

Planning Purbeck's Future



**Core Strategy - Copies of Representations made
Part 3 – 041-060**

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CS041 Eco First

I have to admit that I have not read the full consultation document on the new LDF. I have quickly flicked through the Summary Leaflet, though I didn't get one delivered to my knowledge (maybe a mistake on my part!). So I am responding by email. If this is wrong, or you need further details, please let me know.

There was nothing mentioned in the summary leaflet about Code for Sustainable Homes requirements. There may well be in the full document, so sorry if this is a poorly-informed response.

If there is no mention of Code for Sustainable Homes requirements, and if the LDF is the place for such mentions to be made, then my comment is:

The LDF should include a timetable of explicit Code for Sustainable Homes requirements for new dwellings.

Several local planning authorities have told me that they are 'just going with the national timetable'. However, there is NO national timetable for the sustainability requirements of domestic buildings. There is a timetable for the energy performance of houses, but this does not take into account water use, waste, ecology, materials and management – all important factors in the Code for Sustainable Homes. I think that these are important enough to warrant a mention.

Thanks, and sorry if I have got the wrong end of any stick,

Derek

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CS042 Yattendon Investment Trust Plc

You will recall that I responded to the first draft back in January 2008 requesting that the islands in Poole Harbour not be omitted from the Core Strategy. It appears from the latest document that the islands and indeed the economic benefits of the harbour have not been considered.

This seems a slight oversight given the value the harbour has to the surrounding area both from an amenity, environmental, tourist and economic point of view significant and probably one of the largest drivers of value in the District.

As the operator and owner of the largest marina in the harbour I am very interested as what the objectives are of the Council that controls large parts of the harbour and also the coastline around Purbeck where many of my customers sail too and from.

I would welcome your thoughts on this.

Edward Iliffe

01635 203 912

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CS043 Economic and Community Development Manager

Comments on Core Strategy Public consultation Draft

From Economic and Community Development Manager – Purbeck District Council 9/11/09

Thank you for consulting me on the above draft document, I have the following comments to make:-

Vision for Purbeck p27 Third para should refer to marinating and enhancing the rural landscape and ecology not just “retaining the rural landscape and the function of the countryside” The point being we need a vibrant local economy to afford to be able to maintain the quality and ecological diversity of the countryside, not merely to maintain a denuded landscape which it may be seen as implying.

Spatial Objective 1 – I am concerned about countryside only polices relating to relatively large communities such as Worth Matravers, Lytchett Minster and Briantspuddle where only countryside polices will apply unless those countryside policies allow for the sort of development that may be highlighted in parish plans as vital to their vitality such as shops, community facilities, employment very small scale residential, cafe etc. I think this may be more about allowing for some associated development in the countryside rather than moving these settlements up the heirachy.

Employment Land allocation p 39 table 3 There is an error in the table as Victoria Avenue and Prospect Business Park are one and the same thing. (i.e only room to develop out 1.2 of the allocated 2.4 ha (some unuseable some has gone/is going for HRC use.)

New employment land in Corfe Castle p 42 6.6.4 I object to the loss of proposed employment land in Corfe unless the landowner no longer wishes to proceed there is a dearth of employment land in south Purbeck and the village and sites are need whether or not there is res dev coming forward.

Map 16 page 55 – This map incorrectly show Prospect Business park as being floodable it no longer is as we have raised site levels above flood risk whereas land at rear of Purbeck Business Centre is floodable and not developable but not shown as such.

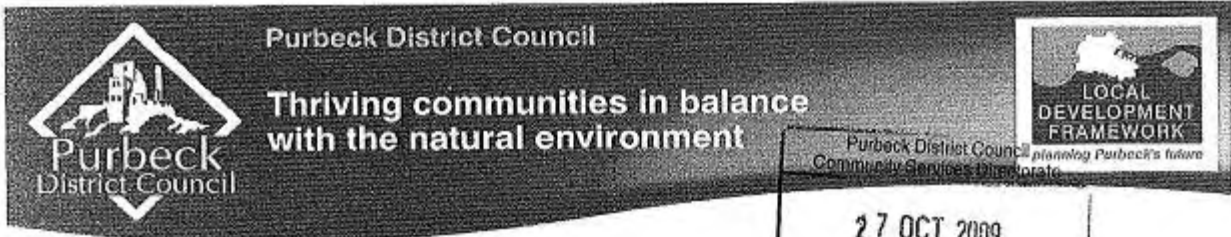
Policy CO Countryside 8.2.1 p 64 Support Policy CO in referring to employment and service uses in the countryside but may need to widen to allow for the range of facilities needed to keep a village alive such as village shops, and commercial facilities such as pub or cafe. This should be repeated in Policy E page 90 where appropriate.

Bio diversity and geodiversity P74/p75 Reference should be included here to the World Heritage Coast designated for its geological and geomorphological interest and the implications of such protection to such things as Coast Protaection (check and poss refer to WHC management plan 2009- 2014).

Policy SD Sustainable Design – Support but to general and hard to assess whether a proposal complies with them. I think BREEAM ratings of min very good or excellent should be insisted upon for large scale commercial as mooted in RSS where say over 100,000 sq metres directly or cumulatively.

Policy E p9091 Economy and Employment This policy should restate what is allowed by policy CO i.e. sensitive small scale business use well related to a complex of buildings or an expansion of an existing employment use.

44/1700



Purbeck District Council
Community Services Directorate

27 OCT 2009

AD: ABCDE

FILE REF

Core Strategy Planning Purbeck's Future Response Form

With reference to the main consultation document, please answer the questions below and, if necessary, briefly explain your answer. If you respond 'no' to any questions and would prefer an alternative, please provide evidence in support of your suggestion. If you are completing this form electronically, feel free to expand the space given for your explanation. If you are completing a paper copy, feel free to attach separate comments, but please state clearly which questions the comments refer to.

If you would like help in completing this form, please contact the Planning Policy Team on 01929 557273.

Please send your completed form back, by **30 October 2009**, to:
 Planning Policy Team, Purbeck District Council, Westport House, Worgret Road,
 Wareham, Dorset, BH20 4PP
 E-mail: ldf@purbeck-dc.gov.uk

Vision for Purbeck	
<input checked="" type="radio"/>	1. Do you agree with the District Vision? Yes Please explain: It summarises what Bere Regis Parish Council feels re Purbeck

Spatial Area Visions	
<input checked="" type="radio"/>	2. Do you agree with the Spatial Area Visions? Yes Please explain: Only the north west of the area was considered and the Council is in agreement with this.

Spatial Objectives



3. Do you agree with the Spatial Objectives?

Yes

Please explain:

This is self evident so the Council can't really disagree.

Policy LD – Location of Development



4 (a) Do you agree with this policy?

Yes

Please explain:

The Council is happy with the settlement hierarchy but is skeptical of Policy 5.6(4(C))

4 (b) Do you agree with the Settlement Hierarchy in Policy LD?

Yes / No (delete as appropriate)

Please explain:

4 (c) Do you agree that on affordable housing should be permitted in settlements not listed under Policy LD), including the villages highlighted in red on Map 9 (affordable housing is social rented and/or shared ownership housing)?

Yes / No (delete as appropriate)

Please explain:

Policy HS – Housing Supply



5. Do you agree with this policy?

No

Please explain:

Policy HS should state a maximum of 2,400 dwellings..

Character Area Development Potential

Q7 6 (a) Do you agree with this approach in estimating development potential?

Yes

Please explain:

6 (b) Is 50% a suitable reduction or should the Council make provision for a higher proportion of development potential to come forward?

Yes / No (delete as appropriate)

Please explain:

Maintaining a 5 Year Land Supply

Q7 7. Should the Core Strategy include phasing for settlement extensions?

No

Please explain:

This Council supports Purbeck District Councils position regarding land supply.

Policy ELS – Employment Land Supply

Q7 8 (a) Do you agree with this policy?

Yes

Please explain:

8 (b) Should existing employment sites (e.g. Winfrith Technology Centre, Holton Heath Industrial Estate and Admiralty Park) be allowed to continue to expand, or should we allocate new sites that are nearer to existing populations in Swanage and Wareham?

Yes

Please explain:

A new railway halt at Winfrith Technology Centre and not find sites in Wareham.

Policy RFS – Retail Floor Space Supply



9 (a) Where do you think is the best location for a new supermarket?

Please tick only one

- Preferred Supermarket Option
Large supermarket at Wareham (2,000sqm)
- Alternative Supermarket Option A
Large supermarket in Swanage (2,000sqm)
- Alternative Supermarket Option B
Medium sized supermarkets in Wareham and Swanage
(1,000sqm in each)

Please explain:

(b) If you do not agree with any of the above options, do you have an alternative suggestion?

Please explain:

No new supermarket in Wareham because there are enough there already.

Development Options



10 (a) The Council has set out its Preferred Option for development in the District. Which option do you think is best for Purbeck and why?

Please tick only one

- Preferred Option
Distribute development around Swanage, Upton, Wareham and the key service villages of Bere Regis, Lytchett Matravers and Wool. YES
- Alternative Option A – concentrate growth on the edge of Wareham.
- Alternative Option B – focus growth at Swanage.

Please explain:

This Council supports the preferred option but new development must be dependant on a new bypass being mentioned in the plan.

10 (b) If you do not like any of the suggested options, what is your alternative suggestion?

Please explain:

Policy CO - Countryside



11 (a) Do you agree with this policy?

Yes

Please explain:

11 (b) Should a sequential approach be followed in the re-use of rural buildings?

Yes

Please explain:

11 (c) Should other uses be considered for the re-use of rural buildings?

No

Please explain:

11 (d) Are there any other countryside related issues that should be addressed by the policy?

No

Please explain:

Policy GB – Green Belt



12 (a) Do you agree with this policy?

Yes

Please explain:

12 (b) Do you agree that small scale rural exception sites for the provision of 100% affordable housing should be allowed as exceptional development in the Green Belt?

Yes

Please explain:

Policy AHT – Affordable Housing Tenure

13. Do you agree with this policy?
No
Please explain:
Demand should dictate the affordable housing mix.

Policy AH – Affordable Housing

14. Do you agree with this policy?
Yes
Please explain:

Policy RES – Rural Exception Sites

15. Do you agree with this policy?
Yes
Please explain:
This allows, for example, the development of the play park at Bere Regis for affordable housing.

Policy GT – Site Criteria for Gypsies, Travellers and Travelling Show People

16. Do you agree with this policy?
Yes
Please explain:

Policy WHN – Wider Housing Needs

17 (a) Do you agree with this policy?
Yes
Please explain:

17 (b) Are you aware of any other specific housing needs that should be addressed?
No
Please explain:

Policy FR – Flood Risk

Q? 23. Do you agree with this policy?
Yes
Please explain:

Policy GP – Groundwater Protection

Q? 24. Do you agree with this policy?
Yes
Please explain:

Policy CE – Coastal Erosion in Swanage

Q? 25. Do you agree with this policy?
Yes/*No*
Please explain:

No view


Policy SD – Sustainable Design

Q? 26. Do you agree with this policy?
Yes
Please explain:

Policy REN – Renewable Energy

Q? 27. Do you agree with this policy?
Yes
Please explain:

and demonstrably to provide non-subsidised energy.

Sustainability Appraisal	
	<p>33. Do you have any comments on the Sustainability Appraisal? Comments:</p> <p>NONE</p>

Contact Details:

Finally, please complete your details below. If you are an agent representing a client please completed both sections:

Personal Details		Agents Details (if applicable)	
Title (Mr/Ms/Mrs/Miss/Other)	Mr	Agent Title (Mr/Ms/Mrs/Miss/Other)	
First Name:	James	Agent First Name:	
Last Name:	Ruddock	Agent Last Name:	
Job Title*:	Clerk to the Council	Agent Job Title:	
Organisation*:	Bere Regis Parish Council	Agent Organisation:	
Address:	11 Tarrant Drive Wareham	Address:	
Postcode:	BH20 4EP	Postcode:	
Telephone:	01929 556263	Telephone:	
E-mail:	Bereregispc1@btconnect.com	E-mail:	

*For Personal Details only enter job title or organisation if responding on behalf of a group or organisation.

Please note that completed response forms will be made publicly available.

CS045 Romany Works Business Park

Your Ref:

Our Ref: PA/TP.63957/5

Please quote our reference in replying

14 October 2009

Planning Policy Team
Planning Department
Purbeck District Council
Westport House
Worgret Road
Wareham
Dorset, BH20 4PP

Dear Sirs

ROMANY WORKS BUSINESS PARK: PURBECK LOCAL DEVELOPMENT FRAMEWORK - CORE STRATEGY REPRESENTATIONS

On behalf of Mr P Farish, the owner of the Romany Works Business Park, I enclose the form of representation to the draft Core Strategy. In this letter I set out further representations in respect of some of the key issues relevant to the future development of my client's land and property at Holton Heath.

Context

Historically, the Romany Works Business Park has benefited from being identified for future development within policies of the North East Purbeck Local Plan and the Purbeck District Local Plan Final Edition. Within the latter document, Policy SS11 permits the construction of new buildings or extensions to existing buildings at the site, subject to certain criteria. The site allocation is shown on Inset Map 9. The site is excluded from the green belt and is not covered by any environmental designations. There is potential for approximately 0.75 hectares (1.8 acres) of land to be developed along side the existing buildings.

When economic circumstances allow, it is intended to submit one or more planning applications that will allow the site to be developed further; enhancing its potential to contribute to the local economy. The continuation of a positive development policy for the site will therefore be sought through any future Site Allocations Development Plan Document (DPD).

I now respond in detail to some of the key issues set out in the draft Core Strategy consultation paper.

Continued

Policy ELS: Question 8(a)

In general terms, Policy ELS can be supported. However, minor amendments to some of the supporting details are sought. This is to emphasise the potential of the Romany Works Business Park to accommodate additional employment development, and will add clarification to the Core Strategy.

Table 3, Page 39; this refers to the Romany Works, with a total allocation of 1.6 ha. This appears to be taken from the existing local plan policy allocation SS11. However, Table 3 also refers to no remaining availability. This is incorrect. Although a planning application for further development has not yet been submitted, it remains a fact that potential exists to accommodate new employment workspace; hence the request for an amendment. This should be consistent with the council's own Employment Review (Stage 2), October 2007. This acknowledged, in the table following Paragraph 15.9, the existing characteristics of Romany Works Business Park:

"Advanced Engineering, Biotechnology, Creative Industries."

The Employment Review then assessed the likely future types of premises to be developed on the site:

"	<i>Types of Premises Likely to be Required</i>
<i>Romany Works, Holton Heath</i>	<ul style="list-style-type: none">• <i>High quality small and medium sized units which combine office and R & D / light industrial functions (B1)</i>• <i>Large B2 units"</i>

Whilst it is accepted that these detailed matters will be contained within a future Site Allocations DPD, it is relevant for the Core Strategy to set out the appropriate policy framework. In this respect I would now also like to respond to Question 8b.

Employment Land Supply: Question 8b

This question seeks views on two alternative options. It does not allow for any consideration of a third option; i.e. a combination of expanding existing estates and some limited provision in areas planned for population growth. This additional option would be consistent with Paragraph 16.2 of the Employment Land Review:

"Potential policy modifications for the LDF have been provided below. These are designed to illustrate intent rather than provide a wording for any future policy on employment:

Core Strategy

- *Protecting and enhancing existing employment areas.*
- *Support for new additional employment opportunities in and around the main town, and in locations of planned population growth.*
- *Promotion of rural workspace provision.*
- *Promotion of high-tech R & D employment opportunities in appropriate existing / existing potential locations."*

Question 8b takes a simplistic approach to potential land use allocations. The location of industry is more complex, and requires a consideration of many other factors. The Core strategy appears to focus on the availability of local labour supply. However, other matters to take into account include the location of suppliers, availability of materials, access to markets and relationship to transport infrastructure. Therefore, the development of previously used sites, in close proximity to main roads and with good access to the conurbation should be the preferred policy approach, before the consideration of development of new greenfield sites.

Holton Heath, including Romany Works Business Park, is well located to deliver business expansion and the required growth in jobs. This should be reflected in the details that support Policy ELS. Consequential amendments are therefore sought to other parts of the Core Strategy:

- Add Romany Works Business Park to Maps 5 and 6.
- Amend text to Map 10: "*Romany Works Business Park - 0.75 ha*"

The new cycle path shown on Map 5 is not shown on Map 6. For clarity, the two maps should be consistent.

I would be grateful if you could acknowledge receipt of these representations and advise me of further stages of the consultation process.

Yours faithfully

Peter Atfield BTP MRTPI

Director, Town Planning & Special Projects

Direct Tel: 01202 550100 Mobile: 07836 202442

Direct Fax: 01202 550022 E-mail: peter.atfield@goadsby.com

CC P Farish Esq.



RA/JC/2034/NEE.304.2

30 October 2009

Mr Steve Dring
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BH20 4PP

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Facsimile: 01202 829285
www.newearthenergy.co.uk

BY POST AND EMAIL

Dear Mr Dring

RE: Response to Purbeck's Emerging Core Strategy, 'Planning Purbeck's Future' Consultation Document – Renewable Energy

Introduction

New Earth Energy (NEE) is a renewable energy company based at Verwood, East Dorset. We are part of the New Earth Solutions Group, which currently provides over 6MW of installed renewable energy in Dorset, through the utilisation of landfill gas at the Canford facility in north Poole.

In response to the need to deliver renewable energy projects, NEE is now preparing a planning application for a Biomass Renewable Energy Facility at the Winfrith (Dorset Green) Technology Park. This facility will supply the local electrical supply grid with up to 10MW of electricity and has the potential to provide up to 10MW thermal heating for the existing and proposed business premises at the Technology Park.

We are keen to help support the development of the spatial development plan for Purbeck. We therefore set out in this letter our view as to how the emerging Purbeck Core Strategy could be bolstered to ensure that the mitigation of climate change, specifically through the development of renewable and low carbon energy, is given commensurate weight to that given at the regional and national levels of governance. This will ensure adequate measures are made to mitigate against the risks of uncontrolled climate change.

Background

Climate change caused by the actions of humans is politically and scientifically accepted in the UK, with major statutory obligations that will require action at all levels of governance. The Climate Change Act 2008 and subsequent 'UK Low Carbon Transition Plan' represent a fundamental movement to ensuring that the UK responds adequately to the climate change challenge. The Act created a legally binding target to reduce the UK's emissions of greenhouse gases (GHGs) to at least 80% below 1990 levels by 2050.



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New Earth Energy Registered Office
Key House, 25 Black Moor Road,
Fiddable Industrial Estate, Verwood,
Dorset, DT11 6AT, England
Registered in England No. 0808055

Alongside the Budget 2009 the Government set out in May 2009 the first three legally binding 'carbon budgets'. During the proposed life of the Purbeck Core Strategy, these budgets require a reduction in greenhouse gas emissions of at least 34% below 1990 levels, by 2020.

To meet these obligations, changes to people's everyday lives will be required, from better insulated homes, to more efficient methods of communicating with each other. The production of renewable and low carbon distributed (decentralised) energy will also ensure the reduction in greenhouse gas emissions.

The UK has now signed up to the EU Renewable Energy Directive. This includes a UK target of 15% of energy (all energy including transport, electricity and heating) from renewables by 2020, which is equivalent to nearly a seven-fold increase in UK renewable energy consumption from 2008 levels. The UK Government has identified this as being the most challenging target of any EU Member State; demonstrating the sheer scale of the challenge ahead.

To meet these obligations Section 182 of the Planning Act 2008 requires Local Authorities, in the production of Development Plan Documents, to:

"Include policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change."

Planning has a key role in creating an attractive environment for innovation and for the private sector to bring forward investment, particularly in enabling the delivery of renewable and low-carbon technologies and supporting infrastructure.

National planning policy contained within PPS1: Delivering Sustainable Development, the PPS1 Supplement on Climate Change and PPS22: Renewable Energy are important in setting out the local planning policy framework in which local policies should be developed. The Key Principles set out in Paragraph 13 of PPS1: Delivering Sustainable Development require that:

"Regional planning bodies and local planning authorities should ensure that development plans contribute to global sustainability by addressing the causes and potential impacts of climate change – through policies which reduce energy use, reduce emissions (for example, by encouraging patterns of development which reduce the need to travel by private car, or reduce the impact of moving freight), promote the development of renewable energy resources, and take climate change impacts into account in the location and design of development."

Paragraph 20 of PPS1 requires that:

"Development plan policies should take account of environmental issues such as: mitigation of the effects of, and adaptation to, climate change through the reduction of greenhouse gas emissions and the use of renewable energy..."

It is clear that the importance of meeting the climate change challenge must be met with proactive local planning policy that supports the delivery of sustainable development. Specifically, Paragraph 22 requires that development plan policies should:

"...should seek to promote and encourage, rather than restrict, the use of renewable resources (for example, by the development of renewable energy)."

Such obligations of national planning policy will need to be incorporated into the final Purbeck Core Strategy. There is now an "urgent need for action on climate change"¹ and this need must be reflected in all forthcoming regional and local planning policies, and may take precedence over other less urgent objectives.

It is therefore welcome that the emerging Purbeck Core Strategy incorporates policies to ensure mitigation and adaption measures; however NEE consider that the current draft policies are limited in their breadth and scope, and do not adequately provide the support required by national policy to deliver renewable and low carbon energy facilities.

Recommendations

NEE wish to make the following recommendations, which it believes would ensure that the adopted Purbeck Core Strategy provides the spatial planning policy basis to help mitigate the effects of uncontrolled climate change.

NEE consider that the following is added to the current 'Five Main Challenges' identified at paragraph 3.2 of the Emerging Core Strategy.

"Responding to the climate change challenge though supporting appropriate mitigation and adaptation measures including the substantial deployment of renewable energy"

NEE consider that to more closely accord with national policy, Policy REN: Renewable Energy should be reworded to the following:

Policy REN: Renewable and Low Carbon Energy

~~Due to the overarching need to respond to the climate change challenge and statutory renewable energy generation obligations, the Council will give the delivery of renewable and low carbon energy infrastructure high priority in its decision making and other activities. The Council encourages the sustainable use and generation of energy and will encourage renewable energy where it is in keeping with the District's landscape and cultural heritage and would not adversely affect the area's biodiversity.~~

At least 10% of the energy to be used in new development of more than 10 dwellings or 1,000m² of non-residential floor space should come from distributed and renewable or low-carbon sources, unless, having regard to the type of development involved and its design, it is demonstrated not to be feasible or viable.

Proposals for renewable and low carbon energy ~~infrastructure (electricity and heat) apparatus~~ will be permitted provided that:

- The technology is suitable for the location and would not cause adverse harm to visual amenity from both within the landscape and views into it;
- It would not have an adverse impact upon the integrity of internationally protected habitats unless there is no alternative solution and there are imperative reasons of overriding public interest;
- It would not cause interference to radar or telecommunications, or a significant adverse effect on highway safety;
- It would not cause harm to residential amenity by virtue of noise, vibration, overshadowing, flicker (associated with turbines), or other harmful emissions;
- Any large-scale proposal [needs defining, is this height or energy generation?] must take into

¹ PPS1 Supplement on Climate Change, Paragraph 6

account Dorset County Council's Landscape Sensitivity Study ~~and should include an agreed restoration scheme and measures to ensure the removal of the installations when operations cease~~

- ~~Where a planning permission is temporary, proposals should include an agreed restoration scheme and measures to ensure removal after operations have ceased;~~
- Safe access during construction and operation must be provided; and
- It would be in accordance with Policy SD: Sustainable Design and Policy HLH: Historic Environment, Landscape and Heritage.

NEE fully agree that Purbeck District Council should plan positively for the achievement of high quality and inclusive design for all development. We welcome the need for proposals to demonstrate support for biodiversity, but specifically consider the requirement for in-built bat and bird nesting / roosting features to be too restrictive and unnecessary in a Core Strategy policy. Demonstration and support for biodiversity can come in many forms, which may or may not include such provision. We therefore request that the following aspect of the emerging Policy SD: Sustainable Design is deleted:

~~Demonstrate support for biodiversity through careful landscaping and through in-built features which provide appropriately configured and located nesting and roosting opportunities for bats and birds.~~

NEE consider that as currently worded, Policy HLH: Historic Environment, Landscape and Heritage, which is required to be met as one of the criteria set out in Policy REN, does not accord with national planning policy for renewable energy proposals, as set out in PPS22 with regard to national or local landscape, conservation or historic environment designations. Paragraph 11 of PPS22 states:

"In sites with nationally recognised designations (Sites of Special Scientific Interest, National Nature Reserves, National Parks, Areas of Outstanding Natural Beauty, Heritage Coasts, Scheduled Monuments, Conservation Areas, Listed Buildings, Registered Historic Battlefields and Registered Parks and Gardens) planning permission for renewable energy projects should only be granted where it can be demonstrated that the objectives of designation of the area will not be compromised by the development, and any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by the environmental, social and economic benefits."

Paragraph 15 states:

"Local landscape and local nature conservation designations should not be used in themselves to refuse planning permission for renewable energy developments. Planning applications for renewable energy developments in such areas should be assessed against criteria based policies set out in local development documents, including any criteria that are specific to the type of area concerned."

NEE recommend that Policy HLH is amended as follows:

~~...Insofar as proposals for development (excluding renewable energy proposals) and other works are also consistent with other policies, the Council will be supportive of those which would cause no significant demonstrable harm to, or detract from the appearance, setting, character, interest and integrity of, locally, nationally and internationally designated landscape and historic environment assets. The Council will expect that wherever possible proposals for development and other works take available opportunities to deliver enhancement of the same.~~

~~Planning permission for renewable energy proposals in sites with nationally recognised landscape and historic environment designations will only be granted where it can be demonstrated that the objectives~~

of the national landscape or historic environment designation will not be compromised by the development, and that any significant adverse effects are clearly outweighed by the environmental, social and economic benefits.

We believe that as a sub-regional employment site, Dorset Green Technology Park offers the best potential of any location in the District to deliver the generation and use of combined heat and power, helping to meet part of Dorset's renewable energy delivery obligations. We believe that a specific policy endorsing the requirement for Dorset Green Technology Park to deliver renewable or low carbon combined heat and power should be developed by the Council, to reflect the unique opportunity that this site offers in terms of sustainable business development.

We consider that the 'Vision for South West Purbeck', page 28, should be amended to read as follows:

...Winfrith Technology Centre Dorset Green Technology Park will provide a focus for inward investment of economic growth, whilst also catering for local employment needs. As a Sub-Regional employment site with aspirations to be zero carbon, on-site renewable or low carbon combined heat and power should be delivered as part of the longer term vision. Improved linkage to Wool Railway Station will be one of a number of issues dealt with through an Area Action Plan.

A similar statement should also be incorporated into the Central Purbeck Vision, regarding Holton Heath.

With regards to developing policy for Strategic Sites, paragraphs 4.6 and 4.7 of PPS12 *Local Spatial Planning* are relevant. These paragraphs state that Core Strategies may allocate strategic sites where such sites are central to the achievement of their strategy. We believe that the potential to deliver significant benefits through the provision of renewable or low carbon CHP at the two Sub-Regional Employment sites, which offer the best potential to utilise such energy, should be reflected in specific policy.

To help deliver Spatial Strategies 5 and 6, the following policy wording should be incorporated into Section 8.17, with a new Core Strategy policy:

Policy SUB - Sub-Regional Employment Sites

As locations with good potential to beneficially utilise distributed renewable or low carbon energy, the Council will support the delivery of on-site combined heat and power facilities at Dorset Green Technology Park and Holton Heath employment sites. Provision for incorporating such facilities should be made where part or full redevelopment is proposed, unless, having regard to the type of development involved and its design, it is demonstrated not to be feasible or viable.

With respect to Policy E: Employment, NEE consider that wider provision for renewable or low carbon CHP facilities on existing and new employment sites should be promoted by the Council, to ensure it delivers its obligations with regard to delivering sustainable energy.

NEE propose the following:

Policy E: Employment

New Employment Provision

New employment provision will be supported:

- Within Swanage, Upton and Wareham and the Key Service Villages;
- For intensification and redevelopment of existing employment land; and
- Through the conversion of redundant buildings to rural workspaces in accordance with Policy CO: Countryside

Safeguarding Employment Land

Existing employment areas will be safeguarded for B1, B2 or B8 uses or for the provision of renewable or low carbon heat and power facilities that can deliver distributed energy. New proposals will only be permitted where they do not compromise the activities or integrity of the employment area.


...

Finally, national policy in PPS22 supports LPAs to consider the opportunity for new developments to incorporate renewable energy projects in all new developments. This is not limited to those of 10 dwellings or 1,000m² of non residential floorspace. As such, NEE would welcome the development of policy REN to promote the delivery of renewable energy in all new development. Whilst such permissive policies do not require developers to provide additional renewable energy, they provide a strong lead that such proposals will be material in the consideration of relevant planning applications.

I hope that you find these comments useful in seeking to develop a proactive framework for sustainable development in Purbeck.

If you have any queries please do not hesitate to contact me.

Yours sincerely

AP 

Robert Asquith
Planning Director
New Earth Energy



Our Ref: GS/PDC CS

30 November 2009

Purbeck District Council
Westport House
Worgret Road
Wareham
Dorsert
BH20 4PP

Dear Sir/Madam,

**Purbeck District Council: Core Strategy Issues and Options Public Consultation
– Planning Purbeck's Future**

Further to my earlier correspondence dated 16 November 2009 regarding the above consultation, I should be grateful if you would replace those representations with the revised represents enclosed herewith.

I enclose a revised response form and a separate but related representation in respect of land at Steppingstones, Stoborough, which should be considered in conjunction with the content of the response form.

It should be noted that Imerys' land at Stoborough could be made available immediately for residential development, subject to the appropriate notice being served on the tenant.

Thank you for consulting with Imerys on this occasion and I look forward to hearing from you in due course.

Please do not hesitate to contact me should you have any queries relating to these submissions.

Yours sincerely

A handwritten signature in black ink that reads "G Staddon".

Gary Staddon
Mineral Planning and Services Surveyor

Imerys Minerals Ltd - Par Moor Centre - Par Moor Road - Par - Cornwall - PL24 2SQ - England
Tel: +44 (0)1726 818000 - Fax: +44 (0)1726 811200

IMERYS is a business name of IMERYS Minerals Ltd
Company No. 269255 - Registered in England and Wales
Registered Office: Par Moor Centre - Par Moor Road - Par - Cornwall - PL24 2SQ - England

Core Strategy Planning Purbeck's Future Response Form

With reference to the main consultation document, please answer the questions below and, if necessary, briefly explain your answer. If you respond 'no' to any questions and would prefer an alternative, please provide evidence in support of your suggestion. If you are completing this form electronically, feel free to expand the space given for your explanation. If you are completing a paper copy, feel free to attach separate comments, but please state clearly which questions the comments refer to.

If you would like help in completing this form, please contact the Planning Policy Team on 01929 557273.

Please send your completed form back, by **30 October 2009**, to:

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

E-mail: ldf@purbeck-dc.gov.uk

Vision for Purbeck



1. Do you agree with the District Vision?

No (delete as appropriate)

Please explain:

It is considered that the vision is too long and too wordy. Previous experiences have indicated that 'visions' should be as succinct as possible and capture the key aims / objectives which can then be expanded upon in the visions for the sub-District areas.

If PDC feels that reference to Purbeck stone quarrying is appropriate within the vision then it would be equitable for the importance of the local Ball Clay industry to be emphasised also.

Spatial Area Visions



2. Do you agree with the Spatial Area Visions?

No (delete as appropriate)

Please explain:

Central Purbeck - Imerys supports the Spatial Area Vision in that development will be required in Stoborough to support its role as a Local Service Village. Stoborough's sustainable location and good links to Wareham should also be recognised with regard the role this village can play in meeting the housing needs of the Purbeck area as well as the housing needs of the village itself.

The Ball Clay industry in Central Purbeck/South West Purbeck should be mentioned due to its economic, social and environmental contribution to the area.

Spatial Objectives



3. Do you agree with the Spatial Objectives?

Yes (delete as appropriate)

Please explain:

It is important that Purbeck's housing needs are met and the role individual villages such as Stoborough can play in meeting these needs should be recognised. The development boundaries of all built up areas should be examined and refined to ensure that sustainable development sites are not ignored merely due to historical boundaries.

Policy LD – Location of Development



4 (a) Do you agree with this policy?

No (delete as appropriate)

Please explain:

It is considered that without a prior review of settlement boundaries in the context of the housing provision to 2026, the hierarchy may not be justified or effective.

Imerys considers that before a 'general location of development' can be justified a review of settlement boundaries should be undertaken and that the reliance on and reference to those boundaries within the old Local Plan is not good practice, especially when the policy demands a justification of 'need' to support any planning application.

4 (b) Do you agree with the Settlement Hierarchy in Policy LD?

No (delete as appropriate)

Please explain:

For the reasons given in 4(a) above.

4 (c) Do you agree that on affordable housing should be permitted in settlements not listed under Policy LD), including the villages highlighted in red on Map 9 (affordable housing is social rented and/or shared ownership housing)?

Yes / No (delete as appropriate)

Please explain:

Policy HS – Housing Supply



5. Do you agree with this policy?

Yes (delete as appropriate)

Please explain:

In principle Imerys agrees with the policy. However, as the RSS has not been approved / adopted how appropriate is the stated minimum provision of 2400 dwellings?

The Core Strategy will need to make provision for the location of 2,400 dwellings in addition to the 2,750 dwellings to be provided in Area of Search 7B. In this event, development boundaries of built up areas will need to be reviewed and villages such as Stoborough will need to play a role in meeting this housing requirement.

Character Area Development Potential



6 (a) Do you agree with this approach in estimating development potential?

Yes / No (delete as appropriate)

Please explain:

6 (b) Is 50% a suitable reduction or should the Council make provision for a higher proportion of development potential to come forward?

Yes / No (delete as appropriate)

Please explain:

Maintaining a 5 Year Land Supply



7. Should the Core Strategy include phasing for settlement extensions? No (delete as appropriate)

Please explain:

Phasing is considered to be too prescriptive. Allow market forces to bring forward a range of developments across the District.

The Core Strategy is intended to cover the period up to 2026 and only makes a five year provision for housing supply. The SHLAA exercise has identified possible housing sites for the next 12 years and these sites should be introduced into the Core Strategy. As stated in section 6.4.2 of the Core Strategy these housing sites should be immediately available and not the subject of phasing.

Policy ELS – Employment Land Supply



8 (a) Do you agree with this policy?

Yes / No (delete as appropriate)

Please explain:

8 (b) Should existing employment sites (e.g. Winfrith Technology Centre, Holton Heath Industrial Estate and Admiralty Park) be allowed to continue to expand, or should we allocate new sites that are nearer to existing populations in Swanage and Wareham?

Yes / No (delete as appropriate)

Please explain:

Policy RFS – Retail Floor Space Supply



9 (a) Where do you think is the best location for a new supermarket?

Please tick only one

• Preferred Supermarket Option
Large supermarket at Wareham (2,000sqm)

• Alternative Supermarket Option A
Large supermarket in Swanage (2,000sqm)

• Alternative Supermarket Option B
Medium sized supermarkets in Wareham and Swanage
(1,000sqm in each)

Please explain:

(b) If you do not agree with any of the above options, do you have an alternative suggestion?

Please explain:

Development Options



10 (a) The Council has set out its Preferred Option for development in the District. Which option do you think is best for Purbeck and why?

Please tick only one

- Preferred Option
Distribute development around Swanage, Upton, Wareham and the key villages of Bere Regis, Lytchett Matravers and Wool. Yes
- Alternative Option A – concentrate growth on the edge of Wareham.
- Alternative Option B – focus growth at Swanage.

Please explain:

This option should allow market forces to deliver a range of properties across the District as opposed to limiting development opportunities, creating disproportionate land values and avoiding concentrated impacts associated with housing development.

The preferred option should be updated to correspond with policy LD: General Location of Development which includes the Local Service Villages of Langton Matravers, Stoborough, West Lulworth and Winfrith Newburgh.

10 (b) If you do not like any of the suggested options, what is your alternative suggestion?
Please explain:

Policy CO - Countryside



11 (a) Do you agree with this policy?

No (delete as appropriate)

Please explain:

Brownfield land should also be bulleted as a location for permitting development.

11 (b) Should a sequential approach be followed in the re-use of rural buildings?

Yes / No (delete as appropriate)

Please explain:

11 (c) Should other uses be considered for the re-use of rural buildings? Yes / No (delete as appropriate)

Please explain:

11 (d) Are there any other countryside related issues that should be addressed by the policy?

Yes / No (delete as appropriate)

Please explain:

Imerys is disappointed to see that NO reference has been made to the Ball Clay Consultation Area despite meetings with and correspondence to Officers at PDC on the subject. (A copy of previous correspondence on this matter is attached to this form).

Policy GB – Green Belt



12 (a) Do you agree with this policy?

No (delete as appropriate)

Please explain:

Similar to Imerys' comments on settlement boundaries and the proposed reliance on old information, it is considered that any policy proposal to allocate Green Belt land for housing should be assessed in advance of the adoption of the CS to establish and ensure that any adjustments to Green Belt designated areas are appropriate. Without this 'up-front' capacity assessment Imerys considers that the hierarchical approach to development could be found to be inappropriate and so frustrate the development of residential housing.

For example the proposal to redefine the Green Belt area to the west of Wareham, albeit situated within the bypass, in order to make provision for a new school, supermarket and 'large scale housing' should be undertaken prior to policy adoption, to ensure that those developments can be accommodated – if not it may be more appropriate to re-adjust the policy approach to the development hierarchy.

The biggest issue here appears to be the dilution of the strength of national and local policy on Green Belt and the message that it portrays to the local community to facilitate development and the precedent that it sets.

A sequential approach should be taken to establish whether the Green Belt boundary should be changed with priority given to potential development sites in the countryside, outside of the Green Belt and before Green Belt development sites are chosen. Such sites as the SHLAA site identified at Steppingstones Fields provide a sustainable solution to contributing to housing needs impacting on the a Green Belt designation.

12 (b) Do you agree that small scale rural exception sites for the provision of 100% affordable housing should be allowed as exceptional development in the Green Belt?

No (delete as appropriate)

Please explain:

100% affordable housing development may be found to be financially undeliverable now and/or in the future and so a more 'equitable' percentage should be considered and applied.

Policy AHT – Affordable Housing Tenure



13. Do you agree with this policy?

No (delete as appropriate)

Please explain:

Too prescriptive and inflexible. Allow demand/market forces to establish what is/will be required.

Policy AH – Affordable Housing



14. Do you agree with this policy?

No (delete as appropriate)

Please explain:

No too proscriptive and inflexible. Bearing in mind the Spatial Areas (Map 2) and the connectivity with and proximity of Stoborough to Wareham, it is considered that the village should be incorporated within the '40%' affordable housing area, as shown, if this spatial approach is to be taken forward.

However, notwithstanding the above comment, allocating a 40% or 50% requirement oversimplifies the situation. The AH % should be based on the viability of the individual scheme on a site by site basis.

Policy RES – Rural Exception Sites



15. Do you agree with this policy?
Yes / No (delete as appropriate)
Please explain:

Policy GT – Site Criteria for Gypsies, Travellers and Travelling Show People



16. Do you agree with this policy?
Yes / No (delete as appropriate)
Please explain:

Policy WHN – Wider Housing Needs



17 (a) Do you agree with this policy?
Yes / No (delete as appropriate)
Please explain:

17 (b) Are you aware of any other specific housing needs that should be addressed?
Yes / No (delete as appropriate)
Please explain:

Policy BIO – Biodiversity & Geodiversity



18. Do you agree with this policy?
No (delete as appropriate)
Please explain:

The ‘Wild Purbeck’ project is described as a ‘longstanding ambition of Natural England’. Although heathland has been a target habitat in Purbeck, especially in the context of Ball Clay pit restoration plans, the company is receiving advice that heathland may no longer be the key habitat to focus on.

With this in mind Imerys considers that it is essential that the views of all key stakeholders on biodiversity and geodiversity are analysed carefully and challenged accordingly to ensure that there is a consensus on what habitats are to be targeted and where to avoid any confusion and to avoid the inappropriate use of resources.

Policy DH – Dorset Heaths International Designations



19. Do you agree with this policy?
No (delete as appropriate)
Please explain:

Imerys is a significant contributor to the re-creation of heathland as a result of the restoration of mineral workings and is aware of the pressure placed on more established and accessible heathland areas.

With reference to residential development it is difficult to understand how the associated impacts on neighbouring heathland can be mitigated effectively by creating sufficient alternative open-space to mitigate all housing site proposals in proximity to heathland. Local public rights of way are likely to be the first choice for daily recreation, dog walking, etc.

Imerys suggests that the existing 400m heathland buffer zone is reviewed in detail (as per settlement boundaries and Green Belt land) to ensure that the minimum housing provision is deliverable bearing in mind the extensive 400m to 5km buffer zone width described in this policy. The onerous list of mitigation measures may also need to be assessed in detail to ensure the effective delivery of 2400 houses.

Policy RP – Retail Provision



20. Do you agree with this policy?
Yes / No (delete as appropriate)
Please explain:

Policy CF – Community Facilities and Services



21. Do you agree with this policy?

Yes / No (delete as appropriate)

Please explain:

Policy GI – Green Infrastructure, Recreation and Sports Facilities



22. Do you agree with this policy?

Yes / No (delete as appropriate)

Please explain:

Policy FR – Flood Risk



23. Do you agree with this policy?

Yes / No (delete as appropriate)

Please explain:

Policy GP – Groundwater Protection



24. Do you agree with this policy?

Yes / No (delete as appropriate)

Please explain:

Policy CE – Coastal Erosion in Swanage



25. Do you agree with this policy?

Yes / No (delete as appropriate)

Please explain:

Policy SD – Sustainable Design



26. Do you agree with this policy?

Yes / No (delete as appropriate)

Please explain:

Policy REN – Renewable Energy



27. Do you agree with this policy?

Yes / No (delete as appropriate)

Please explain:

Policy HLH – Historic Environment, Landscape and Heritage



28. Do you agree with this policy?

Yes / No (delete as appropriate)

Please explain:

Policy E – Employment



29. Do you agree with this policy?

Yes / No (delete as appropriate)

Please explain:

Policy TA – Tourist Accommodation and Attractions



30 (a) Do you agree with the policy wording?

Yes / No (delete as appropriate)

Please explain:

30 (b) Should new tourist accommodation be allowed within the AONB? Yes / No (delete as appropriate)

Please explain:

Policy IAT – Improving Accessibility and Transport

Q? 31. Do you agree with this policy?
 Yes / No (delete as appropriate)
 Please explain:

Policy AP – Implementing an Appropriate Transport Strategy for Purbeck

Q? 32. Do you agree with this policy?
 Yes / No (delete as appropriate)
 Please explain:

Sustainability Appraisal

Q? 33. Do you have any comments on the Sustainability Appraisal?
 Comments:

Contact Details:

Finally, please complete your details below. If you are an agent representing a client please completed both sections:

Personal Details		Agents Details (if applicable)	
Title (Mr/Ms/Mrs/Miss/Other)	Mr	Agent Title (Mr/Ms/Mrs/Miss/Other)	
First Name:	Gary	Agent First Name:	
Last Name:	Staddon	Agent Last Name:	
Job Title*:	Mineral Planning and Services Surveyor	Agent Job Title:	
Organisation*:	Imerys Minerals Limited	Agent Organisation:	
Address:	Par Moor Centre, Par Moor Road, Par, Cornwall	Address:	
Postcode:	PL24 2SQ	Postcode:	
Telephone:	010726 818494	Telephone:	
E-mail:	gary.staddon@imerys.com	E-mail:	

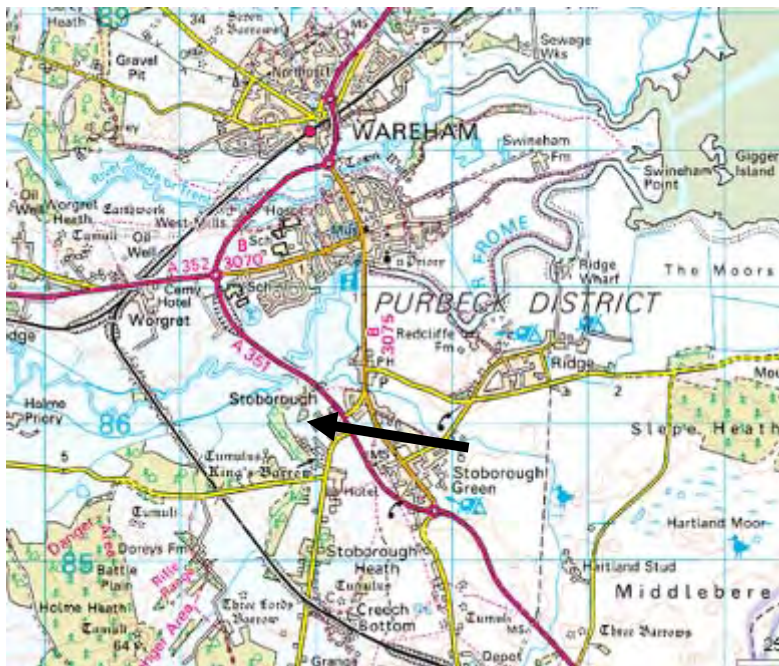
*For Personal Details only enter job title or organisation if responding on behalf of a group or organisation.

Please note that completed response forms will be made publicly available.

Would you like to be included on our LDF database and informed about future consultations? **YES**
 (Delete as Appropriate)

Representations Submitted by Imerys Minerals Ltd in respect of Purbeck District
Council Core Strategy Public Consultation Draft.

These comments are put forward to promote an extension to the settlement boundary of Stoborough.



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Imerys Minerals Ltd is the landowner of the site bounded in red shown below:



This representation proposes that the settlement boundary around Stoborough is redrawn to include the land owned by Imerys for residential development, as shown above.

The Draft Regional Spatial Strategy for the South West of England incorporating the Secretary of State's Proposed Modifications - for public consultation July 2008 requires a substantial increase in the overall provision of housing and provides new housing targets for Purbeck. Policy HMA7 of the proposed modifications states that provision will be made for **at least** 5,150 new homes in the Purbeck area over the plan period up to 2026. This figure includes 2,750 new homes at Area of Search 7B at Lychett Minster (Purbeck) resulting in a further 2,400 further dwellings required in the rest of the Purbeck area. The provision of dwellings in area of search 7B requires a change to the greenbelt boundary. Approximately half of these dwellings are to be provided from 2006-2016 with the remainder provided from 2016-2026. Broad locations for the 11-15 year housing supply should be identified. The Draft RSS states that these figures are not ceilings.

The Draft RSS highlights the problem of housing affordability in the region with house prices greater than 10 times the income ratio. The Draft RSS also promotes the development of new housing in sustainable locations with good access to transport, facilities, open space, public transport, shops, employment, education and health care.

Purbeck's Core Strategy Consultation Draft must be in accordance with the SW RSS and must run for the period up to 2026. The Core Strategy does not include the 2,750 dwellings proposed in the RSS for the Area of Search 7B and proposes only 2,400 new homes. The strategy also identifies a need of 409 affordable dwellings per year from 2007-2012. Although the Core Strategy does not allocate sites, it sets the level of growth and provides a steer on likely location.

The Core Strategy identifies Wareham as including a high level of facilities and services.

The Core Strategy vision identifies that "*Some development will take place in Stoborough to support its role as a Local Service Village*". Policy LD identifies Stoborough as a "Local Service Village" under Development Policy C – Small Towns and Villages. Map 9 proposes a settlement boundary around Stoborough.

The Core Strategy seeks to identify deliverable housing sites in order to avoid speculative applications for settlement extensions. The Core Strategy proposes only 7 new dwellings

for Stoborough. The strategy also identifies that development opportunities in Wareham are limited due to constraints of protected heathlands, flood risk, green belt and AONB.

Stoborough is located only 700m from the high level of facilities offered in Wareham. It is well served by road links and good public transport links to Wareham and elsewhere. Wareham is served by a mainline railway to London Waterloo. In addition the village provides a good level of facilities to its residents. Thus Stoborough is in a sustainable location.

The land owned by Imerys has been included in the 6-15 year supply undertaken in the recent Strategic Housing Land Availability Assessment. The site is not located in an area of flood risk and there are no obvious contamination or pollution hazards affecting the site. The site is well screened by surrounding hedges and trees. The SHLAA identified a possible 40 dwellings on the site. Due to the size of the site and number of dwellings, a proportion of the site would be developed for affordable housing meeting local needs.

The built form of Stoborough has produced a “ribbon-like” development. A more natural form of development would benefit the village and this is best achieved through an extension of the existing settlement boundary. As the site is outside the greenbelt no change to the greenbelt boundary is required. Therefore Stoborough should be prioritised over sites where a change to the greenbelt is required.

An extension to the settlement boundary would provide the opportunity to establish a more appropriate and defensible limit to the village. This would still maintain the separate identities of Stoborough and Stoborough Green while allowing for future development in this sustainable location.

Purbeck Council have objected to the proposals of the Area of Search 7B which is in effect a new town. This proposal will require substantial new infrastructure, has not been tested through Strategic Environmental Assessment and Purbeck Council believe it would fail at examination as it will not satisfy the Habitats Regulations. The Area of Search 7B proposal requires a change to the greenbelt and Purbeck Council believe the retention of the greenbelt is essential. In the event that if the development of the area is rejected the housing requirement of 5,150 new dwellings could still remain.

Considering the requirement to find sites for 2,400 new dwellings and possibly a further 2,750 new dwellings throughout the Borough, Stoborough is well placed to contribute towards delivering this housing need.

The extension of the development boundary and the provision of new housing in this sustainable location will meet this need in accordance with PPS1, PPS3 and PPS7 without requiring a change to the greenbelt. New housing development in this location provides support for local services and facilities. An increase in the potential market of the local area will promote the local economy and support existing facilities as well as providing scope for new services to establish in the area. In addition the site is well connected to the facilities available in nearby Wareham.

Thus Stoborough should be included within the preferred option for the location of new development and the distribution of housing requirement by settlement should be increased from 7 to 47. This includes a minimum of 40 properties on the Imerys site as identified in the SHLAA.

AJP/JM/20227

28 October 2009

Mr S Dring
Planning Policy Manager
Purbeck District Council
Westport House
Worgret Road
Wareham
BH20 4PP

Dear Mr Dring

PURBECK CORE STRATEGY – PREFERRED OPTIONS

Please find enclosed a paper copy of the Response on behalf of **The Charborough Estate**. If you would find an email version useful please contact Jodie Martin at j.martin@pvprojects.com and she will send it through to you.

This has been submitted by the original deadline because, as a significant stakeholder, The Charborough Estate is keen for in depth discussion with yourself and Mark Sturgess on key issues, notably the relationship between housing and SANGS at Wareham, and the green belt at Sandford. We would like to take forward such discussions sooner rather than later.

Yours sincerely

ANDREW PATRICK
DIRECTOR
a.patrick@pvprojects.com

Encs

cc Mr J Boweman, The Charborough Estate



PURBECK CORE STRATEGY

PUBLIC CONSULTATION DRAFT

“RESPONSE”

ON BEHALF OF

THE CHARBOROUGH ESTATE

AJP/20227/26.10.09

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- 3 DEVELOPMENT AT WAREHAM (INC WAREHAM ST MARTIN)
- 4 COUNTRYSIDE & TOURISM

APPENDICES

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- B TABLE B
- C RESPONSE TO QUESTIONS

1. INTRODUCTION AND SUMMARY

1.1 Introduction

The Charborough Estate is a significant stakeholder in Purbeck, with extensive landholding and farming interests (including redundant rural buildings) and extensive areas of Heathland SPA, and potential SANGS, and employment and housing land. Pro Vision are instructed by the Estate to submit these Responses. **The Estate would welcome in-depth discussion on these points.**

1.2 Overview

“Planning Purbeck’s Future-Core Strategy Public Consultation Draft” is clearly and well presented, analyses the issues succinctly, and seeks to put forward cogent policies and proposals in response to those issues, following extensive community consultation. Nevertheless, some aspects need review. The primary concerns are:

- Preferred Option for Development: supported subject to review of the balance of housing between Wareham and Swanage;
- Housing Land Supply approach: supported subject to a review of the likely level of actual delivery of planning permissions not yet built;
- Wareham: a 2000 sq m Supermarket by the Station is supported, as is Ferncroft as a direction for settlement extension; however, Tantinoby Farm should also be included as a direction for settlement extension;
- Green Belt: Boundary changes to accommodate settlement extensions are supported, but deletion of the “White Land” south of Sandford is opposed, subject to further discussion with the LPA;
- Proposed Policy CO (Countryside) needs further review to achieve realistic flexibility, and
- The strategic tourism and recreation opportunity at Morden Park should be included in the Core Strategy.

1.4 Preferred Option for Development (See Section 2 following)

This is generally supported, but there should be less Greenfield housing at Swanage, and more at Wareham, because:

1. Wareham is the most sustainable location in the District: the focus of good quality public transport, education, local government, and health services, with potential for a large supermarket and more employment.
2. Swanage is in the AoNB, and is a less sustainable location than Wareham; opportunities for more employment are very limited and there is no secondary schooling; too much housing without more employment or other services will increase the level of out-commuting.
3. Wareham needs extensive SANGS to protect nearby Heathland SPA, and new housing (in North/North West Wareham) can provide that, if the scale of development is sufficient to support the investment needed.

1.5. Development at Wareham (See Section 3 following)

Section 7.2 and Map 14 makes the sound case for a 2000 sq m Supermarket by the Station, but otherwise should be reviewed to consider:

- Prioritising settlement extension at Tantinoby and Ferncroft because these are the most sustainable locations, and because development here can bring the most community benefits, such as extensive SANGS.
- Allowing up to 400 greenfield dwellings, and
- Seeking 1 ha of employment at Westminster Road.

1.6 **Green Belt**

Green belt boundaries need to be changed at Wareham to accommodate a settlement extension, otherwise the District cannot achieve the most sustainable pattern of development, as required by PPS1, PPS3, the emerging RSS, and the Core Strategy itself. These are “exceptional circumstances” allowing such a change, in accord with PPG2 Paragraph 2.7. However, no such “exceptional circumstances” exist at Sandford to justify deleting the White Land. The Estate would welcome in-depth discussion with the LPA on this issue.

1.7 **Policy CO: The Countryside (See Section 4 following)**

The Charborough Estate welcomes the proposal to allow small scale business development, and farm diversification projects. However, more realistic flexibility is needed to allow for barn conversions to holiday homes, work homes or (in some circumstances) straight residential, and also on occasions to consider new-build residential where this would be, for example, part of a “package” of development bringing employment and community benefits (eg. affordable housing) to a community. **Morden Park** is allocated for tourism and recreation in the Purbeck District Local Plan Final Edition. The size of the site and potential benefit to the local economy and tourism justifies inclusion in the Core Strategy.

2. **THE DISTRIBUTION OF DEVELOPMENT**

2.1 As indicated above this is generally supported, but serious consideration must be given to Swanage, and more at Wareham, because:

1. Wareham is the most sustainable location in the District: the focus of good quality public transport, education, local government, and health services, with potential for a large supermarket and more employment.
2. Swanage is a less sustainable location than Wareham; opportunities for more employment are very limited and there is no secondary schooling; too much housing without more employment or other services will increase the level of out-commuting.
3. Swanage is in the AoNB, and this is a more significant constraint than the Green Belt, because the AoNB has national status, and is a designation of high landscape quality, whereas the Green Belt is not.
4. Wareham needs extensive SANGS to protect nearby Heathland SPA, and new housing (in North/North West Wareham) can provide that, if the scale of development is sufficient to support the investment necessary.

2.2 The preferred option proposes a grand total of 774 dwellings at Swanage, of which 206 would be Greenfield, and a grand total of 438 dwellings at Wareham, of which 210 would be Greenfield. In the light of 2.1 (1-4) above, this relative distribution may well be unsound, as there may be no justification for as many Greenfield dwellings at Swanage as at Wareham, and this may be inconsistent with both national policy

and the emerging Core Strategy itself in regard to sustainable patterns of development.

2.3 This section explains briefly the evidence to support the above concerns.

2.4 **Review of Community Facilities and Service Provision May 2009**

Table 2 of this Local Development Framework Background Paper shows that (as might be expected) both Swanage and Wareham are well ahead of any other settlement in terms of the number of facilities they enjoy. Appendix 3 “Detailed Audit of Community Facilities/Services in Each Settlement” identifies 30 facilities each for both Swanage and Wareham (whereas Table 2 shows that no other settlement has more than 19).

2.5 Whilst this helps to identify Swanage and Wareham as the primary focuses for development, it is of no assistance in identifying whether one is more sustainable than the other. Our Table A (Appendix A, attached) therefore focuses on key factors that make for a sustainable town. Can the residents walk or cycle to school, to work (in the town centre or on an industrial estate or business park), to shop, or to enjoy recreation or leisure? And, if they do need or wish to travel out of town, do they have good public transport as an alternative to the car?

2.6 Our Table A demonstrates clearly that in these key respects Swanage is a less sustainable location than Wareham, particularly in regard to Secondary Schooling, employment on industrial estates, public sports centre provision, and the benefit of potential extensive SANGS. These are all factors which potentially generate car travel. Furthermore, whilst the re-opening of Swanage Branch (hopefully in 2013) will improve the town’s public transport, the fact is that Wareham will remain significantly more sustainable in that respect. The following paragraphs comment briefly on each topic identified by our Table A.

2.7 **Schools**

Table A assumes that the re-organisation will go ahead. As a result it is understood Swanage will have two primary schools, but all pupils over 11 will have to travel to Wareham. Wareham will have one primary school and the Purbeck School, and no pupils will have to travel elsewhere.

2.8 **Industrial Estates and Business Parks**

The LDF Background Document “Settlement Strategy” (Updated 19 May 2009) claims at Table 3 that Swanage enjoys “Major Employment”. However, a glance at the map will demonstrate clearly that, even with the current expansion, the industrial estate and business park off Victoria Avenue, Swanage is much smaller than either Westminster Road or Sandford Lane Industrial Estates at Wareham, let alone the combination of both. Furthermore, Wareham has rail, bus and potential cycle linkage to Holton Heath.

2.9 Spatial Options Background Paper Volume 2 “Challenges” accepts at Para 3.8 that there are very few potential opportunities to increase the economic base within the Town Centre without significant re-organisation of existing uses. The opening of Prospect Business Park may allow some employment growth for the next decade, but beyond that, identifying further suitable sites around Swanage is difficult due to landscape, flooding and residential amenity constraints.

2.10 Not only does Wareham have much more extensive industrial estate and business park provision, but there is room for expansion (Westminster Road and possibly Worgret Road) and it is linked to Holton Heath by frequent rail and bus, and potentially by a cycle way.

2.11 Recreation and Leisure

Research suggests recreation and leisure can generate surprisingly high percentages of car mileage. The ability to walk or cycle to significant recreation and leisure facilities can therefore make a material contribution to sustainability. The only public sports centre in Purbeck is at Wareham. The potential to provide extensive SANGS in association with new housing at Wareham will also bring new opportunities for country walks and dog walking, without using the car.

2.12 Frequent Public Transport

In our view the evidence base plays down the importance of frequent rail services and over estimates the importance of hourly bus services. We question whether the latter level of service is sufficient to encourage people to leave their cars at home.

2.13 The current main public transport routes in Purbeck District comprise:

- Half hourly electric train service Weymouth-Waterloo serving Wool, **Wareham**, Holton Heath (and Poole).
- Hourly bus (40) **Swanage** – Poole serving Langton Matravers, Kingston, Corfe Castle, **Wareham**, Sandford, Holton Heath and Upton.
- 3 buses an hour (8) from Upton to Poole (making 4 buses an hour with Route 40).
- Express bus Poole – Exeter every 2 hours serving Upton, Sandford, **Wareham** and Wool.
- Hourly bus Bournemouth to **Swanage** via Sandbanks Ferry (half hourly during summer, weekends and school holiday).

Thus the only corridor along which the **bus** service is more than hourly is Wareham – Sandford – Upton (with a quarter hourly service from Upton to Poole).

2.14 It is understood that the Swanage Branch may re-open in 2013 subject to government funding and the implementation of re-signalling from Eastleigh to Weymouth. We do not know how frequent the “community” rail service will be connecting Swanage with Wareham (reference has been seen to every 2 hours) but it seems unlikely to be half-hourly through the year. There must also be the possibility that the Route 40 bus may lose some passengers between Wareham and Swanage and thus be reduced in frequency. On balance therefore we consider our strategic assessment of the relative merits of public transport provision in our Table A to be justified and sound.

2.15 Other Factors

a) *AoNB*

Swanage is washed over by the AoNB and, any Greenfield sites will therefore reduce the amount of green countryside in the AoNB, and have the potential to increase the impact of the town upon the nationally protected landscape. This does not apply at Wareham where the SHLAA identifies “suitable” sites for at least 400 dwellings outside the AoNB.

b) *SANGS*

Ecological interests could benefit significantly by the provision of extensive SANGS as a buffer between existing residential areas at Wareham and the Heathland SPA. However, that can only be achieved in conjunction with a sufficiently sizeable housing development at Wareham.

c) *Delivery*

As mentioned the SHLAA identifies opportunities for over 400 dwellings on Greenfield sites at Wareham, promoted by landowners/developers, outside the AoNB, the floodplain, or the 400m “no go” zone around the Heathland SPA, inside the bypass so far as the western boundary of the town is concerned, and, in the case of sites on the northern edge of the town, able to deliver the extensive SANGS required.

2.16 CONCLUSIONS ON PREFERRED OPTION

The proposed balance of housing between Swanage and Wareham is not sound because:

1. Swanage is a less sustainable location than Wareham, especially in respect of schools, employment and public transport:
 - a) There is no justification for directing as much housing to Swanage, which would be contrary to the requirements to seek sustainable patterns of development set out in national (and regional) policy and in the emerging Core Strategy itself;
 - b) There is justification for directing more housing to Wareham, which would comply with national policy and the emerging Core Strategy itself.
2. All Greenfield sites at Swanage are in the AoNB, whereas there is scope for over 400 greenfield dwellings at Wareham outside the AoNB.
3. Greenfield housing development at Wareham could provide SANGS which will be of significant benefit to international wildlife conservation (and the provision of recreational facilities) which cannot be achieved by housing development at Swanage.

2.17 Furthermore the SHLAA has identified sufficient Greenfield sites to deliver greater numbers at Wareham, which are not constrained by floodplain, AoNB, or Heathland SPA, and which are owned by landowners or developers keen to develop them.

2.18 Therefore, whereas the Preferred Option is not sound in proposing too much housing at Swanage and to a little at Wareham, it would be sound if the Greenfield element at Swanage was reduced and the Greenfield element at Wareham increased.

2.19 ALTERNATIVE OPTION “A”

Alternative Option “A” would focus more development on Wareham than suggested above. There would be 635 greenfield dwellings at Wareham and none at Swanage. The Estate recognises why the Preferred Option has been chosen

instead of this option. However, if as a result of public consultation Option “A” is preferred, the Estate would be ready and willing to play a full part in delivering that choice.

2.20 In the opinion of the Estate and its professional advisers, the potential of the sites at Ferncroft, Tantinoby and Sandford have been under-estimated: together with the site opposite Purbeck School in Worgret Road 635 units could be achieved without going west of the bypass.

2.21 **ALTERNATIVE OPTION “B”**

For the reasons set out in our paras 2.1-2.18 above, this would be unjustified, contrary to national policy and unsound. The Estate is therefore firmly opposed to this alternative.

3. **DEVELOPMENT AT WAREHAM (INCLUDING WAREHAM ST MARTIN)**

3.1 The Core Strategy is not the place to argue the case for specific allocations, but this section seeks to elaborate on the following concerns in regard to the Core Strategy:

- The direction of growth for Wareham should give priority to Ferncroft and Tantinoby Farms, because development in these directions would be as sustainable as any other, and would provide extensive SANGS on the north side of the town as an essential buffer between the town and the Heathland SPA.
- Deletion of the “white land” between Sandford (Wareham St Martin) and the rail line, is unsound because there are no exceptional circumstances to justify that particular change to the green belt boundary, and this is a sustainable location in which to retain a potential “reserve site”.

3.2 The Estate would particularly welcome in-depth discussion with the LPA on these two issues.

3.3 **The Direction of Growth at Wareham**

The SHLAA identifies a number of Greenfield sites which meet all the following criteria:

- a) Not in AoNB
- b) Not in Floodplain
- c) Not outside the bypass to the west of the town
- d) Promoted by landowner/developer who will deliver development on the site (in response to appropriate policy changes) and
- e) Over 25 units potential

3.4 These sites are:

6/23/0166	Tantinoby Farm	80 units
6/23/0167	Ferncroft Farm	190 units
6/23/0173	Worgret Road	<u>130 units</u>
		<u>400 units</u>

There are a couple of smaller Greenfield sites which meet criteria (a) – (d) inclusive but are not big enough to relate to strategic directions for settlement extensions.

3.5 Our Table B (Appendix B) compares the accessibility of the three main locations. This is assessed by measuring the distance (on a 1:5000 OS base) by the shortest

available distance on foot from the centre of the likely area of housing development to the centre of the facility in question. The average distance is calculated at the foot of the table. Distances less than 1000m are highlighted. Those more than 1600m (1 mile) are in italics.

- 3.6 It will be noted that there is no material difference between Ferncroft and Worgret Road. Tantinoby is nearly as good as both Ferncroft and Worgret Road. Thus all three directions of growth are in principle “sustainable”.
- 3.7 The Estate considers that development at both Ferncroft and Tantinoby may be necessary to deliver the extensive SANGS that may be needed to protect the Dorset Heathland SPA from the existing residential areas at Wareham. The provision of SANGS may incur considerable cost (not to mention loss of the value of the land given over to that use). Car Parks, interpretation Boards, footways, legal costs and insurance may all arise. Bearing in mind that only 50% of the Greenfield housing will be open-market, the Estate is concerned that development at Ferncroft alone may not be enough to fund the provision of SANGS.
- 3.8 We question whether development along Worgret Road (opposite Purbeck School) could provide the SANGS required; no evidence has been provided to demonstrate such provision.
- 3.9 Therefore:
- Priority for development along Worgret Road is likely to be unsound because, although otherwise sustainable, it is unlikely to be able to deliver the necessary SANGS.
 - Priority for development in both the Ferncroft and Tantinoby directions would be sound, because both would be sustainable, and together they could deliver the SANGS needed; it would also include employment land at Westminster Road.

3.10 **Wareham St Mary (Sandford)**

The Preferred Option proposes to delete the “white land” currently excluded from the Green Belt between Sandford and the railway line in the Local Plan. The Estate has two reasons for opposing this:

- 1) The land may need to be considered as part of a package deal including SANGS, provision of a cycle way from Wareham to Holton Heath, and development elsewhere.
 - 2) Sandford is a sufficiently sustainable location for some Greenfield housing development, with close relationships (as acknowledged in the background papers and the Consultant Document) with Wareham and Holton Heath; if a future need arises for further housing to be identified, it will be appropriate to re-consider this site.
- 3.11 For example, the Transport and Accessibility Background Paper refers to the possibility of establishing a park and ride at Holton Heath with buses/trains thence to Wareham Corfe Castle and Swanage. This would require investment in a significant car park at Holton Heath. There must at least in principle be the possibility that housing at Sandford could fund (or help fund) that: the white land is capable of delivering far more dwellings than assessed in the SHLAA. That could take through traffic off the A351 through Sandford and thus outweigh additional local traffic generated by the housing.

4. COUNTRYSIDE AND TOURISM

- 4.1 Proposed Policy CO1 Countryside: would restrict development in the open countryside (including villages with no village envelope) to:
- Barn conversions for (in order of priority) (1) B1, B2, B8; (2) affordable housing; (3) community use; or failing any of those (4) tourism.
 - Householder applications re: existing dwellings.
 - Small scale business,
 - Farm diversification, or
 - Community facilities
- 4.2 Proposed Policy TA Tourism Accommodation and Attractions: would amongst other things include the following proposed provisions:
- Outside the AoNB, proposals for a new caravan, camping and chalet site will be permitted, provided the proposals meet a demonstrable need as set out in the Tourism Strategy, would be appropriate in scale and visual impact, traffic can be safely accommodated, and “The development would result in net environmental benefits to the site as a whole”.
 - In the countryside new tourist and leisure attractions will only be permitted where they are in accord with Policy CO Countryside.

The Estate’s Concerns

4.3 *Policy CO Countryside*

1. No new-build open market residential would be allowed, even where this would assist in the provision of employment and/or community facilities, thus improving the self-containment of a settlement, and thereby helping to contribute towards sustainability analysis and objectives.
 2. Barns would not be convertible to work homes or open market housing even where:
 - B class uses or tourist accommodation would not be viable
 - B class uses would generate too much traffic in narrow lanes
 - Any use other than residential would create an adverse impact on existing neighbours
 - Employment uses would draw too many people from nearby urban areas out into the open countryside in direct conflict with sustainability aims and objectives.
 3. The requirement for 9 months marketing is quite unreasonable and would introduce unreasonable delay and cost.
 4. Tourism is acknowledged as an important factor of the Purbeck economy, and is therefore illogical to place tourism accommodation last in order of priority in respect of barn conversions.
- 4.4 There is no readily evident justification for these restrictions and requirements, which appear to be contrary to PPS4 which allows for residential conversions where appropriate. The pattern of development that could be created by imposing these restrictions and requirements could prove to be unsustainable by generating too much traffic and commuting into the open countryside. These requirements and

restrictions are therefore neither justified nor in accord with national policy, and are therefore unsound.

4.5 The Estate firmly believes there is “in principle” a case for considering small local developments of (say) 4-10 open-market units in villages where this can enable, for example, the provision of employment to the extent that the overall balance of commuting, and thus sustainability, could be improved for that settlement.

4.6 **Policy TA Tourism**

a. The requirement that a caravan, camping or chalet park proposal should have a net **environmental** benefit to the **site** rules out consideration of other potential benefits.

b. Policy CO allows very little in the way of rural tourism other than barn conversions (as the last choice) and farm diversification: There is no justification for this restriction.

c. The Morden Park opportunity is not identified.

4.7 Again, there appears to be no ready evidence to justify these restrictions or requirements which appear to conflict with National Policy and only other aims and objectives of the emerging Core Strategy. They may therefore be unsound.

4.8 For example, opening up **Morden Park** as a Country Park on the lines of Moors Valley, together with a sensible number of good quality chalets and a touring caravan park, would indeed result in environmental benefits by rescuing the landscape but would also create socio-economic benefits by opening the site to the public. It would also create appropriate open-countryside-type employment for the Morden area as a further benefit.

4.9 **Conclusions – Policy CO**

As set out in full Appendix C the following changes are needed to achieve soundness for Policy CO Countryside and Policy TA Tourist Accommodation and Attractions:

a) Policy CO Countryside should allow limited residential development where this would improve sustainability.

b) Policy CO Countryside should not require 9 months marketing for non B Class uses for barn conversions, and should allow tourist accommodation, work-homes or unrestricted residential where this is more appropriate.

4.10 **Conclusions – Policy TA**

a) New caravan, camping and chalet site should not be required to result in net environmental benefits to the site as a whole (Policy TA).

b) Policy TA should not cross reference to Policy CO Countryside.

c) Policy TA (or a new policy) should identify Morden Park as a strategically significant tourism/leisure opportunity.

APPENDIX A

TABLE A: STRATEGIC COMPARISON OF SWANAGE AND WAREHAM

FACILITY	Swanage	Wareham
1. Schools a) Primary b) Secondary	2	1 1
2. Industrial Estate(s) & Business Parks a) Existing b) Scope for more c) Good access to Holton Heath d) Good access to Winfrith	1	2 1 1
3. Town Centre (Retail & Employment)	1	1
4. Supermarkets a) Existing b) Potential for 2000 sq m supermarket	1 1	1 1
5. Recreation and Leisure a) Theatre/ Cinema b) Public Sports Centre c) Potential SANGS d) Beach	1 1	1 1 1
6. Public Transport a) Half hourly electric train service b) Swanage Branch (from 2013) c) More than hourly bus	 1	 1 1
TOTAL	9	14

APPENDIX B

TABLE B1 SHORTEST DISTANCE IN METRES

Destination	Tantinoby	Ferncroft	Worgret Road (inside bypass)
Purbeck School	1795	1690	890
Primary School	2495	1550	150
Bus Route with more than 1 bus per hour	820	725	890
Rail Station	930	825	1310
Town Centre	1685	1790	890
Potential Supermarket Near Station	810	795	1360
Westminster Road Industry	545	425	1645
Sandford Lane Industry	1395	1290	1755
Purbeck Leisure Centre	2695	1750	350
Potential SANGS	50	70	1755
AVERAGE	1322	1091	1099

TABLE B2

PRINCIPAL DEVELOPMENT DIRECTIONS AT WAREHAM			
Issue	Worgret Road	Ferncroft Farm	Tantinoby Farm
Green Belt?	X	X	X
Not in AoNB?	✓	✓	✓
No Adverse Landscape Impact?	✓	✓	✓
Out of Floodplain?	✓	✓	✓
Provide Extensive SANGS	X	✓	✓
Not Affect SSSI/SPA	✓	✓	✓
Support Town Centre	✓	X	X
Support Development of Northport Centre	X	✓	✓
Accessible	✓	✓	✓
Adverse Impact on Amenity of Existing Residents	✓	X	X
	✓ 7 X 3	✓ 7 X 3	✓ 7 X 3

APPENDIX C

RESPONSES TO SPECIFIC QUESTIONS PRESENTED BY THE CONSULTATION DOCUMENT

Note:

Responses are made in relation to:

- Question 2
- Questions 4-12 inclusive
- Question 14
- Question 20
- Question 30

The Estate wishes to express no view in regard to the other questions.

QUESTION 2 DO YOU AGREE WITH THE SPATIAL AREA VISIONS?

Summary of Proposal (Vision for Central Purbeck)

The vision for Wareham is to enhance its role as shopping, service and employment centre for the District and transport hub. New development will be linked to provision of SANGS – new or enlarged Purbeck School with improved pedestrian/cycle links to rail station – potential to create community focus for North Wareham around rail station with new supermarket. Sandford will maintain its close links with Wareham whilst retaining its own facilities including nearby employment at Holton Heath.

Charborough Estate Response

The vision for Central Purbeck would be sound if it also referred to Wareham as a focus for residential development.

Reasons for Response

As elaborated upon in Sections 2 & 3 above.

Changes needed to achieve soundness

The vision for Central Purbeck to open with the words;

“The priority for Wareham is to enhance the town’s current role as a shopping, service residential and employment centre...”

QUESTION 4 POLICY LD GENERAL LOCATION OF DEVELOPMENT

Summary of Policy LD

Development will be directed towards the most sustainable locations in accord with the following hierarchy:

- A Upton
 - B Swanage and Wareham
 - C Key Service Villages: Bere Regis, Bovington, Corfe Castle, Lytchett Matravers, Sandford, and Wool; local Service Villages: Langton Matravers, Stoborough, West Lulworth, and Winfrith Newburgh
- Otherwise only affordable housing on exceptions sites.

Charborough Estate Response

Policy LD would be sound if it allowed for other development in other settlements or the open countryside in appropriate circumstances.

Reasons for Response

See Section 4 above.

Changes needed to achieve soundness

There may be no need for change to make this policy LD sound provided Policy CO is changed in accord with The Estate's representations.

QUESTION 5 HOUSING SUPPLY

Summary of Proposal

- a) 2400 Dwellings need to be built 2006 – 2026
- b) 395 Have been built since 2006
- c) 503 Have planning permission but not yet built
- d) 1502 Additional provision therefore still needed to achieve (a)
- e) 201 Remaining 5 year supply 2009 – 2014
- f) 666 "Character Area Development Potential"
- g) 635 Balance required
- h) 704 Greenfield provision now proposed to achieve (g)

Charborough Estate Response

The housing supply calculation may not be sound in respect of elements (c) and (e).

Reasons for Response

It is unsound to assume all of (c) will or (e) will come forward. There is no justification for such an assumption.

Changes needed to achieve soundness

Apply a discount to (c) and (e), resulting in a modest increase in (h)

QUESTION 6 CHARACTER AREA DEVELOPMENT POTENTIAL

Summary of Proposal

A capacity analysis of Swanage, Wareham and Key Service Villages has estimated potential for further redevelopment and infill within existing built-up-areas. This identified potential for 1325 dwellings. It is proposed to factor this by 50% to reflect that many such opportunities may not come forward in reality come forward. If all came forward, no

settlement extensions would be needed, but a balance of brownfield and Greenfield is needed to ensure a range of dwelling types and help the Council control the supply of new housing.

Charborough Estate Response

Support: This is a sound approach

Reasons for Response

The Townscape Character Approach appears to be justified and in accord with National Policy and supporting guidance. The 50% discount is justified in light of the uncertainty inherent in windfalls, and the likelihood that, as time goes on, the only such sites left are those which are too difficult to develop or where the owners do not wish to develop.

Changes needed to achieve soundness

None – supported as “sound”.

QUESTION 7 SHOULD CORE STRATEGY PHASE THE DEVELOPMENT OF SETTLEMENT EXTENSIONS?

Summary of Proposal

It is proposed that the Core Strategy should **NOT** introduce any phasing for housing sites.

Charborough Estate Response

Support: Lack of phasing would be “sound”.

Reasons for Response

The proposal to omit any phasing for housing sites would be “sound” because:

- That would comply with the RSS
- Phasing could hold back community benefits which new housing could bring, such as SANGS and local transport links
- Phasing could hold back the provision of affordable and family housing
- There is no evidence to support any need for phasing in Purbeck

Changes needed to achieve soundness

None – lack of phasing supported as “sound”

QUESTION 8 EMPLOYMENT LAND SUPPLY: DO YOU AGREE WITH POLICY ELS AND SHOULD WINFRITH/HOLTON HEATH BE ALLOWED TO EXPAND OR SHOULD SITES NEARER SWANAGE/WAREHAM BE ALLOCATED?

Summary of Policy ELS

Provision will be made for at least 11.5 ha of employment land from 2006 to 2006. Economic development will be focussed at Winfrith Heath, Holton Heath” and the most sustainable locations in accordance with Policy LD: General Location of Development”

Charborough Estate Response

- a) Provisional support subject to referring to existing employment land at Winfrith Technology Centre and Holton Heath and new provision at Wareham (and Swanage).
- b) Winfrith and Holton Heath/Admiralty Park should **NOT** be allowed to expand: new employment land should be at Wareham (and Swanage).

Reasons for Response

- a) Para 6.6.2 explains why land at Winfrith and Holton Heath cannot be de-allocated, but they are not in the most sustainable locations, so expansion would be contrary to national policy, and would be unjustified in the light of alternatives; it would thus be unsound.
- b) The most sustainable locations are Wareham and Swanage (in that order), so in order to be sound the policy should focus on, and refer to, these settlements.

Changes needed to achieve soundness

“Provision will be made for a minimum of 11.5 hectares of employment land over the plan period 2006 – 2026. Economic development will be focussed at sub regional employment sites, on existing employment land only at Winfrith Technology Centre and Holton Heath, and existing and new employment provision at Wareham and Swanage”.

QUESTION 9 WHERE DO YOU THINK IS THE BEST LOCATION FOR A NEW SUPERMARKET?

Summary of Proposal

- Preferred Option - large supermarket at Wareham (Station) (2000 sq m)
- Alternative Option A – large supermarket at Swanage (2000 sq m)
- Alternative Option B – medium sized supermarkets in Wareham and Swanage (1000 sq m each)

Charborough Estate Response

The Charborough Estate supports the Preferred Option for a 2000 sq m supermarket in Wareham.

Reasons for Response

The sound justification for a 2000 sq m supermarket in Wareham is summarised in Paras 6.7.3.1 and 6.7.3.4 of the consultation document. There is no justification for a 2000 sq m supermarket in Swanage, so Alternative Option A would be unsound. Para 6.7.3.5 identifies no overriding justification for Alternative Option B.

Changes needed to achieve soundness?

None – Support Preferred Option as “sound”.

QUESTION 10 WHICH DEVELOPMENT OPTION YOU DO THINK IS BEST FOR PURBECK?

Summary of Proposal

The Council has set out its Preferred Option and two alternatives:

- Preferred – distribute development around Swanage, Upton, Wareham, Bere Regis, Lytchett Matravers and Wool
- Option A – concentrate growth on the edge of Wareham
- Option B – concentrate growth on the edge of Swanage

Charborough Estate Response

Provisional support for Preferred Option subject to review

Reasons for Response

See Sections 2 & 3 above.

Changes needed to achieve soundness

- Map 13: Reduce housing figure at Swanage and increase at Wareham/Sandford
- Table 4: Ditto
- Map 14: Identify Ferncroft/Tantinoby as preferred options for Greenfield development
- Add reference to need for extensive SANGS at Wareham

QUESTION 11 POLICY CO: COUNTRYSIDE

Summary of Proposal

Development in the open countryside will be restricted to:

- Barn conversions (in order of priority) for B1, B2, B8, affordable housing, or community use, or tourism.
- Household Applications
- Small scale business
- Farm diversification or
- Community facilities

Charborough Estate Response

Object: the policy as drafted is unsound.

Reasons for Response

See Section 4 above.

Changes needed to achieve soundness

The opening paragraph of Policy CO Countryside should have added to it:

“Limited residential development where this would improve the sustainability and self containment of a rural community eg. supporting the provision of jobs or other key facilities”.

The second paragraph of Policy CO Countryside should read:

“Planning permission for the re-use of buildings of permanent construction in the open countryside will be permitted in accord with Policy SD: Sustainable Design. The primary

use should be for business (B1, B2 or B8), tourist accommodation (catered or self catering) affordable housing or community facilities. Work-homes or unrestricted residential will be permitted where that is more appropriate because of the location, or the character of the building, or demonstrable viability or sustainability issues”.

The third paragraph of Policy CO Countryside should read:

“Any application for a non B1, B2 or B8 use must be supported by a statement either illustrating the efforts that have been made to secure a suitable business re-use, or demonstrating clearly why the use applied for would be more appropriate in that instance”.

QUESTION 12 GREEN BELT

Summary of Proposal

It is proposed to change the Green Belt boundary to accommodate settlement extensions at Upton, Wareham and Lytchett Matravers, but to delete the “white land” at Sandford and Holton Heath. Small scale “exceptions” sites will be allowed in the Green Belt adjacent to existing settlements where a local housing need has been identified.

Charborough Estate Response

- Support Green Belt boundary changes at Wareham
- Oppose Green Belt boundary changes at Sandford
- Support exceptions sites in Green Belt

Reasons for Response

See Para 1.6 above. The Estate would welcome an early in depth discussion on this issue. Some of the “white land” at Sandford is likely to be needed to implement a cycle way from Wareham and Sandford to Holton Heath away from the A351.

Changes needed to achieve soundness

Delete reference to extending Green Belt at Sandford by deleting the words “Sandford and” from the third bullet point.

QUESTION 14 AFFORDABLE HOUSING

Summary of Proposal

The Council will require at least 50% affordable housing on all Greenfield housing developments over 30 units/1 ha, subject to viability.

Charborough Estate Response

The Estate considers that one of the advantages of allocating sufficient Greenfield housing is the achievement of significant affordable housing, which the District currently needs.

Reasons for Response

Nevertheless the Estate is very concerned at the prospect of having to (effectively) donate 50% of any land to a RSL. This may not only affect viability but also fail to address the

needs of local families and young people who may not qualify for RSL tenancy and who quite reasonably aspire to getting a foot on the bottom rung of the open-market ladder. Experience of larger scale Greenfield development elsewhere demonstrates that S106 agreements can be used, for example, to require a Greenfield development to provide a certain proportion of small units at a price related to average incomes for the district – for example, 25% RSL tenanted, 5% shared ownership, and 20% small open-market. The proposed 50% provision of non-market dwellings could actually reduce the number of new open market dwellings available, and thus force more families and young people into the “affordable” sector. The Policy as proposed is thus well-intentioned but unsound.

Changes needed to achieve soundness

Either:

- Reduce the “affordable” requirements to 35%, or
- Redefine “affordable” to include lower-end open-market, and require a reasonable percentage of such.

QUESTION 30 TOURIST ACCOMMODATION AND ATTRACTIONS

Summary of Proposed Policy TA

The proposed provisions which might affect the Estate are:

- Outside the AoNB, proposals for new caravan, camping and chalet sites will be permitted provided the proposals meet a demonstrable need as set out in the Tourism Strategy, would be appropriate in scale and visual impact, traffic can safely be accommodated and “The development would result in net environmental benefits to the site as a whole”.
- In the countryside new tourist and leisure attractions will only be permitted where they are in accord with Policy Co Countryside.

Charborough Estate Response

Oppose.

Reasons for Response

See Section 4 above.

Changes needed to achieve soundness

- Delete bullet point requiring new caravan camping and chalet sites to result in net environmental benefits to the site as a whole.
- Delete the last sentence “In the countryside.... Policy CO Countryside”.
- Identify Morden Park as a strategically significant tourism/leisure opportunity, by adding at the end:
“The strategic tourism and recreation opportunity at Morden Park will be pursued”.



**International
Tree Foundation**

Registered Charity 1106269

Patron:

27-10-00 ~~HR~~ The Prince of Wales
KG, KT, PC, GCB

Planning Purbeck's Future.
Purbeck Core Strategy.
Comments by the Dorset Branch of the International Tree Foundation.

I have had some difficulty using your response form as many sections are not applicable to our interests while others have more needing to be said than the boxes provide for.

This strategy is an improvement on earlier versions although it is largely concerned with shoehorning housing into an extremely sensitive area for landscape and wildlife. Much of the attraction of Purbeck for both its inhabitants and visitors is the attractive landscape and its wildlife so everything needs to be planned not to compromise these. Purbeck is to be congratulated on its "Keep Purbeck Special" initiative.

For conservation of the environment much is dependant on the details of individual schemes where the impacts and details can be evaluated and it is much more difficult to single out the strategic aspects for components such as trees. Trees and woods need thought within a very long timescale way beyond the plan life so strategic planning is very necessary so I would like to make the following broad brush comments that in some cases apply more widely than to individual policies.

I do not see any sort of overall Nature Conservation section in the broader evidence base list on page 4 perhaps some is covered under landscape and other aspects under the impact of climate change.

- A. Questions 1,2,18,19 There is a great deal more wildlife of international and national importance in Purbeck than just Smooth snakes and Sand lizards and many of these are listed in the annexes of the EC Habitats and Birds Directives. Although no trees are included in these lists several of the species listed have some dependence on trees and woodland such as the Nightjar which although closely associated with heathland for nesting feeds to a considerable extent over adjacent woodland. Trees are also important in the UK for a very large number of lower plants such as Mosses and Lichens for which the British Isles are important within Europe because of their oceanic climate.
- B. Question 18, 19 In its few mentions of woodland there is no distinction made between Ancient semi-natural deciduous woodland and conifer plantation. Within Purbeck there are extensive conifer plantations that may be suitable for recreational use but few Ancient semi-natural woodlands that are particularly vulnerable to recreational and other development pressures. Deciduous woodland soils are particularly vulnerable to compaction that can lead to hydrological stress then fungal

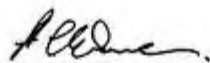
International Tree Foundation is a company limited by guarantee.
Registered Office, Sandy Lane, Crawley Down, West Sussex, RH10 4HS, UK
Registered in England No. 5219549 Tel: 0870 7744269 Fax: 01342 718282
E-mail: info@internationaltreefoundation.org Website: www.internationaltreefoundation.org

infection and may ultimately result in death of trees. Areas to reduce pressure on Heathland need very careful selection so that one biotope is not damaged at the expense of another. Horse routes in or adjacent to woodland can be particularly harmful as the ground pressure of hooves is vastly greater than that of human feet.

- C. Question 28 Green Infrastructure. This is not just a planning issue but needs support through education and the provision of information. If people are to be encouraged to enjoy the countryside this needs to be for quiet enjoyment and they will benefit much more if they understand what to look for and why some features of the countryside are sensitive ultimately the countryside needs to be protected by its users.
- D. Question 11, 12. In the countryside especially where development of recreational facilities such as horse shelters are planned then landscaping should be by using appropriate native trees and shrubs not just exotic evergreens that are a "quick fix" even though these can form a dense green screen.
- E. Question 12, 22, 28. Some landscaping and environmental enhancements can be done using volunteers such as the Dorset Branch of the International Tree Foundation. Involving countryside users in this work is a valuable way of increasing respect and care for the countryside generally and gives people a sense of putting something back into something they value and enjoy.
- F. Question 22, 26, 27. Trees planted within housing developments can be difficult with the current densities of housing but there is now evidence that trees can improve the quality of life and health of people in the built environment. Trees and shrubs can also be used to screen development from the effects of weather and reduce the carbon footprint of houses.

I hope these comments are of value if you require any clarification or more detail I would be pleased to help. Thank you for the opportunity to comment on the future directions of Purbeck.

Dr A.C. Warne
Ecological Advisor
Dorset Branch of the International Tree Foundation.



49 / 1695



Purbeck District Council

Thriving communities in balance with the natural environment



Core Strategy Planning Purbeck's Future Response Form

With reference to the main consultation document, please answer the questions below and, if necessary, briefly explain your answer. If you respond 'no' to any questions and would prefer an alternative, please provide evidence in support of your suggestion. If you are completing this form electronically, feel free to expand the space given for your explanation. If you are completing a paper copy, feel free to attach separate comments, but please state clearly which questions the comments refer to.

If you would like help in completing this form, please contact the Planning Policy Team on 01929 557273.

Please send your completed form back, by **30 October 2009**, to:
Planning Policy Team, Purbeck District Council, Westport House, Worgret Road, Wareham, Dorset, BH20 4PP
E-mail: ldf@purbeck-dc.gov.uk

Vision for Purbeck

Q? 1. Do you agree with the District Vision?
~~Yes~~ / No (delete as appropriate)
Please explain:
Much of the environment is of international & national importance & hence needs protection & management. Much of the other elements of the environment need this too but some enhancement is needed.

Spatial Area Visions

Q? 2. Do you agree with the Spatial Area Visions?
~~Yes~~ / No (delete as appropriate)
Please explain:
Throughout Purbeck is used where protect and manage is needed to "Keep Purbeck Special"

Purbeck District Council
Community Planning & Policy
30 OCT 2009
ACKNOWLEDGEMENT
A B C D E
FILE REF:

Core Strategy Planning Purbeck's Future Response Form

Spatial Objectives

Q? 3. Do you agree with the Spatial Objectives?

~~Yes~~ / No (delete as appropriate)

Please explain:

Agree consent or previously, enhance is overused & protect, manage, conserve is more appropriate

Policy LD - Location of Development

Q? 4 (a) Do you agree with this policy?

Yes / No (delete as appropriate)

Please explain:

N/A.

4 (b) Do you agree with the Settlement Hierarchy in Policy LD?

Yes / No (delete as appropriate)

Please explain:

4 (c) Do you agree that on affordable housing should be permitted in settlements not listed under Policy LD), including the villages highlighted in red on Map 9 (affordable housing is social rented and/or shared ownership housing)?

Yes / No (delete as appropriate)

Please explain:

Policy HS - Housing Supply

Q? 5. Do you agree with this policy?

Yes / No (delete as appropriate)

Please explain:

N/A

Character Area Development Potential

Q? 6 (a) Do you agree with this approach in estimating development potential?
 Yes / No (delete as appropriate) *N/A*
 Please explain:

6 (b) Is 50% a suitable reduction or should the Council make provision for a higher proportion of development potential to come forward?
 Yes / No (delete as appropriate)
 Please explain:

Maintaining a 5 Year Land Supply

Q? 7. Should the Core Strategy include phasing for settlement extensions?
 Yes / No (delete as appropriate) *N/A*
 Please explain:

Policy ELS - Employment Land Supply

Q? 8 (a) Do you agree with this policy?
 Yes / No (delete as appropriate)
 Please explain: *This appears to contradict the current economic situation and a rethink is perhaps needed to make the future more robust against downturns*

8 (b) Should existing employment sites (e.g. Winfrith Technology Centre, Holton Heath Industrial Estate and Admiralty Park) be allowed to continue to expand, or should we allocate new sites that are nearer to existing populations in Swanage and Wareham?
 Yes / No (delete as appropriate)
 Please explain: *N/A*

Policy RFS – Retail Floor Space Supply

Q? 9 (a) Where do you think is the best location for a new supermarket?
Please tick only one

- Preferred Supermarket Option
Large supermarket at Wareham (2,000sqm)
- Alternative Supermarket Option A
Large supermarket in Swanage (2,000sqm)
- Alternative Supermarket Option B
Medium sized supermarkets in Wareham and Swanage
(1,000sqm in each)

Please explain:

N/A.

(b) If you do not agree with any of the above options, do you have an alternative suggestion?

Please explain:

N/A.

Development Options

Q? 10 (a) The Council has set out its Preferred Option for development in the District. Which option do you think is best for Purbeck and why?
Please tick only one

- Preferred Option
Distribute development around Swanage, Upton, Wareham and the key service villages of Bere Regis, Lytchett Matravers and Wool.
- Alternative Option A – concentrate growth on the edge of Wareham.
- Alternative Option B – focus growth at Swanage.

Please explain:

N/A.

10 (b) If you do not like any of the suggested options, what is your alternative suggestion?

Please explain:

Policy CO - Countryside

Q?

11 (a) Do you agree with this policy?

Yes / No (delete as appropriate)

Please explain:

Equestrian shelter should come under Recreation not agriculture

11 (b) Should a sequential approach be followed in the re-use of rural buildings?

Yes / No (delete as appropriate)

Please explain:

N/A

11 (c) Should other uses be considered for the re-use of rural buildings?

Yes / No (delete as appropriate)

Please explain:

N/A

11 (d) Are there any other countryside related issues that should be addressed by the policy?

Yes / No (delete as appropriate)

Please explain:

Policy GB - Green Belt

Q?

12 (a) Do you agree with this policy?

Yes / No (delete as appropriate)

Please explain:

12 (b) Do you agree that small scale rural exception sites for the provision of 100% affordable housing should be allowed as exceptional development in the Green Belt?

Yes / No (delete as appropriate)

Please explain:

Policy AHT – Affordable Housing Tenure

Q? 13. Do you agree with this policy?
 Yes / No (delete as appropriate)
 Please explain: *N/A*

Policy AH – Affordable Housing

Q? 14. Do you agree with this policy?
 Yes / No (delete as appropriate)
 Please explain: *N/A*

Policy RES – Rural Exception Sites

Q? 15. Do you agree with this policy?
 Yes / No (delete as appropriate)
 Please explain: *N/A*

Policy GT – Site Criteria for Gypsies, Travellers and Travelling Show People

Q? 16. Do you agree with this policy?
 Yes / No (delete as appropriate)
 Please explain: *N/A*

Policy WHN – Wider Housing Needs

Q? 17 (a) Do you agree with this policy?
 Yes / No (delete as appropriate)
 Please explain: *N/A*

17 (b) Are you aware of any other specific housing needs that should be addressed?
 Yes / No (delete as appropriate)
 Please explain: *N/A.*

Policy B10 – Biodiversity & Geodiversity

Q? 18. Do you agree with this policy? *Broadly Yes Specifically No.*
Yes / No (delete as appropriate)
Please explain: *(Perhaps more appropriately DK)*
This should include some industrial developments that affect the countryside although this is already severely compromised by the ~~the~~ ^{the} ~~incorporator~~ ^{incorporator} etc ~~location~~ ^{location} decision. Some development tries to include biodiversity enhancement but is merely a box.

Policy D11 – Dorset Heaths International Designations

Q? 19. Do you agree with this policy?
Yes / No (delete as appropriate)
Please explain: *As above.*
There is more to Purbeck than heaths

Policy RP – Retail Provision

Q? 20. Do you agree with this policy?
Yes / No (delete as appropriate)
Please explain: *N/A.*

Policy GF – Community Facilities and Services

Q? 21. Do you agree with this policy?
Yes / No (delete as appropriate)
Please explain:

Policy G1 – Green Infrastructure, Recreation and Sports Facilities

Q? 22. Do you agree with this policy?
Yes / No (delete as appropriate)
Please explain:

Policy FR – Flood Risk

Q? 23. Do you agree with this policy?
 Yes / No (delete as appropriate)
 Please explain: *N/A*

Policy GP – Groundwater Protection

Q? 24. Do you agree with this policy?
 Yes / No (delete as appropriate)
 Please explain: *N/A*

Policy CE – Coastal Erosion in Swanage

Q? 25. Do you agree with this policy?
 Yes / No (delete as appropriate)
 Please explain: *N/A*

Policy SD – Sustainable Design

Q? 26. Do you agree with this policy?
 Yes / No (delete as appropriate)
 Please explain:
Climate Change threaten us all and our environment the highest standards to reduce our carbon footprint are essential.

Policy REN – Renewable Energy

Q? 27. Do you agree with this policy?
 Yes / No (delete as appropriate)
 Please explain:
As above.

Policy HLH – Historic Environment, Landscape and Heritage

Q? 28. Do you agree with this policy?
 Yes / ~~No~~ (delete as appropriate)
 Please explain:

Policy E – Employment

Q? 29. Do you agree with this policy?
 Yes / No (delete as appropriate)
 Please explain: *N/A.*

Policy TA – Tourist Accommodation and Attractions

Q? 30 (a) Do you agree with the policy wording?
 Yes / No (delete as appropriate)
 Please explain: *N/A.*

30 (b) Should new tourist accommodation be allowed within the AONB?
 Yes / ~~No~~ (delete as appropriate)
 Please explain:
High standards of Eco Tourism might be appropriate

Policy IAT – Improving Accessibility and Transport

Q? 31. Do you agree with this policy?
 Yes / No (delete as appropriate)
 Please explain: *N/A.*

Policy AP – Implementing an Appropriate Transport Strategy for Purbeck

Q? 32. Do you agree with this policy?
 Yes / No (delete as appropriate)
 Please explain: *N/A.*

Sustainability Appraisal	
Q?	33. Do you have any comments on the Sustainability Appraisal? Comments:

Contact Details:

Finally, please complete your details below. If you are an agent representing a client please completed both sections:

Personal Details		Agents Details (if applicable)	
Title <small>(Mr/Ms/Mrs/Miss/Other)</small>	Dr	Agent Title <small>(Mr/Ms/Mrs/Miss/Other)</small>	
First Name:	A. C.	Agent First Name:	
Last Name:	WARNE	Agent Last Name:	
Job Title*:	ECOLOGICAL ADVISOR	Agent Job Title:	
Organisation*:	INTERNATIONAL TREE FOUNDATION DORSET BRANCH	Agent Organisation:	
Address:	19. DORCHESTER Rd. FRAMPTON DORCHESTER DORSET	Address:	
Postcode:	DT2 9ND	Postcode:	
Telephone:	01300 321138	Telephone:	
E-mail:	tony.warne@btinternet.com	E-mail:	

*For Personal Details only enter job title or organisation if responding on behalf of a group or organisation.

Please note that completed response forms will be made publicly available.

Would you like to be included on our LDF database and informed about future consultations? Yes No (Delete as Appropriate)

Core Strategy Planning Purbeck's Future Response Form

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Vision for Purbeck



1. Do you agree with the District Vision?

Yes

Please explain:

The Core Strategy is generally very well written. It builds on and develops long-standing policies but there are several areas which give cause for concern, such as the proposed new supermarkets and improvements to transport in the District.

We are particularly pleased about the proposed improvements to existing public footpaths and cycle ways, and the support for the reconnection of the Swanage Railway to the main line network at Wareham.

Spatial Area Visions



2. Do you agree with the Spatial Area Visions?

Yes, in general but with the following comments

Please explain:

Whilst the countryside is addressed in the Vision for Purbeck it is not addressed at all in any of the five spatial areas. Each of the Visions concentrates solely on the market towns and key villages. We suggest that the minor villages and differing landscapes in each of the spatial areas deserve some consideration.

If the A351 is worthy of its own vision, then the coastline is a particular point that should be afforded mention in South West and South East Purbeck, if not with its own section.

South West Purbeck

Section 3.5.3.5 At present, the only way to get from Wool Railway Station to the Winfrith Technology Centre is to walk (in all weathers) three-quarters of a mile. An "improved linkage" would certainly be welcome but you do not say what you have in mind.

An Area Action Plan for Wool is welcomed, but if this is a good idea for Wool why is this the only AAP proposed in the whole District

Central Purbeck

We support the proposed management of heathland by providing alternative green spaces (as at Upton Woods) and by restricting roadside parking.

Improved pedestrian and cycle links from Wareham station would certainly be welcome.

There is no space in Wareham town for a new supermarket, and one outside the town would just KILL OFF the present quite vibrant shopping centre.

As the future of all the Purbeck schools is under review we will not comment at this stage except to say that

building a secondary school on a new site would seem to be an inappropriate use of public money, even if the site were sold for housing, when we already have a surplus of 1000 school places in Purbeck.

South East Purbeck

We strongly support the proposed re-connection of the Swanage to Wareham railway service. This would greatly improve transport in Purbeck, and reduce the congestion on the A351.

We welcome the proposed new green spaces but these will have to be purchased out of public money and looked after indefinitely both here and elsewhere.

A351 Corridor

Wareham Railway Station is three-quarters of a mile from the town centre. A park and ride facility, if only at busy times, would be useful and would help to alleviate parking problems in the town.

The long-proposed segregated cycle path from Wareham to the Baker's Arms and Upton is urgently needed. This would link the Purbeck cycle routes with the extensive system of cycle paths at Upton Park, Upton Woods and on to Holes Bay and the Poole conurbation

Walking or cycling to work is a splendid idea but, in practice, it is a minority pursuit especially these days when people change jobs more often and may find they have a longer or less attractive journey. A good system of footpaths and cycle tracks, and plenty of publicity, will be necessary.

Spatial Objectives



3. Do you agree with the Spatial Objectives?

Yes

Please explain:

If these are in order of priority then No 9 (transport) should be higher up the list.

Policy LD – Location of Development



4 (a) Do you agree with this policy?

Yes, but we feel that Studland merits classification as a Key Service Village.

Please explain:

4 (b) Do you agree with the Settlement Hierarchy in Policy LD?

Yes

Please explain:

4 (c) Do you agree that on affordable housing should be permitted in settlements not listed under Policy LD), including the villages highlighted in red on Map 9 (affordable housing is social rented and/or shared ownership housing)?

No

Please explain:

This policy will tend to set the smaller villages and settlements in aspic. Although it may be difficult to regulate a small amount of market housing in these villages, it should not be impossible and limited market housing such as in-fill should be allowed as it can bring benefits to these small communities.

Policy HS – Housing Supply



5. Do you agree with this policy?

Yes

Please explain:

We would really like to see fewer houses than this but appreciate that numbers will be dictated by the RSS.

Character Area Development Potential



6 (a) Do you agree with this approach in estimating development potential?

Yes

Please explain:

It is logical and apparently evidence based.

6 (b) Is 50% a suitable reduction or should the Council make provision for a higher proportion of development potential to come forward?

Yes

Please explain:

50 % is cautious. These matters are driven by economic considerations and there may well be more windfalls than this, but if more come forward then numbers can be adjusted at periodic reviews under Plan, Monitor and Manage.

Maintaining a 5 Year Land Supply



7. Should the Core Strategy include phasing for settlement extensions? Yes

Please explain:

The RSS target should be used

Policy ELS – Employment Land Supply



8 (a) Do you agree with this policy?

Yes

Please explain:

It accords with Policy LD. The boards at the entrance to The Romany Centre in Wareham Road advertise no less than TEN vacant premises this week. There is some spare room at Holton Heath and lots of room at Winfrith Technology Centre.

8 (b) Should existing employment sites (e.g. Winfrith Technology Centre, Holton Heath Industrial Estate and Admiralty Park) be allowed to continue to expand, or should we allocate new sites that are nearer to existing populations in Swanage and Wareham?

Yes

Please explain:

Existing employment sites should be allowed to continue to expand rather than allocating new sites unless the allocation of a new site would result in a significant reduction in the need to travel.

Policy RFS – Retail Floor Space Supply



9 (a) Where do you think is the best location for a new supermarket?

Please tick only one

- Preferred Supermarket Option
Large supermarket at Wareham (2,000sqm)
- Alternative Supermarket Option A
Large supermarket in Swanage (2,000sqm)
- Alternative Supermarket Option B
Medium sized supermarkets in Wareham and Swanage
(1,000sqm in each)

Please explain:

(b) If you do not agree with any of the above options, do you have an alternative suggestion?

Please explain:

We support Option B for a medium sized supermarket, of 1000 square metres, in Swanage which has the largest population in Purbeck.

There is certainly no need for another supermarket in Wareham.

We are very surprised to hear that only 20 % of Wareham residents do their food shopping in the town, and wonder if this could possibly be a mistake or, perhaps, applied to the time when Somerfield's was closed for a long while before Sainsbury's opened.

If a new supermarket were to be built in Wareham there would be no space in the centre of the town. The suggested site on Green Belt land at Worgret Road is inappropriate and we

strongly oppose this. A large supermarket of 1000 or 2000 square metres could only be sited at the Railway Station.

In any case everybody would travel by car, and it would be too far to walk into the town from either location. As we have previously stated such a development would just KILL OFF the present shopping centre in Wareham.

There are presently two supermarkets and several specialist food shops and a thriving Saturday Market. We cannot understand why anyone would want to make the long journey into Poole or Dorchester to buy food.

We doubt whether any extension to the shopping would be economically viable when there are several empty shops now and when this has been the case for many years. Furthermore, the increasing popularity of on-line food and other shopping will decrease any perceived need for more retail space.

Development Options



10 (a) The Council has set out its Preferred Option for development in the District. Which option do you think is best for Purbeck and why?

Please tick only one

- Preferred Option
Distribute development around Swanage, Upton, Wareham and the key service villages of Bere Regis, Lytchett Matravers and Wool.
- Alternative Option A – concentrate growth on the edge of Wareham.
- Alternative Option B – focus growth at Swanage.

Please explain:

We strongly support the Preferred Option. However, as we have previously stated, some allowance should be made for limited market housing in the smaller villages.

This would have the least effect on the AONB and the Green Belt. It would give rise to a smaller increase in the congestion on the A351 and careful consideration should be given to the location of developments with a preference for Upton, Wareham and Swanage in that order.

We are strongly against development on the western edge of Wareham, and especially against any development at all west of the by-pass.

10 (b) If you do not like any of the suggested options, what is your alternative suggestion?

Please explain:

Policy CO - Countryside



11 (a) Do you agree with this policy?

Yes

Please explain:

But we do not like the vague wordings like “replacement building is not disproportionately larger....” and “shelters are simple in appearance”. These statements can mean anything you want them to mean.

11 (b) Should a sequential approach be followed in the re-use of rural buildings?

Yes

Please explain:

The re-provision of employment in the countryside should be a priority.

11 (c) Should other uses be considered for the re-use of rural buildings? Yes

Please explain:

There is already a good choice of possible developments in the Policy. However, conversion to a dwelling may be preferable to no action at all and should be considered when all other avenues have been sensibly and fully explored.

11 (d) Are there any other countryside related issues that should be addressed by the policy?

Yes

Please explain:

Under Farm Diversification noise and light pollution should be considered. Recreational activities creating noise above an agreed level should not be permitted. Similarly light pollution needs to be considered when flood lighting of developments such as ménages are being proposed.

Policy GB – Green Belt



12 (a) Do you agree with this policy?

Yes

Please explain:

But we feel strongly that no exceptions should be allowed to the Green Belt policy. If (Section 8.3.1) any exception is, in fact, made then an equivalent extension of the Green Belt should be made elsewhere to maintain or enhance it.

12 (b) Do you agree that small scale rural exception sites for the provision of 100% affordable housing should be allowed as exceptional development in the Green Belt?

No

Please explain:

This would create an unwelcome precedent and be in contradiction to Policy RES second bullet point.

If, exceptionally, any such development were to be allowed it is important that it should be immediately adjacent to existing development.

Policy AHT – Affordable Housing Tenure



13. Do you agree with this policy?

Yes

Please explain:

The demand in Purbeck is overwhelmingly for rented accommodation.

Policy AH – Affordable Housing



14. Do you agree with this policy?

Yes

Please explain:

However, the appraisal of non-compliant applications should be commissioned by the Council but paid for by the applicant.

All sites should have a threshold of three dwellings, in view of the demand for affordable housing and the backlog in providing this.

If affordable housing on Greenfield sites can be provided on-site without exception, then this could surely apply to brownfield sites also.

The paragraph about sites which are phased or sub-divided is especially important.

The paragraph about off-site provision is rather vague and could be used by developers as a get-out.

Policy RES – Rural Exception Sites



15. Do you agree with this policy?

Yes

Please explain:

Such a policy is necessary for the provision of affordable housing in the countryside but it is very important that the conditions for these sites should endure indefinitely.

Policy GT – Site Criteria for Gypsies, Travellers and Travelling Show People

Q?

16. Do you agree with this policy?

Yes

Please explain:

The policy is comprehensive but the suggested numbers seem far too large. It is understood that the combined Councils of Bournemouth, Dorset and Poole have instructed a private firm of consultants to undertake a study into the possible sites and it is therefore unwise at this stage to be specifying numbers of particular sites.

It is especially important that these proposed sites should not harm adjacent residential areas or be detrimental to the environment or landscape.

Policy WHN – Wider Housing Needs

Q?

17 (a) Do you agree with this policy?

Yes

Please explain:

It is sensible to provide this accommodation in the towns and key villages

17 (b) Are you aware of any other specific housing needs that should be addressed?

No

Please explain:

Policy BIO – Biodiversity & Geodiversity

Q?

18. Do you agree with this policy?

Yes

Please explain:

We strongly support the Wild Purbeck project but bullet point 5 should be amended to read “Where appropriate requiring development proposals to incorporate bio-diversity elements in accordance with the Design SPD”.

Policy DH – Dorset Heaths International Designations

Q?

19. Do you agree with this policy?

Yes

Please explain:

But the Interim Planning Framework and the Heathlands DPD must be rigorously enforced. Agricultural buildings should be added to the list of developments that will not be permitted within 400 metres of heathland.

Policy RP – Retail Provision

Q?

20. Do you agree with this policy?

Yes

Please explain:

We strongly support the enhancement of the area around Wareham railway station. The present scene hardly shows Wareham in a good light when visitors arrive at the town.

Policy CF – Community Facilities and Services

Q?

21. Do you agree with this policy?

Yes

Please explain:

But (8.11.2) it may be difficult to find new, easily accessible, sites in the towns.

Policy GI – Green Infrastructure, Recreation and Sports Facilities

Q?

22. Do you agree with this policy?

Yes

Please explain:

SANGS and green infrastructure areas at employment sites are good ideas.

Policy FR – Flood Risk



23. Do you agree with this policy?

Yes

Please explain:

The prevention of flood damage to residential housing in such areas as Stoborough village, and elsewhere, should be one of the Council's highest priorities.

Policy GP – Groundwater Protection



24. Do you agree with this policy?

Yes

Please explain:

The intention is good but the policy should be worded "...will only be permitted if there is no risk"

Policy CE – Coastal Erosion in Swanage



25. Do you agree with this policy?

Yes

Please explain:

A sensible restriction.

Policy SD – Sustainable Design



26. Do you agree with this policy?

Yes

Please explain:

But para 2 of Policy SD should be strengthened to read ".....the Council will require proposals for development to....."

Policy REN – Renewable Energy



27. Do you agree with this policy?

Yes

Please explain:

But in Para 8.17.3 The PPS22 statement should be allowed to stand alone and not be qualified by the second sentence which should be deleted as it weakens the PPS statement.

The last sentence of para 8.17.3 should be amended by deleting "large scale" and substituting "renewable energy".

In the second bullet point the word "internationally" before protected areas should be deleted, all protected areas require this degree of security to conform with Policy HLH.

In the fifth bullet point the words "large scale", which are not defined anywhere, should be deleted. All proposals should include these requirements.

Industrial wind turbines, which are sometimes 125 metres high, should NEVER be allowed where they can be seen from the AONB.

They should never be sited near dwellings, where the noise can be a nuisance or much worse.

They should not be sited near roads where falling parts of broken blades, or ice shards (during the winter) could cause serious accidents.

Policy HLH – Historic Environment, Landscape and Heritage



28. Do you agree with this policy?

Yes

Please explain:

This is a positive policy to safeguard the qualities that make Purbeck special.

Policy E – Employment



29. Do you agree with this policy?

Yes

Please explain:

But residential housing on this site is not permitted by present Council policy and we wonder whether the wording of this Policy E is sufficiently strong to prevent the residential housing being proposed by the new owners of the Winfrith Technology Centre.

On the other hand, it could be argued that some housing at Winfrith might ease the problem of excessive travel to work and would be in accordance with the development of a mixed site like Poundbury.

Policy TA – Tourist Accommodation and Attractions



30 (a) Do you agree with the policy wording?

Yes

Please explain:

It covers any perceived possibility of development or loss of accommodation

30 (b) Should new tourist accommodation be allowed within the AONB? s / No

Please explain:

Some development might, exceptionally, be permitted within settlement boundaries.

Policy IAT – Improving Accessibility and Transport



31. Do you agree with this policy?

Yes

Please explain:

Bullet points 1 and 2 need to be reworded

Bullet point 1 should be simplified to “Reduction in the need to travel” a

Bullet point 2 to read “The possible use of public transport”

Policy AP – Implementing an Appropriate Transport Strategy for Purbeck



32. Do you agree with this policy?

Yes

Please explain:

But the word “Improved” needs to be inserted in front of the first sentence.

Sustainability Appraisal



33. Do you have any comments on the Sustainability Appraisal?

Comments:

Yes. The non-technical summary appears to give credibility to and support the Core Strategy as expounded in “Planning Purbeck’s Future”.

Contact Details:

Finally, please complete your details below. If you are an agent representing a client please completed both sections:

Personal Details		Agents Details (if applicable)	
Title (Mr/Ms/Mrs/Miss/Other)	Dr	Agent Title (Mr/Ms/Mrs/Miss/Other)	
First Name:	John	Agent First Name:	
Last Name:	Larkin	Agent Last Name:	
Job Title*:	Minerals and Waste Adviser	Agent Job Title:	
Organisation*:	Campaign to Protect Rural England (CPRE)	Agent Organisation:	
Address:	Lorien Grange Road Stoborough Wareham	Address:	
Postcode:	BH20 5AL	Postcode:	
Telephone:	01-929-555366	Telephone:	
E-mail:	Jalarkin3@yahoo.co.uk	E-mail:	

*For Personal Details only enter job title or organisation if responding on behalf of a group or organisation.

Please note that completed response forms will be made publicly available.

Would you like to be included on our LDF database and informed about future consultations? Yes
(Delete as Appropriate)

Core Strategy Planning Purbeck's Future Response Form

With reference to the main consultation document, please answer the questions below and, if necessary, briefly explain your answer. If you respond 'no' to any questions and would prefer an alternative, please provide evidence in support of your suggestion. If you are completing this form electronically, feel free to expand the space given for your explanation. If you are completing a paper copy, feel free to attach separate comments, but please state clearly which questions the comments refer to.

If you would like help in completing this form, please contact the Planning Policy Team on 01929 557273.

Please send your completed form back, by **30 October 2009**, to:

Planning Policy Team, Purbeck District Council, Westport House, Worgret Road, Wareham, Dorset, BH20 4PP E-mail: ldf@purbeck-dc.gov.uk

Vision for Purbeck



1. Do you agree with the District Vision?

Yes

Please explain:

We are in general agreement with the District Vision statement, and in particular the recognition that the District requires a housing mix to meet the needs of the local community and those of the wider housing market. However, it is felt that a greater emphasis should be given to the role to be played by agriculture, farm diversification and land management in support and protection of smaller communities, the function of the countryside and the landscape.

Spatial Area Visions



2. Do you agree with the Spatial Area Visions?

Yes

Please explain:

These comments relate to the Spatial Area Vision for North East Purbeck.

There should be greater emphasis in the Spatial Area Vision to recognise the influence that the close proximity of the Boroughs of Poole and Bournemouth will have on the development of the North East Purbeck region. The demand for housing will be dictated by the needs of the Boroughs as much as by the local needs. Adjustment to the Green Belt boundaries will be necessary to enable the aims of the vision to be fulfilled.

The provision of improved and enhanced transport system linking the Area to the conurbation will be essential.

We support the development of Upton in its own right including the provision of a town centre focal point. Management of the urban fringe and the links to the countryside will need careful consideration.

We support the development of Lytchett Matravers as a Key Service Village, in particular the provision of employment opportunities and improved facilities together with sufficient mixed residential development to support the role.

Spatial Objectives



3. Do you agree with the Spatial Objectives?

Yes

Please explain:

It is proposed that the objectives recognize:

1. That well planned development can help to manage and fund public transport services.
2. The part to be played by Land Management in achieving the Spatial Objectives. The countryside is a work place providing sustainable employment for local needs

Policy LD – Location of Development



4 (a) Do you agree with this policy?

Yes

Please explain:

Key Service Villages such as Lytchett Matravers have an important role to play in delivering sustainable and supported development with the appropriate facilities and integrated transport systems.

4 (b) Do you agree with the Settlement Hierarchy in Policy LD?

Yes and No

Please explain:

The order of the hierarchy is supported but the removal of settlement boundaries and any opportunity for growth and enhancement will mean the stagnation of the smaller communities and deny local needs.

4 (c) Do you agree that on affordable housing should be permitted in settlements not listed under Policy LD), including the villages highlighted in red on Map 9 (affordable housing is social rented and/or shared ownership housing)?

No

Please explain:

The definition of affordable housing needs to be expanded to include a greater mix of tenure such as private rent accommodation if social housing is to be brought forward.

Policy HS – Housing Supply



5. Do you agree with this policy?

No

Please explain:

While we do not agree with the decision it is recognised that the Council has decided to ignore the allocation of 2750 houses in the Western Sector proposed in the emerging RSS for the purposes of this consultation.

However, we consider that 2400 dwellings will be insufficient to address the housing needs of the District that at a build of 120 houses per annum the District will fail to live up to the Vision for Purbeck and fail to meet the needs of the local community and those of the wider housing market.

Character Area Development Potential



6 (a) Do you agree with this approach in estimating development potential?

No

Please explain:

Given the current and foreseeable economic climate coupled with the costs associated with promoting and developing a residential site a reliance on windfall sites is unrealistic.

6 (b) Is 50% a suitable reduction or should the Council make provision for a higher proportion of development potential to come forward?

Yes / No (delete as appropriate)

Please explain:

As above - given the current and foreseeable economic climate coupled with the costs associated with promoting and developing a site a reliance on windfall sites is unrealistic

Maintaining a 5 Year Land Supply



7. Should the Core Strategy include phasing for settlement extensions? Y No

Please explain:

While phasing will help to assimilate new development the policy needs to sufficient flexibility to meet the RSS housing requirements.

Policy ELS – Employment Land Supply



8 (a) Do you agree with this policy?

No

Please explain:

We agree with the allocation of land for employment use but it should not all be focused on the sub regional employment sites. The provision of employment land in upton, Market and coastal towns and Key Service Villages is essential for the sustainable development of these locations. Any expansion of the Holton Heath Industrial site must be coupled with improvements to the A351 to avoid increased congestion.

8 (b) Should existing employment sites (e.g. Winfrith Technology Centre, Holton Heath Industrial Estate and Admiralty Park) be allowed to continue to expand, or should we allocate new sites that are nearer to existing populations in Swanage and Wareham?

Yes / No (delete as appropriate)

Please explain:

See above

Policy RFS – Retail Floor Space Supply



9 (a) Where do you think is the best location for a new supermarket?

Please tick only one

- Preferred Supermarket Option
Large supermarket at Wareham (2,000sqm)

- Alternative Supermarket Option A
Large supermarket in Swanage (2,000sqm)

- Alternative Supermarket Option B
Medium sized supermarkets in Wareham and Swanage
(1,000sqm in each)

Please explain:

A large Supermarket in Wareham, situated in the centre of the District

1. Will serve a larger part of the District community than Alternative Option A and Alternative Option B effectively exists already
2. Will strengthen the role of Wareham as a market town

(b) If you do not agree with any of the above options, do you have an alternative suggestion?

Please explain:

Development Options



10 (a) The Council has set out its Preferred Option for development in the District. Which option do you think is best for Purbeck and why?

Please tick only one

- Preferred Option
Distribute development around Swanage, Upton, Wareham and the key service villages of Bere Regis, Lytchett Matravers and Wool.
- Alternative Option A – concentrate growth on the edge of Wareham.
- Alternative Option B – focus growth at Swanage.

Please explain:

We favour the Preferred Option. The spread of development is more likely to deliver the Vision for Purbeck. Lytchett Matravers has the potential to accommodate a high level of sustainable growth to meet local needs and those of the wider housing market.

10 (b) If you do not like any of the suggested options, what is your alternative suggestion?

Please explain:

Policy CO - Countryside



11 (a) Do you agree with this policy?

No

Please explain:

The policy must not work to the detriment of economic and social considerations and must not stultify the Countryside. There should be a presumption to support the rural working environment which needs to be able to adapt and develop to meet changing demands placed upon it.

The retention of viable small scale family run farms in Purbeck will be reliant upon development of alternative enterprises and diversification.

11 (b) Should a sequential approach be followed in the re-use of rural buildings?

No

Please explain:

Proposals should be looked at on merit.

11 (c) Should other uses be considered for the re-use of rural buildings? Yes

Please explain:

The viability of the rural economy is essential to achieve the objectives of the Core Strategy. As wide as range of uses as possible should be considered including appropriate residential conversion to accommodate family members and local needs to support rural based enterprises and employment.

11 (d) Are there any other countryside related issues that should be addressed by the policy?

Yes

Please explain:

The policy should encourage rural flexibility and diversification if the Spatial Objectives are to be achieved.

Policy GB – Green Belt



12 (a) Do you agree with this policy?

Yes and No

Please explain:

The Green Belt is drawn too tightly round most villages stifling the enhancement of settlements, their environment and ignores the needs of the communities.

The Green Belt needs to be redefined and its boundaries amended to accommodate the Core Strategy development proposals.

12 (b) Do you agree that small scale rural exception sites for the provision of 100% affordable housing should be allowed as exceptional development in the Green Belt?

Yes

Please explain:

Policy AHT – Affordable Housing Tenure



13. Do you agree with this policy?

No

Please explain:

A more flexible approach as outlined in paragraph 8.4.4 would be more reasonable. Provided secure arrangements to ensure the long term benefits are in place the policy should provide for the provision of affordable housing by private landlords.

Policy AH – Affordable Housing



14. Do you agree with this policy?

Yes

Please explain:

See above

Policy RES – Rural Exception Sites



15. Do you agree with this policy?

Yes

Please explain:

To meet the demand of local needs and support the smaller rural communities.

Provided secure arrangements to ensure the long term benefits are in place the policy should provide for the provision of affordable housing by private landlords and not just Housing Associations.

Policy GT – Site Criteria for Gypsies, Travellers and Travelling Show People



16. Do you agree with this policy?

Yes

Please explain:

Policy WHN – Wider Housing Needs



17 (a) Do you agree with this policy?

Yes

Please explain:

17 (b) Are you aware of any other specific housing needs that should be addressed?

Yes

Please explain:

Policy BIO – Biodiversity & Geodiversity



18. Do you agree with this policy?

Yes and No

Please explain:

The heathland should be protected and enhanced but 'Wild Purbeck' must not be at the expense of the rural community or viability of the small family farms and businesses that exist within the designated area. Without the support of these holdings the land will quickly revert to woodland scrub and negate the ambitions of Natural England.

There should be improved linkage between this policy and policies GI and DH.

Policy DH – Dorset Heaths International Designations



19. Do you agree with this policy?

Yes

Please explain:

However, there should be some flexibility within the policy to take account of alternative protective measures such as physical barriers in exceptional cases.

Policy RP – Retail Provision



20. Do you agree with this policy?

Yes

Please explain:

Policy CF – Community Facilities and Services



21. Do you agree with this policy?

Yes

Please explain:

Policy GI – Green Infrastructure, Recreation and Sports Facilities



22. Do you agree with this policy?

Yes

Please explain:

There should be improved linkage between this policy and policies BIO and DH.

Policy FR – Flood Risk



23. Do you agree with this policy?

Yes

Please explain:

Policy GP – Groundwater Protection



24. Do you agree with this policy?

Yes

Please explain:

Policy CE – Coastal Erosion in Swanage



25. Do you agree with this policy?

Yes

Please explain:

Policy SD – Sustainable Design



26. Do you agree with this policy?

Yes

Please explain:

Policy REN – Renewable Energy



27. Do you agree with this policy?

Yes

Please explain:

All alternative sources of energy must be considered.

Policy HLH – Historic Environment, Landscape and Heritage



28. Do you agree with this policy?

Yes

Please explain:

Policy E – Employment



29. Do you agree with this policy?

Yes / No (delete as appropriate)

Please explain:

Greater emphasis is required on the merits of mixed use development as part of a sustainable development approach.

Policy TA – Tourist Accommodation and Attractions



30 (a) Do you agree with the policy wording?

Yes

Please explain:

Tourism is the live blood of much of Purbeck. Existing tourist attractions should be supported and enhanced and new sustainable tourism should be encouraged.

30 (b) Should new tourist accommodation be allowed within the AONB? Yes

Please explain:

Provided it meets the SD policy requirements.

Policy IAT – Improving Accessibility and Transport



31. Do you agree with this policy?

Yes

Please explain:

The policy should recognise the potential for development to help to deliver improved sustainable accessibility and transport.

Policy AP – Implementing an Appropriate Transport Strategy for Purbeck



32. Do you agree with this policy?

Yes

Please explain:

Sustainability Appraisal



33. Do you have any comments on the Sustainability Appraisal?

Comments:

Contact Details:

Finally, please complete your details below. If you are an agent representing a client please completed both sections:

Personal Details		Agents Details (if applicable)	
Title (Mr/Ms/Mrs/Miss/Other)	Mrs	Agent Title (Mr/Ms/Mrs/Miss/Other)	Mr
First Name:	A E	Agent First Name:	OJH
Last Name:	Mason	Agent Last Name:	Chamberlain
Job Title*:	Landowner	Agent Job Title:	Land Agent
Organisation*:		Agent Organisation:	Chichesters Land Agents
Address:	c/o Chichesters Land Agents 33 West Borough Wimborne Dorset	Address:	c/o Chichesters Land Agents 33 West Borough Wimborne Dorset
Postcode:	BH21 1LT	Postcode:	BH21 1LT
Telephone:	01202 882336	Telephone:	01202 882336
E-mail:	info@chichesters.co.uk	E-mail:	info@chichesters.co.uk

*For Personal Details only enter job title or organisation if responding on behalf of a group or organisation.

Please note that completed response forms will be made publicly available.

Would you like to be included on our LDF database and informed about future consultations? Yes / No
(Delete as Appropriate)

Steve Dring
Planning Policy Manager
Purbeck District Council
Westport House
Worgret Road
Wareham BH20 4PP

25th November 2009

Dear Mr Dring

Core Strategy Issues and Options Consultation

Thank you for consulting Dorset Wildlife Trust (DWT) on the Core Strategy. I have attached our comments form. Overall the draft has much in it which we support and we particularly welcome the emphasis on the need for improved green infrastructure in the District, both in relation to heathland mitigation and elsewhere.

In DWT's view Climate change should be added to the list of main challenges in 3.2. Climate change is likely to have a serious impact on Purbeck within the next 20 years and action on adaptation and mitigation will be needed within this LDF. The potential impacts on Purbeck should feature much more strongly in the plan – for example coastal squeeze/sea level rise, water resource and impacts on tourism.

Please contact me or Sarah Williams (Conservation Officer) should you have any queries about our response or if DWT can provide any further help on biodiversity matters.

Yours sincerely



Imogen Davenport
Director of Conservation
idavenport@dorsetwildlifetrust.org.uk

Core Strategy Planning Purbeck's Future Response Form

With reference to the main consultation document, please answer the questions below and, if necessary, briefly explain your answer. If you respond 'no' to any questions and would prefer an alternative, please provide evidence in support of your suggestion. If you are completing this form electronically, feel free to expand the space given for your explanation. If you are completing a paper copy, feel free to attach separate comments, but please state clearly which questions the comments refer to.

If you would like help in completing this form, please contact the Planning Policy Team on 01929 557273.

Please send your completed form back, by **30 October 2009**, to:
Planning Policy Team, Purbeck District Council, Westport House, Worgret Road, Wareham, Dorset, BH20
4PP E-mail: ldf@purbeck-dc.gov.uk

Vision for Purbeck



1. Do you agree with the District Vision?
Yes with suggested additions
Please explain:

DWT is broadly supportive of the vision.

We welcome the mention to climate change in relation to habitats, however we believe that climate change should be acknowledged more broadly as impacting on all sectors, not just the environment.

We also suggest that the links between the high quality environment in Purbeck and quality of life (for example mental and physical health benefits) for residents should be mentioned – for example in the 1st paragraph “Purbeck will be a place which retains and enhances the unique qualities of its towns, villages, countryside and coast and the contribution they make to quality of life for the whole community.”

Spatial Area Visions



2. Do you agree with the Spatial Area Visions?
Yes with comments
Please explain:

DWT is pleased to see mention made of the need for significant green space / green infrastructure in Bere Regis, Wool, Wareham, Upton and Swanage.

Again perhaps a clearer link between a high quality natural environment and quality of life in these areas could be mentioned to facilitate development patterns which enhance people's ability to connect with and benefit from the natural environment.

Spatial Objectives



3. Do you agree with the Spatial Objectives?
Yes
Please explain:

Policy LD – Location of Development



4 (a) Do you agree with this policy?

Yes /No (delete as appropriate)

Please explain:

4 (b) Do you agree with the Settlement Hierarchy in Policy LD?

Yes with comments

Please explain:

We recognise that the level of housing, based on Map 12, proposed for Winfrith Newburgh and Stoborough as ‘local service villages’ is small. However the District Council should remain aware of the fact that both these villages lie close to internationally designated heathlands so great care will be needed in assessing any housing development proposed here. The criteria of “meets an identified need” set out in the policy should be assessed at a village level rather than a seeking to meet a Purbeck-wide need.

4 (c) Do you agree that on affordable housing should be permitted in settlements not listed under Policy LD), including the villages highlighted in red on Map 9 (affordable housing is social rented and/or shared ownership housing)?

Yes / No (delete as appropriate)

Please explain:

Policy HS – Housing Supply



5. Do you agree with this policy?

Yes with comments

Please explain:

We note that the policy states “in accordance with the emerging RSS”. The District Council in 1.1.4-5 has set out the context regarding the Western Sector proposal and the RSS increase from 2100 to 2400 houses. DWT is mindful that conclusions from the RSS process, or pressure from central government, may be towards increased housing numbers. Therefore, though we do not object to the level set out in this document, we would be concerned, were housing levels subsequently raised, that alternative proposals have not been considered through the RSS Habitats Regulations Assessment process. Therefore we do not agree that alternative higher figures if proposed in the final version of the RSS could simply be adopted for consistency without proper scrutiny against sustainability and habitats regulations assessments.

Character Area Development Potential



6 (a) Do you agree with this approach in estimating development potential?

Yes / No (delete as appropriate)

Please explain:

6 (b) Is 50% a suitable reduction or should the Council make provision for a higher proportion of development potential to come forward?

Yes / No (delete as appropriate)

Please explain:

Maintaining a 5 Year Land Supply



7. Should the Core Strategy include phasing for settlement extensions? Yes / No (delete as appropriate)

Please explain:

Policy ELS – Employment Land Supply



8 (a) Do you agree with this policy?

Yes / No (delete as appropriate)

Please explain:

Please see comments below

8 (b) Should existing employment sites (e.g. Winfrith Technology Centre, Holton Heath Industrial Estate and Admiralty Park) be allowed to continue to expand, or should we allocate new sites that are nearer to existing populations in Swanage and Wareham?

Our comments are below

Please explain:

Holton Heath, Admiralty Park and Winfrith – The Habitats Regulations Assessment (section 10) identifies fragmentation and pressure on heathland as a result of employment allocation as an issue. It concludes (10.3.1) that “the Core Strategy should refrain from promoting any specific levels of provision at Holton Heath and Winfrith until the necessary studies have been undertaken.” The HRA raises most concern about the ability to mitigate the 13ha allocated at Holton Heath/Admiralty Park. It states that a full ecological survey is needed to inform a nature conservation master plan before it could be ascertained how large an area could be allocated. A requirement for a future ongoing management plan to retain and enhance the SNCI grassland at Admiralty Park, as well as other areas of ecological interest which exist on site, is essential as part of any allocation which is made here.

DWT is also concerned about the proposal for some housing at Winfrith Heath – this needs to be carefully considered in the context of the Habitats Regulations.

Proposed locations for employment away from the main settlements at Swanage and Wareham do increase the likelihood of car journeys, and thus demand for transport infrastructure. Therefore DWT is supportive of employment allocations at appropriate sites in these main settlements.

Policy RFS – Retail Floor Space Supply



9 (a) Where do you think is the best location for a new supermarket?

Please tick only one

- Preferred Supermarket Option
Large supermarket at Wareham (2,000sqm)
- Alternative Supermarket Option A
Large supermarket in Swanage (2,000sqm)
- Alternative Supermarket Option B
Medium sized supermarkets in Wareham and Swanage
(1,000sqm in each)

Please explain:

(b) If you do not agree with any of the above options, do you have an alternative suggestion?

Please explain:

Development Options



10 (a) The Council has set out its Preferred Option for development in the District. Which option do you think is best for Purbeck and why?

Please tick only one

- Preferred Option
Distribute development around Swanage, Upton, Wareham and the key service villages of Bere Regis, Lytchett Matravers and Wool.
- Alternative Option A – concentrate growth on the edge of Wareham.
- Alternative Option B – focus growth at Swanage.

Please explain:

The Habitats Regulations Assessment identifies a need for considerable mitigation measures for all the options in relation to impacts of new housing and recreational access on the Dorset Heaths. Option A (focus on Wareham) is identified as particularly problematic and we would suggest both that this option is not taken forward and that the issues raised are noted in relation to any suggestion of increased overall housing numbers in Purbeck.

Of the other 2 options, the preferred option seems to present the greatest benefits from a sustainability point of view. However we note that Swanage is relatively self-contained and that, if mitigation can be secured in the form of green infrastructure for the recreational impacts on both Studland and Godlingston heaths and on the coastal SACs, a focus on development here might fit sustainability criteria. Such an approach is needed in any case under any of the options. We would be concerned, however, if increased development at Swanage led to increased car journeys on the A351 and thus demands for road infrastructure.

Green space / green infrastructure should, as well as being provided within new development be well connected within existing settlements, partly to aid sustainability and partly to provide mitigation for infill development, as agreed through a heathlands DPD.

10 (b) If you do not like any of the suggested options, what is your alternative suggestion?
Please explain:

Policy CO - Countryside



11 (a) Do you agree with this policy?

Yes

Please explain:

We welcome the wording on equestrian development in relation to heathlands.

11 (b) Should a sequential approach be followed in the re-use of rural buildings?

Yes / No (delete as appropriate)

Please explain:

11 (c) Should other uses be considered for the re-use of rural buildings? Yes / No (delete as appropriate)

Please explain:

11 (d) Are there any other countryside related issues that should be addressed by the policy?

Yes / No (delete as appropriate)

Please explain:

Policy GB – Green Belt



12 (a) Do you agree with this policy?

Yes

Please explain:

DWT welcomes the extension of the Green Belt at Sandford and Holton Heath.

12 (b) Do you agree that small scale rural exception sites for the provision of 100% affordable housing should be allowed as exceptional development in the Green Belt?

Yes / No (delete as appropriate)

Please explain:

Policy AHT – Affordable Housing Tenure



13. Do you agree with this policy?

Yes / No (delete as appropriate)

Please explain:

Policy AH – Affordable Housing



14. Do you agree with this policy?

Yes / No (delete as appropriate)

Please explain:

Policy RES – Rural Exception Sites



15. Do you agree with this policy?

Yes / No (delete as appropriate)

Please explain:

Policy GT – Site Criteria for Gypsies, Travellers and Travelling Show People



16. Do you agree with this policy?

Yes

Please explain:

DWT is pleased to see the criterion requiring sites to avoid detrimental impact on the natural environment. These sites can have just as much impact on nature conservation sites as other housing allocations and should be subject to the same rigorous assessment of biodiversity impacts.

Policy WHN – Wider Housing Needs



17 (a) Do you agree with this policy?

Yes / No (delete as appropriate)

Please explain:

17 (b) Are you aware of any other specific housing needs that should be addressed?

Yes / No (delete as appropriate)

Please explain:

Policy BIO – Biodiversity & Geodiversity



18. Do you agree with this policy?

Yes with comments

Please explain:

DWT strongly supports this policy. We do however have some suggested changes which would improve it in our view.

- **Paragraph 8.9.2 mentions protected and biodiversity action plan species and this is welcomed. However there should also be text highlighting the importance of biodiversity action plan habitats which do not occur within statutorily protected sites, as well as ancient woodland and veteran trees, as required by PPS9 paragraphs 10 and 11. This would complete the context for the policy wording which mentions SNCIs, habitats and 'biodiversity elements'.**
- **The policy could helpfully be specific that enhancement and ongoing management of biodiversity and geodiversity assets is sought. For example the 5th bullet could read "that incorporate biodiversity enhancement and management in accordance with..."**
- **Map 20 is welcomed. However it could be made clearer to the reader through firstly the insertion of further text into 8.9.3 to explain "Map 20 Nature Map shows Strategic Nature Areas in Purbeck where the greatest opportunity for landscape-scale biodiversity enhancement lie." The map could also be simplified by the use of single shading schemes for the Rempstone Integrated Management Plan and Wetland Target Area. Finally the Frome Floodplain should also be shaded as a Coastal and Floodplain Grazing Marsh target area on the Nature Map. Dorset Environmental Records Centre have the Nature Map SNA boundaries in GIS format should they be needed.**

Policy DH – Dorset Heaths International Designations



19. Do you agree with this policy?

Yes with comments

Please explain:

- **Paragraph 8.9.6.1 should list the Special Areas of Conservation and Ramsar Site as well as the SPA.**
- **It might clarify the policy if the text in 8.9.6.2 explained that contributions towards mitigation measures will particularly apply to small-scale developments where on-site mitigation will not usually be feasible.**
- **In addition to this heathlands policy, further measures in policy to address Habitats Regulations requirements for Poole Harbour SPA and Ramsar Site may be required. The Habitats Regulations Assessment highlights that there are uncertainties as to whether additional development can be accommodated without wastewater discharges having an adverse effect on the European site. We understand that the Environment Agency have yet to suggest possible mitigation measures, and until this is available and shown to be effective, we must assume that further measures to reduce the inputs to Poole Harbour from future housing will be required. It is important to acknowledge that current nutrient loads are damaging and therefore, without an overall programme to reduce discharges to an acceptable level, any future development would exacerbate the problem. Potential solutions might need to involve developer contributions, or on larger developments on-site treatment to reduce the nutrient load of discharges.**

Policy RP – Retail Provision



20. Do you agree with this policy?

Yes / No (delete as appropriate)

Please explain:

Policy CF – Community Facilities and Services



21. Do you agree with this policy?

Yes / No (delete as appropriate)

Please explain:

Policy GI – Green Infrastructure, Recreation and Sports Facilities



22. Do you agree with this policy?

Yes

Please explain:

DWT welcomes and strongly supports this policy

Policy FR – Flood Risk



23. Do you agree with this policy?

Yes / No (delete as appropriate)

Please explain:

Policy GP – Groundwater Protection



24. Do you agree with this policy?

Yes / No (delete as appropriate)

Please explain:

Policy CE – Coastal Erosion in Swanage



25. Do you agree with this policy?

Yes / No (delete as appropriate)

Please explain:

Policy SD – Sustainable Design



26. Do you agree with this policy?

Yes

Please explain:

DWT supports the reference to biodiversity in the 4th bullet

Policy REN – Renewable Energy



27. Do you agree with this policy?

Yes / No (delete as appropriate)

Please explain:

The policy refers to internationally protected habitats. However it would be helpful if this policy could seek to avoid harm to other biodiversity assets. In many cases solutions can be found through appropriate siting, design or operation which avoid adverse impacts. However without policy requirements for developers to seek such solutions, sites and species may be needlessly harmed. We recommend that Policy BIO should be added to the list in the final bullet.

Policy HLH – Historic Environment, Landscape and Heritage



28. Do you agree with this policy?

Yes / No (delete as appropriate)

Please explain:

Policy E – Employment



29. Do you agree with this policy?

Yes / No (delete as appropriate)

Please explain:

Policy TA – Tourist Accommodation and Attractions



30 (a) Do you agree with the policy wording?

Yes / No (delete as appropriate)

Please explain:

30 (b) Should new tourist accommodation be allowed within the AONB? Yes / No (delete as appropriate)

Please explain:

Policy IAT – Improving Accessibility and Transport



31. Do you agree with this policy?

Yes / No (delete as appropriate)

Please explain:

Policy AP – Implementing an Appropriate Transport Strategy for Purbeck



32. Do you agree with this policy?

No

Please explain:

DWT has some concerns about the Purbeck Transportation Strategy (PTS) as set out in 2004 and these are repeated below for clarity. We are therefore concerned about the inclusion of “targeted road improvements that provide relief to the A351” in the policy. Instead in our view the policy and strategy should be based on public transport, walking and cycling and on-line improvements to road infrastructure.

Whilst we are pleased that the Sandford bypass is not included in the PTS, concerns remain about the overall sustainability of the approach which continues to encourage car-borne transport and may have knock-on impacts on other parts of the road network. The proposal for a Wool bypass, along with C6 upgrading and southern Bere Regis bypass, would increase the attractiveness of this route to traffic from the A35 to Weymouth, then exacerbating traffic concerns in villages such as Owermoigne and Osmington on that route. DWT would object to the inclusion of the Wool bypass as it would pass through a wetland area of high environmental sensitivity adjacent to SSSI and SNCI sites. We believe that a more sustainable local solution to the problem of down time of the level crossing barrier should be sought. We are also concerned that a Wool bypass could increase the attractiveness of the A351 through Sandford as a route from Poole to Weymouth. Added to this is the fact that the A35-C6 route is much longer in distance than the A351 route and again the sustainability impacts of this must be questionable. Instead measures must be introduced which reduce the overall level of road traffic in Purbeck; therefore proposals such as the reconnection of the Swanage railway and increasing self-containment of settlements are supported. Improvements to the A35 route should aim to take through traffic off the A351 and retain it on the A35 to Dorchester rather than diverting back into the district.

Sustainability Appraisal



33. Do you have any comments on the Sustainability Appraisal?

Comments:

Contact Details:

Finally, please complete your details below. If you are an agent representing a client please completed both sections:

Personal Details		Agents Details (if applicable)	
Title (Mr/Ms/Mrs/Miss/Other)	Ms	Agent Title (Mr/Ms/Mrs/Miss/Other)	
First Name:	Imogen	Agent First Name:	
Last Name:	Davenport	Agent Last Name:	
Job Title*:	Director of Conservation	Agent Job Title:	
Organisation*:	Dorset Wildlife Trust	Agent Organisation:	
Address:	Brooklands Farm Forston Dorchester Dorset	Address:	
Postcode:	DT2 7AA	Postcode:	
Telephone:	01305 264620	Telephone:	
E-mail:	idavenport@dorsetwildlifetrust.org.uk	E-mail:	

*For Personal Details only enter job title or organisation if responding on behalf of a group or organisation.

Please note that completed response forms will be made publicly available.

Would you like to be included on our LDF database and informed about future consultations? Yes

Core Strategy Planning Purbeck's Future Response Form

With reference to the main consultation document, please answer the questions below and, if necessary, briefly explain your answer. If you respond 'no' to any questions and would prefer an alternative, please provide evidence in support of your suggestion. If you are completing this form electronically, feel free to expand the space given for your explanation. If you are completing a paper copy, feel free to attach separate comments, but please state clearly which questions the comments refer to.

If you would like help in completing this form, please contact the Planning Policy Team on 01929 557273.

Please send your completed form back, by **30 October 2009**, to:

Planning Policy Team, Purbeck District Council, Westport House, Worgret Road, Wareham, Dorset, BH20 4PP E-mail: ldf@purbeck-dc.gov.uk

Vision for Purbeck



1. Do you agree with the District Vision?

Yes

Please explain:

We are in general agreement with the District Vision statement, and in particular the recognition that the District requires a housing mix to meet the needs of the local community and those of the wider housing market. However, it is felt that a greater emphasis should be given to the role to be played by agriculture, farm diversification and land management in support and protection of smaller communities, the function of the countryside and the landscape.

Spatial Area Visions



2. Do you agree with the Spatial Area Visions?

Yes

Please explain:

These comments relate to the Spatial Area Vision for North East Purbeck.

My clients are disappointed at the Council's decision to ignore the proposals for 2750 dwellings in the western Sector of land at Lytchett Minster as contained in Secretary of State's Proposed Changes to the South West Regional Spatial Strategy and strongly urge it is reconsidered.

There should be more emphasis in the Spatial Area Vision to recognise the influence that the close proximity of the Boroughs of Poole and Bournemouth will have on the development of the North East Purbeck region. Purbeck must meet its own needs and contribute towards the wider needs of the South East Dorset housing market.

A review and adjustment to the Green Belt boundaries will be necessary to enable the aims of the vision to be fulfilled.

The provision of an improved and enhanced transport system linking the Area to the conurbation will be essential.

Management of the urban fringe and the links to the countryside will need careful consideration.

Spatial Objectives



3. Do you agree with the Spatial Objectives?

Yes

Please explain:

The objectives should recognise:

3. The contribution that a well planned development of the western sector can make to securing the Spatial Objectives.
4. The part to be played by Land Management in achieving the Spatial Objectives. The countryside is a work place providing sustainable employment for local needs

Policy LD – Location of Development



4 (a) Do you agree with this policy?

Yes and No

Please explain:

Yes my clients support the this policy but object to the fact that it ignores the allocation to the Western Sector of 2750 dwellings as proposed in Secretary of State's Proposed Changes to the South West Regional Spatial Strategy.

4 (b) Do you agree with the Settlement Hierarchy in Policy LD?

Yes and No

Please explain:

Subject to the comments above it is accepted that most development will be directed towards sustainable locations and we support the order of the hierarchy, however, the removal of settlement boundaries and any opportunity for growth and enhancement will mean the stagnation of the smaller communities and deny local needs.

4 (c) Do you agree that on affordable housing should be permitted in settlements not listed under Policy LD), including the villages highlighted in red on Map 9 (affordable housing is social rented and/or shared ownership housing)?

Yes

Please explain:

The definition of affordable housing needs to be expanded to include a greater mix of tenure such as private rent accommodation if social housing is to be brought forward.

Policy HS – Housing Supply



5. Do you agree with this policy?

No

Please explain:

My clients regret the Council's decision to ignore the strategic allocation of 2750 houses in the Western Sector proposed in the emerging RSS for the purpose of this consultation. It is considered that the Council will be failing its own *Vision for Purbeck* and that 2400 dwellings will be insufficient to address the Vision's requirement for a housing mix to meet the needs of the local community and those of the wider housing market.

Character Area Development Potential



6 (a) Do you agree with this approach in estimating development potential?

No

Please explain:

Given the current and foreseeable economic climate coupled with the costs associated with promoting and developing a residential site a reliance on windfall sites is unrealistic.

6 (b) Is 50% a suitable reduction or should the Council make provision for a higher proportion of development potential to come forward?

Yes / No (delete as appropriate)

Please explain:

As above - given the current and foreseeable economic climate coupled with the costs associated with promoting and developing a site a reliance on windfall sites is unrealistic

Maintaining a 5 Year Land Supply



7. Should the Core Strategy include phasing for settlement extensions? Y No

Please explain:

While phasing will help to assimilate new development the policy needs to sufficiently flexibility to meet the RSS housing requirements.

Policy ELS – Employment Land Supply



8 (a) Do you agree with this policy?

No

Please explain:

Employment land should not all be focused on the sub regional employment sites. A comprehensive mixed development of the Western Sector at Lytchett Minster would enable the RSS economic growth requirements for employment in the Poole Travel to Work Area to be meet.

The provision of employment land in Upton, Market and Coastal Towns and Key Service Villages is essential for the sustainable development of these locations. Any expansion of the Holton Heath Industrial site must be coupled with improvements to the A351 to avoid increased congestion.

8 (b) Should existing employment sites (e.g. Winfrith Technology Centre, Holton Heath Industrial Estate and Admiralty Park) be allowed to continue to expand, or should we allocate new sites that are nearer to existing populations in Swanage and Wareham?

Yes / No (delete as appropriate)

Please explain:

See above

Policy RFS – Retail Floor Space Supply

Q?

9 (a) Where do you think is the best location for a new supermarket?

Please tick only one

- Preferred Supermarket Option
Large supermarket at Wareham (2,000sqm)
- Alternative Supermarket Option A
Large supermarket in Swanage (2,000sqm)
- Alternative Supermarket Option B
Medium sized supermarkets in Wareham and Swanage
(1,000sqm in each)

Please explain:

A large Supermarket in Wareham, situated in the centre of the District:

1. Will serve a larger part of the District community than Alternative Option A, which would be out on a limb to much of the area, Alternative Option B effectively exists already.
2. Will strengthen Wareham as a focal point in the District and support its role as a Market Town.

(b) If you do not agree with any of the above options, do you have an alternative suggestion?

Please explain:

Development Options

Q?

10 (a) The Council has set out its Preferred Option for development in the District. Which option do you think is best for Purbeck and why?

Please tick only one

- Preferred Option
Distribute development around Swanage, Upton, Wareham and the key service villages of Bere Regis, Lytchett Matravers and Wool.
- Alternative Option A – concentrate growth on the edge of Wareham.
- Alternative Option B – focus growth at Swanage.

Please explain:

However, it should include the comprehensive mixed development of the Western Sector land at Lytchett Minster.

10 (b) If you do not like any of the suggested options, what is your alternative suggestion?

Please explain:

See above.

Policy CO - Countryside



11 (a) Do you agree with this policy?

No

Please explain:

The policy must not work to the detriment of economic and social considerations and must not stultify the Countryside. There should be a presumption to support the rural working environment which needs to be able to adapt and develop to meet changing demands placed upon it.

The retention of viable small scale family run farms in Purbeck will be reliant upon development of alternative enterprises and diversification.

11 (b) Should a sequential approach be followed in the re-use of rural buildings?

No

Please explain:

Proposals should be looked at on merit.

11 (c) Should other uses be considered for the re-use of rural buildings? Yes

Please explain:

The viability of the rural economy is essential to achieve the objectives of the Core Strategy. As wide a range of uses as possible should be considered including appropriate residential conversion to accommodate family members and local needs to support rural based enterprises and employment.

11 (d) Are there any other countryside related issues that should be addressed by the policy?

Yes

Please explain:

The policy should encourage rural flexibility and diversification if the Spatial Objectives are to be achieved.

Policy GB – Green Belt



12 (a) Do you agree with this policy?

Yes and No

Please explain:

The Green Belt is drawn too tightly round most villages stifling the enhancement of settlements, their environment and ignores the needs of the communities.

The Green Belt needs to be redefined and its boundaries amended to deliver the Core Strategy development proposals.

12 (b) Do you agree that small scale rural exception sites for the provision of 100% affordable housing should be allowed as exceptional development in the Green Belt?

Yes

Please explain:

To meet the demand of local needs and to support the smaller rural communities.

Policy AHT – Affordable Housing Tenure



13. Do you agree with this policy?

No

Please explain:

A more flexible approach as outlined in paragraph 8.4.4 would be more reasonable. Provided secure arrangements to ensure the long term benefits are in place the policy should allow for the provision of affordable housing by private landlords.

Policy AH – Affordable Housing



14. Do you agree with this policy?

Yes

Please explain:

See above

Policy RES – Rural Exception Sites



15. Do you agree with this policy?

Yes

Please explain:

To meet the demand of local needs and to support the smaller rural communities.

Provided secure arrangements to ensure the long term benefits are in place the policy should allow for the provision of affordable housing by private landlords and not just Housing Associations.

Policy GT – Site Criteria for Gypsies, Travellers and Travelling Show People



16. Do you agree with this policy?

Yes

Please explain:

Policy WHN – Wider Housing Needs



17 (a) Do you agree with this policy?

Yes

Please explain:

17 (b) Are you aware of any other specific housing needs that should be addressed?

Yes

Please explain:

Policy BIO – Biodiversity & Geodiversity



18. Do you agree with this policy?

Yes and No

Please explain:

The heathland should be protected and enhanced but 'Wild Purbeck' must not be at the expense of the rural community or viability of the small family farms and businesses that exist within the designated area. Without the support of these holdings the land will quickly revert to woodland scrub and negate the ambitions of Natural England.

There should be improved linkage between this policy and policies GI and DH.

Policy DH – Dorset Heaths International Designations



19. Do you agree with this policy?

Yes

Please explain:

The provision of SANGs is essential to the mitigation of the impact of development on vulnerable sites. SANGS can be delivered through a comprehensive mixed development such as that proposed for the Western Sector land at Lytchett minster.

There should also be some flexibility within the policy to take account of alternative protective measures such as physical barriers in exceptional cases.

Policy RP – Retail Provision



20. Do you agree with this policy?

Yes

Please explain:

Policy CF – Community Facilities and Services



21. Do you agree with this policy?

Yes

Please explain:

Policy GI – Green Infrastructure, Recreation and Sports Facilities



22. Do you agree with this policy?

Yes and No

Please explain:

Green Infrastructure, Recreation, Sports Facilities and SANGs can be delivered through a comprehensive mixed development such as that proposed for the Western Sector land at Lytchett Minster.

Policy FR – Flood Risk



23. Do you agree with this policy?

Yes

Please explain:

Policy GP – Groundwater Protection



24. Do you agree with this policy?

Yes

Please explain:

Policy CE – Coastal Erosion in Swanage



25. Do you agree with this policy?

Yes

Please explain:

Policy SD – Sustainable Design



26. Do you agree with this policy?

Yes

Please explain:

Policy REN – Renewable Energy



27. Do you agree with this policy?

Yes

Please explain:

Development of the Western Sector land at Lytchett Minster as proposed in the emerging RSS is an opportunity to provide and deliver the use and generation of energy from renewable sources to meet the County level targets.

Policy HLH – Historic Environment, Landscape and Heritage



28. Do you agree with this policy?

Yes

Please explain:

Policy E – Employment



29. Do you agree with this policy?

Yes / No (delete as appropriate)

Please explain:

More emphasis is required on the merits of mixed use development as part of a sustainable development approach.

Policy TA – Tourist Accommodation and Attractions



30 (a) Do you agree with the policy wording?

Yes

Please explain:

Tourism is the live blood of much of Purbeck. Existing tourist attractions should be supported and enhanced and new sustainable tourism should be encouraged.

30 (b) Should new tourist accommodation be allowed within the AONB? Yes

Please explain:

Provided it meets the SD policy requirements.

Policy IAT – Improving Accessibility and Transport



31. Do you agree with this policy?

Yes

Please explain:

The policy should recognise the potential for development to help to deliver improved sustainable accessibility and transport.

Policy AP – Implementing an Appropriate Transport Strategy for Purbeck



32. Do you agree with this policy?

Yes

Please explain:

Sustainability Appraisal



33. Do you have any comments on the Sustainability Appraisal?

Comments:

Contact Details:

Finally, please complete your details below. If you are an agent representing a client please completed both sections:

Personal Details		Agents Details (if applicable)	
Title (Mr/Ms/Mrs/Miss/Other)		Agent Title (Mr/Ms/Mrs/Miss/Other)	Mr
First Name:		Agent First Name:	OJH
Last Name:	The Trustees of Sir TE Lees' Estate Settlement	Agent Last Name:	Chamberlain
Job Title*:	Landowners	Agent Job Title:	Land Agent
Organisation*:		Agent Organisation:	Chichesters Land Agents
Address:	c/o Chichesters Land Agents 33 West Borough Wimborne Dorset	Address:	c/o Chichesters Land Agents 33 West Borough Wimborne Dorset
Postcode:	BH21 1LT	Postcode:	BH21 1LT
Telephone:	01202 882336	Telephone:	01202 882336
E-mail:	info@chichesters.co.uk	E-mail:	info@chichesters.co.uk

*For Personal Details only enter job title or organisation if responding on behalf of a group or organisation.

Please note that completed response forms will be made publicly available.

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(Delete as Appropriate)

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With reference to the main consultation document, please answer the questions below and, if necessary, briefly explain your answer. If you respond 'no' to any questions and would prefer an alternative, please provide evidence in support of your suggestion. If you are completing this form electronically, feel free to expand the space given for your explanation. If you are completing a paper copy, feel free to attach separate comments, but please state clearly which questions the comments refer to.

If you would like help in completing this form, please contact the Planning Policy Team on 01929 557273.

Please send your completed form back, by **30 October 2009**, to:

Planning Policy Team, Purbeck District Council, Westport House, Worgret Road, Wareham, Dorset, BH20 4PP E-mail: ldf@purbeck-dc.gov.uk

Vision for Purbeck



1. Do you agree with the District Vision?

Yes

Please explain:

We are in general agreement with the District Vision statement, and in particular the recognition that the District requires a housing mix to meet the needs of the local community and those of the wider housing market. However, it is felt that a greater emphasis should be given to the role to be played by agriculture, farm diversification and land management in support and protection of smaller communities, the function of the countryside and the landscape.

Spatial Area Visions



2. Do you agree with the Spatial Area Visions?

Yes

Please explain:

These comments relate to the Spatial Area Vision for North East Purbeck.

There should be more emphasis in the Spatial Area Vision to recognise the influence that the close proximity of the Boroughs of Poole and Bournemouth will have on the development of the North East Purbeck region. The demand for housing will be dictated by the needs of the Boroughs as much as by the local needs. Adjustment to the Green Belt boundaries will be necessary to enable the aims of the vision to be fulfilled.

The provision of an improved and enhanced transport system linking the Area to the conurbation will be essential.

We support the development of Upton as a town in its own right including the provision of a central focal point. While Upton is categorised as part Strategically Significant Cities and Towns, it is prudent for the Town to move towards self containment. This can be achieved through a combination of the provision of improved and enhanced facilities, local employment opportunities, development of an integrated transport system and sustainable residential development. The 400m heathland buffer limits the potential for windfall development within the existing settlement and therefore residential growth will depend on settlement extension. We support the proposal for the identified extension site off Policeman's Lane.

Management of the urban fringe and the links to the countryside will need careful consideration.

Spatial Objectives



3. Do you agree with the Spatial Objectives?

Yes

Please explain:

It is proposed that the objectives recognise:

5. That well planned development can help to manage and fund public transport services.
6. The part to be played by Land Management in achieving the Spatial Objectives. The countryside is a work place providing sustainable employment for local needs

Policy LD – Location of Development



4 (a) Do you agree with this policy?

Yes

Please explain:

Yes and clearly the larger existing settlements, such as Upton, have a key role to play in the delivery of sustainable and supported development with the appropriate facilities and integrated transport systems.

4 (b) Do you agree with the Settlement Hierarchy in Policy LD?

Yes and No

Please explain:

It is accepted that most development will be directed towards sustainable locations and we support the order of the hierarchy, however, the removal of settlement boundaries and any opportunity for growth and enhancement will mean the stagnation of the smaller communities and deny local needs.

4 (c) Do you agree that on affordable housing should be permitted in settlements not listed under Policy LD), including the villages highlighted in red on Map 9 (affordable housing is social rented and/or shared ownership housing)?

No

Please explain:

The definition of affordable housing needs to be expanded to include a greater mix of tenure such as private rent accommodation if social housing is to be brought forward.

Policy HS – Housing Supply



5. Do you agree with this policy?

No

Please explain:

While we do not agree with the decision it is recognised that the Council has decided to ignore the allocation of 2750 houses in the Western Sector proposed in the emerging RSS for the purpose of this consultation.

However, we consider that 2400 dwellings will be insufficient to address the housing needs of the District and that at a build of 120 houses per annum the District will fail to live up to the Vision for Purbeck and fail to meet the needs of the local community and those of the wider housing market.

Character Area Development Potential



6 (a) Do you agree with this approach in estimating development potential?

No

Please explain:

Given the current and foreseeable economic climate coupled with the costs associated with promoting and developing a residential site a reliance on windfall sites is unrealistic.

6 (b) Is 50% a suitable reduction or should the Council make provision for a higher proportion of development potential to come forward?

Yes / No (delete as appropriate)

Please explain:

As above - given the current and foreseeable economic climate coupled with the costs associated with promoting and developing a site a reliance on windfall sites is unrealistic

Maintaining a 5 Year Land Supply



7. Should the Core Strategy include phasing for settlement extensions? Y No

Please explain:

While phasing will help to assimilate new development the policy needs to sufficiently flexibility to meet the RSS housing requirements.

Policy ELS – Employment Land Supply



8 (a) Do you agree with this policy?

No

Please explain:

We agree with the allocation of land for employment use but it should not all be focused on the sub regional employment sites. The provision of employment land in Upton, Market and Coastal Towns and Key Service Villages is essential for the sustainable development of these locations. Any expansion of the Holton Heath Industrial site must be coupled with improvements to the A351 to avoid increased congestion.

8 (b) Should existing employment sites (e.g. Winfrith Technology Centre, Holton Heath Industrial Estate and Admiralty Park) be allowed to continue to expand, or should we allocate new sites that are nearer to existing populations in Swanage and Wareham?

Yes / No (delete as appropriate)

Please explain:

See above

Policy RFS – Retail Floor Space Supply



9 (a) Where do you think is the best location for a new supermarket?

Please tick only one

- Preferred Supermarket Option
Large supermarket at Wareham (2,000sqm)

- Alternative Supermarket Option A
Large supermarket in Swanage (2,000sqm)

- Alternative Supermarket Option B
Medium sized supermarkets in Wareham and Swanage
(1,000sqm in each)

Please explain:

A large Supermarket in Wareham, situated in the centre of the District:

3. Will serve a larger part of the District community than Alternative Option A, which would be out on a limb to much of the area, Alternative Option B effectively exists already.

4. Will strengthen Wareham as a focal point in the District and support its role as a Market Town.

(b) If you do not agree with any of the above options, do you have an alternative suggestion?
Please explain:

Development Options



10 (a) The Council has set out its Preferred Option for development in the District. Which option do you think is best for Purbeck and why?

Please tick only one

- Preferred Option
Distribute development around Swanage, Upton, Wareham and the key service villages of Bere Regis, Lytchett Matravers and Wool.
- Alternative Option A – concentrate growth on the edge of Wareham.
- Alternative Option B – focus growth at Swanage.

Please explain:

We favour the Preferred Option. The spread of development is more likely to deliver the Vision for Purbeck.

10 (b) If you do not like any of the suggested options, what is your alternative suggestion?
Please explain:

Policy CO - Countryside



11 (a) Do you agree with this policy?

No

Please explain:

The policy must not work to the detriment of economic and social considerations and must not stultify the Countryside. There should be a presumption to support the rural working environment which needs to be able to adapt and develop to meet changing demands placed upon it.

The retention of viable small scale family run farms in Purbeck will be reliant upon development of alternative enterprises and diversification.

11 (b) Should a sequential approach be followed in the re-use of rural buildings?

No

Please explain:

Proposals should be looked at on merit.

11 (c) Should other uses be considered for the re-use of rural buildings? Yes

Please explain:

The viability of the rural economy is essential to achieve the objectives of the Core Strategy. As wide as range of uses as possible should be considered including appropriate residential conversion to accommodate family members and local needs to support rural based enterprises and employment.

11 (d) Are there any other countryside related issues that should be addressed by the policy?

Yes

Please explain:

The policy should encourage rural flexibility and diversification if the Spatial Objectives are to be achieved.

Policy GB – Green Belt



12 (a) Do you agree with this policy?

Yes and No

Please explain:

The Green Belt is drawn too tightly round most villages stifling the enhancement of settlements, their environment and ignores the needs of the communities.

The Green Belt needs to be redefined and its boundaries amended to accommodate the Core Strategy development proposals.

12 (b) Do you agree that small scale rural exception sites for the provision of 100% affordable housing should be allowed as exceptional development in the Green Belt?

Yes

Please explain:

To meet the demand of local needs and to support the smaller rural communities.

Policy AHT – Affordable Housing Tenure



13. Do you agree with this policy?

No

Please explain:

A more flexible approach as outlined in paragraph 8.4.4 would be more reasonable. Provided secure arrangements to ensure the long term benefits are in place the policy should allow for the provision of affordable housing by private landlords.

Policy AH – Affordable Housing



14. Do you agree with this policy?

Yes

Please explain:

See above

Policy RES – Rural Exception Sites



15. Do you agree with this policy?

Yes

Please explain:

To meet the demand of local needs and to support the smaller rural communities.

Provided secure arrangements to ensure the long term benefits are in place the policy should allow for the provision of affordable housing by private landlords and not just Housing Associations.

Policy GT – Site Criteria for Gypsies, Travellers and Travelling Show People



16. Do you agree with this policy?

Yes

Please explain:

Policy WHN – Wider Housing Needs



17 (a) Do you agree with this policy?

Yes

Please explain:

17 (b) Are you aware of any other specific housing needs that should be addressed?

Yes

Please explain:

Policy BIO – Biodiversity & Geodiversity



18. Do you agree with this policy?

Yes and No

Please explain:

The heathland should be protected and enhanced but 'Wild Purbeck' must not be at the expense of the rural community or viability of the small family farms and businesses that exist within the designated area. Without the support of these holdings the land will quickly revert to woodland scrub and negate the ambitions of Natural England.

There should be improved linkage between this policy and policies GI and DH.

Policy DH – Dorset Heaths International Designations



19. Do you agree with this policy?

Yes

Please explain:

However, there should be some flexibility within the policy to take account of alternative protective measures such as physical barriers in exceptional cases.

Policy RP – Retail Provision



20. Do you agree with this policy?

Yes

Please explain:

Policy CF – Community Facilities and Services



21. Do you agree with this policy?

Yes

Please explain:

Policy GI – Green Infrastructure, Recreation and Sports Facilities



22. Do you agree with this policy?

Yes

Please explain:

There should be improved linkage between this policy and policies BIO and DH.

Policy FR – Flood Risk



23. Do you agree with this policy?

Yes

Please explain:

Policy GP – Groundwater Protection



24. Do you agree with this policy?

Yes

Please explain:

Policy CE – Coastal Erosion in Swanage



25. Do you agree with this policy?

Yes

Please explain:

Policy SD – Sustainable Design



26. Do you agree with this policy?

Yes

Please explain:

Policy REN – Renewable Energy



27. Do you agree with this policy?

Yes

Please explain:

All alternative sources of energy must be considered.

Policy HLH – Historic Environment, Landscape and Heritage



28. Do you agree with this policy?

Yes

Please explain:

Policy E – Employment



29. Do you agree with this policy?

Yes / No (delete as appropriate)

Please explain:

Greater emphasis is required on the merits of mixed use development as part of a sustainable development approach.

Policy TA – Tourist Accommodation and Attractions



30 (a) Do you agree with the policy wording?

Yes

Please explain:

Tourism is the live blood of much of Purbeck. Existing tourist attractions should be supported and enhanced and new sustainable tourism should be encouraged.

30 (b) Should new tourist accommodation be allowed within the AONB? Yes

Please explain:

Provided it meets the SD policy requirements.

Policy IAT – Improving Accessibility and Transport



31. Do you agree with this policy?

Yes

Please explain:

The policy should recognise the potential for development to help to deliver improved sustainable accessibility and transport.

Policy AP – Implementing an Appropriate Transport Strategy for Purbeck



32. Do you agree with this policy?

Yes

Please explain:

Sustainability Appraisal



33. Do you have any comments on the Sustainability Appraisal?

Comments:

Contact Details:

Finally, please complete your details below. If you are an agent representing a client please completed both sections:

Personal Details		Agents Details (if applicable)	
Title (Mr/Ms/Mrs/Miss/Other)	Mrs S, Mrs E & Mr CJ	Agent Title (Mr/Ms/Mrs/Miss/Other)	Mr
First Name:		Agent First Name:	OJH
Last Name:	Omond, Brierton & Lees	Agent Last Name:	Chamberlain
Job Title*:	Landowners	Agent Job Title:	Land Agent
Organisation*:		Agent Organisation:	Chichesters Land Agents
Address:	c/o Chichesters Land Agents 33 West Borough Wimborne Dorset	Address:	c/o Chichesters Land Agents 33 West Borough Wimborne Dorset
Postcode:	BH21 1LT	Postcode:	BH21 1LT
Telephone:	01202 882336	Telephone:	01202 882336
E-mail:	info@chichesters.co.uk	E-mail:	info@chichesters.co.uk

*For Personal Details only enter job title or organisation if responding on behalf of a group or organisation.

Please note that completed response forms will be made publicly available.

Would you like to be included on our LDF database and informed about future consultations? Yes
(Delete as Appropriate)

26 November 2009
E:\DEVLAND\6877 Balado Bere Regis\Planning\Core Strat Consultation response.doc



Planning Policy Team
Purbeck District Council
Westport House
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Wareham
BH20 4PP

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Dear Sirs,

RE: CORE STRATEGY PLANNING PURBECK'S FUTURE RESPONSE FORM

In reference to the extension provided for the consultation, until the 30th November, please find enclosed the completed response to the Core Strategy, Planning Purbeck's Future Response Form.

The landholding comprises approximately 5.18 acres (2.1Ha) which is located to the west of Rye Hill, opposite the existing school. The site is accessed off White Lovington and Rye Hill and offers the potential to accommodate residential development to meet the longer term housing needs of the area with the levels of growth set out in the Regional Spatial Strategy.

As well as being located opposite the existing primary school, the site also abuts residential development off White Lovington. Due to the sites proximity to the local school and the village, the site is also well sheltered (visually) from the surrounding area to the south by established trees and would provide a suitable site for future residential development.

We welcome the identification of Bere Regis as a Key Service Village through the Core Strategy Spatial Background Paper and the recognition of Bere Regis to provide 57 dwellings during the plan period. We feel that due to the proximity of the site to the school and other adjoining residential properties it would lend itself for residential development.

We are aware that the site was not submitted as part of the call for sites which closed in July 2009 and include with this form a SHLAA response form in case it of assistance.

There are no restrictions on the site which would prevent it from being brought forward and we would be happy to discuss this further on behalf of our clients.

Yours faithfully

Mike Pennock MRICS
Development Consultancy

Enc – SHLAA form
Core Strategy Planning Purbeck's Future Response Form
Plan showing the location of the site

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Core Strategy Planning Purbeck's Future Response Form

With reference to the main consultation document, please answer the questions below and, if necessary, briefly explain your answer. If you respond 'no' to any questions and would prefer an alternative, please provide evidence in support of your suggestion. If you are completing this form electronically, feel free to expand the space given for your explanation. If you are completing a paper copy, feel free to attach separate comments, but please state clearly which questions the comments refer to.

If you would like help in completing this form, please contact the Planning Policy Team on 01929 557273.

Please send your completed form back, by **30 October 2009**, to:
Planning Policy Team, Purbeck District Council, Westport House, Worgret Road,
Wareham, Dorset, BH20 4PP
E-mail: ldf@purbeck-dc.gov.uk

Vision for Purbeck

Q1 1. Do you agree with the District Vision?

Yes – In so much as it relates to Bere Regis as being identified as a Key Service Village within the document.

On the assumption that the consultation document is prepared on the basis set out at paragraph 6.1.1 confirming that it ignores the RSS requirement for an Urban Extension of 2,750 dwellings

Spatial Area Visions

Q2 2. Do you agree with the Spatial Area Visions?

Yes – In so much as it relates to Bere Regis as being identified as a Key Service Village within the document

Please explain:

Bere Regis benefits from good communications and emphasis should be

placed upon this settlement for housing and employment development.

Bere Regis offers, as identified, areas of Green Space to ensure a sustainable and comprehensive development does occur.

Spatial Objectives



3. Do you agree with the Spatial Objectives?

YES – In so much as it relates to Bere Regis as being identified as a Key Service Village within the document

Please explain:
These reflect the characteristics of Purbeck.

Policy LD – Location of Development



4 (a) Do you agree with this policy?

Yes – In so much as it relates to Bere Regis as being identified as a Key Service Village within the document

4 (b) Do you agree with the Settlement Hierarchy in Policy LD?

Yes– In so much as it relates to Bere Regis as being identified as a Key Service Village within the document

Please explain:
Bere Regis is a Key Service Village and lies at the intersection of the A35 and A31 which is the gateway to a large majority of the Purbeck tourist attractions. Bere Regis offers residential development sites and existing employment sites which can be easily expanded and allow for comprehensive development to occur.

4 (c) Do you agree that on affordable housing should be permitted in settlements not listed under Policy LD), including the villages highlighted in red on Map 9 (affordable housing is social rented and/or shared ownership housing)?

Yes



Policy HS – Housing Supply

5. Do you agree with this policy?

Yes – In so much as it relates to Bere Regis as being identified as a Key Service Village within the document

Please Explain

Due to the uncertainty of windfall as outlined in the Draft Core Strategy settlement extensions need to be considered around the most sustainable locations. This will ensure that the LA has enough land to bring forward the required amount of development. Bere Regis has numerous sites which are outside of the settlement boundary but which can be and should be incorporated within these.



Character Area Development Potential

6 (a) Do you agree with this approach in estimating development potential?

Yes – In so much as it relates to Bere Regis as being identified as a Key Service Village within the document

Due to the uncertainty of windfall as outlined in the Draft Core Strategy settlement extensions need to be considered around the most sustainable locations. This will ensure that the LA has enough land to bring forward the required amount of development. Bere Regis has numerous sites which are outside of the settlement boundary but which can be and should be incorporated within these.

6 (b) Is 50% a suitable reduction or should the Council make provision for a higher proportion of development potential to come forward?

No

Please explain:

Due to the uncertainty 50% has not been justified or evidenced, councils are also required to provide and maintain a 5 year rolling land supply, this cannot be expected to be down to windfall. Windfall has been occurring through the Local Plan and thus reducing the amount of available windfall sites available in the settlement boundary's. For this reason settlement extensions need to be used as well.

Maintaining a 5 Year Land Supply

Q7 7. Should the Core Strategy include phasing for settlement extensions?

Yes

Please explain:

In order to secure the delivery of the RSS target a phasing policy should be introduced that identifies specific, deliverable sites over the plan period

Policy ELS – Employment Land Supply

Q8 8 (a) Do you agree with this policy?

Yes

Please explain:

As identified Bere Regis has an existing employment site to come forward and this should be used.

8 (b) Should existing employment sites (e.g. Winfrith Technology Centre, Holton Heath Industrial Estate and Admiralty Park) be allowed to continue to expand, or should we allocate new sites that are nearer to existing populations in Swanage and Wareham?

N/A

Policy RFS – Retail Floor Space Supply

Q7 9 (a) Where do you think is the best location for a new supermarket?
Please tick only one

- Preferred Supermarket Option
Large supermarket at Wareham (2,000sqm)
- Alternative Supermarket Option A
Large supermarket in Swanage (2,000sqm)
- Alternative Supermarket Option B
Medium sized supermarkets in Wareham and Swanage
(1,000sqm in each)

Please explain:

N/A

(b) If you do not agree with any of the above options, do you have an alternative suggestion?

Please explain:

N/A

Development Options

Q7 10 (a) The Council has set out its Preferred Option for development in the District. Which option do you think is best for Purbeck and why?
Please tick only one

- Preferred Option
Distribute development around Swanage, Upton, Wareham and the key service villages of Bere Regis, Lytchett Matravers and Wool.
- Alternative Option A – concentrate growth on the edge of Wareham.
- Alternative Option B – focus growth at Swanage.

Please explain:

The preferred Option allows for the Key Service villages to be built out as well, such as Bere Regis which has strong communication links.

Bere Regis is also able to provide both housing and employment land which will increase its sustainability and reduce the travel to work times.

Core Strategy Planning Purbeck's Future
Response Form
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10 (b) If you do not like any of the suggested options, what is your alternative suggestion?
Please explain.

Bere Regis also offers sites which are out side of the settlement boundary such as the land to the west of the school. This land is accessible and would be able to allow housing allocations on this land.

Policy CO - Countryside

Q? 11 (a) Do you agree with this policy?
Please explain:

N/A

11 (b) Should a sequential approach be followed in the re-use of rural buildings?

N/A

11 (c) Should other uses be considered for the re-use of rural buildings?

N/A

11 (d) Are there any other countryside related issues that should be addressed by the policy?

N/A

Policy GB – Green Belt

Q? 12 (a) Do you agree with this policy?

N/A

12 (b) Do you agree that small scale rural exception sites for the provision of 100% affordable housing should be allowed as exceptional development in the Green Belt?

Yes

Please explain:
It provides affordable housing options for local people who would have been priced out the market previously, especially with second houses being used for holiday homes.

Policy AHT – Affordable Housing Tenure

Q7 13. Do you agree with this policy?

NO

Please explain:
The percentage of social rented housing needs to be reduced.

Policy AH – Affordable Housing

Q7 14. Do you agree with this policy?

NO

Please explain:
The threshold of 3 is too low and the percentage of Affordable Housing which has been identified is too high. This will result in residential developments not coming forward due to the viability.

Policy RES – Rural Exception Sites

Q7 15. Do you agree with this policy?

Yes

Please explain:
It allows affordable housing the smaller more remote villages

Policy GT – Site Criteria for Gypsies, Travellers and Travelling Show People

Q7 16. Do you agree with this policy?

N/A

Core Strategy Planning Purbeck's Future
Response Form
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Policy WHN – Wider Housing Needs	
Q7	17 (a) Do you agree with this policy? Yes Please explain: It is correct that the Key Village settlements should be included, especially the ones which benefit from good communications 17 (b) Are you aware of any other specific housing needs that should be addressed? No
Policy BIO – Biodiversity & Geodiversity	
Q7	18. Do you agree with this policy? N/A
Policy DH – Dorset Heaths International Designations	
Q7	19. Do you agree with this policy? NO Please explain: It should only be applicable in built up conurbations not rural villages where there are existing open areas and not the same pressures on open space.
Policy RP – Retail Provision	
Q7	20. Do you agree with this policy? N/A

Policy CF – Community Facilities and Services	
Q7	<p>21. Do you agree with this policy? Yes</p> <p>Please explain: Bere Regis has land to offer which is close to the centre of the town. This land to the west of Rye Hill can be used for residential development and would also be able to incorporate a new school which has been identified</p>

Policy GI – Green Infrastructure, Recreation and Sports Facilities	
Q7	<p>22. Do you agree with this policy? Yes</p> <p>Please explain: Bere Regis has land which is not restricted and would be able to provide recreation and new sports pitches along with housing. The land to the west of Rye Hill adjacent to the school would be able to accommodate this.</p>

Policy FR – Flood Risk	
Q7	<p>23. Do you agree with this policy? N/A</p>

Policy GP – Groundwater Protection	
Q7	<p>24. Do you agree with this policy? No</p> <p>Please explain: Due to modern building techniques little impact now occurs on these areas. It is possible to monitor them and allow more stringent measures to be imposed but this should not prevent development upon an area.</p>

Policy CE – Coastal Erosion in Swanage	
Q7	25. Do you agree with this policy? N/A

Policy SD – Sustainable Design	
Q7	26. Do you agree with this policy? N/A

Policy REN – Renewable Energy	
Q7	27. Do you agree with this policy? N/A

Policy HLH – Historic Environment, Landscape and Heritage	
Q7	28. Do you agree with this policy? N/A

Policy E – Employment	
Q7	29. Do you agree with this policy? Yes

Policy TA – Tourist Accommodation and Attractions	
Q7	30 (a) Do you agree with the policy wording? N/A
	30 (b) Should new tourist accommodation be allowed within the AONB? N/A

Policy IAT – Improving Accessibility and Transport	
Q7	31. Do you agree with this policy? N/A
Policy AP – Implementing an Appropriate Transport Strategy for Purbeck	
Q7	32. Do you agree with this policy? N/A
Sustainability Appraisal	
Q7	33. Do you have any comments on the Sustainability Appraisal? Comments:

Contact Details:

Finally, please complete your details below. If you are an agent representing a client please completed both sections:

Personal Details		Agents Details (if applicable)	
Title <small>(Mr/Ms/Mrs/Miss/Other)</small>		Agent Title <small>(Mr/Ms/Mrs/Miss/Other)</small>	Mr
First Name:		Agent First Name:	Mike
Last Name:		Agent Last Name:	Pennock
Job Title*:		Agent Job Title:	Development Surveyor
Organisation*:		Agent Organisation:	Savills
Address:		Address:	Wessex House Priors Walk Wimborne Dorset
Postcode:		Postcode:	BH21 1PB
Telephone:		Telephone:	01202 856800
E-mail:		E-mail:	mpennock@savills.com

*For Personal Details only enter job title or organisation if responding on behalf of a group or organisation.

Please note that completed response forms will be made publicly available.

Would you like to be included on our LDF database and informed about future consultations? **Yes**

Land at White Lovington,
Bere Regis, Dorset



Response from Swanage Town Council to the Draft Core Strategy consultation exercise

Approved 16th November 2009

Q1 Do you agree with the Vision for Purbeck?

Vision for Purbeck

Purbeck will be a place which retains and enhances the unique qualities of its towns, villages, countryside and coast, whilst improving the quality of life for the whole community. Its three towns will be distinctive and thriving with good access to facilities to meet everyday needs. Its key villages will retain their facilities and their sense of community while the more rural areas will retain their functional character.

To achieve this Purbeck will provide a mix of housing types, sizes and tenures which are affordable and suitable in meeting local needs and those of the wider housing market. Such new development will have high standards of design and will respond positively to Purbeck's rich diversity of local architectural traditions, thereby helping sustain the special character of the district and the distinctiveness of places within it.

Purbeck will have a wider access to well-paid and diverse local employment opportunities. Agriculture, farm diversification, estate management and Purbeck stone quarrying will play a role in retaining small rural communities, the wider rural landscape and the function of the countryside.

Purbeck will continue to value its unique and internationally important habitats in the face of modern pressures, including the effects of climate change. At the same time, its excellent tourist facilities will serve its world-famous visitor sites and will continue to draw visitors to its coast, beaches, historic towns and villages.

While acknowledging and planning for the importance of the links between Purbeck and the Poole/Bournemouth conurbation, the need to travel will be reduced in the district's larger settlements. This will be achieved by increased self-containment and the concentration of employment, shops, services and community facilities. These will be accessible to communities through the provision of a wider range of transport methods and a shift in travel choices and patterns. Connectivity between settlements will have been enhanced through improvements to existing public footpaths, cycle ways, the district's road network, and a greater provision of public transport, including support for the reconnection of the Swanage Railway.

The Town Council is concerned that the vision is unrealistic because it does not recognise the likely economic climate in which it will be implemented. The final paragraph is wishful thinking and needs to address how "hollowing out" of public services and community facilities at the tip of the Purbeck peninsular will be avoided. There is no reference to the development of sea transport to minimise congestion in the peak season.

Q2 Do you agree with the Spatial Area Visions?

4.3.6 South East Purbeck

Vision for South East Purbeck

Swanage has a dual role as a centre for local residents and seaside resort. The town will be enhanced through the provision of a range of facilities, services, shops and employment provision. Swanage will retain its status as one of Dorset's most self-contained settlements, whilst enhancing the special historic character of the town and its setting within the AONB and the Jurassic Coast. Opportunities will be taken to reinforce service provision through the improvement of health and sports facilities. New family housing and, in particular, affordable housing and care/sheltered housing, will allow local people the opportunity to continue to live and work within Swanage. A diverse, thriving and prosperous economy will be developed through the promotion of a variety of business uses, the development of niche businesses which reflect the specific character and culture of the town, and a broad business portfolio which will ensure a strong economy beyond the traditional tourist season. New development will be accompanied by significant areas of new green space that will improve access to the countryside to the west of Swanage and improve the setting of the town within the AONB. The town's role as a visitor destination will be developed through the provision of improved facilities and creation of enhanced public spaces along the seafront. The re-opening of the Swanage to Wareham railway line will improve accessibility to employment and educational opportunities along the A351 Corridor and to Poole.

As one of the most distinctive historic settlements in Dorset, **Corfe Castle** will continue to be a focal point for surrounding villages, as well as an important tourist attraction. Corfe Castle will continue to provide good quality facilities for everyday needs including shops, community facilities and services. New development, including affordable housing of a proportionate amount to the size and function of the village, will support the enhanced role of Corfe Castle as a Key Service Village.

Some development will take place in **Langton Matravers** to support its role as a Local Service Village.

Yes. Consider replacing the phrase 'seaside resort' with 'tourist destination', as the former suggests tourism is restricted to the summer season. The Town Council is pleased to see a strong emphasis placed on the retention and improvement of public services, given the repeated attempts to reduce these in recent years (e.g. threat to hospital out of hours service, reduced library opening, day centre closure, removal of household recycling centre, loss of secondary education). Some confusion surrounds the statement that 'new development will be accompanied by significant areas of new green space' which appears to be a contradiction in terms. Access by sea should be included.

Q3 Do you agree with the Spatial Objectives?

Spatial Objectives

The vision for Purbeck will be achieved through the following spatial objectives:

1. *Respect the character and distinctiveness of Purbeck's settlements and countryside.*
2. *Meet Purbeck's housing needs.*
3. *Conserve and enhance Purbeck's natural habitat.*
4. *Support local communities.*
5. *Reduce vulnerability to climate change and dependence upon fossil fuels.*
6. *Ensure high quality, sustainable design.*
7. *Conserve and enhance the landscape, historic environment and cultural heritage of the District.*
8. *Promote a prosperous local economy.*
9. *Provide an integrated transport system and better accessibility to services for everyday needs.*

Yes.

Q4 (a) Do you agree with Policy LD?

Policy LD: General Location of Development

Development will be directed towards the most sustainable locations in accordance with the following settlement hierarchy:

Development Policy A – Strategically Significant Cities and Towns
Upton

Development Policy B - Market and Coastal Towns
Swanage and Wareham

Development Policy C – Small Towns and Villages
Key Service Villages:
Bere Regis, Bovington, Corfe Castle, Lytchett Matravers, Sandford and Wool
Local Service Villages:
Langton Matravers, Stoborough, West Lulworth, Winfrith Newburgh

Development Policy A and B settlements will be the focus for new development within the District. Development will only take place in Development Policy C settlements where it meets an identified need including both open market and affordable housing and contributes to the provision or protection of village services.

Settlement boundaries will be reviewed for Development Policy A, B and C settlements through the Site Allocations Plan. In the interim, the Local Plan settlement boundary for the settlements listed in this policy will be carried forward.

Settlements not listed in this policy will be classed as falling within the countryside and development will only be permitted in exceptional circumstances as set out in Policy CO: Countryside.

Yes. The Town Council supports the continued application of a settlement boundary in respect of Swanage and looks forward to playing an active part in the proposed review.

Q4 (b) Do you agree with the Settlement Hierarchy in Policy LD?

Yes.

Q4 (c) Do you agree that only affordable housing should be permitted in settlements not listed under Policy LD, including the villages highlighted in red on Map 9 (affordable housing is social rented and/or shared ownership housing)?

Yes. The Town Council fully supports the provision of housing to enable the families of local residents to continue to live locally, although there should be some acknowledgement that there may be exceptions to the rule. As an example, this policy should not restrict the conversion of existing non-residential buildings within the private sector to fulfil the same aim.

Q5 Do you agree with policy HS?

Policy HS - Housing Supply

Provision will be made for a minimum of 2,400 dwellings over the plan period 2006–2026 in accordance with the emerging RSS. Housing development will be focused at the most sustainable locations in accordance with Policy LD: General Location of Development.

No. The Town Council acknowledges that the total of 2,400 dwellings may be included in the RSS, but maintains its support for the original total of 2,100 dwellings over 20 years. Any additional development will not only increase congestion on the A351 but will also threaten the character of this environmentally sensitive district.

Q6 (a) Do you agree with this approach in estimating development potential?

6.2 Character Area Development Potential

- 6.2.1 A large proportion of development in Purbeck has been met through infilling and intensification within built up areas, referred to as 'windfall'. It is realistic to expect that windfall will continue to form an important part of the housing supply, but predicting where and when this will occur is difficult as it is not appropriate for the Council to contact each house-owner and ascertain whether they intend to seek future development in their back garden.
- 6.2.2 Instead, a capacity analysis has been carried out for Upton, Swanage, Wareham and the Key Service Villages to estimate the potential for further re-development and intensification within the current settlement boundary. Similar opportunities to replicate recent planning permissions were analysed based upon character areas identified through the Townscape Character Assessment (2009). This study is available as a background paper and will be fed into the 2009 Strategic Housing Land Availability Assessment, when it is published later in the year.
- 6.2.3 The analysis identified a potential for 1,325 dwellings. In order not to overly rely upon windfall, which is by its nature uncertain, a 50% reduction has been made to reflect some of this potential not coming forward. The resulting 666 dwellings are considered to be an under-estimation and a range of 666 -1,325 dwellings could theoretically be applied. If 100% of the windfall capacity identified were to come forward, there would be no need for settlement extensions. However, a balance of settlement extensions and windfall is considered necessary to provide a range of dwelling types and ensure that the Council is able to control the supply of new housing.

Yes. The Town Council accepts that a balance needs to be struck between “windfall development” in town centre locations and small settlement extensions. The Council is keen to restrict the redevelopment of certain parts of the town into multi-occupancy units, and would like to see the retention and expansion of the Houses in Large Gardens Policy Area contained in the existing Local Plan.

Q6 (b) Is 50% a suitable reduction or should the Council make provision for a higher proportion of development potential to come forward?

50% is a suitable reduction. As stated above, the Town Council wishes to see a decrease in the development of flats in the town centre which has been ongoing over the last 40 years.

Q7 Should the Core Strategy include phasing for settlement extensions?

- 6.4.1 The Council is required to maintain a rolling five year land supply of deliverable housing sites. As is evident from the housing trajectory there is concern that in 2-3 years the supply of housing sites coming forward will slow down and the Council will not be able to maintain a five year land supply of deliverable sites. In that situation, landowners and developers would have the opportunity to submit speculative planning applications for settlement extensions on sites not identified through the planning process or subject to public consultation. This 'planning by appeal' approach could have significant consequences, as the Council would have little control on where new housing is built.
- 6.4.2 The RSS sets a 120 dwelling per annum target. To comply with the RSS, the Council is **not proposing any phasing of housing sites**. This will allow greenfield sites to come forward early in the plan period and help maintain a five year housing land supply. Delivery of settlement extensions will be expected post 2012 once the Core Strategy and Site Allocations plans have been adopted. Further work will be undertaken with developers to update the housing trajectory to reflect completion rates on settlement extensions.

The Town Council would wish to see a balanced approach to development over the period 2010-2026, including a mixture of town centre and small settlement extensions across the period. If this can be achieved without the formal phasing of development then there is no need for this to be included within the Core Strategy.

Q8 (a) Do you agree with the Employment Land Supply Policy?

Policy ELS - Employment Land Supply
Provision will be made for a minimum of 11.5 hectares of employment land over the plan period 2006–2026. Economic development will be focused at sub regional employment sites at Winfrith Technology Centre and Holton Heath and the most sustainable locations in accordance with Policy LD: General Location of Development.

Yes.

Q8 (b) Should existing employment sites (e.g. Winfrith Technology Centre, Holton Heath Industrial Estate and Admiralty Park) be allowed to continue to expand, or should we allocate new sites that are nearer to existing populations in Swanage and Wareham?

Development should be focussed on existing sites. Given the transportation difficulties affecting Swanage and the recent provision of the Prospect Business Park it is unlikely that further large-scale employment sites will be viable in close proximity to Swanage.

Q9 (a) Where do you think is the best location for a new supermarket?

Preferred Supermarket Option
• 2,000sqm in Wareham
Alternative Supermarket Option A
• 2,000sqm in Swanage
Alternative Supermarket Option B
• 1,000sqm in both Swanage and Wareham

NB: 1,000 sqm is the equivalent size of Sainsbury's in Wareham or Co-Op in Swanage.

None of the above.

Q9 (b) If you do not agree with any of the above options, do you have an alternative suggestion?

The Town Council disputes the need for a new supermarket at either Wareham or Swanage. Adequate facilities are available in neighbouring larger towns such as Poole and Dorchester and online shopping provides another alternative. The District Council's focus should be on the retention of the existing retail mix in Swanage and the wider expansion of retail facilities in the District; local support is strong for sustainable projects involving local producers in preference to the growth of existing national supermarket chains. It is noted that the 'Vision for South East Purbeck' included in this document does not refer to the need for a new supermarket in Swanage, stating instead that 'the development of niche businesses which reflect the specific character and culture of the town' will be key to 'a diverse, thriving and prosperous economy'.

Q10 (a) The Council has set out its Preferred Option for development in the District. Which do you think is the best for Purbeck and why?

Options for Public Consultation	
Preferred Option:	Distribute development around Swanage, Upton, Wareham and the Key Service Villages of Bere Regis, Lytchett Matravers and Wool
Alternative Option A:	Concentrate growth on the edge of Wareham
Alternative Option B:	Focus growth at Swanage

Given the restraints placed on the District Council by the RSS, a modified version of the Preferred Option would be the best for the District. The Town Council agrees that development should be distributed across the district rather than being focussed on any one settlement. However, the number of dwellings proposed for Swanage under this option is too large. It is quite clear from Tables 4, 7 and 10 that Swanage has already taken the greatest share of development in the District over the past 3 years. This town has seen either the building or granting of planning permission for 317 dwellings over this period, amounting to 35% of all new dwellings in the District. Whilst it is appropriate that Swanage continues to provide some new housing, it is felt this should be closer to the total of 251 (15 per annum) proposed in Option A rather than the 457 (27 per annum) proposed in the Preferred Option. A relatively small increase in the number of dwellings to be built at Upton and the Key Service Villages should curtail the need for the large settlement extension and supermarket at Wareham proposed under Option A.

Q11 (a) Do you agree with the Countryside Policy?

Policy CO: Countryside
<p>Development in the countryside will be permitted where:</p> <ul style="list-style-type: none">• A countryside location is essential; or• It comprises the reuse, alteration, extension or replacement of a rural building; or• It comprises outbuildings within the curtilage of existing buildings; or• It is for sensitive small-scale business use, well related to a complex of buildings or the expansion of an existing employment use;• It is a farm diversification scheme; or• It is a community facility or service located close to existing settlements and in an accessible location.
<p>Re-use of Rural Buildings</p> <p>Planning permission for the re-use of rural buildings of permanent and substantial construction in the countryside will be permitted in accordance with Policy SD: Sustainable Design. In the first instance the primary purpose of the re-use should be for a business use (B1, B2 or B8), in the second instance for affordable housing, in the third instance for the provision of community facilities for identified local need and finally tourist accommodation.</p> <p>Any application for a non-business use must be supported by a statement illustrating the efforts that have been made to secure a suitable business re-use and the reasons why a business re-use could not be accommodated or would not be economically viable. The statement must demonstrate that a business re-use has been sufficiently marketed for a period of at least 9 months to demonstrate that it is not a viable option.</p> <p>Where reuse, alteration or extension involves works to a traditional agricultural building, guidelines within the District Design Supplementary Planning Document will be taken into account. The intrinsic character of such buildings and the contribution they make to the interest and attractiveness of the countryside should not be harmed.</p>

Replacement Buildings

The replacement of an existing building in the countryside will be permitted in accordance with Policy SD: Sustainable Design, provided that the replacement building is not disproportionately larger than the existing building, is not the result of a temporary permission or series of temporary permissions, and has an established lawful use.

Outbuildings

Planning permission for outbuildings within the curtilage of existing buildings in the countryside will be permitted in accordance with Policy SD: Sustainable Design.

Farm Diversification

Diversification of existing farms will be encouraged provided that:

- Farming is still the primary purpose of the enterprise;
- Diversification will support the current farming business;
- Diversification projects either utilise existing buildings or are close to existing buildings.

Equestrian Development

Essential equestrian-related development such as stables and field shelters will be permitted in the countryside provided that:

- They are simple in appearance and small in scale;
- They are sensitively sited (e.g. adjacent to an existing complex of buildings or, if there are no buildings, adjacent to an existing field boundary);
- They are appropriately landscaped; and
- They do not have a detrimental impact, directly or indirectly, on landscape character or internationally designated heathland.

Yes, although, as stated in response to question 4 (c) above, this policy should not restrict the conversion of existing non-residential buildings within the private sector that would enable the family of a local resident to continue to live locally.

Q11 (b) Should a sequential approach be followed in the re-use of rural buildings?

No comment.

Q11 (c) Should other uses be considered for the re-use of rural buildings?

No comment.

Q11 (d) Are there any other countryside related issues that should be addressed by the policy?

No comment.

Q12 (a) Do you agree with the Green Belt Policy?

Policy GB – Green Belt

The extent of the South East Dorset Green Belt will be maintained subject to the following alterations:

- Redefining the Green Belt boundary to accommodate settlement extensions at Upton, Wareham and Lytchett Matravers;
- Addition of Green Belt at Sandford and Holton Heath; and
- Minor boundary re-alignment to coincide with OS Base map.

All of the above alterations to the Green Belt boundary will be made through detailed boundary amendments in the Site Allocations Plan.

In exceptional circumstances, the development of limited affordable housing will be allowed adjacent to existing settlements within the Green Belt where it meets an identified local housing need in accordance with Policy RE: Rural Exception Sites.

Yes, although the proposed alterations to the Green Belt should be on as small a scale as possible.

Q12 (b) Do you agree that small scale rural exception sites for the provision of 100% affordable housing should be allowed as exceptional development in the Green Belt?

Yes, provided such provision is on a small scale and is strictly controlled and conforms to a high standard of design using appropriate materials for the locality.

Q13 Do you agree with the Affordable Housing Tenure Policy?

Policy AHT - Affordable Housing Tenure

Affordable housing provision tenure will be split as follows:

- 90% Social Rented Housing
- 10% Intermediate Housing to Rent or Purchase

Yes. The provision of social rented housing will be the most effective way of ensuring that affordable housing remains available for future generations of local residents.

Q14 Do you agree with the Affordable Housing Policy?

Policy AH – Affordable Housing

The Council will apply the following policy in relation to affordable housing provision when determining planning applications for all new residential development, including residential elements of mixed use schemes:

The following proportions of affordable housing provision will be required on:

- brownfield market housing developments of 3 or more dwellings, or a site area of 0.1 or more hectares; and
- greenfield market housing developments of between 3 and 29 dwellings, or a site area of 0.1 to 0.9 hectares.

(i) at least 50% in the Swanage and Coast sub-market areas

(ii) at least 40% elsewhere

The Council will require at least 50% affordable housing provision on all greenfield housing developments of 30 or more dwellings, or a site area of 1 or more hectares.

In all cases the Council will take account of:

- Current identified local need in Purbeck District;
- Economic viability of provision;
- Proximity to local services;
- Other planning objectives for the site; and
- Any other considerations deemed relevant to the delivery of affordable housing.

The affordable housing provision required in accordance with this policy will be expected to be provided on-site. Where on-site provision is not feasible, the Council will in the first instance seek to secure equivalent off-site provision and, where this is demonstrated to be undeliverable, the payment of a commuted sum to the equivalent amount of on-site provision. The applicant will be expected to provide robust justification in support of off-site provision or the payment of a commuted sum. This should identify how it would contribute to wider objectives relating to the creation of sustainable and mixed communities and / or meeting a particular identified local housing need. The affordable housing provision required on greenfield sites will be provided on-site without exception.

Where it is considered that there are significant economic viability constraints that would prevent the provision of affordable housing in accordance with the policy, the developer will be required to provide full justification of exceptional circumstances to the Council's satisfaction. Such justification will be expected to include a financial viability appraisal, site suitability appraisal, and development mix appraisal. This 'open book' approach will enable the Council to form a view on the viability of the proposed scheme, including the identification of economic constraints (for example, existing high use values) and their impact. The appraisal will be subject to independent verification, which the applicant will be expected to fund.

To ensure the development of mixed and sustainable communities, the affordable housing element of schemes should be fully integrated or 'pepper potted' through the site apart from in exceptional circumstances where sufficient justification for concentration in one location is provided by the applicant and agreed by the Council.

Sites which are phased or sub-divided and developed separately will be considered by the Council as part of a larger 'comprehensive' scheme. Affordable housing provision will be required in accordance with the combined site area rather than smaller phased or subdivided areas. The affordable housing provision must be provided on each phase or subdivision.

Further detail will be set out in the Affordable Housing Supplementary Planning Document.

Yes.

Q15 Do you agree with the Rural Exception Sites Policy?

Policy RES: Rural Exception Sites

Housing development within or adjoining existing settlements with a population less than 3,000, on sites where housing would otherwise be contrary to the policies for general housing provision in rural areas, may, in exceptional circumstances, be permitted to meet local needs for affordable housing in rural areas, provided that:

- The Council is satisfied that the proposal is capable of meeting an identified, current, local need within the Parish, or immediately adjoining rural Parishes, which cannot otherwise be met;
- The site is not remote from existing buildings and does not comprise scattered, isolated development in the open countryside;
- The site is within close proximity to, or is served by, sustainable transport providing access to local employment opportunities, shops, services and community facilities.
- The scheme is small in scale, of character appropriate to the location and of a high quality design; and
- There are secure arrangements to ensure that the benefits of affordable housing will be enjoyed by subsequent as well as initial occupiers.

Yes.

Q16 Do you agree with the proposed Site Criteria for Gypsies, Travellers and Travelling Show People?

Policy GT: Site Criteria for Gypsies, Travellers and Travelling Show People

The required provision of transit and permanent pitches will be addressed through the joint Gypsy and Traveller DPD.

The following considerations will be taken into account in the determination of locations for Gypsy and Traveller sites:

- The site is well located and would enable reasonable access to facilities such as schools, shops and medical facilities;
- Sites provide for adequate on site facilities for parking, storage, play and residential amenity;
- The site allows for adequate levels of privacy and residential amenity for the occupiers;
- The site allows for adequate levels of privacy and would not harm the residential amenity of adjacent occupiers or the operation of adjacent uses; and
- The site would not result in a detrimental impact on the natural environment or landscape.
- In the case of Travelling Show People, the site can accommodate the turning requirements and adequate storage needs of equipment;

The Council is committed to working in partnership with Gypsies and Travellers and with their representative groups, and with local residents to seek solutions to issues concerning Gypsy and Traveller accommodation.

Yes.

Q17 (a) Do you agree with the Wider Housing Needs Policy?

Policy WHN – Wider Housing Needs

The provision of supported housing (including sheltered housing and extra care housing for older people), care homes and nursing homes will be encouraged to meet the District's specific wider housing needs provided that provision is focused within the towns of Upton, Swanage and Wareham and/or the Key Service Villages to ensure that residents have access to community facilities, service and public transport provision.

Any proposal for the loss of an existing facility should be in accordance with Policy CF: Community Facilities and Services.

Yes. Swanage has seen a steep decline in the provision of care home places in recent years and the Town Council wholeheartedly supports any policy that will help to reverse this trend.

Q17 (b) Are you aware of any other specific housing needs that should be addressed?

No comment.

Q18 Do you agree with the Biodiversity & Geodiversity Policy?

Policy BIO: Biodiversity & Geodiversity

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

- The promotion of Strategic Nature Areas as identified on the Nature Map;
- Efforts to enhance, link and create habitats to enable adaptation to climate change;
- The achievement of the 'Wild Purbeck' project;
- Resisting development that could adversely affect Sites of Nature Conservation Interest (SNCI) and Local Nature Reserves (LNR);
- Allowing development proposals that incorporate biodiversity elements in accordance with the Design SPD; and
- Maintaining regionally important geological and geomorphological sites (RIGS) for their scientific and educational value.

Yes.

Q19 Do you agree with the Dorset Heaths International Designations Policy?

Policy DH – Dorset Heaths International Designations

Development will not be permitted where it would be likely to lead to an adverse effect upon the integrity, directly or indirectly, of the Dorset Heaths International designations.

The following forms of development (including changes of use) will not be permitted within a 400m buffer around protected heathland:

- (i) Residential (C3) development that would involve a net increase in dwellings;
- (ii) Tourist accommodation including hotels, guest houses, boarding houses and bed and breakfast accommodation which require planning permission (C1 uses) and self-catering tourist accommodation
- (iii) Sites providing accommodation for Gypsy and Traveller and Travelling Show People (permanent and transit)
- (iv) Equestrian-related development that may directly or indirectly result in an increased adverse impact on the heathland.

Between 400 metres and 5km of a heathland, residential development will be expected to take all necessary steps on site to avoid or mitigate any adverse effects upon the site's integrity or, where this cannot be achieved within the residential development, make a contribution towards mitigation measures designed to avoid such adverse effects taking place. Measures will include:

- Provision of open space and appropriate facilities to meet recreation needs and deflect pressure from heathland habitats;
- Heathland support areas;
- Warden services and other heathland/harbour management;
- Access and parking management measures; and
- Green Infrastructure.

The Council will jointly prepare a Heathland Mitigation Development Plan Document with affected neighbouring authorities to set out a long-term mitigation strategy to ensure that the growth planned for South East Dorset can be accommodated without having an adverse effect upon the integrity of the Dorset Heaths.

Yes.

Q20 Do you agree with the Retail Provision Policy?

Policy RP: Retail Provision

New Retail Provision

A hierarchy of Centres will be taken into account when considering proposals for new retail development:

- Town Centres: Wareham and Swanage
- District Centres Upton
- Local Centres Corfe Castle and Wool
- Local Shops All other Purbeck villages

Any proposal for new retail provision should be commensurate with the position of the relevant centre within the hierarchy and also be in accordance with Policy RFS: Retail Floor Space Supply.

Within the Primary Shopping Areas in Swanage and Wareham changes between Class A of the Use Classes Order will be permitted, provided that this would not harm the vitality, viability and functionality of the town centre as a whole. Primary shopping areas will be reviewed through the Site Allocations DPD. In the interim, the boundaries used in the Local Plan will be carried forward.

Swanage - The enhancement of the area around the railway station will be encouraged and the re-development of the Pierhead cafe has been identified to be of key importance.

Upton - The enhancement of the centre will be encouraged and the re-development of the Greenridge pub site has been identified to be of key importance.

Wareham – The enhancement of the area around the railway station will be encouraged with potential to create a new central focus to North Wareham

Safeguarding Retail Provision

Development leading to loss of uses within Class A of the Use Classes Order will only be permitted if:

- The facility has been sufficiently and realistically marketed over a 9 month period;
- That the current use is demonstrably no longer viable; and
- The change of use would not harm vitality, viability and functionality of the settlement.

Yes. The Town Council looks forward to partaking in the proposed review of the primary shopping area boundary.

Q21 Do you agree with the Community Facilities and Services Policy?

Policy CF: Community Facilities and Services

New Facilities and Services

The Site Allocations Plan will consider the requirements for new sites and/or the extension or relocation of:

- Schools needed to implement the new education system in the Purbeck Pyramid;
- Healthcare facilities at Wareham, Swanage, Sandford and Bere Regis;
- Community facilities identified through Town and Parish Plans.

Where appropriate, the implementation of these facilities will be linked to new development.

Planning permission for new community facilities in the countryside will be granted provided that:

- The use cannot reasonably be met within the settlement; and
- The facility meets an identified local need; and
- It is located close to existing settlements and in an accessible location; and
- It conforms with Policy CO: Countryside.

Safeguarding Existing Facilities and Services

Development (including change of use) that would result in the loss of existing community facilities/services as listed above will not be permitted unless:

- The premises or location are unsuitable;
- Replacement facilities are proposed that are readily accessible to the catchment population or alternative facilities are available locally;
- It can be demonstrated that there is no current or future need for the use through sufficient and realistic marketing for a period of at least 9 months; and
- It would constitute a change of use to another facility or service where there is a proven local need, i.e. as identified in a Parish or Town Plan.

Yes. Further to the response to Question 2) above, the Town Council is pleased to see a policy to safeguard existing facilities, given the repeated attempts to reduce these in recent years (e.g. threat to hospital out of hours service, reduced library opening, day centre closure, removal of household recycling centre, loss of secondary education).

Q22 Do you agree with the Green Infrastructure, Recreation and Sports Facilities Policy?

Policy GI: Green Infrastructure, Recreation and Sports Facilities

New Facilities

All new residential development will be required to make provision for:

- Recreation, sport and/or open space facilities
- Green Infrastructure

Where possible, facilities should be provided on site, as an integral part of the development. However, where on-site provision is not appropriate, off-site provision or a financial contribution will be sought. The level of contributions will be set out in the South East Dorset Green Infrastructure Strategy and the Purbeck Recreation Supplementary Planning Document.

Settlement extensions and major employment sites will be expected to contribute towards the delivery of significant areas of new Green Infrastructure and the management of a connected network of new and enhanced open spaces and corridors in accordance with the Green Infrastructure Strategy standards.

New facilities will be set out in the Site Allocations DPD.

Safeguarding Existing Facilities

All 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 shortfall in the plan period.

Replacement Facilities

Any replacement provision will take account of the needs of the area and current standards of open space, sport and/or recreational provision but should generally be equivalent to, or an improvement upon, the existing resource, in terms of size, usefulness, attractiveness, quality and accessibility.

Yes. The Town Council anticipates that contributions from developers may be put towards the improvement of existing sport and recreation facilities (including children’s play areas), a number of which are owned and/or operated by the Town Council. Diving is an important recreational activity which brings economic benefits to Swanage and should be included.

Q23 Do you agree with the Flood Risk policy?

Policy FR: Flood Risk

Priority will be given to development in areas not considered to be at risk of flooding or coastal erosion or at risk of creating flooding problems elsewhere. The impact of flooding will be managed by locating development in accordance with Purbeck’s Strategic Flood Risk Assessment (SFRA).

In addition to the requirements set out in PPS25, (requiring all new development over 1 hectare to submit a Flood Risk Assessment), a Flood Risk Assessment will be required for all planning applications under 1 hectare that:

- will alter the natural rate of surface water run-off
- or
- are located in areas where there is known to be a localised flooding or drainage problem as set out in the SFRA maps
- or
- are located in areas below 3.55m Above Ordnance Datum (AOD)
- or
- are located in areas below 6m AOD and are within 50 metres of the coast (defined as back edge of beach or coast protection line)

All FRAs should include a topographic survey with levels reduced to ordnance datum. Finished Floor Levels must be set at an agreed level above ordnance datum which should include 600mm freeboard.

New development within Flood Zones 2 and 3 must undertake a sequential test, in accordance with PPS25. However, this test is unlikely to be passed as Purbeck has sufficient space to accommodate development outside areas of flood risk.

Largely, yes. However, the policy as written will preclude developments on the pier to replace the shanty town which currently services the diving community. This policy should not provide an obstacle to replacing the temporary buildings which do no justice to the pier.

Q24 Do you agree with the Groundwater Protection Policy?

Policy GP: Groundwater Protection

Development within Groundwater Source Protection Areas, as defined on the Proposals Map, will be permitted if there is no risk to the quality or quantity of groundwater.

Yes.

Q25 Do you agree with the Coastal Erosion in Swanage Policy?

Policy CE: Coastal Erosion in Swanage

Development of additional buildings, outbuildings, and extensions to buildings will not be permitted within a 400 metre buffer around the cliff tops at Durlston as shown on Map 22.

Map 22: 400 metre buffer around cliff tops in Durlston, Swanage



Purbeck D.C., Licence No. LA100022058, 2009

The Town Council supports such a proposal in principle, although the extent of the exclusion zone requires very careful consideration and at present is too extensive. The buffer zone should have a robust focus on the area directly at risk of land slippage. Has consideration been given to the 100-year erosion line utilised by DCC's Earth Sciences Manager for the World Heritage Site? If the area remains as set out in Map 22 it will preclude redevelopment of two major eyesores along Swanage Waterfront: the Pier Head site (identified as in need of redevelopment within Policy RP above) and the diving huts on the pier. This must not happen.

Q26 Do you agree with the Sustainable Design Policy?

Policy SD: Sustainable Design

The Council will give the achievement of design quality a high priority in its decision making and other activities.

Proposals for development, landscaping, advertisements and other applicable works should be consistent with guidelines set out in the Design Supplementary Planning Document and where relevant Dorset County Council's Residential Car Parking Strategy. These should also take into account the findings of Conservation Area Appraisals, Townscape Character Appraisals, Dorset Historic Towns Survey, and the Dorset Landscape Character Assessment.

In addition to showing conformity with the above the Council will be supportive of proposals for development which:

- demonstrate a positive approach to the functional, spatial and aesthetic compatibility and integration of new development with its context. Special emphasis is placed upon reflecting the diverse but localised traditions of building material usage found across the District, and the innovative use of the same where opportunities are presented;
- demonstrate a positive approach to delivery of sustainable development objectives through site layout and building design which should be as comprehensive as conformity with other policies and criteria allows;
- demonstrate regard for neighbour amenity by avoidance or mitigation of the overshadowing and overlooking of adjoining properties, or affliction of other identifiable nuisances where these would cause significant and measurable harm;
- demonstrate support for biodiversity through careful landscaping and through in-built features which provide appropriately configured and located nesting and roosting opportunities for bats and birds.
- in addition to the above criteria achieve a score of at least 14 points ('gold' or 'silver' standard) measured against 'Building for Life' standards where development consists of ten or more dwellings.

Yes.

Q27 Do you agree with the Renewable Energy Policy?

Policy REN: Renewable Energy

The Council encourages the sustainable use and generation of energy and will encourage renewable energy where it is in keeping with the District's landscape and cultural heritage and would not adversely affect the area's biodiversity.

At least 10% of the energy to be used in new development of more than 10 dwellings or 1,000m² of non-residential floor space should come from decentralised and renewable or low-carbon sources, unless, having regard to the type of development involved and its design, it is demonstrated not to be feasible or viable.

Proposals for renewable energy apparatus will be permitted provided that:

- The technology is suitable for the location and would not cause adverse harm to visual amenity from both within the landscape and views into it;
- It would not have an adverse impact upon the integrity of internationally protected habitats unless there is no alternative solution and there are imperative reasons of overriding public interest;

- It would not cause interference to radar or telecommunications, or highway safety;
- It would not cause harm to residential amenity by virtue of noise, vibration, overshadowing, flicker (associated with turbines), or other harmful emissions;
- Any large-scale proposal must take into account Dorset County Council's Landscape Sensitivity Study and should include an agreed restoration scheme and measures to ensure the removal of the installations when operations cease;
- Safe access during construction and operation must be provided; and
- It would be in accordance with Policy SD: Sustainable Design and Policy HLH: Historic Environment, Landscape and Heritage.

Yes. Suggest amendment of the third paragraph to read "... not cause adverse harm to visual amenity from within the landscape, views into it **and out of it.**" Offshore wind farms may well spoil the view if they are sited too close to shore.

Q28 Do you agree with the Historic Environment, Landscape and Heritage Policy?

Policy HLH: Historic Environment, Landscape and Heritage
<p>The Council will give the protection, conservation and enhancement of the District's landscape and historic environment a high priority in its decision-making and other activities. These will be informed by Conservation Area Appraisals, the Dorset Landscape Character Assessment, AONB Management Plan, Purbeck Heritage Strategy, the District Design Supplementary Planning Document and other strategies, wherever relevant.</p> <p>Insofar as proposals for development and other works are also consistent with other policies, the Council will be supportive of those which would cause no demonstrable harm to or detract from the appearance, setting, character, interest and integrity of, locally, nationally and internationally designated landscape and historic environment assets. The Council will expect that wherever possible proposals for development and other works take available opportunities to deliver enhancement of the same.</p>

Yes.

Q29 Do you agree with the Employment Policy?

Policy E: Employment
<p>New Employment Provision New employment provision will be supported:</p> <ul style="list-style-type: none"> • Within Swanage, Upton and Wareham and the Key Service Villages; • For intensification and redevelopment of existing employment land; and • Through the conversion of redundant buildings to rural workspaces in accordance with Policy CO: Countryside <p>Safeguarding Employment Land Existing employment areas will be safeguarded for B1, B2 or B8 uses. New proposals will only be permitted where they do not compromise the activities or integrity of the employment area.</p>

Exceptionally, other uses that generate employment will also be considered on safeguarded employment land where they are appropriate to the location providing that:

- The principal activity is not primarily retail in nature;
- There is a need for the business to be located within the employment area on account of close connection with neighbouring businesses;
- There is a potential for an adverse impact if located within another more sensitive location, such as residential areas; and
- There is a lack of suitable alternative sites, other than in existing employment areas for the type of employment activity proposed.

Redevelopment or change of use of employment land

Redevelopment or the change of uses of employment land (for uses other than those considered above) will only be permitted where:

- Alternative suitable employment land of the same size is provided elsewhere in the District; or
- It can be demonstrated that there is no longer a need for the employment use and the current use has been sufficiently and realistically marketed for a period of at least 9 months to show that the current use is no longer viable; and
- The location or expansion of the existing employment use(s) would not result in an unacceptable adverse impact on neighbouring residential uses.

Yes. However, high speed internet connections should be included as supporting new employment. It also appears that this strategy would prevent the Kings Road depot and Kings Court business centre being developed for affordable housing, despite this being an ideal site for such development.

Q30 (a) Do you agree with the Tourist Accommodation and Attractions Policy Wording?

Policy TA: Tourist Accommodation and Attractions

New Accommodation

Proposals for new development of serviced and self-catering tourist accommodation or extension to existing premises will be permitted within settlement boundaries, provided that the proposal can conform to the Policy SD: Sustainable Design.

Within the Area of Outstanding Natural Beauty, proposals for new caravan, camping and / or chalet sites will not be permitted. Alterations to existing sites will be permitted where the following criteria can be met:

- It would meet demonstrable need as set out in the Tourism Strategy;
- The proposal would be of an appropriate scale in relation to its setting;
- The development is sited to be visually unobtrusive and will help to conserve and enhance the surrounding landscape;
- Any traffic generated by the proposed site access can be safely accommodated by the local road network; and
- The development would result in net environmental benefits to the site as a whole.

Outside of the Area of Outstanding Natural Beauty, proposals for new caravan, camping and chalet sites and extensions or alterations to existing sites will be permitted provided the proposal satisfies the criteria above.

Safeguarding Existing Accommodation

Proposals that would result in the loss of hotel, guesthouse, boarding house and bed and breakfast use (which is not ancillary to the primary residential (C3) use of the dwelling) will not be permitted unless it can be demonstrated that:

- The current use has been sufficiently and realistically marketed for a period of at least 9 months to show that the current use is no longer viable.

New Attractions

Proposals for new tourist and leisure attractions within settlement boundaries will be allowed where they are in accordance with Policy SD: Sustainable Design. In the countryside new tourist and leisure attractions will only be permitted where they are in accordance with the Policy CO: Countryside.

Yes. The Town Council is extremely pleased to see the inclusion of a policy to safeguard existing holiday accommodation.

Q30 (b) Should new Tourist Accommodation be allowed within the AONB?

Yes, provided that such new accommodation is sensitively and sustainably designed, and it can be shown not to have a negative impact on the environment and landscape.

Q31 Do you agree with the Improving Accessibility and Transport Policy?

Policy IAT: Improving Accessibility & Transport

Improving accessibility within Purbeck will be achieved through better provision of local services and facilities, which reduce the need to travel, especially by car. This will be achieved by assessing development proposals against the following criteria:

- The development should be located in the most accessible location and reduce the need to travel;
- The development should maximise the use of alternative and sustainable forms of travel;
- The development, where it is likely to result in significant transport implications, is supported by a detailed transport assessment;
- The development, where of a significant scale, is supported by a travel plan;
- The development should provide for improved safety and convenience of travel, including improved access to local services and facilities by foot, cycle and public transport;
- The development should provide safe access to the highway, and/or should provide towards new/improved access to the highway and maintenance/improvement of the local highway.

Yes, although again the sea has been neglected as a way to improve accessibility and transport.

Q32 Do you agree with the Implementing an Appropriate Transport Strategy for Purbeck Policy?

Policy ATS: Implementing an Appropriate Transport Strategy for Purbeck

Transport conditions within Purbeck will be achieved through the implementation of the Purbeck Transportation Strategy, which includes the following elements: the provision of cycle routes, improved transport interchanges and targeted road improvements that provide relief to the A351.

Mitigating the impact of New Development

The impact of additional road trips from new development will be mitigated through developers' financial contributions towards the implementation of the Purbeck Transportation Strategy. Such contributions will be sought in accordance with 'Development Contributions towards Transport Infrastructure in Purbeck' which is regularly updated and will be formalised as a Supplementary Planning Document (SPD).

Detailed proposals for key transport infrastructure identified in the Purbeck Transportation Strategy will be provided for in the forthcoming Site Specific Allocations DPD, as appropriate.

Development proposals that are likely to adversely affect the implementation of transport infrastructure required to achieve the aims of the Purbeck Transportation Strategy will not be permitted.

Yes, although it should be noted that sea access from the Poole/Bournemouth conurbation, Weymouth, Southampton and the Isle of Wight, marketed as an attraction, could ease the congestion. Attention should be paid to the developing Dorset County Council Transportation Plan and the outcomes of the Dorset and East Devon Waterborne Transport Scoping Study.

Q33 Do you have any comments on the Sustainability Appraisal?

The Town Council fully endorses the promotion of additional facilities and services and retention of existing ones. The Sustainability Appraisal needs to address how “hollowing out” of communities can be avoided when economic pressures on Dorset County Council will prompt it to merge facilities and services. One thing the Strategy cannot do is change the geography of Purbeck therefore it needs to present solutions to this problem. Alternatively, if it is deemed uneconomic to provide publicly funded services and facilities at the tip of the peninsular then it must follow that further development in this area is inappropriate.

Core Strategy Planning Purbeck's Future Response Form

With reference to the main consultation document, please answer the questions below and, if necessary, briefly explain your answer. If you respond 'no' to any questions and would prefer an alternative, please provide evidence in support of your suggestion. If you are completing this form electronically, feel free to expand the space given for your explanation. If you are completing a paper copy, feel free to attach separate comments, but please state clearly which questions the comments refer to.

If you would like help in completing this form, please contact the Planning Policy Team on 01929 557273.

Please send your completed form back, by **30 October 2009**, to:
 Planning Policy Team, Purbeck District Council, Westport House, Worgret Road, Wareham, Dorset, BH20 4PP E-mail: ldf@purbeck-dc.gov.uk

Vision for Purbeck



1. Do you agree with the District Vision?

No (delete as appropriate)

Please explain:

The first four paragraphs of the vision are supported. In particular the first sentence of the second paragraph is supported as this recognises that it is important for housing provision to meet local needs as well as the wider needs of the housing market. A significant level of demand for housing in Purbeck comes from outside the district, provision needs to be made for this otherwise the situation in relation to local needs will worsen significantly.

The last paragraph of the vision refers to reducing the need to travel and increasing self containment in the District's larger settlements. This is a worthy objective and is fully supported in principle, however measures for achieving this set out in the vision fail to recognise the need to balance housing and employment growth as an essential and integral component of the strategy. The second and third sentences of the last paragraph should therefore be amended as follows:

This will be increased self containment to balance housing and jobs growth and concentrate housing, employment, shops, services and community facilities at locations that are accessible by a wide range of transport methods and encourage a shift in travel choices and patterns.

Spatial Area Visions



2. Do you agree with the Spatial Area Visions?

No (delete as appropriate)

Please explain:

The Spatial Area Vision for South West Purbeck does not recognise the full potential of Wool and Winfrith to accommodate balanced housing and employment growth. In view of its range of services, good transport links, and expanding role as an employment centre, the Wool / Winfrith area should be identified as a sustainable location for further development alongside the market and coastal towns of Wareham and Swanage. Reference should also be made to the transport improvements for the area proposed in the Purbeck Transport Strategy.

The Spatial Area Vision for the A351 Corridor fails to recognise the need for wider improvements to the transport network in Purbeck. The Purbeck Transport Study recognises that issues along the A351 corridor required a coordinated and integrated approach that looked beyond the A351 to address the wider transport network across the District.

The spatial area vision for the A351 corridor appears to have taken a step backwards by focusing on the A351 in isolation, without reference to the wider transport issues facing the District and the joined-up approach proposed through the Purbeck Transport Strategy which includes improvements along the C6/A352 as part of an integrated package of measures.

Spatial Objectives



3. Do you agree with the Spatial Objectives?

Yes (delete as appropriate)

Please explain:

The spatial objectives reflect the characteristics of Purbeck and the issues identified in sections 2 and 3 of the Consultation Draft Core Strategy. In particular objectives 2. Meet Purbeck's housing needs, and 8. Promote a prosperous economy are supported.

Policy LD – Location of Development



4 (a) Do you agree with this policy?

No (delete as appropriate)

Please explain:

The principle that development will be directed to the most sustainable locations is fully supported, however the policy as currently worded fails to put this principle into practice. A more detailed response in relation to the settlement hierarchy is set out in our response to Q4b, but the main point of objection is that the policy does not reflect the different roles and characteristics of the District's settlements and a more refined approach is needed to reflect the differing functions and growth potential of the District's larger settlements.

In summary, Wool meets all of the criteria set out in the emerging RSS for policy B settlements, and clearly has the potential to play a strategic role locally. In view of its range of services, good transport links, lack of constraints, and expanding role as an employment centre, the Wool / Winfrith area should be identified as a sustainable location for further development alongside the market and coastal towns of Wareham and Swanage.

The policy also implies that Upton itself is a Strategically Significant City or Town, this is clearly not the case and the Review of Community Facilities and Service Provision Background Paper (Purbeck District Council, May 2009) highlights that Upton has fewer community services and facilities than Wool. The policy should clarify that Upton falls within the wider South East Dorset SSCT. The urban extension to the west of the South East Dorset SSCT set out in the Secretary of State's Proposed Changes to the RSS would also have the effect of bringing Lytchett Matravers into SSCT. As such it is not appropriate to count housing provision at Upton or Lytchett Matravers towards the 2,400 dwelling housing provision figure which the RSS specifically attributes to the part of the District outside the SSCT.

4 (b) Do you agree with the Settlement Hierarchy in Policy LD?

No (delete as appropriate)

Please explain:

The settlement hierarchy set out in Policy LD does not represent an accurate reflection of the different roles and characteristics of the settlements identified as Key Service Villages under Development Policy C. The settlement hierarchy should reflect the potential of settlements to accommodate sustainable growth.

A review of the evidence base for the settlement hierarchy in Policy LD suggests that it is based on the ranking of settlements set out in the Review of Community Facilities and Service Provision Background Paper (Purbeck District Council, May 2009). The ranking of settlements set out in Table 2 of the Background Paper categorises Wool as a 'Group 3' settlement with 15-19 types of facilities, however the detailed audit on which this is based reveals that Wool has 20 types of facilities, and should therefore be ranked as a 'Group 2' settlement. Furthermore, the ranking does not take account of the provision of employment opportunities or potential for economic growth and does not take account of the presence of constraints to development.

Several of the Key Service Villages identified in Policy LD function as dormitory / commuter settlements with limited opportunities for employment development and sustainable transport modes. Conversely, Wool functions more akin to a Development Policy B settlement with a high level of services, good transport links including bus and rail services, and an expanding role as an employment centre with the sub-regional employment site at Winfrith Technology Centre (WTC). Wool has few of the constraints to growth experienced by other settlements in Purbeck. It is uniquely placed to act as a sustainable and self contained community serving a wider rural area.

Wool lies at a strategic location at the intersection of the A352 and the Weymouth to London mainline railway, it also lies on a key north south route between the A31 and A35 and is at a gateway

to many of Purbeck's main tourist attractions. It plays an important role as a transport and service hub for the wider area, with bus services providing links to Winfrith, Weymouth, Wareham, Dorchester, Bovington and surrounding villages, and rail services from Wool station to Weymouth, Dorchester, Wareham, Poole, Bournemouth, Southampton and on to London operating hourly and half hourly services at peak times.

Wool has a good range of services and facilities including schools, shops, a post office, a library, pubs, a village hall, churches, a GP surgery, petrol stations with garage facilities, and recreation grounds. There is potential to improve and revitalise many of these to increase self-containment and enhance the settlement's role as a service centre.

Its function is closely related to that of Bovington and Winfrith, as recognised in the proposed joint Area Action Plan for Wool, Winfrith and Bovington. As such the real population of the area that should be considered for planning purposes is over 4,300.

WTC is located to the west of Wool and is a strategic employment site supporting around 1,600 jobs. The WTC site has recently been sold by the Homes and Communities Agency, the new owners have re-branded the site Dorset Green Technology Park and are developing a masterplan for the development of the site as a zero carbon employment centre. The regeneration and expansion of the site has the potential to deliver over 2,400 jobs in the plan period.

The emerging RSS sets out the following criteria for Development Policy B settlements:

- an existing concentration of business and employment and realistic potential for employment opportunities to be enhanced
- shopping, cultural, faith, education, health and public services that meet the needs of the settlement and surrounding area
- there are sustainable transport modes that can be maintained or developed to meet identified community needs in the settlement and the surrounding area

As described above, Wool meets all of these criteria and clearly has the potential to play a strategic role locally. In view of its range of services, good transport links, and expanding role as an employment centre, the Wool / Winfrith area should be identified as a sustainable location for further development alongside the market and coastal towns of Wareham and Swanage.

4 (c) Do you agree that on affordable housing should be permitted in settlements not listed under Policy LD), including the villages highlighted in red on Map 9 (affordable housing is social rented and/or shared ownership housing)?

No (delete as appropriate)

Please explain:

Objection is raised to the proposed removal of the settlement boundary at East Burton. East Burton lies immediately to the west of Wool, between the large settlement of Wool and the sub-regional employment site at Dorset Green Technology Park (the former Winfrith Technology Centre). Development along Burton Road and Dorchester Road effectively links the settlements, and East Burton functions as part of this larger settlement rather than as an isolated rural community.

Development in the vicinity of East Burton has the potential to deliver a number of benefits including improved links to WTC and a number of sites adjoining the settlement boundary at East Burton have been included in the 6-10 year housing supply in Purbeck's SHLAA and represent suitable sites for housing subject to a review of settlement boundaries.

The settlement boundary at East Burton should therefore be retained and expanded to allow for sustainable growth at a location that is within walking distance of the sub-regional employment site and a range of shops, services, facilities and public transport links.



Policy HS – Housing Supply

5. Do you agree with this policy?

No (delete as appropriate)

Please explain:

The housing provision 2,400 dwellings proposed in Policy HS fails to address fundamental issues of housing shortages, affordability issues, and past under delivery of housing in Purbeck.

Policies HD1 and HMA7 of the emerging RSS requires Purbeck to plan for 5,150 new dwellings between 2006 and 2026. This should be considered the minimum level of housing provision for the District.

Whilst we do not consider that the Western Sector represents a suitable location for an urban extension of 2,750 new dwellings, the need to plan for a sufficient level of housing to meet the needs of the District and the wider HMA is paramount. The Core Strategy should therefore work within the overall total housing requirement of 5,150 new dwellings for the District, but alternative locations to the Western Sector should be identified which can meet development in a sustainable manner, taking into account access to jobs, community facilities and sustainable transport links.

As set out in our comments in response to Q4, the principle of distributing development to the most sustainable locations is fully supported, however the approach to the general location of development set out at Policy LD fails to put this principle into practice. In view of its range of services, good transport links, lack of constraints, and expanding role as an employment centre, the Wool / Winfrith area should be identified as a sustainable location for further development alongside the market and coastal towns of Wareham and Swanage.



Character Area Development Potential

6 (a) Do you agree with this approach in estimating development potential?

No (delete as appropriate)

Please explain:

The approach to calculating Character Area Development Potential appears to be based on unpublished reports and is contrary to the approach to determining housing land requirements set out at paragraphs 58 and 59 of PPS3.

Furthermore there is no evidence to suggest that components of housing provision included in rows (c) and (e) of Table 2 have been tested for deliverability as required by paragraph 54 of PPS3.

6 (b) Is 50% a suitable reduction or should the Council make provision for a higher proportion of development potential to come forward?

No (delete as appropriate)

Please explain:

The Council has not demonstrated robust evidence of genuine local circumstances that prevent specific sites being identified. As such there is no justification for including a windfall allowance in the housing figures and no allowance should be made for Character Area Development Potential.

Maintaining a 5 Year Land Supply



7. Should the Core Strategy include phasing for settlement extensions? Yes

Please explain:

In order to secure the delivery of the RSS target of 257.5 dwellings per annum, a phasing policy should be introduced that identifies specific, deliverable sites over the plan period.

Policy ELS – Employment Land Supply



8 (a) Do you agree with this policy?

No (delete as appropriate)

Please explain:

There is a well documented and continuing shortfall of employment land provision in the South East Dorset SSCT. The EiP Panel identified a potential shortage of employment land as a significant issue across the conurbation and recommended that a search for 110 ha of employment land should be conducted. The Secretary of State's proposed changes to the draft RSS has proposed an increase to 152 ha. This recommendation clearly reflects the need for an adequate provision to be made between neighbouring local authorities to ensure that the local economy can provide the full contribution needed to the regional and national economy. This is a cross boundary issue that is likely to require a wider sub-regional approach.

Notwithstanding the above, the identification of Winfrith Technology Centre as a sub-regional employment site is supported. A further 20 ha of land for employment development at WTC could deliver up to 4,000 jobs. In order to ensure a sustainable settlement strategy for the District, this needs to be balanced by housing growth in the Wool / Winfrith area.

8 (b) Should existing employment sites (e.g. Winfrith Technology Centre, Holton Heath Industrial Estate and Admiralty Park) be allowed to continue to expand, or should we allocate new sites that are nearer to existing populations in Swanage and Wareham?

Yes

Please explain:

The continued expansion of Winfrith Technology Centre as a sub-regional employment site is supported. Issues regarding the need to balance housing and employment development would be best resolved by allocating further housing growth to the Wool / Winfrith area.

Although heathland and flood risk considerations restrict the potential for non-employment uses on the WTC site, the Council's SHLAA demonstrates that there is significant potential for housing-led development on land between WTC and Wool. Such development would allow a balance between jobs and housing growth to be achieved at a sustainable location that has access to a range of services and facilities, has good transport links including bus and rail services, and has few of the constraints to growth experienced by other settlements in Purbeck.

The Wool / Winfrith area is uniquely placed to meet Purbeck's housing and employment needs in a sustainable and self contained manner through balanced jobs and housing growth.

Policy RFS – Retail Floor Space Supply



9 (a) Where do you think is the best location for a new supermarket?

Please tick only one

- Preferred Supermarket Option
Large supermarket at Wareham (2,000sqm)
- Alternative Supermarket Option A
Large supermarket in Swanage (2,000sqm)
- Alternative Supermarket Option B
Medium sized supermarkets in Wareham and Swanage
(1,000sqm in each)

Please explain:

(b) If you do not agree with any of the above options, do you have an alternative suggestion?

Please explain:

As detailed elsewhere in this response, the Core Strategy fails to balance jobs and housing growth in the District. The Council's SHLAA demonstrates that there is significant potential for housing-led development on land between WTC and Wool to balance planned jobs growth at WTC. Such development has the potential to support a small discount food store or small to medium supermarket as part of a new or improved local centre at Wool.

Development Options



10 (a) The Council has set out its Preferred Option for development in the District. Which option do you think is best for Purbeck and why?

Please tick only one

- Preferred Option
Distribute development around Swanage, Upton, Wareham and the key service villages of Bere Regis, Lytchett Matravers and Wool.
- Alternative Option A – concentrate growth on the edge of Wareham.
- Alternative Option B – focus growth at Swanage.

Please explain:

10 (b) If you do not like any of the suggested options, what is your alternative suggestion?

Please explain:

It is noted at paragraph 7.1.3 of the draft Core Strategy that the option of improving the self-sufficiency of Wool has been discounted as it would not comply with the emerging RSS, which aims to concentrate developments at settlements with higher levels of service provision thereby reducing the need to travel by car.

As detailed in our response to questions 4(a) and 4(b), we consider that this approach represents a mis-interpretation of guidance in the emerging RSS. The emerging RSS requires that local authorities base their proposals for development on a clear understanding of the role and function of settlements and the ability to increase self containment, highlighting the need to balance economic growth with housing growth.

Paragraph 3.4.2 of the emerging RSS specifically notes that where there are few towns which meet all the criteria of Development Policy B, districts should identify those settlement with potential to play a more strategic role locally and allocate development accordingly. The following criteria are set for Development Policy B settlements:

- an existing concentration of business and employment and realistic potential for employment opportunities to be enhanced
- shopping, cultural, faith, education, health and public services that meet the needs of the settlement and surrounding area
- there are sustainable transport modes that can be maintained or developed to meet identified community needs in the settlement and the surrounding area

Wool meets all of these criteria and clearly has the potential to play a strategic role locally. It has strong sustainability credentials and is not constrained by Green Belt, landscape or nature conservation designations. The settlement benefits from a range of community facilities including shops, schools, library, and doctors surgery. Public transport provision includes a range of bus services and a railway station on the Weymouth – London line with regular services to Dorchester and Weymouth, Poole, Bournemouth, and Southampton.

The settlement adjoins Winfrith Technology Centre, which has recently been sold by the Homes and Communities Agency, the new owners have re-branded the site Dorset Green Technology Park and are developing a masterplan for the development of the site as a zero carbon employment centre. The regeneration and expansion of the site has the potential to deliver over 2,400 jobs in the plan period.

The level of housing development for Wool suggested in Table 4 of the draft RSS is wholly inadequate to meet identified housing needs for the area. The Purbeck Housing Needs Survey 2008 highlights Wool as having the highest level of current housing need in the District, with 111 households currently in need and 90 households per annum likely to be in need in the future. The current level of housing provision would therefore result in a shortfall of over 1,700 homes in the Wool area over the plan period. Furthermore the mismatch between the level of housing provision at Wool indicated in Table 4 when compared with the level of local housing need and the level of employment development planned at Green Technology Park raises significant doubts over the sustainability of the Council's preferred option.

Savills has previously prepared a report for two major landowners in the Wool area, the Lulworth Estate and Redwood Partnership, entitled *Wool – vision for a sustainable community*. This report considered the economic, environmental and social issues facing the area and set out a long term

vision, masterplan and regeneration strategy for Wool and Winfrith based on a thorough investigation of the needs of the area and the District as a whole. The Redwood Partnership has further developed proposals for its landholdings in the area as submitted to the Council in response to consultation on the SHLAA. This report demonstrates the potential for Wool and Winfrith to develop as a sustainable rural community, and when considered alongside the emerging masterplan for significant jobs growth at Green Technology Park, provides a strong case for the identification of Wool as a preferred location for balanced housing and employment growth.

In view of its range of services, good transport links, expanding role as an employment centre, level of housing need, and potential for increased self-containment, the Wool / Winfrith area should be identified as a sustainable location for further development alongside the market and coastal towns of Wareham and Swanage. The level of housing provision proposed for Wool set out in Table 4 of the draft Core Strategy should be increased significantly to provide a balance between jobs and housing growth and to meet identified local housing needs.

Policy CO - Countryside



11 (a) Do you agree with this policy?

Yes / No (delete as appropriate)

Please explain:

11 (b) Should a sequential approach be followed in the re-use of rural buildings?

Yes / No (delete as appropriate)

Please explain:

11 (c) Should other uses be considered for the re-use of rural buildings? Yes / No (delete as appropriate)

Please explain:

11 (d) Are there any other countryside related issues that should be addressed by the policy?

Yes / No (delete as appropriate)

Please explain:

Policy GB – Green Belt



12 (a) Do you agree with this policy?

No (delete as appropriate)

Please explain:

Government guidance in PPG2:Green Belts is that regional and strategic policy sets the framework for Green Belt Policy. Where existing local plans are being revised and updated, existing Green Belt boundaries should not be changed unless alterations to the structure plan have been approved, or other exceptional circumstances exist, which necessitate such revision. Under the Planning and Compulsory Purchase Act 2004, structure plans have now been replaced by Regional Spatial Strategies.

Policy HMA 7 of the emerging RSS specifically provides for revisions to the Green Belt in relation to the Area of Search 7B at Lytchett Minster, it does not indicate any requirement for a review of Green Belt boundaries to accommodate the remaining 2,400 dwelling provision for the area of Purbeck outside the South East Dorset SSCT.

There is therefore no justification for the alterations to Green Belt boundaries that are proposed in the draft Core Strategy at Wareham, Lytchett Matravers, or Upton.

As detailed elsewhere in these representations, the settlement strategy and distribution of development proposed in the Core Strategy has failed to take into account the potential for sustainable and balanced housing and employment development in the Wool / Winfrith area, which would not require any alterations to the Green Belt.

12 (b) Do you agree that small scale rural exception sites for the provision of 100% affordable housing should be allowed as exceptional development in the Green Belt?

Yes / No (delete as appropriate)

Please explain:

Policy AHT – Affordable Housing Tenure



13. Do you agree with this policy?

Yes / No (delete as appropriate)

Please explain:

Policy AH – Affordable Housing



14. Do you agree with this policy?

Yes / No (delete as appropriate)

Please explain:

Policy RES – Rural Exception Sites



15. Do you agree with this policy?

Yes / No (delete as appropriate)

Please explain:

Policy GT – Site Criteria for Gypsies, Travellers and Travelling Show People



16. Do you agree with this policy?

Yes / No (delete as appropriate)

Please explain:

Policy WHN – Wider Housing Needs



17 (a) Do you agree with this policy?

Yes / No (delete as appropriate)

Please explain:

17 (b) Are you aware of any other specific housing needs that should be addressed?

Yes / No (delete as appropriate)

Please explain:

Policy BIO – Biodiversity & Geodiversity



18. Do you agree with this policy?

Yes / No (delete as appropriate)

Please explain:

Policy DH – Dorset Heaths International Designations



19. Do you agree with this policy?
Yes / No (delete as appropriate)
Please explain:

Policy RP – Retail Provision



20. Do you agree with this policy?
Yes / No (delete as appropriate)
Please explain:

Policy CF – Community Facilities and Services



21. Do you agree with this policy?
Yes / No (delete as appropriate)
Please explain:

Policy GI – Green Infrastructure, Recreation and Sports Facilities



22. Do you agree with this policy?
Yes / No (delete as appropriate)
Please explain:

Policy FR – Flood Risk



23. Do you agree with this policy?
Yes / No (delete as appropriate)
Please explain:

Policy GP – Groundwater Protection



24. Do you agree with this policy?
Yes / No (delete as appropriate)
Please explain:

Policy CE – Coastal Erosion in Swanage



25. Do you agree with this policy?
Yes / No (delete as appropriate)
Please explain:

Policy SD – Sustainable Design



26. Do you agree with this policy?
Yes / No (delete as appropriate)
Please explain:

Policy REN – Renewable Energy



27. Do you agree with this policy?
Yes / No (delete as appropriate)
Please explain:

Policy HLH – Historic Environment, Landscape and Heritage



28. Do you agree with this policy?
Yes / No (delete as appropriate)
Please explain:

Policy E – Employment



29. Do you agree with this policy?
Yes / No (delete as appropriate)
Please explain:

Policy TA – Tourist Accommodation and Attractions



30 (a) Do you agree with the policy wording?
Yes / No (delete as appropriate)
Please explain:

30 (b) Should new tourist accommodation be allowed within the AONB? Yes / No (delete as appropriate)
Please explain:

Policy IAT – Improving Accessibility and Transport



31. Do you agree with this policy?
Yes / No (delete as appropriate)
Please explain:

Policy AP – Implementing an Appropriate Transport Strategy for Purbeck



32. Do you agree with this policy?
Yes / No (delete as appropriate)
Please explain:

Sustainability Appraisal



33. Do you have any comments on the Sustainability Appraisal?
Comments:

The sustainability appraisal does not appear to provide an objective framework for the assessment of all of the options for development, and as such it is not possible to demonstrate that the plan is the most appropriate taking into consideration all reasonable alternatives.

Table 4.2 of the sustainability appraisal notes that Option 7: Improving self-sufficiency of Wool has not been taken forward for consultation, but does not provide sufficient explanation of why this is the case. Whilst the SA considers that Wool scores highly because of its facilities, including the railway, it does not appear to have taken into account the potential jobs growth planned for Winfrith Technology Centre. There is clearly potential for further housing growth at Wool to contribute to self containment and reduce the need to travel, improving the overall sustainability of the Core Strategy, this needs to be explicitly recognised in the SA.

The SA also makes reference to potential issues with rural heaths to the west of Wool, however it is apparent from a review of the Habitats Regulations Assessment of the draft Core Strategy that there are likely significant effects associated with the preferred option and both of the alternative options considered. Furthermore the HRA suggests that the block of heathland that encompasses Winfrith, Tadnoll and Knighton heaths is predicted to see a relatively small increase in recreational use compared to other heaths in the vicinity of Wareham and Upton. Although Winfrith Heath is noted in the HRA as being easily accessed by car from the west of Wool and the number of alternative options for residents in Wool is fairly limited in comparison with other parts of Purbeck, these are factors that can be addressed through mitigation. The HRA does not therefore provide any justification for not taking forward the option of improving the self-sufficiency of Wool.

Contact Details:

Finally, please complete your details below. If you are an agent representing a client please completed both sections:

Personal Details		Agents Details (if applicable)	
Title (Mr/Ms/Mrs/Miss/Other)		Agent Title (Mr/Ms/Mrs/Miss/Other)	Mr
First Name:		Agent First Name:	Tim
Last Name:		Agent Last Name:	Hoskinson
Job Title*:		Agent Job Title:	Associate
Organisation*:	Redwood Partnership	Agent Organisation:	Savills
Address:	c/o Agent	Address:	Wessex House Priors Walk Wimborne Dorset
Postcode:		Postcode:	BH21 1PB
Telephone:		Telephone:	01202 856851
E-mail:		E-mail:	thoskinson@savills.com

*For Personal Details only enter job title or organisation if responding on behalf of a group or organisation.

Please note that completed response forms will be made publicly available.

Would you like to be included on our LDF database and informed about future consultations? Yes
(Delete as Appropriate)



Core Strategy Planning Purbeck's Future Response Form

With reference to the main consultation document, please answer the questions below and, if necessary, briefly explain your answer. If you respond 'no' to any questions and would prefer an alternative, please provide evidence in support of your suggestion. If you are completing this form electronically, feel free to expand the space given for your explanation. If you are completing a paper copy, feel free to attach separate comments, but please state clearly which questions the comments refer to.

If you would like help in completing this form, please contact the Planning Policy Team on 01929 557273.

Please send your completed form back, by **30 October 2009**, to:
Planning Policy Team, Purbeck District Council, Westport House, Worgret Road, Wareham, Dorset, BH20 4PP
E-mail: ldf@purbeck-dc.gov.uk

Vision for Purbeck

Q? 1. Do you agree with the District Vision?
 Yes (delete as appropriate)
 Please explain:
 But despite 3.7.2 stating that the level of self-containment for Lytchett Matravers (Purbeck's largest village) is relatively low, this is not then picked up as an 'Issue or Challenge' in 3.7.4 (ok – arguably in 3.7.4.4 Out-commuting)

Spatial Area Visions

Q? 2. Do you agree with the Spatial Area Visions?
 Yes (delete as appropriate)
 Please explain:
 Where environmental improvements and/or community benefits are envisaged, eg enhancement of Lytchett Matravers centre, the plan must allow for sufficient development to bring forward adequate section 106 funding.

Spatial Objectives



3. Do you agree with the Spatial Objectives?

Yes (delete as appropriate)

Please explain:

But these are basic unquestionable objectives which the planning authority should take as read!

Policy LD – Location of Development



4 (a) Do you agree with this policy?

No (delete as appropriate)

Please explain:

The deletion of settlement boundaries from certain villages effectively reinforces their alleged 'non-sustainability'. This is a misguided metropolitan viewpoint which fails to understand the rural economy.

4 (b) Do you agree with the Settlement Hierarchy in Policy LD?

Yes (delete as appropriate)

Please explain:

4 (c) Do you agree that on affordable housing should be permitted in settlements not listed under Policy LD), including the villages highlighted in red on Map 9 (affordable housing is social rented and/or shared ownership housing)?

Yes (delete as appropriate)

Please explain:

Policy HS – Housing Supply



5. Do you agree with this policy?

No (delete as appropriate)

Please explain:

Yes in respect of general strategy but with the proviso that villages also need a degree of development as noted above.

Character Area Development Potential



6 (a) Do you agree with this approach in estimating development potential?

Yes (delete as appropriate)

Please explain:

Albeit I believe your Townscape Character Assessment has not yet been published which means we have to take your suggested approach on trust.

6 (b) Is 50% a suitable reduction or should the Council make provision for a higher proportion of development potential to come forward?

No (delete as appropriate)

Please explain:

How can we agree to this without the as yet unpublished evidence referred to in (a) above?

Further, the rate at which so-called windfall sites may come forward is likely to be lower than anticipated. By their nature most will have existing use value and the differential against residential value will be diminished by social housing, transport infrastructure, heathland mitigation and other 106 obligations.

Maintaining a 5 Year Land Supply



7. Should the Core Strategy include phasing for settlement extensions?

Yes (delete as appropriate)

Please explain:

Policy ELS – Employment Land Supply



8 (a) Do you agree with this policy?

No (delete as appropriate)

Please explain:

Yes in respect of general strategy, albeit provision should be made, possibly as part of the 11.5ha expectation, for employment and economic activity within villages to reduce the need to travel and to sustain and reinforce the viability of the rural economy.

8 (b) Should existing employment sites (e.g. Winfrith Technology Centre, Holton Heath Industrial Estate and Admiralty Park) be allowed to continue to expand, or should we allocate new sites that are nearer to existing populations in Swanage and Wareham?

No (delete as appropriate)

Please explain:

This is not a yes/no question. It is an either /or question. The answer is that employment growth should relate to population centres to reduce the need for travel.

Policy RFS – Retail Floor Space Supply

Q?

9 (a) Where do you think is the best location for a new supermarket?

Please tick only one

- Preferred Supermarket Option
Large supermarket at Wareham (2,000sqm)

Please explain:

Whilst the preferred option should be to always shop locally, the reality is that most of us do use our cars and shop at large supermarkets. Shoppers from Wareham and a good proportion from Swanage for instance currently travel to the Fleetsbridge Tesco. Therefore it follows that to most effectively reduce car miles, a large supermarket in Purbeck would best be sited centrally at Wareham. Even if this cannot be located in or tight to the existing Wareham retail area, it would serve to keep shoppers in the area and thereby would not impact negatively on the viability of the town.

(b) If you do not agree with any of the above options, do you have an alternative suggestion?

Please explain:

Development Options

Q?

10 (a) The Council has set out its Preferred Option for development in the District. Which option do you think is best for Purbeck and why?

Please tick only one

- Preferred Option
Distribute development around Swanage, Upton, Wareham and the key service villages of Bere Regis, Lytchett Matravers and Wool.

Please explain:

We support your Preferred Option albeit with reservations over the proposed large housing numbers still proposed for Swanage. It is acknowledged that Swanage is unusually self-contained but the numbers which PDC are currently seeking to accommodate are not particularly related to Swanage.

The town has tenuous travel links inasmuch as the railway, although a splendid project, is unlikely to realize its full potential without central government commitment to 'joined up transport', mooted by John Prescott about 10 years ago but which so far has not been moved forwards. The A351 is severely constrained at Corfe Castle where it cannot be upgraded or rerouted without serious environmental consequences.

Further, given the proper concern that Purbeck has a too large proportion of second homes, surely allocating a large proportion of the district's new housing at the seaside, will perpetuate and exacerbate this trend?

Cynically, one might think that this is an easy paper exercise to solve Purbeck's obligation to achieve housing numbers. A good proportion of the numbers should be distributed around the villages to reinforce and sustain the local economy for local needs, not second home owners.

In the section 7 'Development Options' leading up to Q10, you ask a number of questions and then supply your own answers.

In the case of Lytchett Matravers 7.2.7, you suggest a settlement expansion of 50 dwellings. In the light of the unsuitability of Swanage as described above, we suggest that this could easily be increased to say 100 dwellings. We have previously indicated to you that land fronting Huntick Road, together with the north end of Foxhills Road, is located close to the village centre, is discrete within the wider landscape, already has satisfactory highway access, is adjacent to all main services, is not unduly constrained by ecological, arboricultural, archaeological or flooding issues and could be brought forward for development at short notice.

You also refer to 25 of the 50 dwellings as being 'affordable' (by which we assume you mean RSL owned/controlled). The proportion should accord with your general 35% requirement.

10 (b) If you do not like any of the suggested options, what is your alternative suggestion?

Please explain:

See 10(a) above.

Policy CO - Countryside



11 (a) Do you agree with this policy?

No (delete as appropriate)

Please explain:

We agree with that redundant, sound and usually traditional buildings in the countryside should be considered for new uses. A sequence of preferred uses has for a long time included employment, community and/or holiday accommodation. Depending on the amount of refurbishment work required and location/market demand one of these has usually proved viable. Conversion to open market housing was disallowed/discouraged because of no housing outside settlement boundary policy and reinforced by a perception that traditional, robust and usually austere rural buildings should not take on a domestic character with garden clutter.

However, your preferred second option is now stated as affordable housing. This inappropriate because such housing normally has zero site value and thus is unlikely to be viable or be brought forward, the locations are often remote from community facilities or employment, and further, would lead to the sort of domestication/garden clutter which you have always resisted.

Reuse for holiday and second home use would be preferable with suitable restrictions on design and cartilage. This would be a positive measure to ease the demand for second homes.

11 (b) Should a sequential approach be followed in the re-use of rural buildings?

Yes (delete as appropriate)

Please explain:

Yes, but see comments in 11(a) above.

11 (c) Should other uses be considered for the re-use of rural buildings?

Yes (delete as appropriate)

Please explain: There may be uses as yet not conceived which could be appropriate. Take proposals on their merits than being overprescriptive.

11 (d) Are there any other countryside related issues that should be addressed by the policy?

Yes (delete as appropriate)

Please explain:

Encouragement should be given to energy generation – solar, wind, hydro to address your identified Issues and Challenges.

Policy GB – Green Belt



12 (a) Do you agree with this policy?

Yes (delete as appropriate)

Please explain:

12 (b) Do you agree that small scale rural exception sites for the provision of 100% affordable housing should be allowed as exceptional development in the Green Belt?

Yes (delete as appropriate)

Please explain:

Policy AHT – Affordable Housing Tenure



13. Do you agree with this policy?

No (delete as appropriate)

Please explain:

Without exception, on every multiple housing development, we have been asked by one or all of the interested parties (landowner, developer, parish/town council, neighbours) to include a large proportion of shared ownership rather than social rented properties. The usual concern is to do with pride of ownership and care for surroundings/community.

Policy AH – Affordable Housing



14. Do you agree with this policy?

No (delete as appropriate)

Please explain:

The proposed very high proportions of social housing will impact on development viability (your suggested 'exceptional circumstances' caveat is noted) and dilute contributions for community benefits/environmental enhancements which might otherwise come forward. A more sensitive endeavour would be to introduce a sliding scale of social housing provision with a lower starting threshold (a financial contribution at the bottom end) and also a requirement for a certain proportion of smaller and hence lower priced open market houses.

Policy RES – Rural Exception Sites



15. Do you agree with this policy?

Yes (delete as appropriate)

Please explain:

Policy GT – Site Criteria for Gypsies, Travellers and Travelling Show People



16. Do you agree with this policy?

No (delete as appropriate)

Please explain:

In the interests of equality for all, all groups and individuals should be subject to the same rights and obligations as each other, including planning law/regulations.

Policy WHN – Wider Housing Needs



17 (a) Do you agree with this policy?

Yes (delete as appropriate)

Please explain:

17 (b) Are you aware of any other specific housing needs that should be addressed?

Yes / No (delete as appropriate)
Please explain:

Policy BIO – Biodiversity & Geodiversity

Q? 18. Do you agree with this policy?
Yes (delete as appropriate)
Please explain:
But also consider the rights of competing interests.

Policy DH – Dorset Heaths International Designations

Q? 19. Do you agree with this policy?
Yes / No (delete as appropriate)
Please explain:
The argument and policies are now unduly biased towards Natural England and their interests.

Policy RP – Retail Provision

Q? 20. Do you agree with this policy?
Yes / No (delete as appropriate)
Please explain:

Policy CF – Community Facilities and Services

Q? 21. Do you agree with this policy?
Yes (delete as appropriate)
Please explain:

Policy GI – Green Infrastructure, Recreation and Sports Facilities

Q? 22. Do you agree with this policy?
Yes (delete as appropriate)
Please explain:

Policy FR – Flood Risk

Q?

23. Do you agree with this policy?

Yes / No (delete as appropriate)

Please explain:

You should not prejudge the justification for coastal development. It should be assessed on its merits.

Policy GP – Groundwater Protection

Q?

24. Do you agree with this policy?

Yes (delete as appropriate)

Please explain:

Policy CE – Coastal Erosion in Swanage

Q?

25. Do you agree with this policy?

No (delete as appropriate)

Please explain:

The case is not proven

Policy SD – Sustainable Design

Q?

26. Do you agree with this policy?

Yes (delete as appropriate)

Please explain:

But why include bullet point 3? This is normal good planning/design and is not related to this heading.

Policy REN – Renewable Energy

Q?

27. Do you agree with this policy?

No (delete as appropriate)

Please explain:

The policy is beset with too many caveats implying a presumption against renewable energy sources. Each application should be taken on its merits with a presumption in favour.

Policy HLH – Historic Environment, Landscape and Heritage



28. Do you agree with this policy?

Yes (delete as appropriate)

Please explain:

Policy E – Employment



29. Do you agree with this policy?

Yes (delete as appropriate)

Please explain:

See also comments above re encouragement of the rural economy and reduction of the need to travel to work.

Policy TA – Tourist Accommodation and Attractions



30 (a) Do you agree with the policy wording?

Yes (delete as appropriate)

Please explain:

30 (b) Should new tourist accommodation be allowed within the AONB?

No (delete as appropriate)

Please explain:

See comments re reuse of rural buildings and the opportunity to ease the second home demand.

Policy IAT – Improving Accessibility and Transport



31. Do you agree with this policy?

No (delete as appropriate)

Please explain:

Place more emphasis on segregated cycle routes.

Policy AP – Implementing an Appropriate Transport Strategy for Purbeck



32. Do you agree with this policy?

No (delete as appropriate)

Please explain:

The strategy was introduced illegally without proper consultation. The demands are excessive and tied up with unfair conditions. Moreover, much of the perceived problem derives from Poole – Weymouth/WDDC traffic which should not be solely addressed by Purbeck residents.

Sustainability Appraisal	
Q?	33. Do you have any comments on the Sustainability Appraisal? Comments:

Contact Details:

Finally, please complete your details below. If you are an agent representing a client please completed both sections:

Personal Details		Agents Details (if applicable)	
Title <small>(Mr/Ms/Mrs/Miss/Other)</small>	Mr	Agent Title <small>(Mr/Ms/Mrs/Miss/Other)</small>	
First Name:	Ken	Agent First Name:	
Last Name:	Morgan	Agent Last Name:	
Job Title*:	Architect	Agent Job Title:	
Organisation*:	Morgan Carey Architects	Agent Organisation:	
Address:	The Apple House, Palmers Orchard, Lytchett Matravers, Poole.	Address:	
Postcode:	BH16 6HG	Postcode:	
Telephone:	01202 622447	Telephone:	
E-mail:	krm@morgancarey.co.uk	E-mail:	

*For Personal Details only enter job title or organisation if responding on behalf of a group or organisation.

Please note that completed response forms will be made publicly available.

Would you like to be included on our LDF database and informed about future consultations? Yes / (Delete as Appropriate)

Core Strategy Planning Purbeck's Future Response Form

With reference to the main consultation document, please answer the questions below and, if necessary, briefly explain your answer. If you respond 'no' to any questions and would prefer an alternative, please provide evidence in support of your suggestion. If you are completing this form electronically, feel free to expand the space given for your explanation. If you are completing a paper copy, feel free to attach separate comments, but please state clearly which questions the comments refer to.

If you would like help in completing this form, please contact the Planning Policy Team on 01929 557273.

Please send your completed form back, by **30 October 2009**, to:

Planning Policy Team, Purbeck District Council, Westport House, Worgret Road, Wareham, Dorset, BH20 4PP E-mail: ldf@purbeck-dc.gov.uk

Vision for Purbeck



1. Do you agree with the District Vision?

Yes (delete as appropriate)

Please explain: Provided that this is a vision and that the Local Planning Authority does not expect delivery of all aspects in the Plan period as this would be unrealistic. It is doubtful whether the population of Swanage and the rest of the District, together with the limited new development fund all aspects of the vision.

Spatial Area Visions



2. Do you agree with the Spatial Area Visions?

Yes (delete as appropriate)

Please explain: Subject again, to the proviso that we do not believe that the vision can be delivered in all its aspects in the Plan period because the level of economic development, including housing, provided in the Plan is insufficient to deliver all of the aspects of the vision.

Spatial Objectives



3. Do you agree with the Spatial Objectives?

No (delete as appropriate)

Please explain: The spatial objectives cannot deliver the vision. The overwhelming emphasis is on protecting and enhancing the environment. There is insufficient emphasis on the economic objectives which would help to protect and enhance the environment and the integrated transport system. With regret, although I consider the objectives to be desirable, I consider them to be aspirational and incapable of delivery. I do not believe that the proposals will meet Purbeck's housing needs. Regrettably, some of the objectives also have cost implications which will impact upon the ability to deliver the economic development in the form of housing and employment. In short, I consider that the spatial objectives need to be more realistic.

Policy LD – Location of Development



4 (a) Do you agree with this policy?

Yes (delete as appropriate)

Please explain: This policy is consistent with the Regional policy.

4 (b) Do you agree with the Settlement Hierarchy in Policy LD?

Yes (delete as appropriate)

Please explain: As above

4 (c) Do you agree that only affordable housing should be permitted in settlements not listed under Policy LD), including the villages highlighted in red on Map 9 (affordable housing is social rented and/or shared ownership housing)?

No (delete as appropriate)

Please explain: There is an error in the question as set out above. In the Document, it refers to only affordable housing. I believe it is unrealistic to have a policy which does not provide for any private housing in small settlements and I think it is undesirable that small settlements should be allowed to stagnate. Why, for example, should people with a local connection who do not need affordable housing be deprived of the opportunity to live within a community where they perhaps grew up? Furthermore, I think it is unrealistic in the 21st century to expect landowners to provide land only for affordable housing. There are very few examples of exceptions sites having been developed in the Green Belt where a similar policy already exists.

Policy HS – Housing Supply



5. Do you agree with this policy?

No (delete as appropriate)

Please explain: The Local Planning Authority cannot simply ignore the requirement for 2,750 homes somewhere, if not at Lytchett Minster. It is accepted that it may not be appropriate to allocate all of that 2,750 homes to Purbeck, but Purbeck should share part of the requirement, if it cannot be accommodated elsewhere in South East Dorset. East Dorset, Bournemouth and Christchurch are already the subject of RSS proposals for Areas of Search in the Green Belt. Poole is heavily constrained by its Borough boundaries.

It is considered that the Plan should have an option which includes taking a share of the 2,750 dwellings originally allocated to the Lytchett Minster area. This could be achieved by combining the housing and employment figures from Options A and B into a revised version of the Preferred Option. This would provide:-

Swanage – 412 dwellings

Wareham – 635 dwellings

Upton – 69 dwellings

Bere Regis – 50 dwellings

Lytchett Matravers – 50 dwellings

Wool – 50 dwelling

Total: 1,266 dwellings.

The above is based on the fact that the Planning Authority have been able to identify locations where these levels of housing supply are achievable. This level of provision would enable more of the vision to be achieved.

Character Area Development Potential



6 (a) Do you agree with this approach in estimating development potential?

No (delete as appropriate)

Please explain: I accept that this approach is an improvement over rolling forward past rates of windfall development, particularly since windfall sites cannot be relied on. However, I feel the Local Authority have not gone far enough in identifying potential development sites.

6 (b) Is 50% a suitable reduction or should the Council make provision for a higher proportion of development potential to come forward?

No (delete as appropriate)

Please explain: The Council needs to make more provision if it is going to meet the spatial objective to “*meet Purbeck’s housing needs*”. Removing the reduction of 50% would result in a possible provision of 1,325 dwellings which is reasonably consistent with the suggestion I made in answer to Question 5 where I have suggested a provision of 1,266 dwellings.

Maintaining a 5 Year Land Supply



7. Should the Core Strategy include phasing for settlement extensions?

No (delete as appropriate)

Please explain: The release of windfall sites for development will be spread across the Plan period. Those windfall sites are less likely to produce meaningful affordable housing numbers. Whilst I understand the general presumption in favour of brownfield sites before greenfield sites, it is the latter which the Local Authority can rely on to provide more affordable housing early in the Plan period.

Policy ELS – Employment Land Supply



8 (a) Do you agree with this policy?

Yes / No (delete as appropriate) Comment:

Please explain: The Plan should recognise that many jobs are created in non-B Class Uses, including Care Homes, Medical Centre and retail developments. There should be scope in all settlements for development for new businesses to start up, including new industrial premises. It appears to me that there is likely to be some re-balancing of world trade markets with a resurgence in manufacturing for the home market, in this country. This is most likely to take place initially through development of new businesses.

8 (b) Should existing employment sites (e.g. Winfrith Technology Centre, Holton Heath Industrial Estate and Admiralty Park) be allowed to continue to expand, or should we allocate new sites that are nearer to existing populations in Swanage and Wareham?

Yes (delete as appropriate)

Please explain:

Policy RFS – Retail Floor Space Supply



9 (a) Where do you think is the best location for a new supermarket?

Please tick only one

- Preferred Supermarket Option
Large supermarket at Wareham (2,000sqm)
- Alternative Supermarket Option A
Large supermarket in Swanage (2,000sqm)
- Alternative Supermarket Option B
Medium sized supermarkets in Wareham and Swanage
(1,000sqm in each)

Please explain:

(b) If you do not agree with any of the above options, do you have an alternative suggestion?

Please explain:

Development Options



10 (a) The Council has set out its Preferred Option for development in the District. Which option do you think is best for Purbeck and why?

Please tick only one

- Preferred Option
Distribute development around Swanage, Upton, Wareham and the key settlements of Bere Regis, Lytchett Matravers and Wool.
- Alternative Option A – concentrate growth on the edge of Wareham.
- Alternative Option B – focus growth at Swanage.

Please explain: The Respondents support the Preferred Option and/or Option B. It is agreed that the Preferred Option has the potential set out at paragraph 7.2.2 and 7.2.9. However, I feel that the level of development proposed for Swanage in the Preferred Option would not enable the range of community facilities which the Local Authority and population consider to be desirable. In particular, although the Respondents could accommodate a health facility on the former Grammar School site, this would reduce the potential of that site for housing and the larger the facility, the greater the reduction of the available land for housing purposes. The Respondent is willing to provide what might amount to a community hospital on the site with day surgery, X-ray facilities and a small amount of overnight bed-spaces. However, I do not think it is necessary that such development would incorporate an ambulance station because it seems to me that such a facility needs to be located so as to achieve the greatest coverage within the target times for attendance and that might not be achieved on the Grammar School site. The Respondents can deliver a Care Home and a health facility. The suggestion that any settlement extension would have to provide significant open space and landscaping to enhance the settlement edge sounds aspirational. Significant open space and landscaping will reduce the developable area. The development value will be reduced by the provision of affordable housing and transportation contributions. The landowners beyond the potential development sites will have an eye to development value if they are expected to contribute land for open space. If that contribution fell on the shoulders of the developer that would further reduce the viability.

I am pleased to see that the Local Planning Authority is aware of the factors which may affect viability, that these may affect the delivery of housing, including affordable housing.

Focusing growth at Swanage would mean that the amount of economic development, both in terms of employment and housing is likely to provide a greater level of funding for affordable housing, and infrastructure, both in community and physical terms.

So as not to disadvantage other communities, I suggest that it is necessary to increase the overall level of housing provision and adopt the Preferred Option with housing figures which reflect those in both Options A and B.

10 (b) If you do not like any of the suggested options, what is your alternative suggestion?

Please explain:

Policy CO - Countryside



11 (a) Do you agree with this policy?

Yes / No (delete as appropriate)

Please explain:

11 (b) Should a sequential approach be followed in the re-use of rural buildings?

Yes / No (delete as appropriate)

Please explain:

11 (c) Should other uses be considered for the re-use of rural buildings? Yes / No (delete as appropriate)

Please explain:

11 (d) Are there any other countryside related issues that should be addressed by the policy?

Yes / No (delete as appropriate)

Please explain:

Policy GB – Green Belt



12 (a) Do you agree with this policy?

Yes / No (delete as appropriate)

Please explain:

12 (b) Do you agree that small scale rural exception sites for the provision of 100% affordable housing should be allowed as exceptional development in the Green Belt?

Yes / No (delete as appropriate)

Please explain:

Policy AHT – Affordable Housing Tenure



13. Do you agree with this policy?

No (delete as appropriate)

Please explain: Recent experience suggests that Housing Needs Assessment is totally unreliable. In one recent case, local housing need has been reduced by 50% in a matter of two months without a single new affordable dwelling having been provided. Developers' reluctance to provide affordable housing is often tempered if the Planning Authority is willing to accept a higher percentage of intermediate housing. Housing where the occupant has a share of the equity also appears to generate more responsibility. Intermediate housing also enables young households in particular to progress up the housing ladder, progression in turn will reduce the need for social rented housing. We suggest a split of 70% rented; 30% intermediate.

Policy AH – Affordable Housing



14. Do you agree with this policy?

No (delete as appropriate)

Please explain: There is no justification for a geographical split in the level of affordable housing provision.

If a Local Authority has to resort to a viability toolkit the policy is clearly unsound. Viability should only be an issue in a minority of cases, not a matter of course.

A threshold of three dwellings on brownfield sites is a nonsense. At this level, in 99% of cases, existing use/investment values will exceed development value. Unless development value exceeds the existing use value, development will not take place. As to the level of affordable housing provision, greenfield sites without planning permission clearly have a low site value. If there is to be a difference in the level of provision, it should be based on whether a site is previously developed or not (brown/greenfield). On greenfield sites a higher level of provision can be more easily justified because of the difference in value.

This policy will not only fail to deliver the level of affordable housing sought. It will deliver less housing in total as landowners hold on, anticipating a future change in policy, or developers of small sites will seek permission only for one or two houses.

Only the larger sites will justify 30% - 40% provision of affordable housing. Full integration or pepper-potting is not supportable. There will clearly be a resistance to paying normal market prices for houses which are next to ones let on subsidised rents. There are many people, like myself, who would not do so. What the Local Planning Authority is contemplating is no more than social engineering.

Policy RES – Rural Exception Sites



15. Do you agree with this policy?

Yes / No (delete as appropriate)

Please explain:

Policy GT – Site Criteria for Gypsies, Travellers and Travelling Show People



16. Do you agree with this policy?

Yes / No (delete as appropriate)

Please explain:

Policy WHN – Wider Housing Needs



17 (a) Do you agree with this policy?

Yes (delete as appropriate)

Please explain: The owners of the former Grammar School site in Swanage would release part of the site for extra care housing for elderly people or a Care Home/Nursing Home. An operator for a Care Home with nursing, comprising 60-70 bed-spaces has been identified.

17 (b) Are you aware of any other specific housing needs that should be addressed?

Yes / No (delete as appropriate)

Please explain:

Policy BIO – Biodiversity & Geodiversity



18. Do you agree with this policy?

Yes / No (delete as appropriate)

Please explain:

Policy DH – Dorset Heaths International Designations



19. Do you agree with this policy?

No (delete as appropriate)

Please explain: The evidence upon which this policy is postulated is coloured by the predisposition of the authors. However, the objection in this case is primarily to the wording of the policy. For developments beyond 400 metres, it is unlikely that any steps could be taken on site to mitigate the so called adverse effects upon the integrity of Dorset Heathland. The policy should be honest and simply require a financial contribution because, in reality, that is always going to be the case.

Policy RP – Retail Provision



20. Do you agree with this policy?
Yes / No (delete as appropriate)
Please explain:

Policy CF – Community Facilities and Services



21. Do you agree with this policy?
Yes / No (delete as appropriate)
Please explain:

Policy GI – Green Infrastructure, Recreation and Sports Facilities



22. Do you agree with this policy?
No (delete as appropriate)
Please explain: This policy is too vague. The policy should set out the standard for recreation, sport and open space facilities even if each settlement is looked at individually in terms of Supplementary Planning Guidance as to what facilities already exist. I do not believe that all new residential development should necessarily make recreation provision if what is already there is adequate. I do not think that the standards should be relegated to SPD.

Earlier in the Local Plan, it acknowledges development is likely to become unviable if too many demands are made of it. In my opinion, it is likely to be unreasonable to expect settlement extensions to deliver significant areas of new green infrastructure. The management of a connected network should be financed through revenue receipts, not capital receipts.

Policy FR – Flood Risk



23. Do you agree with this policy?
Yes / No (delete as appropriate)
Please explain:

Policy GP – Groundwater Protection



24. Do you agree with this policy?
Yes / No (delete as appropriate)
Please explain:

Policy CE – Coastal Erosion in Swanage



25. Do you agree with this policy?
Yes / No (delete as appropriate)
Please explain:

Policy SD – Sustainable Design



26. Do you agree with this policy?
Yes / No (delete as appropriate)
Please explain:

Policy REN – Renewable Energy



27. Do you agree with this policy?
No (delete as appropriate)
Please explain: A requirement for at least 10% of energy to come from decentralised and renewable or low carbon sources is firstly, arbitrary and secondly, unintelligible to the general public. The policy is vague and, in so far as it relates to proposals for apparatus, it is unduly complex.

Policy HLH – Historic Environment, Landscape and Heritage



28. Do you agree with this policy?
Yes / No (delete as appropriate)
Please explain:

Policy E – Employment



29. Do you agree with this policy?
Yes / No (delete as appropriate)
Please explain:

Policy TA – Tourist Accommodation and Attractions



30 (a) Do you agree with the policy wording?
Yes / No (delete as appropriate)
Please explain:

30 (b) Should new tourist accommodation be allowed within the AONB? Yes / No (delete as appropriate)
Please explain:

Policy IAT – Improving Accessibility and Transport



31. Do you agree with this policy?
Yes / No (delete as appropriate)
Please explain:

Policy AP – Implementing an Appropriate Transport Strategy for Purbeck



32. Do you agree with this policy?
No (delete as appropriate)

Please explain: The amount of development proposed in the Plan is not sufficient to finance any significant part of the Purbeck Transportation Strategy, the cost of which is such that there is very little likelihood of it ever being implemented. It is not clear who else would finance the bulk of the infrastructure set out in this strategy. Developers will end up paying the majority of the cost of a small part of the strategy. Unfortunately, much of the developers' contributions seem to be being used on consultants' fees rather than practical measures. In theory, if such a policy is adopted then all developments will be subject to a contribution including affordable housing. If the cost is going passed on, the affordable housing soon becomes unaffordable. The likelihood is that an affordable housing provider will be unwilling to add the cost to his total bill and the developer will be expected to further subsidise the affordable housing. This takes us back to paragraph 7.2.12 of the Consultation Document in which the Council acknowledge the limited scope for additional contributions.

Sustainability Appraisal



33. Do you have any comments on the Sustainability Appraisal?
Comments:

Contact Details:

Finally, please complete your details below. If you are an agent representing a client please completed both sections:

Personal Details		Agents Details (if applicable)	
Title (Mr/Ms/Mrs/Miss/Other)		Agent Title (Mr/Ms/Mrs/Miss/Other)	Mr
First Name:		Agent First Name:	Malcolm
Last Name:		Agent Last Name:	Brown
Job Title*:		Agent Job Title:	Planning Director
Organisation*:	Welfare Dwellings Residential Care	Agent Organisation:	Sibbett Gregory
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Telephone:		Telephone:	01202 661177
E-mail:		E-mail:	malcolm@sibbettgregory.com

*For Personal Details only enter job title or organisation if responding on behalf of a group or organisation.

Please note that completed response forms will be made publicly available.

Would you like to be included on our LDF database and informed about future consultations? Yes
(Delete as Appropriate)

WYG Planning & Design

part of the WYG group



Ref: A011389/SM/sm
Date: 27 November 2009

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

BY POST AND EMAIL

Dear Sir

PURBECK LOCAL DEVELOPMENT FRAMEWORK CORE STRATEGY – PUBLIC CONSULTATION DRAFT

Having reviewed the recently published Purbeck Draft Core Strategy – Purbeck's Future we are pleased to provide our general comments relating to some of the questions within the document:

Question 3 asks whether respondents agree with the spatial objectives set out for Purbeck. In general, we wish to support the spatial objectives set out in the Core Strategy, in particular those which promote a prosperous economy and better access to services for residents.

Question 10 relates to growth and the location of future development in the district. It is considered that growth in the district should respect the general role and function of settlements and seek to meet any identified needs as part of a sustainable pattern of development.

Question 20 sets out a hierarchy of centres identifying Swanage and Wareham as town centres. This hierarchy is supported, as are the implications that future retail development should meet the key PPS6 tests.

We trust that these representations are of assistance and we look forward to receiving clarification of their receipt shortly.

Yours faithfully

Simon Metcalf
Associate



creative minds safe hands

Ropemaker Court, 12 Lower Park Row, Bristol, BS1 5BN

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WYG 2009/11/27