of adjacent landscapes and cumulative impacts so there is no need to repeat it. It is agreed that reference to all ecological sites should be added.

ACTIONS: Amend 2nd bullet point to '...adverse ecological impact upon the integrity of protected habitats'.

| Name | Plan sound? | Comment on soundness | Proposed Change |
|---------------------|--------------------|---|---------------------------------------|
| RSPB | | Support, particularly intention to support works proven to be necessary to secure broader conservation objectives. | |
| Save Herston Fields | Unsound | Settlement extensions contradict mandate of this policy. | Delete settlement extensions from CS. |
| Weld Estate | | Policy should refer to PPS5. Policy should not be overly restrictive, blocking viable contemporary use. Should recognise that best way to protect a structure is to give it purpose & usefulness. | |

Council Response to comments on 8. Landscape, Historic Environment and Heritage :

ISSUES: Comments relate to the scope of the policy, its relationship to PPS5 and potential nature of its application. English Heritage highlight the lack of a historic environment ‘strategy’ encouraged by PPS5 Policy HE.3.

RESPONSE: Although there is no specific historic environment strategy, it is embedded within the Core Strategy, with a pro-active stance on the re-use of rural buildings (policy CO), protection of landscape and heritage assets (policy LHH), and separate spatial visions to ensure development is locally distinctive. This latter point will be reinforced through design guidance and development briefs for each settlement extension. Improvements can be made to chapter 2 to provide greater clarity on local context and the differences between the five spatial areas, and this could be reflected in each spatial vision. Considering the concept of ‘cultural landscapes’ it is not useful to treat landscape and historic environment as separate issues as they are ultimately inextricably linked. It is important to note that policy LHH is a development management policy, not a strategy. It has a much broader remit than PPS5, taking in both trees and landscape generally, therefore any supposed repetition of PPS5 could be considered more apparent than real. There is no necessity to reference PPS5 itself in the policy as PPS5 is policy in its own right. Policy LHH provides ample scope for good quality, sensitive conservation work.

ACTIONS: Make clear in chapter 2 and the five spatial visions the key landscape, heritage, coastal and environmental differences between spatial areas.

Chapter: 8. Economy and Employment

Para/Policy/Map: 8.18.1

| | | | |
|----------------------|----------------|---|--|
| Swanage Town Council | Unsound | Importance of broadband from working from home, improving local service delivery, online health clinics, online tuition, rural entrepreneurship. "Mind the Gap: Digital England - a Rural Perspective" (2009) sets out dangers of missing out economic benefits from high speed internet connections. Upload speeds in Swanage 0.34 megabytes per second. National average 0.623. | 8.18 to include reference of important of superfast broadband to local economy in Swanage & Purbeck. |
|----------------------|----------------|---|--|

Para/Policy/Map: E: Employment

| | | | |
|--------------------|----------------|---|--|
| Highways Agency | | Lack of emphasis on sustainable transport. | Policy wording to say that new employment uses to be accessible by sustainable transport modes & employers to implement sustainable travel plans. |
| Royal Mail | | Essential that growth at Wareham & Swanage does not adversely impact Royal Mail operations. | |
| Weld Estate | | Support development of DGTP. Existing employment sites should be focus of Purbeck's employment effort. | |
| ZBV (Winfrith) Ltd | Unsound | Policy not appropriate for promoting regeneration & new development at DGTP. Policy should support & direct new employment. Lack of provision for B class uses to strategic employment sites including DGTP. Does not promote growth across all sectors, including retail, leisure & tourism in line with PPS4. Does not recognise benefits in bringing forward non B class development on or close to employment land, e.g. where existing employment land is redundant or under-used, non B class uses could support or fund wider regeneration schemes. Policy not flexible enough to enable such schemes to come forward. | Policy E should support & direct new employment provision for B class uses to strategic employment sites alongside towns. Should support employment growth across all sectors, including leisure & tourism rather than just B class uses. Should recognise regeneration benefits of bringing forward non B class uses either on or close to employment land, e.g. where existing employment land is redundant or under-used. |

Name **Plan sound? Comment on soundness**

Proposed Change

Council Response to comments on 8. Economy and Employment :

ISSUES: Concerns raised over lack of emphasis on sustainable travel, importance of broadband and need for flexibility to allow non B Class uses on or close to employment land in order to support regeneration schemes of DGTP.

COUNCIL RESPONSE: The provision of good quality broadband facilities across the District is recognised as important. New employment uses should be accessible by sustainable transport modes and the need for larger employers to implement sustainable travel plans is also acknowledged. DGTP has been identified as an important employment hub, but large scale growth of non B class uses is not considered essential to unlock economic growth. The phasing of future development at the site will be considered through subsequent plan(s) following completion of work on the Employment Land Review Part 3.

ACTIONS: Reference desire for good quality broadband facilities to be provided across the District in para 8.18. Within the text of Policy E add reference to 'New employment uses will need to be accessible by sustainable transport modes'. Add reference to the requirement for the implementation of sustainable travel plans.

Chapter: 8. Tourist Accommodation and Attractions

Para/Policy/Map: 8.19

| | | |
|-------------------------|---|---|
| Dorset AONB Partnership | Lack of reference to impact of tourism & visitor transport on landscape and lack of a parking strategy. | Refer to impact of tourism & visitor transport on landscape and make reference to visitor transport schemes. Tourism enterprises should be encouraged to be much greener in transport terms. Purbeck-wide parking strategy. |
|-------------------------|---|---|

Para/Policy/Map: 8.19.2

| | |
|------------------------------------|--|
| Jurassic Coast World Heritage Team | Paragraph 8.19.2 does not take into account tourism trends being more orientated to outdoors & cultural experiences. |
|------------------------------------|--|

Para/Policy/Map: TA: Tourist Accommodation and Attractions

| | | |
|---------------------------------|--|---|
| Dorset AONB Partnership | Unclear why new sites or extensions to existing sites are not permitted within AONB. | Such development may not be unacceptable. |
| Rempstone Estate Unsound | Unduly restricts conversion of existing rural buildings & existing tourist camping sites within AONB. Inappropriate for provision of new self catering facilities through conversion of existing buildings to be prohibited. | <p>Policy should include new fourth & fifth bullet points: The provision of new self catering tourist facilities through the conversion of existing rural buildings will be considered where it can be shown that the development would not prejudice the conservation of the landscape and where environmental enhancement would accrue. The upgrading of existing caravan, chalet or tented camping sites in the AONB will be considered where such proposals are accompanied by landscape management and enhancement schemes and it can be shown that the landscape character will be conserved and enhanced.</p> <p>The following text should be deleted from the policy:</p> <p>'Upgrading of existing caravan, chalet or tented camping sites must be in accordance with Policy</p> |

| Name | Plan sound? Comment on soundness | Proposed Change |
|------------------------------------|--|---|
| RSPB | Support, especially protection of AONB. | CO: Countryside'. |
| The Charborough Estate | Unsound Over restrictive. Prohibition of chalets & campsites within Green Belt detrimental to farm diversification. There are no touring caravan sites along A31 (T) or A35 routes. Policy would eliminate proposals for Morden Park as some chalets & camp/caravan park would be necessary to make scheme viable. Morden Park scheme would include element of country park with public access, along with high quality chalets & touring caravan/camping park. | Policy to be redrafted to include: consideration of provision for touring caravan sites along the A35 or A31 subject to criteria of Policy CO Countryside. Consideration of development of Morden Park as a country park, together with a modest no. of chalets & a touring caravan/camping park. |
| Think Global Group | Coastal areas have reached their capacity without damaging national heritage sites. Further promotion of beach holidays should be resisted. | Encourage a wider interest in all year round tourism compatible with the rich and varied landscape resources. |
| Weld Estate | Wording too restrictive as will inadvertently curtail improvements for existing camping & caravanning sites. Improving their infrastructure & facilities should be encouraged, provided improvements are in keeping with area. New tourist accommodation should be allowed within AONB. | Include additional bullet point as justification for site alterations. Development to be allowed if demonstrated as a site improvement fulfilling an established need, & if no adverse impact on local setting or amenity. |
| ZBV (Winfrith) Ltd | Unsound There is opportunity to locate a new hotel development at DGTP in conjunction with wider regeneration of site. A new hotel would support business functioning of the site & provide new accommodation to cater for those working & visiting site. | Recognition should be given to benefits of locating new hotel development within existing business/employment areas - where such a facility could provide business support & also cater for tourism market. |
| Jurassic Coast World Heritage Team | No recognition of importance of tourism in employment. Lack of reference to visitor management initiatives to reduce visitor impact. Lack of reference to economic value of tourism & how to "sell" it. No reference to extending visitor season nor of international visitor needs. | |

Council Response to comments on 8. Tourist Accommodation and Attractions :

ISSUES: Concerns are raised by landowners that the policy is overly restrictive. Issues of the management of tourism and transport within the landscape and AONB are raised.

COUNCIL RESPONSES: The restriction on additional tourist campsite facilities within the AONB area is a reflection of the adequate supply of existing facilities, along with a desire to discourage additional tourist traffic from relying upon access along the A351. There are no exceptional circumstances identified which would justify development of chalet and tourist campsites within the Green Belt. The conversion of rural buildings is covered by Policy CO: Countryside and it is agreed that greater flexibility should be given to allow different uses. The policy includes details concerning the preferred locations for new built serviced accommodation. Transport concerns will be addressed through the Purbeck Transport Strategy.

ACTIONS: Review the changes of use permitted through the reuse of rural buildings under Policy CO: Countryside.

Chapter: 8. Military Needs

Para/Policy/Map: MOD: Military Needs

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|--|---|
| RSPB | Support, & would welcome involvement. |
| Jurassic Coast World Heritage Team | No reference of coast or World Heritage Site. Potential for conflict within coastal setting. |

Council Response to comments on 8. Military Needs :

ISSUES: None

COUNCIL'S RESPONSE: None

ACTIONS: None required.

Chapter: 8. Consultation Zones

Para/Policy/Map: CZ: Consultation Zones

| | | |
|-----------------------|--|---|
| Dorset County Council | Policy wording needs to be updated to reflect changes in 08 November Schedule of Amendments. Furthermore, emerging Minerals Core Strategy includes a revised mineral safeguarding policy and map, which will supersede current (1999) map. | Suggested rewording provided. Supporting text should make reference to emerging Minerals Core Strategy & revised policy & map on mineral safeguarding. |
| Imerys Minerals Ltd | Appendix 4: errors within proposal maps. Lack of reference to Minerals Consultation Area (Dorset Minerals & Waste Local Plan 1999). Subject to adoption of Minerals CS, amendments required at later stage. Policy CZ needs further amendments to "Kaolin and Ball Clay Association (UK)" rather than "Ball Clay Producers' Federation". | Amend proposals maps to be consistent with Minerals Consultation Area contained within Dorset Minerals & Waste Local Plan 1999. Amend Policy CZ with reference "Kaolin & Ball Clay Association (UK)". |

Council Response to comments on 8. Consultation Zones :

ISSUES: Comments highlight errors made in original draft and remedied through an amendment schedule that accompanied the Pre-Submission draft for consultation.

COUNCIL'S RESPONSE: Agree with the changes suggested.

ACTIONS: Amend policy and Appendix 4 maps to reflect comments from Dorset County Council and Imerys about consultation on minerals.

| <i>Name</i> | <i>Plan sound? Comment on soundness</i> | <i>Proposed Change</i> |
|--|--|---|
| Chapter: 8. Improving Accessibility | | |
| Para/Policy/Map: 8.22 | | |
| Dorset AONB Partnership | Lack of reference to National Cycle Network of SW Coast Path National Trail. | Make reference to National Cycle Network of SW Coast Path National Trail. |
| Swanage Town Council | Unsound Importance of broadband from working from home, improving local service delivery, online health clinics, online tuition, rural entrepreneurship. "Mind the Gap: Digital England - a Rural Perspective" (2009) sets out dangers of missing out economic benefits from high speed internet connections. Upload speeds in Swanage 0.34 megabytes per second. National average 0.623. | 8.22 to include reference of important of superfast broadband to reduction in traffic congestion in Swanage & Purbeck. |
| Para/Policy/Map: 8.22.1 | | |
| Dorset AONB Partnership | Concerns over intention to provide additional road access capacity into Purbeck | Reduce road capacity & encourage alternative forms of sustainable transport. |
| Para/Policy/Map: 8.22.6 | | |
| Dorset AONB Partnership | Lack of reference to compulsory travel plans & community transport schemes for all development & existing communities. Lack of reference to Manual for Streets 2, Dorset Rural Roads Protocol, Coastal Car Park Design Guide. | Make reference to compulsory travel plans & community transport schemes for all development & existing communities. Make reference to Manual for Streets 2, Dorset Rural Roads Protocol, Coastal Car Park Design Guide. |
| Para/Policy/Map: IAT: Improving Accessibility & Transport | | |
| Dorset AONB Partnership | Final bullet point lacks reference to Dorset Rural Roads Protocol. | Final bullet point to include reference to Dorset Rural Roads Protocol. |
| Highways Agency | Support inclusion that further strategic transport schemes & funding may be proposed through SEDMMTS. Welcome transport-related criteria set out to assess new development proposals. Support spatial objective 9. | |
| Highways Agency | Supports reference to updated Purbeck Transportation Strategy and SEDMMTS. However, reference to the latter should be amplified to clarify the role of SEDMMTS to | |

| Name | Plan sound? | Comment on soundness | Proposed Change |
|--------------------|--------------------|--|---|
| | | Purbeck specifically. Recommends that model is utilised at earliest opportunity to influence planning & transport strategy under development in District. | |
| Think Global Group | Unsound | Oppose use of C6 road as a corridor for traffic south of A35 because of environmental damage to adjoining heathland (SPA), difficulties in widening road on environmental grounds & narrow bridge & resulting bottle neck at Wool. | Remove para 8.22.3 |
| Weld Estate | | Support. | |
| ZBV (Winfrith) Ltd | Unsound | Broad support for policy, but this needs to consider wider options. | Policy should encourage other sustainable transport modes, such as use of car clubs - which can help reduce car ownership. |
| Mr Gloyn-Cox | Unsound | Lack of reference to provision of high speed broadband to promote home-working in Swanage with minimum added congestion. | Build provision of high speed broadband connections into policy & indicate ways in which onward transmission can be stimulated. |
| Mr Seal | Unsound | No mention of high speed broadband for promoting business in the area. | Include high speed broadband. |

Council Response to comments on 8. Improving Accessibility :

ISSUES: Opposition to using C6 as corridor. Lack of reference to National Cycle Network, broadband, more sustainable transport, compulsory travel plans, car clubs, Manual for Streets 2, Dorset Rural Roads Protocol, Coastal Car Park Design Guide, role of SEDMMTs.

COUNCIL'S RESPONSE: The A35 and C6 corridor provides an alternative route east-west route than using the congested A351 (and A352). Previous plans for a Bere Regis and Wool bypasses have been shelved due to lack of funding, but traffic management and safety improvements along the C6 are still planned. SEDMMTs recommendations will be included in Local Transport Plan 3 (LTP3), which in turn will guide Purbeck's Core Strategy and future Core Strategy documents. Other omissions, as listed above, can be included in the Core Strategy as explanatory text.

ACTIONS: Omissions on specific guidance, travel plans, car clubs, National Cycle Network and broadband to be included in text.

Chapter: 8. Transport Strategy

Para/Policy/Map: ATS: Implementing an Appropriate Transport Strategy for Purbeck

| | | | |
|------------------------------------|----------------|---|--|
| Dorset County Council | Sound | A number of risks associated with delivery of PTS. It is a pooled scheme to mitigate cumulative impacts & must be replaced by CIL before 2014 or monies will no longer be collectable. Rate of collection of contributions dependent on rate of development coming forward. Delivery of PTS to some extent reliant on operational decisions of commercial operators. | Commitment to CIL necessary to ensure continued collection of monies to implement PTS. |
| Weld Estate | | Support. | |
| ZBV (Winfrith) Ltd | Unsound | Vital that future policy concerning financial contributions towards implementation of Purbeck Transportation Scheme (PTS) have regard to need to encourage rather than restrain new development. Overall levels of contributions should take into account net additional trips generated by development, support introduction of traffic credit system (would take into account under-used or vacant space). Contributions required by PTS might prohibit bringing forward of new development at DGTP. This could put such sites at a disadvantage when compared to other potential business locations outside of District. | Policy should have regard to need to encourage rather than restrain new development. Overall levels of contributions need to take into account net additional trips generated by development, support introduction of traffic credit system (to take into account any under-used or vacant space). |
| Jurassic Coast World Heritage Team | | Transport references focuses mostly on roads & reducing congestion on A351. Lack of mention of improving public transport for visitor access & encouraging behavioural change. Purbeck very accessible by public transport (train, steam train, buses, chain ferry, boats services way-marked cycle routes & walking trails). Purbeck's reputation of being congested during peak season can be used to encourage non-car based travel. No links made between transport & tourism, even though visitors perceived as greatest cause of congestion. | Transport must link to tourism marketing. Purbeck's reputation of being congested during peak season should be used to encourage non-car based travel. Links to be made between transport & tourism. |

Name **Plan sound? Comment on soundness**

Proposed Change

Council Response to comments on 8. Transport Strategy :

ISSUES: Dorset County Council highlights risks associated with delivery of the Purbeck Transportation Strategy (PTS), which will need to be replaced by Community Infrastructure Levy (CIL) by 2014. Concern raised that development might be stifled by contributions and a traffic credit system is required.

COUNCIL'S RESPONSE: The Council acknowledges that CIL will need to be prepared shortly. Comments on stifling of development and traffic credit system are noted, although the Policy states that the PTS is a "flexible strategy to meet changing scenarios". The Transport Policy Development Panel, which includes Council Members, guides changes to the PTS and is aware of the issues raised. Amendments to the PTS are planned in 2011, although this would not change the wording of Policy ATS.

ACTIONS: Amend section to make clear reference to Council's commitment towards preparation of CIL charging schedule.

Chapter: 9. Implementation and Monitoring

Para/Policy/Map: DEV: Development Contributions

| | | | |
|-----------------------|----------------|--|---|
| Bloor Homes Ltd | Unsound | It does not clarify what development will be expected to make contributions; it is not clear why contributions would be required from commercial, retail, or industrial development. It is not clear why the policy is required. | Provide further clarity or delete policy. |
| Dorset County Council | Unsound | CIL needs to be in place by 2014 or this will have implications for DCC & delivery of services. Concentration on affordable housing, transport, heathland mitigation & recreation/open space does not take account of full impacts of development on local infrastructure & services. DCC may lose opportunity to gain part of levy to fund impacts upon its services. Implementation Plan would be appropriate starting point so that elements of infrastructure that are responsibility of DCC are included as part of thorough assessment of development impact. It should include transport, education, adult social care, waste facilities, green infrastructure, adult learning & library facilities, based on economic viability & council priorities, enabling other opportunities for funding to be directed in effective manner. | PDC should make its commitment clear on preparing a charging schedule for CIL & on working with DCC & other relevant infrastructure providers to carry out comprehensive assessment of infrastructure, funding requirements, economic viability & priorities in determining levy. |
| Mr & Mrs Hampshire | Unsound | | Remove requirement for contribution for recreational open space in light of the requirement for mitigation of potential impact upon nearby heathland. |
| RSPB | | Support, particularly for heathland mitigation. | |
| Scott Estate | Unsound | Fails to clarify type of developments to be affected by contributions. Unclear why affordable housing or heathland mitigation contributions would be required for commercial, retail or industrial development. Policy not required as does not cover all contributions, it will be replaced by various SPDs, or is covered by other policies in CS. | Provide more clarity, or delete policy. |
| ZBV (Winfrith) Ltd | | Support policy. | |

Name **Plan sound? Comment on soundness**

Proposed Change

Council Response to comments on 9. Implementation and Monitoring:

ISSUES: Concerns raised about what type of developments provide contributions and Council's commitment of Community Infrastructure Levy (CIL).

COUNCIL'S RESPONSE: Agree CIL charging schedule needed by 2014 and reference in text as necessary. Agree that clarity is needed on what development contributes to what.

ACTIONS: Amend section to make clear reference to Council's commitment towards the preparation of a CIL charging schedule before April 2014 and provide clear policy on the types of contributions that will be required from new development prior to the implementation of CIL. Ensure that clear links are provided to the relevant contribution policy (Transport, Affordable Housing and Heathland Mitigation) and any supporting documentation. Amend policy to delete recreation / open space contribution requirement - this will be addressed through preparation and implementation of CIL rather than interim guidance.

Chapter: Appendices

Para/Policy/Map: Appendix 1

| | | | |
|---------------|----------------|--|---|
| Birchmere Ltd | Unsound | Object to Key Diagram showing Holton Heath as Green Belt. No exceptional circumstances to justify extension of Green Belt to land south of A351. Land does not meet PPG2 tests for inclusion & such allocation would limit future expansion. | Delete Green Belt addition at Holton Heath (south of A351). |
|---------------|----------------|--|---|

Para/Policy/Map: Appendix 2

| | | | |
|-----------------------|--|--|---|
| Dorset Wildlife Trust | | Glossary refers to SNCIs as being identified by DWT, whereas it is panel including DCC, NE, DERC & independent ecologists. | Amend to: "SNCIs: Sites of Nature Conservation Interest. In Purbeck SNCIs have been identified by Dorset SNCI Panel. These sites are of considerable nature conservation value at local level. Some may include habitats of comparable quality to SSSIs but are of smaller area or of more fragmented nature" |
|-----------------------|--|--|---|

Para/Policy/Map: Appendix 3

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| RSPB | | Local target for biodiversity refers to "no change in area". | Target should set significant increases in biodiversity. |
| Jurassic Coast World Heritage Team | | No targets other than for Heathlands within natural environment. No reference to coast, AONB, inland sites etc. | Targets for coast, AONB, & inland sites. |

Para/Policy/Map: Appendix 4

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| Birchmere Ltd | Unsound | Object to depiction of land south of A351 as Green Belt. There are no exceptional circumstances to justify the extension of the Green Belt to land south of the A351m, the land does not meet PPG2 tests for inclusion and that such an allocation would limit future expansion. | Delete the Green Belt addition at Holton Heath (south of A351). |
| CG Fry & Son Ltd | Unsound | Site A &/or Site B &/or Site E should also be allocated for development. | Amend map to reflect release of more land for development at Lytchett Matravers at Site A &/or Site B &/or Site E. |
| RSPB | | Proposed boundary changes unclear | Amend map to make changes clear. |

Name **Plan sound? Comment on soundness**

Proposed Change

Council Response to comments on Appendices :

ISSUES: Comments suggest improvements to Glossary (Appendix 2), "significant increases" in biodiversity targets, targets for coast, AONB and inland sites (Appendix 3), and improving the quality of the map (Appendix 4). Suggested amendment to map to release more land for development at Lytchett Matravers.

COUNCIL RESPONSE: Agree with comments on Glossary and quality of map. Additional sites will not be released for development at Lytchett Matravers, as the site earmarked for development has been consulted on and was supported locally over and above the other sites put forward. In the case of internationally protected sites, Dorset Environment Records Centre provides the data, and this will be used for monitoring purposes. Other suggested targets will not be monitored due to data not being readily available.

ACTIONS: Amend the Glossary (Appendix 2) to reflect DWT comments. Update changes to proposals maps (Appendix 4) to include a schedule of changes and provide a key on each map.

Chapter: Omissions

| Para/Policy/Map: | Omission | |
|-------------------------|--|---|
| Bloor Homes Ltd | Separate policy detailing new extent of Green Belt is needed. | Suggest wording: "The extent of the Green Belt in Purbeck District is defined by the map ##. This follows the settlement boundaries of the main towns but allows for settlement extensions at Wareham, Upton and Lytchett Matravers as defined in Policy LD." |
| Dorset AONB Partnership | Lack of reference to the designation of protected landscapes, National Tranquillity Mapping, The Dorset Trees, Woods & Forest Strategy & Coastal environment | CS should show how Council intends to interpret national policy at local level. Include reference to National Tranquillity Mapping, The Dorset Trees, Woods & Forest Strategy, Purbeck Heritage Coast, Dorset Seascape Assessment, & Coastal Corridor Action Plan. |
| Dorset County Council | No mention of existing or proposed minerals minerals or waste operations, which could be impacted upon through policies Co, RES, GT, CF, REN, TA and E. Potential to cause sterilisation of an undeveloped mineral resource. Omissions also in policies IAT & ATS which do not acknowledge that minerals have to be worked where they are found. Some acknowledgement of minerals as a special case in terms of transport needs should be in supporting text of Core Strategy. | Reference to Bournemouth, Dorset & Poole Minerals & Waste Plan (1999) & Bournemouth, Dorset & Poole Waste Plan (2006). Reference to work being underway to produce Minerals Core Strategy to replace Local Plan by 2011. Introduction to Chapter 8 should refer to need to avoid impacts on existing or proposed minerals/waste sites, & to avoid unnecessary sterilisation of mineral resources. This reflects relatively high concentration of minerals operations & resources in Purbeck. Minerals, as a special case of transport needs, should be acknowledged in supporting text. |
| Dorset Wildlife Trust | Omission - Policy SW refers to heathland mitigation at Bovington, but not Wool (pressure on Winfrith Heath). | Refer to heathland mitigation at Wool because of pressure on Winfrith Heath. |
| Education Swanage | Grammar School site has not been considered for Free School. | Develop Grammar School site & refurbish school for Free School, but not in this Core Strategy. Needs consideration later on. |
| English Heritage | Lack of reference to spatial heritage concerns & how these | Chapter 7 should detail spatial heritage concerns & |

| Name | Plan sound? | Comment on soundness | Proposed Change |
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| | | should be mapped. | how these should be mapped. |
| Lytchett Minster & Upton Town Plan Group | | Policies required for protection of trees around the Yarrells School & for town centre improvements. Aspirations of LM & Upton town plan to be taken into consideration. | |
| Save Herston Fields | | There is no Recreation & Open Space Strategy and this is required by planning law. | |
| Swanage Railway Co. Ltd | Unsound | Need policy that protects land used for rail purposes & land adjacent to existing railway stations where inappropriate development could prejudice implementation of essential facilities, pursuant to strategic transport objectives. Should recognise that additional maintenance, storage buildings & sidings are essential. Need policy focussing on regeneration & use of brownfield land e.g. Furzebrook sidings. The site could be brought back into use for e.g. Swanage Railway. | Amend to: "Development that would prejudice the existing and potential use of land for railway infrastructure and transport interchanges will not be permitted. Development relating to the provision of railway infrastructure considered essential to the achievement of the objectives of this strategy will be permitted, subject to all the relevant planning considerations." |
| Mr Gloyn-Cox | Unsound | Swanage described as "vibrant seaside town", but Core Strategy has not analysed strengths, weaknesses, opportunities & threats (SWOT). It has not proposed initiatives & has not presented them for public consultation. | SWOT analysis of Swanage (as provided by representor), with accompanying 15 policy options as suggested. These include: fast broadband, tidal barrier, Free School, affordable housing, leisure centre, boutique shopping area, health care, services for elderly, community trust, lobbying to support diving. |

Name **Plan sound? Comment on soundness**

Proposed Change

Council Response to comments on Omissions :

ISSUES: Comments relate to various omissions of text or policies. Omission of a Needs of Different Household Groups policy, which should also include reference to continuing care retirement communities (CCRC). Minerals and waste sites should be referenced throughout plan. Omission of the aspirations of Upton town plan.

COUNCIL RESPONSE: The Core Strategy is a strategic document and should not repeat national policy (i.e. PPG2: Green Belt), make non-essential references to strategies or include details on specific non-strategic sites. More detailed policies considering parcels of land should be included in subsequent plan(s). Amendments to the Green Belt is covered through chapter 7 and a separate policy would provide unnecessary duplication. It is considered that there is no need for a separate policy on needs of different household groups because there is nothing in the Core Strategy which would preclude providing for these groups and including a separate policy would be unnecessary repetition. Minerals resources are afforded protection through Policy CZ: Consultation Zones and further reference throughout the plan would be excessive. Minerals sites are set out in is unnecessary. It is agreed that the Upton Town plan aspiration for an improved town square should be highlighted.

ACTIONS: Include map showing landscape character areas within Chapter 2 to help explain spatial areas. Make greater reference to heritage differences between spatial areas in chapters 2 and 7. Add reference to Upton town square in Policy NE.