

Planning Purbeck's Future



**Core Strategy - Copies of Representations made
Part 4 – 061-080**

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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



1. Do you agree with the District Vision?

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

Please explain:

Generally yes but it does not really define some of the terms used in the consultation document such as Key Service Village and Local Service Village. Some residents are likely to wonder whether they are living in some parallel Purbeck as places like East Stoke don't or hardly merit a mention and certainly don't appear on the maps. Shades of Brigadoon perhaps!

Spatial Area Visions



2. Do you agree with the Spatial Area Visions?

Yes / ~~No~~ (delete as appropriate) but see comment above.

Please explain:

The Vision refers to Bovington having a role as a Key Service Village yet the hub of the civilian population in Cologne Road is cut off from direct access to the services in the Camp Centre by the Army security fencing.

Wool did I believe produce Parish Plan under an earlier scheme about 10 years ago. There is concern locally that Wool is being turned into a small town without the infrastructure to support it. The recent High Street scheme has done little to improve things and people from East Stoke for example now avoid it.

There is an assumption that people working at Winfrith can easily arrive by train. The reality is that they as many of the employees live in rural areas not serviced by or with easy access to the rail network let alone a frequent and scheduled bus service. The developers have grand designs for more housing and hotels which are not conducive to the Strategy.

Spatial Objectives



3. Do you agree with the Spatial Objectives?

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

Please explain:

But we must be sure we can deliver against all of them.

Policy LD – Location of Development



4 (a) Do you agree with this policy?

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

Please explain:

To maintain viable communities within the smaller villages and to avoid them becoming dominated by retirement or holiday homes then there needs to be controlled development within defined boundaries. This should be a mixture of social rented/co-ownership and market housing to keep local young people in those villages. Access to local housing should give priority to those who already live, work or have family living in a village.

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

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

Please explain:

As above. This approach will provide greater flexibility to meet the numbers of houses required.

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:

But see previous comments as the term “affordable housing” must be applied in its broadest sense where it includes market housing at the bottom end of the scale which can be owned outright.

Policy HS – Housing Supply



5. Do you agree with this policy?

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

Please explain:

Character Area Development Potential



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

Yes / No (delete as appropriate)

Please explain:

But there needs to be a pragmatic approach against over development and the resulting increase in density.

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:

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:

The former within reason and acceptable industry type and density levels.

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: The existing supermarkets need to concentrate on the core business of providing a full range of groceries. If they want to provide other lines then they could take up retail space in the empty shops.

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:

I agree in principle but see earlier comments regarding other villages. I disagree with discounting the wider development because it doesn't conform to the RSS. We need to focus on what is best for Purbeck as a whole.

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:

But there needs to be safeguards to prevent the follow up application to convert to residential use. Or is that what is meant by the question below?

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:

Although controls need to be in place to prevent unsuitable development there are quite a few mini industrial estates springing up around the county through re-use of agricultural buildings. We need to be sure that these are not going to be required again in the future to sustain UK food production.

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:

Providing it is sustainable and not used as the thin end of the wedge for creeping urbanisation.

Policy AHT – Affordable Housing Tenure



13. Do you agree with this policy?

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

Please explain:

Most of the young people I have spoken with aspire to own their own homes so in line with the previous comments we need to try and address these needs for local young people. The danger is that by targeting a high number of social rented housing we will produce the sink estates of the future concentrated in the towns and larger villages.

Policy AH – Affordable Housing



14. Do you agree with this policy?

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

Please explain:

But see comments above.

Policy RES – Rural Exception Sites



15. Do you agree with this policy?

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

Please explain:

This may address my previously expressed concerns providing that adequate arrangements for such implementation are made and enforced.

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:

However the Council should deal firmly with those who illegally occupy or develop unauthorised sites

Policy WHN – Wider Housing Needs



17 (a) Do you agree with this policy?

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

Please explain:

However how does this policy relate to existing provision in Care Homes for example out-with the Towns and KSV for example those in East Stoke and East Holme where it is difficult for residents and staff to access community services and facilities?

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

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

Please explain:

Should we not have a policy to address the points above? E.g. the extension of the footpath on the A352 to Binnegar Hall would improve safer access to the X53 bus service. Therefore this strategy should be referenced from the DCC LTP Improvements Priorities List.

Policy BIO – Biodiversity & Geodiversity



18. Do you agree with this policy?

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

Please explain:

Map is a little difficult to follow because of the size.

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:

I support the policy in principle but do not support the idea of retail development around the area of the station especially in light of recent events over the crossing. The safeguarding of retail provision must focus on the town centres and maintaining those. It should also take into account the greater use of on-line shopping and encourage the local super markets to provide this facility to the outlying villages.

Policy CF – Community Facilities and Services



21. Do you agree with this policy?

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

Please explain:

Noting that at this stage the proposals for the schools are still subject to further consultation.

Policy GI – Green Infrastructure, Recreation and Sports Facilities



22. Do you agree with this policy?

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

Please explain:

We must protect our open spaces.

Policy FR – Flood Risk



23. Do you agree with this policy?

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

Please explain:

However this is not a subject to be treated lightly and we need to ensure that all agencies involved do not make matters worse through the implementation of environmental or housing schemes without a proper FRA. This includes the HLF project along the Frome vale for example. We should also ensure that ditches and gulleys are kept clear by landowners and responsible authorities.

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:

However the comments made by the local councillors who have the informed local knowledge of past and present problems must be heeded.

Policy SD – Sustainable Design



26. Do you agree with this policy?

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

Please explain:

Policy REN – Renewable Energy

Q?

27. Do you agree with this policy?

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

Please explain:

This will be a hot topic in the coming months.

Policy HLH – Historic Environment, Landscape and Heritage

Q?

28. Do you agree with this policy?

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

Please explain:

It is the character of our countryside that makes Purbeck special and much of it AONB so it is good to see this referenced.

Policy E – Employment

Q?

29. Do you agree with this policy?

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

Please explain:

However the policy should also include support for existing employment in rural areas, not only farming but other traditional crafts including the inshore fishing industry in Lulworth and elsewhere along the rest of Purbeck's coastline.

Policy TA – Tourist Accommodation and Attractions

Q?

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

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

Please explain:

However the second paragraph in the policy should be expanded to take into account other changes of use e.g. conversion of garages to holiday accommodation.

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

Please explain:

See above.

Policy IAT – Improving Accessibility and Transport

Q?

31. Do you agree with this policy?

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

Please explain:

But it must be approached with a degree of realism and pragmatism. E.g. we are struggling currently to get regular scheduled bus services to some of our villages and this is unlikely to change.

Policy AP – Implementing an Appropriate Transport Strategy for Purbeck

Q?

32. Do you agree with this policy?

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

Please explain:

But see previous comments

Sustainability Appraisal



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

Comments:

No but a general comment I found the document very comprehensive although some of the Parish Councillors found it rather heavy going.

Contact Details:

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

Personal Details

Title Cllr
(Mr/Ms/Mrs/Miss/Other)
First Name: Barry
Last Name: Quinn
Job Title*: Cllr
Organisation*: West Purbeck Ward
and East Stoke Parish
Council
Address: Wistaria Cottage
East Stoke
Wareham

Agents Details (if applicable)

Agent Title
(Mr/Ms/Mrs/Miss/Other)
Agent First Name:
Agent Last Name:
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Telephone: 01929 462623
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Postcode:
Telephone:
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 on Behalf of Bloor Homes in relation to strategic land interests at Worgret Road, Wareham

Personal Details		Agents Details (if applicable)	
Title		Agent Title	Ms
First Name:		Agent Name: First	Lindsay
Last Name:		Agent Last Name:	Thompson
Job Title:		Agent Job Title:	Senior Planner
Organisation:	Bloor Homes	Agent Organisation:	Terence O'Rourke Ltd
Address:		Address:	Everdene House Deansleigh Road Bournemouth Dorset
Postcode:		Postcode:	BH7 7DU
Telephone:		Telephone:	01202 421142
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Would you like to be included on our LDF database and informed about future consultations? **Yes**

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

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.

Vision for Purbeck



1. Do you agree with the District Vision?

Yes. Bloor Homes supports in particular the recognition in the vision that Purbeck towns should thrive and that the District must provide homes to meet both local needs *and those of the wider housing market area*.

Spatial Area Visions



2. Do you agree with the Spatial Area Visions?

We agree with the vision for central Purbeck.

Spatial Objectives



3. Do you agree with the Spatial Objectives?

In general, yes. However, there should also be a spatial objective that references the amendments required to the green belt; we would suggest wording, which states “the green belt will be amended accordingly to allow sustainable development”.

Policy LD – Location of Development



4 (a) Do you agree with this policy?

We agree that development should be located in the most sustainable locations of which Wareham is one.

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

Generally yes.

4 (c) Do you agree that 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 comment.

Policy HS – Housing Supply



5. Do you agree with this policy?



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

Bloor Homes considers that it is only possible to agree with the housing position statement dated 1 April 2008 (which we understand is due to be updated) if you agree with the findings of the SHLAA and the Townscape Character Assessment (a document that has yet to be published for public consultation). As such, Bloor Homes considers that it needs to reflect further on how comprehensive and intensive the capacity analysis has been in identifying sites and the extent to which it has been informed by industry and market intelligence.

Figure 'f', character area development potential, seems an arbitrary figure that is not based on a robust evidence base. Bloor Homes understands that Purbeck District Council may have experienced an increase in windfall sites over the past five years. However, they do not consider that this meets the requirements of PPS3 (Housing) (paragraph 59) which states: *“Allowances for windfalls should not be included in the first 10 years of land supply unless Local Planning Authorities can provide robust evidence of genuine local circumstances that prevent specific site being identified. In these circumstances, an allowance should be included but should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends”*. This is more of a concern considering that there is a heavy reliance on windfall development to deliver 25% of the District’s housing supply. Bloor Homes considers that Purbeck District Council needs to provide much more robust evidence to support these assumptions.

Criterion 'h' seems irrelevant to this assessment and should not feature. As it states on Purbeck District Council's internet page in relation to the SHLAA, *“It is important to recognise that the SHLAA does not determine whether a site should be given planning permission and developed.”* Therefore we do not see the relevance of including this figure in this table since there is no certainty this site should even get planning permission let alone be delivered.

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

At this stage Bloor Homes is not convinced that sufficient evidence exists to support a windfall development allowance set at 50% of the windfalls predicted by the capacity study.

PPS12, Local Spatial Planning, (2008) requires that for a Development Plan Document to be found sound it should be based on *“robust and credible evidence”*. The findings of the Townscape Character Assessment and other recent studies have yet to be fed back into the Strategic Housing Land Availability Assessment. For instance, the Townscape Character Assessment remains a draft document and has not been subject to any public consultation. Due to the lack of consultation, we do not consider it to form a sound evidence base.

Bloor Homes is particularly concerned about the inclusion of some existing employment sites as potential housing sites within the character assessment. Without market testing and public consultation there is less certainty that these actively used sites will be delivered. As such, any document that relies on this study cannot be considered to form part of a robust and credible evidence base.

Likewise, Bloor Homes considers the 50% level as arbitrary because it does not appear to have taken account of future market trends. The most recent impacts on the development industry of the economic slow down are not considered in this housing position statement as it dates back to April 2008.

As mentioned, there is no certainty that these sites can be delivered and this is recognised by the Council itself. Bloor Homes therefore considers that an assumption that 50% of sites

will be delivered is unrealistic, without an up to date evidence base to support this assumption.

Maintaining a 5 Year Land Supply



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

No. PPS12 (paragraph 4.44) requires that for the Core Strategy to be found sound it should be effective, and to achieve this it must be flexible and deliverable. A phasing provision for settlement extensions would not allow sufficient flexibility and may stifle delivery.

Policy ELS – Employment Land Supply



8 (a) Do you agree with this policy?

No comment.

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 comment.

Policy RFS – Retail Floor Space Supply



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

Bloor Homes support the preferred option for a supermarket at Wareham. They consider the most suitable location to be the land north of Worgret Road where a supermarket could be delivered close to existing community facilities (thereby maximising opportunities for linked trips) and is close to existing and proposed housing (offering the opportunity for non car mode trips).

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?

The preferred option and option A both recognise Wareham's development potential. This is supported by Bloor Homes as Wareham is considered to have a high degree of self-containment, a good range of facilities and public transport connections and will benefit from housing and retail growth that will enable it to become more self-sufficient.

The Core Strategy can allocate strategic sites, and as such, Bloor Homes would like to highlight the significant potential of land located within the confines of the bypass at Worgret Road, Wareham, to contribute to the future housing requirements of Wareham and Purbeck in a sustainable manner. The site adjoins the existing built-up area, it is located only 600 metres from the town centre with its employment, retail and service facilities, and lies close to the Council offices and several schools. It is a highly sustainable site and will perform well in any sequential test of potential options at Wareham, with the only real constraint being the existence of the green belt. The site can readily accommodate an urban extension in a way that enhances the approach to Wareham from the west, whilst minimising the visual effects of development from surrounding areas and protecting key views of Wareham from the north. Allocation of this strategic site would provide a degree of certainty that is advocated by PPS12 (paragraph 4.14) *“core strategies represent a considerable body of work and are intended to endure and give a degree of certainty to communities and investor.”*

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?
11 (b) Should a sequential approach be followed in the re-use of rural buildings?
11 (c) Should other uses be considered for the re-use of rural buildings?
11 (d)
Are there any other countryside related issues that should be addressed by the policy?

No comment.

Policy GB – Green Belt



- 12 (a) Do you agree with this policy?

We agree that the green belt at Wareham should be redefined in order to accommodate a sustainable settlement extension. However, the Core Strategy is a spatial planning document and therefore this document should provide local communities and investors with some certainty, as advocated by PPS12 (paragraph 4.14), by indicating the direction of the revised the green belt boundary.

- 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 comment.

Policy AHT – Affordable Housing Tenure



13. Do you agree with this policy?

No.

The requirements of the policy conflict with the approach outlined in paragraph 8.4.4 that suggests a more reasonable and flexible position. Likewise, the delivery of a very high proportion of social rented homes as part of larger developments is contrary to PPS3 which seeks a mix of housing, both market and affordable, particularly in terms of tenure and price, to support a wide variety of households in all areas, both urban and rural. The proposed policy approach therefore runs contrary to the theme of creating mixed and balanced communities.

Policy AH – Affordable Housing



14. Do you agree with this policy?

No. Bloor Homes does not agree because the *requirement* of 50% appears out of kilter with the proportion of provision envisaged by the emerging South West Regional Spatial Strategy, which requires local planning authorities to set *targets* for at least 35% affordable housing. PPS3: Housing, clearly states that local development documents should set “targets” for the amount of affordable housing and that the policy wording should be “consistent with national policy” (PPS12 paragraph 4.33). This policy should therefore be reworded to indicate that it is a target.

Policy RES – Rural Exception Sites

Q? 15. Do you agree with this policy?

No comment.

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

Q? 16. Do you agree with this policy?

No comment.

Policy WHN – Wider Housing Needs

Q? 17 (a) Do you agree with this policy?

No comment.

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

No comment.

Policy BIO – Biodiversity & Geodiversity

Q? 18. Do you agree with this policy?

No.

This policy requires linkage with a green infrastructure strategy and the potential provision of suitable accessible natural green space as part of the avoidance and mitigation packages of strategic developments.

Policy DH – Dorset Heaths International Designations

Q? 19. Do you agree with this policy?

No comment.

Policy RP – Retail Provision

Q? 20. Do you agree with this policy?

No comment.

Policy CF – Community Facilities and Services

Q? 21. Do you agree with this policy?

The consideration of the need for and location of major new community facilities cannot wait until the site allocations plan. This will have strategic implication and must be considered as part of the core strategy.

Policy GI – Green Infrastructure, Recreation and Sports Facilities

Q? 22. Do you agree with this policy?

No.

Bloor Homes considers that there is a need for better alignment and interlinkage between this policy and Policies BIO and DH. Likewise, it is difficult to comment in full on this policy prior to the publication of the Green Infrastructure Strategy and the Recreational and Open Space Strategy and the information gathered in support of them.

Policy FR – Flood Risk

Q? 23. Do you agree with this policy?

No. The final sentence of this policy should be removed as it is prejudicial.

Policy GP – Groundwater Protection

Q? 24. Do you agree with this policy?

No. The wording should be amended to make reference to development within groundwater source protection areas being permitted where there is no significant risk to the quality or quantity of groundwater.

Policy CE – Coastal Erosion in Swanage

Q? 25. Do you agree with this policy?

No comment.

Policy SD – Sustainable Design

Q? 26. Do you agree with this policy?

No. This policy approach is too restrictive and repetitive. For instance, the final bullet points requires a gold or silver building for life score but Life Time Homes will be brought into Building Regulations in 2011.

Policy REN – Renewable Energy

Q? 27. Do you agree with this policy?

No. It is considered that the second paragraph of this policy involves a requirement that is not adequately justified at this time. However, recognition of the impact on feasibility and viability is supported. It is not clear if the District Council has conducted any specific feasibility or viability testing of the policy requirement.

Policy HLH – Historic Environment, Landscape and Heritage

Q? 28. Do you agree with this policy?

No. This policy is primarily a development management tool. It is questioned whether the policy is needed in a core strategy document.

Policy E – Employment

Q? 29. Do you agree with this policy?

No comment.

Policy TA – Tourist Accommodation and Attractions

Q? 30 (a) Do you agree with the policy wording?
30 (b) Should new tourist accommodation be allowed within the AONB?

No comment.

Policy IAT – Improving Accessibility and Transport

Q? 31. Do you agree with this policy?

Pending the outcome of the South East Dorset Multi Modal Transport Study, which will be a critical part of the evidence base, Bloor Homes has no comment on this policy.

Policy AP – Implementing an Appropriate Transport Strategy for Purbeck

Q? 32. Do you agree with this policy?

Pending the outcome of the South East Dorset Multi Modal Transport Study, which will be a critical part of the evidence base, Bloor Homes has no comment on this policy.

Sustainability Appraisal

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

Comments:

No comment.



Purbeck District Council

Thriving communities in balance
with the natural environment



Core Strategy Planning Purbeck's Future Response Form

Vision for Purbeck

Q?

1. Do you agree with the District Vision?
Yes but with additional wording below:

A new second sentence in the second paragraph could be added to set the scene for other policies.
Where development is to take place it will support existing services and facilities.

Spatial Area Visions

Q?

2. Do you agree with the Spatial Area Visions?
Yes

Strongly support the vision for Central Purbeck and the aim that some development will take place in Stoborough to support its role as a Local Service Village.

Spatial Objectives

Q?

3. Do you agree with the Spatial Objectives?
Yes

Policy LD – Location of Development

Q?

4 (a) Do you agree with this policy?
Yes - in so far as it relates to Stoborough

4 (b) Do you agree with the Settlement Hierarchy in Policy LD?
Yes - in so far as it relates to Stoborough

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

- Q? 5. Do you agree with this policy?
Yes - in so far as it will relate to Stoborough

Character Area Development Potential

- Q? 6 (a) Do you agree with this approach in estimating development potential?
Yes
- 6 (b) Is 50% a suitable reduction or should the Council make provision for a higher proportion of development potential to come forward?
Yes to the first question and No to the second since development delivered through windfall sites is notoriously difficult to predict.

Maintaining a 5 Year Land Supply

- Q? 7. Should the Core Strategy include phasing for settlement extensions?
No. No fixed phasing rule should be adopted as this might hinder the five year housing supply figure. Decisions on settlement extensions should take account of housing needs surveys and the delivery of affordable dwellings to meet that need.

Policy ELS – Employment Land Supply

- Q? 8 (a) Do you agree with this policy?
Yes
- 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

Policy RFS – Retail Floor Space Supply

- Q? 9 (a) Where do you think is the best location for a new supermarket?
No preference
- (b) If you do not agree with any of the above options, do you have an alternative suggestion?
Not applicable

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?

- 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.

None of the above as none of them would meet the affordable housing need in Stoborough and the number of dwellings suggested is well short of the SHLAA. The options make nonsense of the Spatial Vision of "some development will take place in Stoborough to support its role as a Local Service Village."

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

Stoborough should have a housing figure of 20 dwellings in line with the SHLAA and the Spatial Vision

Policy CO - Countryside

Q?

11 (a) Do you agree with this policy?

Yes but with the following amendments

Development in the countryside will be permitted where:

- 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 an estate or farm diversification scheme; or
- It is for a leisure or tourist development in balance with the natural environment; or
- It is a community facility or service located close to existing settlements and in an accessible location.

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

Yes

11 (c) Should other uses be considered for the re-use of rural buildings?
Yes The policy should include development that would serve a worthwhile environmental purpose (land management, nature conservation and habitat enhancement) and development for leisure and tourism. The farm diversification section should be reworded to:

Estate and Farm Diversification

Diversification of existing estates and farms will be encouraged provided that:

- Rural enterprises such as farming and forestry are still the primary purpose of the enterprise;
- Diversification will support the current estate and farming business;
- Diversification projects either utilise existing buildings or are close to existing buildings.
- Opportunities for leisure and recreation are in balance with the natural environment

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

Yes Leisure and tourism are omitted

Policy GB – Green Belt



12 (a) Do you agree with this policy?

No comment

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

Policy AHT – Affordable Housing Tenure



13. Do you agree with this policy?

No comment

Policy AH – Affordable Housing



14. Do you agree with this policy?

Yes in principle but not in so far as the detail percentage figures are concerned since if a site is capable of development but the housing need survey identifies a figure that is in line with or just in excess of the RSS percentage there should be flexibility to settle the actual percentage on the housing need for the particular settlement.

Policy RES – Rural Exception Sites

Q? 15. Do you agree with this policy?
Yes

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

Q? 16. Do you agree with this policy?
No comment

Policy WHN – Wider Housing Needs

Q? 17 (a) Do you agree with this policy?
Yes

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

Policy BIO – Biodiversity & Geodiversity

Q? 18. Do you agree with this policy?
No. The policy in the fourth bullet point is unduly restrictive. It should be reworded as follows:
Resisting development that could adversely affect Sites of Nature Conservation unless there are sound mitigation and enhancement measures to compensate for any such affect

Policy DH – Dorset Heaths International Designations

Q? 19. Do you agree with this policy?
Yes in general terms

Policy RP – Retail Provision

Q? 20. Do you agree with this policy?
No comment

Policy CF – Community Facilities and Services

Q? 21. Do you agree with this policy?
No comments

Policy GI – Green Infrastructure, Recreation and Sports Facilities

Q? 22. Do you agree with this policy?
Yes

Policy FR – Flood Risk

Q? 23. Do you agree with this policy?
Yes

Policy GP – Groundwater Protection

Q? 24. Do you agree with this policy?
Yes

Policy CE – Coastal Erosion in Swanage

Q? 25. Do you agree with this policy?
No comment

Policy SD – Sustainable Design

Q? 26. Do you agree with this policy?
Yes

Policy REN – Renewable Energy

Q? 27. Do you agree with this policy?
No as the policy does not make any provision for low energy use technology either in addition to or instead of the 10% figure for renewable energy. Substantial energy saving is just as important as energy from renewable sources.

Policy HLH – Historic Environment, Landscape and Heritage

Q? 28. Do you agree with this policy?
Yes in general but the policy could usefully refer to the exception of justified enabling development.

Policy E – Employment

Q? 29. Do you agree with this policy?
Yes

Policy TA – Tourist Accommodation and Attractions	
Q?	30 (a) Do you agree with the policy wording? Yes
	30 (b) Should new tourist accommodation be allowed within the AONB? Yes but only if it is in the form of reasonable expansion of an existing facility or is coupled with acknowledged environmental benefits
Policy IAT – Improving Accessibility and Transport	
Q?	31. Do you agree with this policy? No comment
Policy AP – Implementing an Appropriate Transport Strategy for Purbeck	
Q?	32. Do you agree with this policy? Yes provided the contributions are appropriate in scale and kind and meet current Government policy and advice
Sustainability Appraisal	
Q?	33. Do you have any comments on the Sustainability Appraisal? No 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	
Title		Agent Title	Mr
First Name:		Agent First Name:	Ian
Last Name:		Agent Last Name:	Ellis
Job Title*:		Agent Job Title:	Director
Organisation:	Stoborough Settlement	Agent Organisation:	Southern Planning Practice
Address:	C/o Rempstone Estate Office Cow Lane Wareham Dorset	Address:	Youngs Yard Churchfields Winchester Hampshire
Postcode:	BH20 4RD	Postcode:	SO21 1NN
Telephone:		Telephone:	01962 715770
E-mail:		E-mail:	ian@southernplanning.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 - I am already included



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 November 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:

Whilst we support the principles of the statement we would suggest that the term "well paid" is deleted in reference to employment opportunities as this is not quantified and could imply certain types of employment use. Furthermore, there is no reference to the importance of existing employment land.

We would recommend the following wording "*Purbeck will have wider access to diverse and increased local employment opportunities and existing employment areas will be retained and enhanced where appropriate*"

Spatial Area Visions

Q? 2. Do you agree with the Spatial Area Visions?

Yes (delete as appropriate)

Please explain:

We support the recognition of the sub-regional importance of the Holton Heath Industrial employment site.

Spatial Objectives

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

Yes (delete as appropriate)

Please explain:

Whilst we agree with the objectives, we would suggest No.8 is modified to reflect the need to meet employment land regional objectives. We would recommend the wording is changed to "Promote and enable a prosperous local economy"

Policy LD – Location of Development

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

No (delete as appropriate)

Please explain:

The wording of the policy should be changed to state "General Location of Residential Development". As employment development is not referred to in the policy or supporting text.

Furthermore, employment cannot fall into the settlement hierarchy in the same way as residential. For example the Holton Heath Industrial Estate and Admiralty Park are regionally important employment site (Map 10) however both would fall within the settlement hierarchy in policy LD as 'Key Service Villages' or within the 'Countryside'. This is not a true reflection of their status and therefore the policy should specify that development does not include employment.

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:

Character Area Development Potential

Q? 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

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

Yes / No (delete as appropriate)

Please explain:

Policy ELS – Employment Land Supply

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

No (delete as appropriate)

Please explain:

We support paragraph 6.5.4.4 which requires masterplanning work to be undertaken and a development brief prepared for an extension to Holton Heath Industrial Estate (we refer to this as Holton Gate).

We consider masterplanning work offers the opportunity to create better linkages between Admiralty Park and the Holton Heath Industrial Estate and will strengthen the regional importance of this area.

However, whilst we support the thrust of the policy, which promotes economic development being focused at Holton Heath Industrial Estate, we have several concerns about this policy.

We consider the policy is confusing as the 11.5 hectares is not proportioned to Travel to Work Areas (TTWA). Purbeck falls within 2 TTWAs – Dorchester and Weymouth TTWA and Poole TTWA. As the policy refers to Winfrith and Holton Heath it appears the 11.5 hectares applies to both TTWA. Although Holton Heath Industrial Estate and Winfrith are not in the same TTWA. However, the supporting text only refers to the Poole TTWA and not the Dorchester and Weymouth TTWA which leads to the confusion. We realise the confusion arises from the SWRDA Workplace Strategy (2008) which assesses employment demand and supply on a TTWA basis and then in Appendix D quantifies the breakdown to LPA's. There is no explanation of how this is worked out for individual areas or what the breakdown is for LPA's such as Purbeck which lie within 2 TTWA's.

Para 6.5.1.2 of the supporting text states that 1,735-5,300 jobs need to be created within Purbeck within the remainder of Poole TTWA. However, it is not clear how this translates to the employment land requirement of 11.5 hectares.

Para 6.5.2.1 of the supporting text states that traditional industrial employment is projected to decline. However, the SWRDA Workplace Strategy reports that Purbeck has the lowest warehousing stock of all the authorities. We consider the oversupply of B8 uses in Poole has resulted in the reduction of industrial land proportioned to Purbeck. Therefore, further analysis of the SWRDA justification is required.

Table 3 is confusing as it appears the remaining available sites have been allocated in the Preferred Option (Table 6) as individual sites are listed. However, this is at odds with Paragraph 1.2.4 of the supporting text which states the Core Strategy does not allocate sites.

In addition, Table 3 does not include Holton Gate (land north of Holton Heath Industrial Estate) which is referred to in Paragraph 6.5.4.4. If the Core Strategy deleted site specific references this

would allow more flexibility in choosing more appropriate sites in the Site Allocation DPD.

Table 3 includes an allocation of 5 hectares for Admiralty Park. We consider the Core Strategy should be more flexible as the masterplanning process will consider the amount of suitable land for development at Holton Gate and Admiralty Park. Therefore the quantum of land for allocation should be derived from the masterplanning process.

We object to the wording in Paragraph 6.5.4.2, specifically the reference to requiring an allocation for “refurbishment” of Admiralty Park. An allocation or planning permission is not required for refurbishment or repairs and this wording should therefore be deleted.

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:

Given the regional significance of the Holton Heath Industrial Estate and Admiralty Park it is logical to extend this employment area which is already established.

This area is located on a train line and the extension of the employment site to include Holton Gate could enable transport improvements both within the site and also along the A351.

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:

(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:

Providing the development options do not affect the strategic nature or importance of Holton Heath Industrial Estate/Admiralty Park we have no preference.

We note the Maps (13, 17 and 18) and Tables (6, 9, 12) identify individual employment sites and hectarage for development. We consider this is at odds with Paragraph 1.2.4 of the supporting text which states the Core Strategy does not allocate sites. We would recommend the sites are deleted from the maps/tables and a more general approach is applied, such as “at least 13ha of employment land to be found in the Holton Heath area”. Otherwise it will restrict the flexibility of allocating sites in the Site Allocations DPD if they are in locations other than those set out in the Core Strategy.

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?

No (delete as appropriate)

Please explain:

We object to the policy and paragraph 8.3.3 of the supporting text.

The Green Belt should not be extended to cover the Holton Gate (area between Holton Heath and Admiralty Park) as this would restrict future employment growth. Furthermore, it would conflict with the objectives of the Core Strategy (paragraph 6.5.4.4) which recommends masterplanning is undertaken for this new employment site.

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

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

Policy RES – Rural Exception Sites

Q? 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

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

Policy WHN – Wider Housing Needs

Q? 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

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

We object to Map 20 which shows the Holton Gate (land between Admiralty Park and Holton Heath Industrial Estate) as lowland heath. Whilst the area has been colonized by pine trees since the 1950's it is not heathland.

Policy DH – Dorset Heaths International Designations	
Q?	19. Do you agree with this policy? Yes / No (delete as appropriate) Please explain:
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 / No (delete as appropriate) Please explain:
Policy GI – 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:
Policy GP – Groundwater Protection	
Q?	24. Do you agree with this policy? Yes / No (delete as appropriate) Please explain:
Policy CE – Coastal Erosion in Swanage	
Q?	25. Do you agree with this policy? Yes / No (delete as appropriate) Please explain:

Policy SD – Sustainable Design

Q? 26. Do you agree with this policy?
Yes / No (delete as appropriate)
Please explain:

Policy REN – Renewable Energy

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

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 (delete as appropriate)
Please explain:

Whilst we support the objectives of this policy we consider it is not flexible to cover other objectives of the Core Strategy, such as the masterplanning of Holton Gate (between Admiralty Park and Holton Heath Industrial Estate) for future employment use.

We would therefore recommend that the wording of the second bullet point is changed to “For intensification, redevelopment and extension to existing employment land”

Policy TA – Tourist Accommodation and Attractions

Q? 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?
No (delete as appropriate)
Please explain:

Whilst we consider it is right that development should mitigate against the impacts it creates this can be in the form of either on-site provision or financial contributions.

The policy should be reworded to allow for on-site mitigation where feasible.

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)		Agent Title (Mr/Ms/Mrs/Miss/Other)	Mrs
First Name:		Agent First Name:	Joanna
Last Name:		Agent Last Name:	Clark
Job Title*:		Agent Job Title:	Principal Planner
Organisation*:	Birchmere Ltd	Agent Organisation:	Broadway Malyan
Address:	- see agent	Address:	3 Weybridge Business Park, Addlestone Road, Weybridge, Surrey
Postcode:	- see agent	Postcode:	KT15 2BW
Telephone:	- see agent	Telephone:	01932 845599
E-mail:	- see agent	E-mail:	j.clark@broadwaymalyan.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)

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

30 November 2009

Dear Mr Dring

PURBECK CORE STRATEGY PUBLIC CONSULTATION

Thank you for consulting the RSPB on the Core Strategy. I attach a completed response form.

Please contact me if you have any queries about our response, or require any further information.

Yours sincerely

Renny Henderson
Conservation Officer

Enc.

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, we would like to suggest the following amendments.

Please explain:

Purbeck has an extraordinarily rich landscape and wildlife, both of which are significant in a national and international context. We are pleased to note the central position of landscape and wildlife in the 'Vision for Purbeck'.

We suggest that this recognition should extend to a commitment to *enhance* existing wildlife habitats and the promotion of *additional* wildlife habitats, for wildlife and people.

We note the recognition given to climate change but think this needs to be stated in bolder terms. Climate change is today's dominant environmental and political issue and has the potential to affect all activities in Purbeck. The Core Strategy (CS) provides an opportunity for the Council to shape and deliver policies which reduce emissions and to promote adaptation and mitigation measures and this should be an explicit in the CS.

Spatial Area Visions



2. Do you agree with the Spatial Area Visions?

Yes, but we would like to make the following comments.

Please explain:

We note the five inter-related spatial visions expressed on pages 27 - 30. The implications of these spatial visions on designated sites is a significant issue, and whilst reflected and analyzed in the supporting CS Habitats Regulations Assessment (HRA) and in the summary text for each of the visions, these will need further assessment when progressed to the site allocation stage.

In particular, these visions will need to be delivered within the context of the Dorset Heathlands Interim Planning Framework (IPF) and its successor the Dorset Heathlands Joint Development Plan Document (JDPD). Cross-boundary working between authorities is essential for the effective planning and delivery of heathland mitigation measures and green infrastructure, and the Council must continue to engage and build capacity for this process.

Spatial Objectives



3. Do you agree with the Spatial Objectives?

NO, we would like to suggest the following amendment.

Please explain:

We welcome the objectives, and strongly support spatial objectives 1, 5, 7 and 9. We suggest rephrasing spatial objective 3 to

“conserve and enhance Purbeck’s existing habitats and promote additional habitat creation”.

Policy LD – Location of Development



4 (a) Do you agree with this policy?

Yes

Please explain:

We generally support the hierarchy towards locating development set out in Policy LD.

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?

Yes

Please explain:

The Government’s proposed changes to the draft Regional Spatial Strategy (RSS) sets out a requirement for 2,400 dwellings (from an original 2,100 dwellings) within Purbeck over the plan period 2006-2026.

Assuming the RSS is confirmed Purbeck should seek to deliver this allocation in the most sustainable way and with regard to the possible environmental effects including those on designated sites.

We are confident that the Core Strategy HRA process undertaken has assessed adequately the nature of possible impacts on the internationally designated sites arising from the 2,400 dwellings, however we make further comments on the HRA under Q33 below.

We are aware that the RSS identifies ‘area of search 7b’ also referred to as the Western Sector, for an additional 2,750 dwellings. The Council (along with others) has objected to this proposal and the allocation is not addressed in the CS or the HRA. Should the Government confirm the 7b allocation (and/or increase the current allocation beyond 2,400 dwellings), this will require a separate assessment.

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:

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 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:

Section 7 presents three alternative options for development. The Council's preferred option seeks to distribute development around the principal settlements, the alternatives focus growth principally at Wareham and Swanage.

We generally support the preferred option. However, there are environmental implications, and these are recognized in section 7.5 of the CS. Site-specific allocations will require further assessment for their impacts on designated habitats.

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 support the caveat to this policy which seeks to ensure equestrian-related development does not have a direct or indirect impact on internationally designated heathland. Such proposals would need to be screened under the Habitats Regulations and may require a full Assessment.

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?
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

Please explain:

We strongly support Policy BIO.

We support the text within paragraph 8.9.3 which promotes Strategic Nature Areas as mechanisms for promoting biodiversity protection and enhancement.

We strongly support the inclusion of the 'Wild Purbeck' vision – which begins to express the potential of Purbeck for heathland habitat creation. The RSPB afford this vision a high priority, as it offers opportunities to connect existing, isolated, heathlands together to form larger areas that are more robust and better able to withstand the impacts of climate change and other pressures. The Wild Purbeck 'umbrella' also offers the opportunity to describe and quantify the restoration and creation potential of other Purbeck habitats such as wetlands, grasslands and woodland.

The RSPB is working closely with the Council and others in developing this wider vision, which we consider has great potential for wildlife and people living and visiting Purbeck.

Policy DH – Dorset Heaths International Designations



19. Do you agree with this policy?

Yes

Please explain:

We strongly support Policy DH.

We welcome the supporting text in section 8.9.6. Paragraph 8.9.6.1 should also refer to Special Areas of Conservation (SAC) and Ramsar sites as well as SPA.

Purbeck has an important heathland resource estimated at some 4,300 ha, representing approximately 7% of the national resource and there is considerable potential to increase this habitat through targeted restoration and creation schemes, notably via mineral site restoration and selective removal of conifers from plantation woodland on former heathlands within the District. This will assist in meeting UK Biodiversity Action Plan targets. Recent research undertaken as part of Nature AfterMinerals (a Natural England and RSPB project with industry funding, see www.afterminerals.com) has identified at least 800 hectares of potential heathland on some 14 minerals sites in Purbeck. The RSPB is actively pursuing such opportunities with partners. The potential in Purbeck for large-scale habitat restorations is significant in a UK context.

Paragraphs 8.9.6.1 and 8.9.6.2 describe the operation of the Dorset Heathlands Interim Planning Framework (IPF) in which mitigation measures are sought for residential development lying between 400m and 5 km of designated heathlands. There is a good body of scientific evidence on the effects of residential development and occupation on designated heathlands which supports the rationale for the IPF approach which will also underpin the development of the Dorset Heathlands Joint Development Plan Document (JDPD) which will replace the IPF.

We strongly support the explicit recognition that monitoring of mitigation projects and the condition and use of the existing heathlands is essential, both to ensure the mitigation projects are meeting their objectives and that pressures are not increasing on the heathlands.

We are pleased to note the commitment to developing and managing the JDPD with neighbouring authorities. There is a positive and successful working relationship in place between the SE Dorset authorities and conservation and other stakeholders.

Under ‘spatial objective 3: conserve and enhance Purbeck’s natural habitat’ attention also needs to be directed to possible impacts on habitats other than heathland, notably the implications of development pressures on the freshwater and coastal wetlands of Poole Harbour, which is designated as a Special Protection Area (SPA) under the Birds directive and is also a Ramsar site. Recreational disturbance in the Harbour is of growing concern to conservation organizations and work is underway to assess the issue, coordinated by Natural England, with the Borough of Poole also directly involved. The Council need to be engaged with this developing area of work.

Section 9 of the HRA identifies a number of issues associated with water abstraction and wastewater discharges. The HRA has highlighted some uncertainty over the scale of existing environmental effects linked to water abstraction and nutrient discharges within the District. This raises uncertainties about whether *additional* development can be accommodated without having adverse effects on the various international sites within and adjacent to the District. It is important that the CS sets out a strategy to address these concerns, with a clear commitment from the Council to work with partners to develop an understanding of the extent of current problems and devising and delivering the necessary mitigation measures to avoid adverse effects.

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:

We support Policy GI.

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:

We support the desire to deliver sustainable design in new build development, particularly development which demonstrates support for biodiversity through landscaping and in situ features that provide appropriate breeding, roosting or feeding opportunities for birds.

Policy REN – Renewable Energy



27. Do you agree with this policy?

Yes

Please explain:

The RSPB is supportive of renewable energy proposals, providing there are not adverse environmental affects. These schemes may help reduce energy demand and reduce CO2 emissions.

We recommend adding Policy BIO to the list of policies that are noted under the last bullet point of Policy REN.

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:



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

Comments:

We would like to raise some additional comments on the Habitats Regulations Assessment. This is a separate document to the Sustainability Appraisal.

We have considered the HRA dated September 2009 prepared by David Tyldesley and Associates and Footprint Ecology. We were provided with a draft of this report prior to its final submission and were pleased to note a number of our observations have been reflected in the version supporting the draft CS.

On page 7 of the HRA it states that:

Our assessment of the development proposals considered at preferred options stage showed that, without mitigation measures, adverse effects would be likely as a result of the Core Strategy alone, either as single elements or as a combination of elements within the plan for each of these issues (see Table 1). However, mitigation measures, which would eliminate these effects, are largely feasible (in some cases some further work is required to check that the mitigation can be implemented) and can be built into the Core Strategy before submission. If included in the submitted Core Strategy, as recommended, these avoidance measures would eliminate the likelihood of significant effects.

This is a critical finding of the HRA. The Council need to secure and deliver the various measures described in the HRA, as summarized in section 12, to ensure the Core Strategy will not have adverse effects upon the international sites. We consider that a separate Implementation Plan, prepared by the Council and agreed by Natural England and other appropriate parties, is necessary to ensure this. Some of the mitigation will require actions outside the Council's direct control (as is explicitly identified in the HRA at paragraph 5.8.1) and will involve collaboration with other organizations and individuals. The Council must develop appropriate capacity to manage such relationships if the CS is to be deliverable.

We would welcome further dialogue with the Council on this matter.

On page 3 of the HRA it states that:

There are obligations on Member States to avoid deterioration of habitats and significant disturbance of species on European sites. It seems clear that some measures under the Directives will be needed to tackle existing pressures and problems, including deterioration of water quality and habitat deterioration and disturbance on the designated sites. The next phase of the Habitats Regulations Assessment will need to attempt to identify what the measures may be, how effective they may be, and when they may take effect. It will then be necessary to consider whether those measures may be sufficient to also counter the effects of increased development, as a result of the plan; or would different measures, or more of the same measures be required? Provision for any additional or different measures will need to be incorporated into the proposals of the Core Strategy.

The RSPB agrees with the HRA analysis that there are separate legal obligations on Member States to take appropriate steps to avoid deterioration of habitats and habitats of species, as well as significant disturbance of species for which European sites are designated. The RSPB also agrees that it is appropriate to take such measures in to account as part of the context for the HRA. However, there are some key points that need to be borne in mind in determining the weight to be accorded such measures:

1. site condition monitoring of SSSIs (and therefore European sites) does not ordinarily monitor the effects of recreational disturbance on birds and their habitats. Therefore, we are not convinced these impacts will be adequately addressed through any resulting SSSI remedies work, nor their impacts taken into account in determining favourable condition targets for the SSSIs and related European sites. We strongly recommend consulting Natural England over the extent to which the impacts of recreational disturbance (and other urban effects) on the SPA ground nesting birds have been addressed in site condition monitoring, and how the results of such monitoring have been manifested in measures to prevent the historic and ongoing impacts on these species, as now recognized in scientific research;

2. however, if we assume that NE has identified the measures necessary to remedy the historic and ongoing impacts of recreational disturbance (and other urban effects) on the European sites, it will be insufficient to rely on general commitments that such measures may take place at some point in the future. To be able to rely on such measures for the purpose of the HRA, we would expect there to be a high degree of certainty that the correct remedial measures have been identified, they relate to the impacts arising from the HRA, funding is secured and in place, and a binding commitment that the measures will be carried out within a specified timescale. To rely on anything less, risks undermining the conclusions of the HRA and therefore increase the magnitude of any related adverse effects arising from the Purbeck Core Strategy.

We also have concerns about the proposed treatment of in-combination effects.

It is extremely difficult to design mitigation measures that will not leave a minor residual effect upon a Natura 2000 site. Although in any case that impact may be of a *de minimus* level there is a risk that enough of these residual effects, when combined, will give rise to an adverse effect upon the integrity of a Natura 2000 site. The impact of recreational disturbance from housing around the Dorset Heathlands SPA shows how important the accumulation of these individual minor effects can be. The Council must be confident that its plan avoids an adverse effect, on its own or in combination with other plans or projects. In the *Waddenzee* case the European Court of Justice made it clear that a conclusion of no adverse effect can only be reached "where no reasonable scientific doubt remains as to the absence of such effects." In this context the in combination assessment represents a safety net, a final "check" on the adequacy of the proposed mitigation measures, rather than an added layer of complexity. However, we do not consider that a conclusion of no adverse effect can be reached in the absence of such a check.

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:	Renny	Agent First Name:	
Last Name:	Henderson	Agent Last Name:	
Job Title*:	Conservation Officer	Agent Job Title:	
Organisation*:	RSPB	Agent Organisation:	
Address:	Keble House, Southernhay Gardens, Exeter, Devon	Address:	
Postcode:	EX1 1NT	Postcode:	
Telephone:	01395 432691	Telephone:	
E-mail:	Renny.henderson@rspb.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

Q? 1. Do you agree with the District Vision?
 No
 Please explain:
 It is waffle. Purbeck and its vision will provide nothing. Development is provided by private investment, which Purbeck can only try to influence. Increased self-containment can only occur by critical mass of housing, employment and community facilities, which is as applicable to the Local Service Villages as it is to the larger villages and towns. The Vision gives no information about certainty and programming of funding to provide public transport and reconnection of the Swanage Railway. How does this assist developer’s decisions?

Spatial Area Visions

Q? 2. Do you agree with the Spatial Area Visions?
 No
 Please explain:
 There is no “vision”. The proposals are vague and the question is far too wide in its application to six spatial areas. Support is given to residential development in Winfrith Newburgh.

Spatial Objectives

Q? 3. Do you agree with the Spatial Objectives?
 Yes, subject to infill/windfall residential development being permitted in Local Service Villages.

Policy LD – Location of Development

Q? 4 (a) Do you agree with this policy?
 No
 Please explain:
 Open market housing in Development Policy C towns and villages should not be fettered to meeting an “identified need” (undefined) in addition to meeting housing supply. Additional housing provision for Winfrith Newburgh is appropriate and sustainable because of the Winfrith Technology Centre site and proposals for additional employment development there – Policy ELS refers. Good quality local housing will attract inward investment and investors.

4 (b) Do you agree with the Settlement Hierarchy in Policy LD?
 Yes, subject to the comments at 4(a).

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

Please explain:

This will introduce social housing ghettos rather than provide a mix of housing and mix of social strata.

Policy HS – Housing Supply



5. Do you agree with this policy?

Yes, subject to the comments on Policy LD above.

Character Area Development Potential



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

Yes

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

Policy ELS – Employment Land Supply



8 (a) Do you agree with this policy?

Yes, however additional housing (more than 3) will be necessary to provide mixed housing and employment development which will be sustainable.

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 – it is brownfield development.

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:

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?

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?

No

Please explain:

The test for development in the AONB should be one of harm. See the West Dorset Local Plan tourism policies.

30 (b) Should new tourist accommodation be allowed within the AONB? Yes, subject to the test of harm. See the West Dorset Local Plan tourism policies.

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 complete both sections:

Personal Details

Title Mr
(Mr/Ms/Mrs/Miss/Other)
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Last Name: Smeaton
Job Title*:
Organisation*:

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Dorchester

Agents Details (if applicable)

Agent Title Mr
(Mr/Ms/Mrs/Miss/Other)
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*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)

WAREHAM TOWN TRUST

January 29, 2010

Mr Steve MacKenzie
Chief Executive
Purbeck District Council
Westport House
Worgret Road
Wareham
Dorset

Dear Mr Mackenzie **PLANNING PURBECK'S FUTURE -PURBECK CORE STRATEGY**

Thank you for the opportunity to comment on the draft Purbeck Core Strategy. Whilst Wareham Town Trust generally supports the proposed vision and objectives and in particular shares the objective "respect the character and distinctiveness of Purbeck's towns, villages and countryside", we strongly object to the proposals for future retailing which we consider would erode this very character. Securing Wareham's future vitality and viability is of paramount importance and should we feel underpin the policy for Wareham.

Whilst we support Policy HLH in the draft strategy which gives priority to the protection, conservation and enhancement of the District's landscape and historic environment, conserving the historic fabric of Wareham is clearly inextricably linked to the town's vitality and viability. In this respect we consider that the proposed edge-of-town centre or out-of-town supermarket in Wareham would undermine rather than protect the town's historic environment.

We recognize and support a certain amount of new development for housing and employment in order to provide affordable housing and local employment as well as to support the viability of shops and services. We consider that the amount of new development needs to be limited by the capacity of the existing settlements in order not to affect the special landscape of this area. Nor should it reduce the provision of open space to meet the needs of residents. We consider that development should be kept within the existing Wareham bypass and strongly urge that any proposals for extension beyond this to the west of Wareham be resisted. You have previously rejected proposals to develop to the west of Wareham bypass and this was upheld on appeal due to its prominent location and the expected impact on the surrounding landscape and particularly the Site of Special Scientific Interest.

With regard to the proposals for future retailing we strongly object to the options for provision of an edge-of-town supermarket of whatever size in Wareham which would if adopted represent a complete change of Council policy and would detrimentally affect the character, vitality and viability of Wareham. We are most concerned about the implications for Wareham of either of these proposals and urge you to consider the following points:

- The Council has in the past resisted proposals for edge-of-town/out-of-town supermarkets in Wareham due to the likely impact on the vitality and viability of the town centre. More recently this has resulted in the successful and very welcome expansion and enhancement of the main town centre supermarket which was taken

ALAN TUBBS, CHAIR
40 STOUR DRIVE • WAREHAM • DORSET
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over by Sainsbury's. We were therefore most concerned and surprised to see that no option was included in the Core Strategy to maintain the existing town centre provision, particularly in view of this recent success and the Council's previous policy of resisting out-of-town/edge-of-town retail in order to maintain the vitality and viability of the town centre.

- We understand that the Retail Study carried out by Nathaniel Lichfield and Partners in 2008 provided the evidence for the draft Core Strategy. However this Study points out that the Council must carefully consider whether the benefits of a new supermarket would outweigh potential harm to the vitality and viability of the town centre. The Study states in its conclusions "The impact of large stores would need to be carefully considered, particularly if out-of-centre stores are proposed. The provision of in-centre or edge-of-centre stores should be the priority" and in respect of Wareham that "In Wareham, the only identified site that could accommodate a larger store is out-of-centre***As such, the Council will need to carefully consider whether the qualitative benefit to residents as a whole and the potential to reduce outflow of convenience expenditure would outweigh any potential for harm on the vitality and viability of the town centre.***" The Core Strategy options document does not set out the need to balance these factors nor does it examine or address the likely impact of the options proposed on the vitality and viability of either Swanage or Wareham town centres or consider the option of not providing additional retail floorspace outside of these town centres. We urge the Council to follow Government guidance and, as required under Planning Policy Statement 6 (PPS6), first assess the likely impact of an edge-of-centre/out-of-centre supermarket before taking the allocation of a site any further.

- The retail study carried out by Drivers Jonas in 1999/2000 to examine the arguments relating to a superstore proposal at Worgret Road concluded that an out-of-town store would have an unacceptable impact on the vitality and viability of the town centre and that whilst leakage to other centres would be reduced continuing to accept leakage was the lesser of the two evils.

- It is recognised that a significant proportion of Wareham residents commute to Bournemouth, Poole and Dorchester, such that a significant amount of leakage could be attributed to those stopping at Tesco's, Asda etc on their way home from work. Clearly this is likely to continue even if a new supermarket is built at the edge of Wareham. It is also known that people are loyal to their brand of supermarket and that a new supermarket is only likely to claw back a percentage of those shopping at the same brand of supermarket.

- PPS6 also states "***where possible, growth should be accommodated by more efficient use of land and buildings within existing centres (para 2.4.)***" and where growth cannot be accommodated in the centres, planning authorities should plan for the extension of the primary shopping area – not the development of out-of-centre sites. The sequential approach does include out-of-centre sites as the last option, with preference to those which will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with it.

- PPS6 also states that "***strategic choices about where growth should be accommodated and how it can be used most effectively to strengthen or regenerate existing centres.***" Clearly strengthening the existing town centre should be the aim of the Core Strategy and proposals should follow that as the primary aim with the requirement to meet future needs as subsidiary to this primary aim. It is clear that the town's economy is fragile and that every effort is needed to secure its future for the enjoyment of generations to come.

- The DETR report "Impact of Large Foodstores on Market Towns and District Centres" 1998, provides relevant evidence of the impact of edge-of-town and out-of-town supermarkets on smaller town centres, indicating that market town centre foodstores suffered impacts on their market share of between 13% and 50%. The evidence shows that smaller town centres which depend on convenience retailing to underpin economic viability (as with Wareham) were most at risk from harmful impact from out-of-town stores. As a fragile town centre Wareham is at risk of losing the recent improved foodstore provision in the town centre.

- The Town Trust considers that an edge-of-town centre or out-of-town supermarket would have a damaging effect on the vitality and viability of Wareham town centre, affecting not only the existing supermarkets but also the independent retailers in the town. The vision of a "distinctive and thriving" town is unlikely to be the result if either of the two retail options presented in the draft

strategy are pursued. The report clearly recognises the potential harm on the vitality and viability of the town centre of such a proposal.

- In addition, clearly this study was carried out prior to Sainsbury's taking over the main supermarket in Wareham at which time the floor-space of the store was significantly increased and the turnover has undoubtedly also increased. This is likely to indicate a significant reduction in the predicted "need" for additional retail space in Wareham and therefore the study clearly needs to be revisited in order to take account of this.

The Council has up to now upheld policies which secure the long term vitality and viability of Wareham town centre and we would urge you to urgently reconsider these ill considered proposals. The economy of the town is clearly in a delicate balance and such proposals would have a devastating effect on the town. ***We urge you to act now and drop the proposed options with respect to future retailing in Wareham in order to maintain the future vitality and viability of this well loved town.***

Sincerely,

Alan Tubbs, Chair, Wareham Town Trust

Copies:

Members of Wareham Town Council
Members of Purbeck District Council
Wareham and District Chamber of Trade and Commerce
Wareham and District Development Trust
Wareham Community Partnership
Purbeck Environment Action Team

CS068 Serco Group - Richard Hiles

From: Richard Hiles[SMTP:RICHARD.HILES@SERCO.COM]

Dear sir,

The following gives my personal views on two of the issues raised in Planning Purbeck's Future.

Q10

As a resident of Upton, I am opposed to the target of 315 new homes within the existing settlement boundary. The existence of the 400m Natural England heathland buffer zones will concentrate this development into a narrow strip through Upton's centre. This will have the following detrimental effects on Upton.

- 1) It will overcrowd the central area with housing and harm the local character.
- 2) It will mean that high density housing will be developed, which will then offer minimal amenity space for the children of the families in that accommodation.
- 3) It will place too much strain on existing facilities.

The target for Upton as a whole should be reduced to around 200 new dwellings based on the current buffer zones. If these were to be modified in any way (e.g. if certain forms of low risk accommodation could be tolerated within a zone of 200m to 400m say - e.g. sheltered accommodation for the elderly), this figure could be revised upwards. Also, if (with community agreement), some limited settlement extension was permitted, the figure could also be revised upwards. At present though, 315 extra houses within the confines of the settlement boundary and the heathland buffer zones is too many.

Q13

The mix of social rented to intermediate housing should be 67%:33% and not 90%:10%.

Instead, more effort should be put into encouraging those currently occupying social rented accommodation to move into other forms of accommodation as it becomes available. A large programme of building social rented housing will repeat the mistakes made in earlier generations which led to the sale of many council houses (something which at the time seemed to solve a problem, but which ultimately has led to the current shortage).

Our communities need more shared equity accommodation to allow those unable to buy to start becoming responsible home-owners, and to allow local young people to remain within the community.

Regards,

Richard Hiles

4 Moorland Way,
Upton,
Poole,
Dorset
BH16 5JT

Please note: my email address is now Richard.Hiles@serco.com

Tel: +44 (0) 1305 851171

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JR/CHE/JS/P3762
27 November 2009

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

For the attention of Keith Childs

Dear Sir/Madam

Purbeck District Council LDF – Core Strategy Public Consultation Draft – September/October/November 2009

We write on behalf of our client, ZBV (Winfrith) Ltd, to make representations to the Draft Core Strategy ‘Planning for Purbeck’s Future’ (September 2009). As you may be aware, ZBV (Winfrith) Ltd are working in partnership with the Homes & Communities Agency (HCA) to kick-start the regeneration of the Winfrith Technology Centre (WTC) – soon to be renamed Dorset Green Technology Park.

The WTC site came under ZBV’s ownership in 2007, following a tender process initiated by the former owners English Partnership (now the HCA). Prior to this, the site was part of the wider Winfrith campus which was, up until 1995, operated by UKAEA as part of the UK’s civil nuclear research programme. The WTC site was decommissioned in the late 1990’s and has been in use as a technology centre since that time.

The WTC site has long been a major employment location within the region, largely due to the site’s longstanding association with UKAEA and the UK nuclear industry. However, the site is now at an important transition point. Whilst a number of the existing buildings on-site have been sub-divided into smaller business units and re-let, the quality of accommodation is generally poor and lacks modern services and amenities. As a result, major new investment is now critically required to improve the quality of the on-site business accommodation/functioning, and to encourage new firms and businesses to locate at WTC in the future.

Allied to this, large areas of the WTC site are either vacant or currently under-used and capable of accommodating significant new employment/business growth. Indeed, the recent SWRDA Workspace Strategy (2008) identifies an opportunity to deliver 20ha of new development at the site. ZBV and the HCA are committed to delivering the sustainable (and viable) regeneration of the WTC site – which will not only ensure its economic future, but will also promote the site as a sub-regional (and eventually regional) employment location.

In early 2008, ZBV engaged the Prince’s Foundation for the Built Environment (PFBE) to undertake an Enquiry by Design (EbD) to create a ‘vision’ for bringing forward the sustainable regeneration of the site. The EbD process involved wide ranging consultation with a number of stakeholders, statutory bodies and the local community. The final EbD Vision Document (entitled: Winfrith Technology Centre – Vision and Design Guidance) was published in July 2008.

The EbD process identified the opportunity to deliver regeneration through a sustainable mixed-use approach. This included the provision of significant new business development along-side a mix of other uses (including residential) to create a sustainable community with improved links to and better integration with the nearby settlements (including East Burton and Wool). However, it was recognised that the preferred mixed-use approach would require a change in the adopted planning policy position concerning new development in the area.

ZBV has appointed Rummey Design and Rolfe Judd Planning to develop a Masterplan which builds on the early ‘vision’ work undertaken by the PFBE. The Masterplan is intended to assess the key constraints and

opportunities associated with bringing forward new development and wider sustainable regeneration of the WTC site. Once complete, the Masterplan will establish a clear development framework, which will provide a 'blue-print' for the future regeneration of the WTC.

Consultation has already commenced on the content of the Masterplan. To date this has included a two-day stakeholder exhibition and workshop (held on site on 30/31 July 2009 – attended by representatives of the Government Office for the South West, Dorset County Council, Purbeck District Council, Wool & Winfrith Parish Councils, existing WTC tenants and local interest groups) and a presentation to Wool Parish Council (on 21 October 2009). Feedback from these early events is now informing the evolution of the Masterplan.

The intention is that the Masterplan will assist the Council with the preparation of the proposed Winfrith, Wool and Bovington Area Action Plan (AAP). However, it is recognised that the draft Core Strategy will begin to establish the broad parameters for new development coming forward within the AAP area. Hence, our representations set out the ZBV/HCA vision for the WTC site and explain the principal drivers behind the regeneration proposals.

With this in mind, we enclose a completed copy of the Council's 'Response Form' which sets out our core representations. In addition, we also enclose a statement (entitled "Dorset Green Technology Park – Delivering Regeneration") which explains the vision for the WTC site, identifies the opportunities and constraints to new development, and outlines the proposed strategy for delivering regeneration (through the Masterplanning process).

Furthermore, having reviewed the draft Core Strategy, we note that there are several key sections included within the document which are not directly covered by the questions set out within the consultation Response Form. Hence, we set out our comments to these sections of the draft Core Strategy below.

Representations to sections of the Draft Core Strategy not included on the Response Form

Section 3.5 – South West Purbeck Spatial Area

We have the following comments/observations on the South West Purbeck Spatial Area (which includes the WTC site):

- **Para 3.5.1 – we note the identification of Wool as a Key Service Village and a 'key transport interchange' within the Spatial Area. However, whilst Wool does provide some services (including shops, pubs, school etc), it is our view that there is currently an under provision of key services/facilities within the village (particularly given the size of settlement and proximity to the WTC site). Furthermore, the existing facilities (particularly the retail offer) are dispersed and there is little to define the 'centre' of Wool.**

In our view there is an opportunity (and need) to improve the range of services/facilities provided within Wool and this should be recognised and promoted through emerging policy. As part of the Masterplan process consideration is being given to options both for strengthening the links between the WTC site and Wool, and improving the overall range of facilities/services available to both residents and the existing/future workforce.

Given the location of the site, the transport links (provided by Wool Station) and the potential for an improved relationship with the WTC site, it is our view that Wool should aspire to become a 'Town' – offering a range of facilities/services, a range of housing choice (including affordable housing), new employment opportunities (at WTC), improved accessibility (via public transport) and improved community infrastructure. Again, this should be recognised within emerging planning policy.

- **Para 3.5.3.1 (Issues and Challenges) – it is recognised that despite their close proximity, there is only a very limited relationship between the employment function of the WTC site and Wool. This is primarily as a result of the historic use of the WTC site - which required some physical separation from the surrounding population centres for security and safety purposes.**

Indeed, it is interesting to note from initial survey work undertaken by the Masterplanning team that the vast majority of the existing workforce (at the WTC site) live outside the immediate area and commute an average distance of between 10-25 miles to work. Furthermore, it is also clear that the current workforce do not visit or make regular use of the services/facilities within Wool itself (note: this is probably a response to the limited offer within Wool, the poor links between WTC and the village, and the absence of car parking in Wool).

In our view there are significant opportunities to strengthen the links/connections between Wool and WTC (both in terms of form and function) through the regeneration of the WTC site (and the Masterplanning process). A key objective of the Masterplan is to explore opportunities for:

- *improving pedestrian links between WTC and Wool;*
 - *improving public transport links between Wool and the WTC site, and to the wider area;*
 - *achieving a link (possible via a shuttle bus) between the WTC and Wool station;*
 - *improving the range of local facilities and services available to the existing workforce and the residents of Wool and East Burton;*
 - *improving the availability (and affordability) of housing around WTC and within Wool to encourage existing and future workers to live within the local area.*
- *Para 3.5.3.2 – we agree that the preparation of an Area Action Plan provides the most effective mechanism to stimulate improvements to local areas and manage new growth/development. We are also firmly of the view that the Masterplan (currently being developed for the WTC site) should play a critical role in the future formulation of the AAP.*
 - *Para 3.5.3.3 – whilst the South West Purbeck Spatial Area is not identified within the RSS for ‘major growth’, there is, in our view, a clear opportunity (and need) for ‘managed growth’. This approach is not only consistent with Development Policy C (within the RSS), which recognises the need to support economic activity; extend the range of services facilities and to meet identified housing need to help promote stronger communities; and greater self containment within the regions towns/villages; but also recognises reflects the strong locational advantages of the area (particularly around Wool).*

In many ways, the South West Purbeck Spatial Area is unique, in that it includes the WTC (a major sub-regional employment site with potential for expansion/growth); direct main-line train access to London Waterloo (via Wool station); a series of population centres all in relatively close proximity; good road links; and internationally known tourist attractions (Lulworth Cove, Durdle Door and the Jurassic Coastline). However, despite these benefits, the area suffers from a number of deficiencies – poor levels of containment (with significant inward and outward commuting); limited services/facilities serving the existing population; poor public transport linkages between the main population centres and facilities; traffic congestion along the A352; and poor affordability and availability of new housing.

In our view, managed growth (particularly through new development) will provide the opportunity to address and overcome these deficiencies and deliver sustainable improvements/benefits for the area. In particular, the regeneration of the WTC site (via new business development alongside a mix of uses - including residential) will provide the opportunity to kick-start wider improvements within the South West spatial area. As noted within the accompanying ‘Delivering Regeneration’ report, promoting new development at the WTC site will:

- *contribute to the regeneration of the existing WTC campus and deliver new ‘business’ development to enable the site to function as a ‘prestige’ business/employment location within the Borough and wider region (in-line with recommendations of the SWRDA Strategy);*
- *follow a sustainable communities approach towards new development by delivering a mix of uses to improve access to jobs, homes, leisure, shops, community facilities and social infrastructure;*
- *deliver new residential development as part of a comprehensive sustainable regeneration scheme – improving access to housing (for the existing and future workforce); improving affordability; and reducing inward commuting distances;*

- ensure that regeneration objectives are viable/achievable by incorporating a mix of uses (particularly the new residential development) which will also act as an enabling development to cross-subsidise the wider regeneration of the business campus;
- improve connectivity and links with the neighbouring settlements thereby better integrating the WTC site (and future development) with the existing communities;
- allow a comprehensive sustainable transport strategy to be implemented which will reduce reliance private car use, promote sustainable transport modes and improves access to public transport.

Furthermore, given the opportunity for growth at the WTC site and the options for strengthening the links with neighbouring settlements, we believe that Wool and East Burton should be the focus for growth and new development within South West Purbeck.

As noted above, it is also our view that Wool should aspire to become a 'Town' – offering a variety of facilities/services, a range of housing choice (including affordable housing), new employment opportunities (at WTC), improved accessibility (via public transport) and improved community infrastructure. This should be recognised within emerging planning policy.

- Para 3.5.3.4 – we recognise the existing traffic congestion issues associated with the level crossing on the A352 at Wool. ZBV and the HCA will be working with Dorset County Council to explore potential options for reducing congestion along the main road network.

However, notwithstanding the issues arising from the level crossing within Wool, we believe that local congestion can also be relieved (in the long-term) by improving the range of services/facilities and housing within the locality (particularly within Wool itself); improving public transport links into/out of the Spatial Area; and by promoting sustainable transport initiatives – thereby reducing the prospect of inward/outward commuting by car (note: from survey work completed by the Masterplanning team it is apparent that c.89% of commuter trips made by the existing WTC workforce are made by car).

- Map 4: Context in South West Purbeck – as per our comments above, it is important that the context map also indicate the need to improve linkages between Wool and the WTC site. This critical issue will be a key component in developing the Masterplan for the regeneration of the WTC site.

Section 6.5 – Employment Land Supply

- Para 6.5.2.2 and Para 8.19.1 – we are pleased to see the reference to the conclusions of the SWRDA Workspace Strategy – which recognises that the WTC site has the potential to accommodate 20ha of employment land/business growth and development. In our view, this provides a reasonable estimate of the scale of business development which may be achievable at the site – albeit, we believe that it may be possible to achieve a greater level of business development in the future (note: the potential scale of achievable development will be identified through the Masterplanning process).

It should also be noted that it is ZBV/HCA's intention that through the regeneration of the WTC site, the future Dorset Green Technology Park will become nationally known as a prestigious business park with a focus on high-tech business/companies. As a result, it is possible that the status of the business campus will increase to a 'regionally significant employment site' during the plan period for the Core Strategy.

We would also urge the Council to take on-board the other key recommendations included within the SWRDA report in relation to the WTC - which include:

- the Council should ensure that planning applications (promoting new development at the site) can be determined through the existing local plan and Core Strategy prior to the adoption of an AAP (for the area);
- once the Masterplan is available for the site the Council “will need to show a level of commitment, for an initial phase of employment development at least”;
- the Council should also demonstrate “backing for support services” in terms of “facilities for the employees and Wool / Winfrith, these could include enhanced conference facilities, catering, hotel, gym and leisure”;

- *there is recognition of the HCA's (and ZBV's) aspiration to provide residential development in and around the WTC site;*
 - *that requiring contributions towards transport infrastructure (under the January 2007 – 'Development Contributions Towards Transport Infrastructure in Purbeck') may be prohibitive to bringing forward new development at the WTC site – and may put the site at a disadvantage when being considered (by future tenants/occupants) against other potential business locations outside the District;*
 - *support for future development (and the Masterplan) to be supported by an 'open-book' viability appraisal – in order to understand the costs associated with delivering new development;*
 - *the benefits of promoting a 'green' or low carbon form of development – which could be key in attracting new businesses to the site.*
- *Section 6.5.6 (Winfrith Technology Centre) – as noted above, the WTC site has long been a major employment location within the region, largely due to the site's longstanding association with UKAEA and the UK nuclear industry. However, as the UKAEA operations wind down, the site is now at an important transition point. Major new investment is now required to deliver the regeneration of the site; to improve the quality of the on-site business accommodation/functioning; and to encourage new firms and businesses to locate at WTC in the future.*

The majority of the existing buildings and infrastructure were originally constructed to serve the previous UKAEA use. Whilst a number of these buildings have been refurbished, sub-divided into smaller units and re-let, the quality of the accommodation is generally poor and is lacking modern services and amenities. Furthermore, as noted within the SWRDA Workspace Strategy (2009), there are considerable areas (20ha plus) within the site which are underused or currently vacant which are capable of accommodating new development.

With this in mind, ZBV and the HCA are committed to delivering the sustainable (and viable) regeneration of the WTC site which will ensure its future as a business location following UKAEA's eventual departure. In the short-term (the next 1-3 years), this will involve re-launching the site as the Dorset Green Technology Park (DGTP) and consolidating its role as a sub-regional 'prestige' business location via small-scale business development and improvements to the wider units/facility. In the medium to long-term (the next 20 years and beyond), the intention is to significantly improve the accommodation, services and facilities at the site through substantive new development – with the aspiration that the site becomes a regionally important employment centre (focused on high tech and specialist industries and business sectors).

Furthermore, a key aspiration for both ZBV and the HCA is to adopt a 'sustainable communities' approach (based on a mixed-use development – incorporating residential), to achieve new development which not only meets the needs of the future business community but also builds on and improves linkages with the wider area (particularly Wool) – offering a genuinely inclusive and sustainable development solution.

It is recognised that whilst the 'sustainable communities' approach is well aligned with the broad aims of national planning policy (i.e. PPS1 – promoting sustainable communities, PPS3, emerging PPS4, PPS7, PPG13, PPS22, PPS25 etc), the introduction of a mix of uses (including residential) as part of the wider regeneration of the business campus will require a change in the planning policy approach towards the WTC site.

However, given the constraints associated with bringing forward new development at the site and the relatively low market rents likely to be generated by business space (both existing and new) in this location, the regeneration of the WTC site and more specifically the provision of significant new business accommodation (as identified by the SWRDA study), will be not viable without some form of cross-subsidisation from higher value land-uses (i.e. to act as an enabling development).

The core vision for the Masterplan is set out in the accompanying 'Delivering Regeneration' statement and is based on promoting the regeneration of the WTC site by securing new investment and delivering significant new business development (ensuring the status of the site as a 'sub-regional' - and eventually regional – employment location). This will be achieved through the provision of a mix of uses (including residential) which will (in part) fund the new business

development at the WTC site, but also provide support facilities (to serve the existing business and residential communities) and provide a more sustainable development solution and pattern of growth.

In our view, the adoption of a mixed-use approach (as advocated by the draft Masterplan) will also offer the opportunity to respond (and overcome) a number of the current deficiencies within the South Purbeck Spatial Area, particularly in terms of:

- improving access to new jobs and stimulating economic activity within the region;
- improving the range of services/facilities available for use by existing/future residents and the WTC workforce;
- strengthening linkages between WTC and Wool, and out to the surrounding area;
- improving access to sustainable transport choices;
- providing new residential development to improve access to housing (for the existing and future workforce); improving affordability; and reducing inward commuting;
- providing new social and community infrastructure (i.e. education and health services).

Overall, the proposed Masterplan has the potential to deliver 140,000 – 150,000sq.m of prestige business/industrial/storage accommodation (within the renamed Dorset Green Technology Centre), business support facilities (including retail, hotel, leisure facilities), between 400-600 residential units, community uses, new infrastructure, improved transport connections and significant environmental improvements. Furthermore, all new development will be designed to achieve sustainability objectives – including use of on-site renewable energy generation, energy efficiency measures, sustainable transport modes and waste mitigation proposals.

- **Para 6.5.6.3 – we note the reference to the possibility of linking the site to Dorset County Council’s proposed Mechanical Biological Treatment Plant (MBT). However, we would bring it to the Council’s attention that the ZBV are in advanced discussions with New Earth Solutions (NES) with a view to accommodating a biomass renewable energy facility on-site as part of the wider regeneration proposals. This plant will have the potential to provide both heat and power to the future development at the site and will make a strong contribution towards reducing carbon emissions from future phases of development. It is anticipated that a planning application for the plant will be submitted early in 2010.**

I trust that the above (and enclosed) is of assistance and will aid you in the preparation of the Core Strategy. I can confirm that ZBV would welcome the opportunity to continue a dialogue on the future of WTC, the continuing work on the Masterplan and the opportunities for promoting the regeneration proposals via the emerging Local Development Framework as it progresses.

Yours faithfully

Jon Sheldon
Rolfe Judd Planning

Enc.

C.C. Paul Britton - HCA
John West – ZBV (Winfrith) Ltd
Jeremy Fooks – ZBV (Winfrith) Ltd
Bryan Green – ZBV Ltd
Robert Rummey – Rummey Design

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 / ~~No~~ (delete as appropriate)

Please explain:

We broadly support the 'Vision for Purbeck'. However, promoting sustainability and delivering sustainable development (and communities) should be at the heart of the future vision for Purbeck.

With this in mind, greater recognition should be given to the need to deliver managed growth (and new development) throughout the Borough. In particular, the Council should commit to exploring opportunities to improve the function/role of the existing towns and key villages (particularly Wool). This should include policy support for the strengthening the range of services/facilities provided; encouraging economic development and providing new housing (where needed). This approach would be consistent with Development Policy C of the RSS.

Recognition should also be given to the opportunity to achieve a more sustainable pattern of development – in particular, locating new housing next to existing business/employment locations (such as at the Winfrith Technology Centre), which will offer the opportunity to reduce inward commuting, and improve access to jobs, services, retail facilities and homes.

Spatial Area Visions



2. Do you agree with the Spatial Area Visions?

Yes / ~~No~~ (delete as appropriate) **See comments below**

Please explain:

Whilst we broadly support the Spatial Area Vision for South West Purbeck we have a number of comments in relation to both Wool and Winfrith Technology Centre (WTC).

Wool

We note the identification of Wool as a Key Service Village and a 'key transport interchange'. However, whilst Wool does provide some services (including shops, pubs, school etc), it is our view that there is currently an under provision of key services/facilities within the village (particularly given the size of settlement and proximity to the WTC site). Furthermore, the existing facilities (particularly the retail offer) are dispersed and there is little to define the 'centre' of Wool.

There is an opportunity (and need) to improve the range of services/facilities provided within Wool and this should be recognised and promoted through emerging policy. Furthermore, options both for strengthening the links between the WTC site and Wool, and improving the overall range of facilities/services available to both residents and the existing/future workforce should also be explored.

Given the location of the site, the excellent public transport links (provided by Wool Station) and the

potential for an improved relationship with the WTC site, it is our view that Wool should aspire to become a 'Town' – offering a range of facilities/services, new housing choice (including affordable housing), new employment opportunities (at WTC), improved accessibility (via public transport) and improved community infrastructure.

Indeed, in view of the strong locational benefits of Wool, we believe that the village (and the WTC site) should become the focus for growth and new development within the South West Purbeck Spatial Area.

Winfrith Technology Centre (WTC)

We support (and welcome) the inclusion of the WTC site within the vision for South West Purbeck – particularly in terms of providing a focus for inward investment of economic growth, improving local employment needs, and improving linkages with Wool.

As you may be aware, ZBV (Winfrith) Ltd are working in partnership with the Homes & Communities Agency (HCA) to develop a Masterplan for the regeneration of the WTC site. The statement accompanying our representations (entitled “*Dorset Green Technology Park – Delivering Regeneration*”) sets out the Masterplan vision for the WTC site, identifies the opportunities and constraints to new development, and outlines the proposed strategy for delivering long-standing regeneration.

In summary, the core objective for the Masterplan is to investigate options for:

- promoting the regeneration the existing WTC campus and to deliver significant new 'business' development to enable the site to function as a 'prestige' sub-regional business/employment location within the Borough region;*
- adopting a sustainable communities approach towards new development by delivering a mix of uses to improve access to jobs, homes, leisure, shops, community facilities and social infrastructure;*
- providing new residential development as part of a comprehensive sustainable regeneration scheme – to improve access to housing (for the existing and future workforce); to improve affordability; and to reduce inward commuting distances.*
- achieving a viable regeneration strategy where the mix of uses (particularly the new residential development) will also act as an enabling development to cross-subsidise the wider regeneration of the business campus;*
- developing a high quality urban design and architectural approach towards the redevelopment of the site – including the formulation of a design code and landscape strategy;*
- improving connectivity and links with the neighbouring settlements (particularly Wool) thereby better integrating the WTC site (and future development) with the existing communities;*
- taking a phased approach towards the delivery of new development – to meet demand and to balance future development with the provision of improved housing, leisure, community and social facilities;*
- promoting a sustainable transport strategy which reduces reliance on the use of the car, promotes sustainable transport modes and improves access to public transport (particularly the Wool transport hub);*
- ensuring the development is well integrated and improves the environment – particularly the neighbouring Dorset Heathlands, the on-site ecology and wildlife habitats;*
- improving existing infrastructure and services – including the implementation of infrastructure and drainage strategies (which will include SUDs) and the mitigation of any potential flood risk;*
- incorporating measures targeted at reducing carbon emissions and tackling climate change – including the potential introduction of on-site energy generation (via renewable energy*

sources), sustainable construction techniques, promoting energy efficiency, encouraging sustainable travel patterns etc.

The Spatial Area Vision should also recognise the above opportunities – particularly in terms of strengthening links and better integrating Wool and WTC, which will enable a more sustainable pattern of development to be achieved.

Spatial Objectives



3. Do you agree with the Spatial Objectives?

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

Please explain:

We broadly support the Spatial Objectives for Purbeck. However, as noted above, promoting 'sustainability' and delivering sustainable development (and communities) should be at the heart of the Spatial Objectives for Purbeck.

With this mind, greater emphasis should be placed on the need to deliver managed growth (and new development) throughout the Borough. In particular, the Council should commit to exploring opportunities to improve the function/role of the existing towns and key villages (particularly Wool) - in terms of strengthening the range of services/facilities provided; encouraging economic development and providing new housing (where needed).

Greater recognition should also be given to the opportunity for locating new housing (alongside other uses) next to existing business/employment locations (such as at the Winfrith Technology Centre) – which will deliver a more sustainable pattern of development by improving access to jobs, services, retail facilities and homes, and reduce the need for inward commuting.

Finally, we recommend that Objective 8 be amended as follows:

"8. Promote and support a prosperous local economy and direct new business development towards the sub-regional employment locations."

Policy LD – Location of Development



4 (a) Do you agree with this policy?

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

Please explain:

Whilst we support a sustainable approach towards the location of new development within the Borough, future policy should also recognise that there are other locations with the Borough (outside the settlement hierarchy) where new development can improve sustainability and deliver significant benefits for the local area.

As noted above, there are existing locations (which include brownfield site - such as WTC) where there is considered to be an opportunity to deliver regeneration (alongside a number of wider improvements) via new development. Such development has the potential to achieve a number of sustainability objectives (such as reducing the need to travel, improving access to jobs, services, facilities and homes etc).

Therefore Policy should recognise that there are locations within the Borough (outside the defined hierarchy), where new development will be supported.

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

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

Please explain:

We broadly support the Settlement Hierarchy outlined in Policy LD. However, given Wool's location, the good transport links (provided by Wool Station) and the potential for an improved relationship

with the WTC site, it is our view that Wool should aspire to become a 'Town' – offering a variety of facilities/services, a range of housing choice (including affordable housing), new employment opportunities (at WTC), improved accessibility (via public transport) and improved community infrastructure. Again, this should be recognised within emerging planning policy.

Furthermore, we believe that there is an opportunity (and need) to improve the range of services/facilities provided within Wool and this should be recognised and promoted through emerging policy. Indeed, as part of the Masterplan process (being undertaken by ZBV and the HCA) consideration is being given to options both for strengthening the links between the WTC site and Wool, and improving the overall range of facilities/services available to both residents and the existing/future workforce.

The above is supported by the recent SWRDA – Workspace Strategy (Oct 2008) which identifies the WTC site as having the potential to accommodate 20ha of employment/business growth and development and urges the Council to demonstrate “backing for support services” in terms of “facilities for the employees and Wool / Winfrith, these could include enhanced conference facilities, catering, hotel, gym and leisure”.

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)?

Yes / No (delete as appropriate)

Please explain:

Any policy should be applied flexibly to ensure other planning policy objectives are met, and any associated development needed to sustain these rural settlements is not deterred.

Policy HS – Housing Supply



5. Do you agree with this policy?

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

Please explain:

We broadly support the objective of the Policy subject to our comments/representations to Policy LD above and subject to the outcome of the final version of the RSS.

However, in our view, there is potential to accommodate a greater level of housing growth within the Borough. Achieving higher levels of housing growth will increase supply of homes locally and assist in tackling affordability issues within the region. As noted above, we believe that the WTC site (and neighbouring Wool) has the potential to accommodate new housing growth as part of the sustainable (and viable) regeneration of the WTC.

Notwithstanding this, it is important that any housing targets adopted are seen as a minimum and are not utilised as a notional maximum to preclude further residential development coming forward within the plan period.

In view of the current economic climate, there is considerable uncertainty over the residential development in the pipeline and future supply of residential development. It is therefore vital that the Council adopts a positive and flexible approach towards all new potential residential development (subject to meeting other objectives within the plan) to ensure that future housing needs within the Borough can be met.

Character Area Development Potential



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

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

Please explain:

Planning Policy Statement 3 (PPS 3) is clear (Paragraph 59) that allowances for windfalls should not be included in the first 10 years of land supply unless there are genuine local

circumstances that prevent specific sites from being identified.

Whilst the Borough does include large swathes of nationally/internationally protected sites which will restrict new residential development, detailed evidence on the windfall sites has not been forthcoming with this consultation (although we understand it is being prepared). Hence, it is important that the Council does not rely on windfall sites alone – but instead assess all options to accommodate the predicted growth.

We would opine that the proposed low affordable housing threshold (3 units/ 0.1 Ha) could seriously deter small brownfield infill opportunities coming forward, particularly where there is an existing use.

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:

See comments above.

Maintaining a 5 Year Land Supply



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

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

Please explain:

As noted above, in view of the current economic climate, there is considerable uncertainty over the residential development in the pipeline and future supply of residential development. It is therefore vital that the Council adopts a positive and flexible approach towards all new potential residential development (subject to meeting other objectives within the plan) to ensure that future housing needs within the Borough can be met.

Hence, the suggested approach of working with developers to update the housing trajectory on an annual basis represents a far more pragmatic approach that will reflect the current challenges within the housing market.

Policy ELS – Employment Land Supply



8 (a) Do you agree with this policy?

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

Please explain:

We broadly support and agree with general approach of Policy ELS – in terms of directing new economic development towards the sub-regional employment sites.

As noted within the SWRDA Workspace Strategy (2009) – the WTC site has capacity (and existing infrastructure) to accommodate significant levels of new business development (20ha). Indeed the SWRDA strategy recommends that the WTC site should have 5 hectares of land made available to accommodate local employment growth/demand and a further 15 hectares for inward investment opportunities.

In our view, this provides a reasonable estimate of the scale of business development which may be achievable at the site – albeit, we believe that it may be possible to achieve a greater level of business development in the future (note: the future Masterplan will identify the potential scale of achievable development at the site).

We would also urge the Council to take on-board the other key recommendations included within the SWRDA report in relation to the WTC - which include:

- *the Council should ensure that planning applications (promoting new development at the site) can be determined through the existing local plan and Core Strategy prior to the adoption of an AAP*

(for the area);

- once the Masterplan is available for the site the Council “will need to show a level of commitment, for an initial phase of employment development at least”;
- the Council should also demonstrate “backing for support services” in terms of “facilities for the employees and Wool / Winfrith, these could include enhanced conference facilities, catering, hotel, gym and leisure”;
- there is recognition of the HCA’s (and ZBV’s) aspiration to provide residential development in and around the WTC site;
- that requiring contributions towards transport infrastructure (under the January 2007 report – ‘Development Contributions Towards Transport Infrastructure in Purbeck’) may be prohibitive to bringing forward new development at the WTC site – and may put the site at a disadvantage when being considered (by future tenants/occupants) against other potential business locations outside the District;
- support for future development (and the Masterplan) to be supported by an ‘open-book’ viability appraisal – in order to understand the costs associated with delivering new development;
- the benefits of promoting a ‘green’ or low carbon form of development – which could be key in attracting new businesses to the site.

We would also draw it to the Council’s attention that ZBV/HCA intend to re-launch the site as the ‘Dorset Green Technology Park’ in January 2010. This will also include extensive marketing of existing and new business space at the site. This will be the first phase in the long-term regeneration of the site.

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:

We are firmly of the view that new economic development should continue to be directed towards the existing sub-regional employment sites – with a particular focus on providing new development at the WTC site (as per the recommendations of the SWRDA strategy).

The WTC site has long been a major employment location within the region, largely due to the site’s longstanding association with UKAEA and the UK nuclear industry. However, as the UKAEA operations wind down, major new investment is now required to regenerate the site – in order to improve the quality of the on-site business accommodation/functioning, and to encourage new firms and businesses to locate at WTC in the future.

The majority of the existing buildings and infrastructure were originally constructed to serve the previous UKAEA use. Whilst a number of these buildings have been refurbished, sub-divided into smaller units and re-let, the quality of the accommodation is generally poor and is lacking modern services and amenities. Furthermore, as noted within the SWRDA Workspace Strategy (2009), there are considerable areas (20ha plus) within the site which are underused or currently vacant which are capable of accommodating new development.

Agents acting on behalf of ZBV believe that without significant investment there is a risk that the business/employment functioning of the WTC site will decline and vacancy levels increase. Furthermore, as the UKAEA operation continues to wind down, it is possible that some existing firms (particularly those associated with the nuclear industry) will look relocate to other modern sites within the region.

As noted above, ZBV and the HCA are committed to securing the sustainable and viable regeneration of WTC site to secure its position as the prestige employment site for high-tech firms within the Borough (and wider region).

In the short-term (the next 1-3 years), this will involve re-launching the site as the Dorset

Green Technology Park (DGTP) and consolidating its role as a sub-regional 'prestige' business location via small-scale business development and improvements to the wider units/facility. In the medium to long-term (the next 20 years and beyond), the intention is to significantly improve the accommodation, services and facilities at the site through substantive new development – with the aspiration that the site becomes a regionally important employment centre (focused on high tech and specialist industries and business sectors).

We are not aware of any alternative site (with investor support/backing) where a similar scale and quality of business development as per that envisaged at the WTC site could be delivered.

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 noted above, it is our view that there is currently an under provision of key services and retail facilities within Wool (particularly given the size of settlement and proximity to the WTC site). Furthermore, the existing facilities (particularly the retail offer) are dispersed and there is little to define the 'centre' of Wool.

There is an opportunity (and need) to improve the range of services/facilities provided within Wool and this should be recognised and promoted through emerging policy. Furthermore, options both for strengthening the links between the WTC site and Wool, and improving the overall range of facilities/services available to both residents and the existing/future workforce should also be explored.



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 do not fully support any of the above options. However, we do broadly support the objectives of the Council's 'Preferred Option', but subject to fundamental revisions/amendments – particularly, in terms of the future policy approach towards the WTC site. We expand on our recommended approach below.

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

Please explain:

We note that one of the 'development options' considered (and then discounted by the Council) proposed improving the self-sufficiency of Wool. This option was based on allowing significant growth within Wool with the aim of bringing forward economic growth and improving self sufficiency. The option was discounted because, in the Council's view, it did not comply with the emerging RSS.

However, we believe that promoting a greater level of self-sufficiency within Wool (and bringing forward new growth/development to achieve this) is not only necessary to deliver a more sustainable pattern of development (and to overcome a number of the challenges/constraints associated with the area), but also vital to support the regeneration and expansion of the WTC site.

Furthermore, we contend that this approach is fully complicit with a number of the key policy objectives included within the emerging RSS. We expand on our reasoning below:

Whilst Wool is not identified within the RSS for 'major growth', there is, in our view, a clear opportunity (and need) for 'managed growth'. In many ways Wool is unique, in that it includes the WTC (a major sub-regional employment site identified within emerging policy for expansion/growth); direct main-line train access to London Waterloo (via Wool station); and good road linkages to the other population centres within the Borough.

However, despite these benefits, Wool suffers from a number of deficiencies – poor levels of self containment (with significant inward and outward commuting, particularly to the WTC site); limited services/facilities serving the existing population; little or no interaction between the residential and working communities; poor local public transport linkages; potential for traffic congestion along the A352; and poor affordability and availability of new housing.

Indeed, this position is supported by initial survey work undertaken by the ZBV/HCA Masterplanning team which indicates that:

- *the vast majority of the existing workforce (at the WTC site) live outside the Wool/WTC area and commute an average distance of between 10-25 miles to work;*
- *there is limited evidence that anyone working at the WTC site lives within Wool;*
- *89% of all commuter trips currently made to the WTC site are completed by car;*
- *the current workforce do not visit or make regular use of the services/facilities within Wool itself - probably due to the limited offer within Wool, the poor links between WTC and the village, and the absence of car parking in Wool.*

The key objective of emerging policy within the draft RSS is to achieve a more sustainable

pattern of growth and to promote 'Sustainable Communities'. Strategic Policy SD4 states that 'growth and development will be planned and managed positively to create and maintain 'Sustainable Communities' by:

- linking the provision of homes, jobs and services based on role and function so that cities, towns and villages and groups of places have the potential to become more self contained and the need to travel is reduced;
- promoting a step change in public transport, taking steps to manage demand for travel, and promoting public transport;
- encouraging business activity particularly small businesses and their contribution to the region's prosperity;
- making adequate and affordable housing available for all residents, including the provision of a range and mixture of different housing types to accommodate the requirements of local communities;
- making best use of existing infrastructure and ensuring that supporting infrastructure is delivered in step with development.
- realising the economic prosperity of the South West and reducing disparity;
- setting a clear vision and strategy to meet the diverse needs of all people in existing and future communities;

Strategic Policies CSS, D and C also provide support for new development within the region's towns and villages where it achieves 'greater self-containment and promote stronger communities'.

The Masterplan process (currently being undertaken by ZBV and the HCA) is focused on delivering the viable and sustainable regeneration of the WTC site (and to secure its future as a business location following UKAEA's eventual departure). A key aspiration for both ZBV and the HCA is to adopt a 'sustainable communities' approach (based on a mixed-use development – incorporating residential), which will be based on the following core objectives:

- *promoting the regeneration of the existing WTC campus and to deliver significant new 'business' development to enable the site to function as a 'prestige' sub-regional business/employment location within the Borough region (in-line with the recommendations of the SWRDA Strategy);*
- *delivering a mix of uses to support the existing working and resident populations, thereby improving access to jobs, homes, leisure, shops, community facilities and social infrastructure;*
- *providing new residential development as part of a comprehensive sustainable regeneration scheme – to improve access to housing (for the existing and future workforce); to improve affordability; and to reduce inward commuting distances.*
- *achieving a viable regeneration strategy where the mix of uses (particularly new residential development) will also act as an enabling development to cross-subsidise the wider regeneration of the business campus;*
- *improving connectivity and links between Wool and WTC thereby better integrating the working and residential communities;*
- *taking a phased approach towards the delivery of new development – to meet demand and to balance future development with the provision of improved housing, leisure, community and social facilities;*
- *develop a comprehensive sustainable transport strategy which will reduce reliance on private car use, promote sustainable transport modes and improve access to public transport – all of which has the potential to reduce congestion on the A352 (and car borne commuting);*
- *ensuring the development is well integrated and improves the environment – particularly the neighbouring Dorset Heathlands, the on-site ecology and wildlife habitats;*
- *improving existing infrastructure and services – including the implementation of infrastructure and drainage strategies (which will include SUDs) and the mitigation of any potential flood risk;*

- to incorporating measures targeted at reducing carbon emissions and tackling climate change – including the potential introduction of on-site energy generation (via renewable energy sources), sustainable construction techniques, promoting energy efficiency, encouraging sustainable travel patterns etc.

All of the above, will promote stronger links between WTC and Wool; achieve greater self containment; integrate and strengthen the working and resident communities and reduce the prospect of inward/outward commuting. This approach is considered to be very much in-line with the core objectives of Strategic Policy within the RSS.

Furthermore, as noted above, given the constraints associated with bringing forward new development at the WTC site and the relatively low market rents likely to be generated by business space in this location, the regeneration of the site and delivery of significant new business accommodation, is not likely to be viable without some form of cross-subsidisation from higher value land-uses (i.e. to act as an enabling development).

On this basis of the above, it is recommended that the Council's Preferred Option be amended to include (as part of the overall strategy) support for managed growth/development within Wool (in tandem with the regeneration of the WTC site), where this will achieve greater levels of self containment and will accord with the sustainable communities approach (as advocated by Strategic Policy SD4).

Policy CO - Countryside



11 (a) Do you agree with this policy?

Yes / No (delete as appropriate)

Please explain:

Whilst we support the broad approach to the respecting the character and distinctiveness of Purbeck's countryside, future policy should be flexible and recognise that there may be certain situations where new development within the countryside may be beneficial and achieve wider policy/regeneration objectives (particularly adjacent to the existing settlements).

As noted above, ZBV and the HCA are developing a Masterplan to deliver the regeneration of the WTC site, alongside wider improvements to the Wool area. This may include some development outside the existing settlement boundaries. Given the benefits associated with the regeneration of the WTC site, this type of development should not be precluded from coming forward.

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

Yes / No (delete as appropriate)

Please explain:

As per are response to 11(a)

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

Please explain:

As per are response to 11(a)

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

Yes / No (delete as appropriate)

Please explain:

As per are response to 11(a)

Policy GB – Green Belt



12 (a) Do you agree with this policy?

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

Please explain:

No further comments

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:

There should be flexibility in the type of affordable provision. Development outside settlement boundaries will have difficulty in obtaining grant (from the HCA), and the Council's aspirations for high levels of social rented housing will be very difficult to achieve, without a level of cross-subsidy from intermediate provision.

Policy AHT – Affordable Housing Tenure



13. Do you agree with this policy?

Yes / No (delete as appropriate)

Please explain:

It is vital that all future policy concerning the delivery of affordable housing within future development has regard to the need to encourage rather than restrain residential development. In particular, targets should be applied flexibly, taking into account individual site costs, the circumstances of the site (i.e. the presence of contamination and other constraints), overall scheme viability, the availability of public subsidy and other scheme requirements (including other potential infrastructure improvements and wider community benefits to be brought about by a development).

We would therefore urge the Council to utilise 'open book' viability assessments to establish the appropriate (and reasonable) level of affordable housing and tenure mix to be provided on individual sites.

It is also not clear from the supporting text how the proposed affordable housing tenure split of 90:10 social rented: intermediate has been formulated. We note that the supporting text makes reference to the SHMA/BHM model and assessment work, which recommends a social rented: intermediate tenure split ratio of 67:33. No clear evidence has been included within the Core Strategy to demonstrate why the alternative tenure split has been utilised.

Furthermore, we would also actively encourage the Council to support other potential sources of affordable housing – such as discounted or low cost housing. This can be particularly important source of new housing for first-time buyers.

Similarly, given the high levels of holiday/second homes within the Borough, the Council may also consider giving support to new housing schemes which commit to making/marketing new residential accommodation to those living or working in the Borough in advance of making the properties available on the general market. Such an approach will prioritise housing for the local population.

Policy AH – Affordable Housing



14. Do you agree with this policy?

Yes / No (delete as appropriate)

Please explain:

As noted above, it is vital that all future policy concerning the delivery of affordable housing within future development has regard to the need to encourage rather than restrain residential development. In particular, targets should be applied flexibly, taking into account individual site costs, the circumstances of the site (i.e. the presence of contamination), overall scheme viability, the availability of public subsidy and other scheme requirements (including other potential infrastructure improvements and wider community benefits to be brought about by a development).

We therefore support the Council's recognition of the benefit of completing 'open book' viability assessments to establish the appropriate (and reasonable) level of affordable housing and tenure mix to be provided on individual sites.

Furthermore, we would also actively encourage the Council to support other potential sources of affordable housing – such as discounted or low cost housing. This can be particularly important source of new housing for first-time buyers.

Similarly, given the high levels of holiday/second homes within the Borough, the Council may also consider giving support to new housing schemes which commit to making/marketing new residential accommodation to those living or working in the Borough in advance of making the properties available on the general market. Such an approach will prioritise housing for the local population.

Policy RES – Rural Exception Sites



15. Do you agree with this policy?

Yes / No (delete as appropriate)

Please explain:

No comment at this time.

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:

No comment at this time

Policy WHN – Wider Housing Needs



17 (a) Do you agree with this policy?

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

Please explain:

No comment at this time

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

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

Please explain:

As noted above, we would also actively encourage the Council to support other potential sources of affordable housing – such as discounted or low cost housing. This can be particularly important source of new housing for first-time buyers.

Similarly, given the high levels of holiday/second homes within the Borough, the Council may also consider giving support to new housing schemes which commit to making/marketing new residential accommodation to those living or working in the Borough in advance of making the properties available on the general market. Such an approach will prioritise housing for the local population.

Policy BIO – Biodiversity & Geodiversity



18. Do you agree with this policy?

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

Please explain:

There should be explicit reference to possible mitigation measures which may be undertaken to enable other objectives of the Strategy to be met.

- “Resisting development that could adversely affect Sites of Nature Conservation Interest (SNCI) and Local Nature Reserves (LNR), **unless suitable mitigation measures can be put in place to off-set any potential impact.**”

Policy DH – Dorset Heaths International Designations



19. Do you agree with this policy?

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

Please explain:

We broadly support the approach outlined within the policy. In view of the location of the WTC site close to the Dorset Heaths, the proposed Masterplan will include a comprehensive strategy for ensuring that new development respects and maintains the Dorset Heaths.

Policy RP – Retail Provision



20. Do you agree with this policy?

Yes / No (delete as appropriate) See comments below

Please explain:

As noted above, it is our view that there is currently an under provision of key services/facilities within the village (particularly given the size of settlement and proximity to the WTC site). Furthermore, the existing facilities (particularly the retail offer) are dispersed and there is little to define the 'centre' of Wool.

There is an opportunity (and need) to improve the range of services/facilities provided within Wool and this should be recognised and promoted through emerging policy. Furthermore, options both for strengthening the links between the WTC site and Wool, and improving the overall range of facilities/services available to both residents and the existing/future workforce should also be explored.

Policy CF – Community Facilities and Services



21. Do you agree with this policy?

Yes / No (delete as appropriate)

Please explain:

We broadly support the proposed policy approach towards the retention of community facilities and services. However, it is vital that when considering the need for new facilities (or retention of existing facilities) full consideration is given the potential for new development to come forward.

Furthermore, future policy should seek to promote greater self containment amongst the Borough's towns and villages. Hence, opportunities to improve and enhance community facilities and services within these settlements should be positively encouraged.

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:

Whilst we recognize the intention of Policy FR: Flood Risk, we are concerned that it is not consistent with the requirements of PPS25.

The main objective of PPS25 is to ensure that flood risk is taken into account at all stages in the planning process to avoid inappropriate development in areas at risk of flooding, and to direct development away from areas at highest risk. To achieve this objective, PPS25 requires local planning authorities to apply a Sequential Test when allocating new development sites having the regard to the potential for flood risk.

The purpose of the Sequential Test is to steer new development to areas at the lowest probability of flooding (i.e. Zone 1). Where there are no reasonably available sites in Flood Zone 1, decision makers should take into account the flood risk vulnerability of land-uses and consider the reasonably available sites in Flood Zone 2. Only where there are no reasonably available sites in Flood Zones 1 or 2 should decision makers should consider the suitability of sites in Flood Zone 3.

Paragraph 18 of PPS 25 makes it clear that if, following the application of the Sequential

Test, it is not possible, consistent with wider sustainability objectives, for a development to be located in zones of lower probability of flooding the Exception Test can be applied. The test is intended to provide a method of managing flood risk whilst allowing necessary (and important) development to occur on sites which experience a greater probability of flood risk.

Paragraph 19 goes on to state that the Exception Test is only appropriate for use when there are large areas in Flood Zones 2 and 3, and where the Sequential Test alone cannot deliver acceptable sites, but where some continuing development is necessary for wider sustainable development reasons, taking into account the need to avoid social or economic blight.

For the Exception Test to be met:

1. it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, The benefits of the development should contribute to the Core Strategy's Sustainability Appraisal where possible;
2. the development should be on developable previously developed land, such as sites appropriate for housing in accordance with PPS3 e.g. sustainable brownfield sites.
3. a Flood Risk Assessment must demonstrate that the development will be safe without increasing flood risk elsewhere, and where possible reduce flood risk overall.

There is no evidence within the Core Strategy to indicate whether the Council has undertaken a Sequential Test and that sufficient sites have been identified to accommodate future growth. Furthermore, the current drafting makes no reference to the Exceptions Test and therefore cannot be considered to comply with PPS25.

Accordingly, it is recommended that the policy be redrafted to reflect the above. Furthermore, the final line of text within the policy should be deleted:

~~“However, this test is unlikely to be passed as Purbeck has sufficient space to accommodate development outside areas of flood risk.”~~

Policy GP – Groundwater Protection



24. Do you agree with this policy?

Yes / No (delete as appropriate)

Please explain:

No comment at this stage.

Policy CE – Coastal Erosion in Swanage



25. Do you agree with this policy?

Yes / No (delete as appropriate)

Please explain:

No comment at this stage.

Policy SD – Sustainable Design



26. Do you agree with this policy?

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

Please explain:

We broadly support and welcome the Council's approach towards sustainable design. This policy should allow for innovation in design and the incorporation of a range of sustainable methods and measures within development proposals, and not be overly prescriptive.

Policy REN – Renewable Energy



27. Do you agree with this policy?

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

Please explain:

We would bring it to the Council's attention that the ZBV are in advanced discussions with New Earth Energy (NEE) with a view to accommodating a biomass renewable energy facility on-site as part of the wider regeneration proposals. This plant will have the potential to provide both heat and power to the future development at the site and will make a strong contribution towards reducing carbon emissions from future phases of development. It is anticipated that a planning application for the plant will be submitted early in 2010.

In support of NEE's proposals we would recommend the following amendments to Policy REN:

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.

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 and low carbon energy infrastructure (electricity and heat) 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 significant interference to radar or telecommunications, or highway safety;
- It would not cause harm to residential amenity
- Any large-scale proposal (greater than 10MW installed capacity) must take into account Dorset County Council's Landscape Sensitivity Study
- 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.

Policy HLH – Historic Environment, Landscape and Heritage



28. Do you agree with this policy?

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

Please explain:

No comments at this time.



29. Do you agree with this policy?

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

Please explain:

Whilst we acknowledge the policy approach towards new employment development outlined within Policy E is intended as a 'catch-all', we are not convinced that it is appropriate in terms of promoting the regeneration and new development at the WTC site.

As noted above, the WTC site has long been a major employment location within the region, largely due to the site's longstanding association with UKAEA and the UK nuclear industry. However, as the UKAEA operations wind down, the site is now at an important transition point. Major new investment is now required to deliver the regeneration of the site; to improve the quality of the on-site business accommodation/functioning; and to encourage new firms and businesses to locate at WTC in the future.

The majority of the existing buildings and infrastructure were originally constructed to serve the previous UKAEA use. Whilst a number of these buildings have been refurbished, sub-divided into smaller units and re-let, the quality of the accommodation is generally poor and is lacking modern services and amenities. Furthermore, as noted within the SWRDA Workspace Strategy (2009), there are considerable areas (20ha plus) within the site which are underused or currently vacant which are capable of accommodating new development.

With this in mind, ZBV and the HCA are committed to delivering the sustainable (and viable) regeneration of the WTC site which will ensure its future as a business location following UKAEA's eventual departure.

In the short-term (the next 1-3 years), this will involve re-launching the site as the Dorset Green Technology Park (DGTP) and consolidating its role as a sub-regional 'prestige' business location via small-scale business development and improvements to the wider units/facility. In the medium to long-term (the next 20 years and beyond), the intention is to significantly improve the accommodation, services and facilities at the site through substantive new development – with the aspiration that the site becomes a regionally important employment centre (focused on high tech and specialist industries and business sectors).

Furthermore, a key aspiration for both ZBV and the HCA is to adopt a 'sustainable communities' approach (based on a mixed-use development – incorporating residential), to achieve new development which not only meets the needs of the future business community but also builds on and improves linkages with the wider area (particularly Wool) – offering a genuinely inclusive and sustainable development solution.

It is recognised that whilst the 'sustainable communities' approach is well aligned with the broad aims of national planning policy (i.e. PPS1 – promoting sustainable communities, PPS3, emerging PPS4, PPS7, PPG13, PPS22, PPS25 etc), the introduction of a mix of uses (including residential) as part of the wider regeneration of the business campus will require a change in the planning policy approach towards the WTC site.

However, given the constraints associated with bringing forward new development at the site and the relatively low market rents likely to be generated by business space (both existing and new) in this location, the regeneration of the WTC site and more specifically the provision of significant new business accommodation (as identified by the SWRDA study), will be not viable without some form of cross-subsidisation from higher value land-uses (i.e. to act as an enabling development).

The core vision for the Masterplan is set out in the accompanying 'Delivering Regeneration' statement and is based on promoting the regeneration of the WTC site by securing new investment and delivering of significant new business development (ensuring the status of the site as a 'sub-regional' - and eventually regional – employment location). This will be achieved through the provision of a mix of uses (including residential) which will (in part) fund the new business development at the WTC site, but also provide support facilities (to serve the existing business and residential communities) and provide a more sustainable development solution and pattern of growth.

In our view, the adoption of a mixed-use approach (as advocated by the draft Masterplan) will also offer the opportunity to respond (and overcome) a number of the current deficiencies within the South Purbeck Spatial Area, particularly in terms of:

- improving access to new jobs and stimulating economic activity within the region;
- improving the range of services/facilities available for use by existing/future residents and the WTC workforce;
- strengthening linkages between WTC and Wool, and out to the surrounding area;
- improving access to sustainable transport choices;
- providing new residential development to improve access to housing (for the existing and future workforce); improving affordability; and reducing inward commuting;
- providing new social and community infrastructure (i.e. education and health services).

Overall, the proposed Masterplan has the potential to deliver 140,000 – 150,000sq.m of prestige business/industrial/storage accommodation (within the renamed Dorset Green Technology Centre), business support facilities (including retail, hotel, leisure facilities), between 400-600 residential units, community uses, new infrastructure, improved transport connections, significant environmental improvements. Furthermore, all new development will be designed to achieve sustainability objectives – including use of on-site renewable energy generation, energy efficiency measures, sustainable transport modes and waste mitigation proposals.

Policy TA – Tourist Accommodation and Attractions



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

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

Please explain:

Recognition should also be given to the benefits of locating new hotel development close to or within existing business/employment areas – where such a facility can operate as a support facility and cater for the business tourism market.

~~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:

We broadly support the objectives of Policy IAT. As noted above, a core objective of the Masterplan for the WTC site is to develop a comprehensive sustainable transport strategy which will reduce reliance on the use of the private car, promote sustainable transport modes and improves access to public transport – all of which has the potential to reduce congestion on the A352 (and car borne commuting).

It is also recommended that the policy encourage other sustainable transport modes – such as the use of car clubs – which can reduce car ownership levels.

Policy AP – Implementing an Appropriate Transport Strategy for Purbeck



32. Do you agree with this policy?

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

Please explain:

It is vital that all future policy concerning the making of financial contributions towards the implementation of the Purbeck Transportation Strategy have regard to the need to encourage rather than restrain new development development. In particular, overall levels of contributions should take into account the net additional trips generated by development, support the introduction of a 'traffic credit' system (to take into account under used or vacant space).

Furthermore, as noted within the SWRDA Strategy (2009) there may be situations where requiring contributions towards transport infrastructure (under the Purbeck Transportation Strategy) may be prohibitive to bringing forward new development (such as at the WTC site). In particular, high costs are likely to put certain sites at a disadvantage when being considered (by future tenants/occupants) against other potential business locations outside the District.

Sustainability Appraisal



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

Comments:

No comment at this stage.

Contact Details:

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

Personal Details

Title
(Mr/Ms/Mrs/Miss/Other)
First Name:
Last Name:
Job Title*:
Organisation*: ZBV (Winfrith) Ltd.
Address: C/O Agent

Agents Details (if applicable)

Agent Title Mr
(Mr/Ms/Mrs/Miss/Other)
Agent First Name: Jon
Agent Last Name: Roshier
Agent Job Title: Director
Agent Organisation: Rolfe Judd Planning
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*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)

Environment Directorate

County Hall, Colliton Park
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DX: DX 8716 Dorchester
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Date: 30 November 2009
My ref: GY/LDF/Purbeck/CS01

Dear Steve,

Planning Purbeck's Future – Core Strategy Public Consultation Draft (Sept 2009)

Comments from Dorset County Council

Thank you for giving Dorset County Council the opportunity to comment on the above document. Please find below officer comments for which I will seek the endorsement of the Portfolio Holder.

The draft Core Strategy and supporting documents clearly set out the District Council's preferred and alternative options and the background evidence to support this. The maps and diagrams are very useful in summarising and explaining the issues and proposals. We would, however, wish you to consider the following points:

Paragraph 1.1.4

This section states that this document does not include a proposal for an urban extension at Lytchett Minster (identified as 'the Western Sector' by Purbeck DC). In terms of the emerging RSS, this is a significant omission, which would call into question the general conformity of the draft DPD if the emerging RSS is finalised in its current format. Policy HMA 7 states that Purbeck will make provision for 5,150 dwellings in total during the plan period (2006 to 2026). This provision will include 2,750 new homes at an area of search 7B at Lytchett Minster (sic) in the Strategically Significant City and Town of South East Dorset. Paragraph 1.1.4 of the draft DPD gives a clear summary of the reasoning for this omission. As the paragraph states, the County Council is supportive of the concerns raised by the District Council in relation to the proposed urban extension. The County Council's representations to the Regional Spatial Strategy Proposed Changes, requesting the removal of area of search 7B, are set out in a report to Cabinet on 1st October 2008. The report can be found at:

<http://www1.dorsetforyou.com/Council/COMMIS.nsf/MIN/B3C61630581B5BF8802574CE00337F47?OpenDocument>

Q1 Vision for Purbeck

The reference to Purbeck stone quarrying playing a role in retaining small rural communities is welcomed.

However, the vision does not recognise the role of culture in supporting the well-being of individuals and communities. It is suggested that the vision acknowledges that access to cultural and creative activity raises the quality of life and is important for maintaining good physical and mental health. Culture also underpins a community's sense of place. More information and evidence is available at www.dorsetforyou.com/culturalstrategy

The Dorset Citizens Panel April 2009 shows:

- 78% agree that access to cultural activities helps to make Dorset a better place to live
- 77% agree that engagement in cultural activities contributes to an improved quality of life

The survey gives detailed information about access to cultural activity in Purbeck available at http://www.dorsetforyou.com/media/pdf/m/n/COC_report_background_1.pdf

Q3 Spatial Objectives

In terms of achieving Objective 4 - Support local communities, it is suggested that there will need to be recognition of the role of culture and the need to ensure access to cultural infrastructure and activity.

Q7 Maintaining a 5 Year Land Supply

Emerging RSS clearly indicates two phasing periods 2006-2016 and 2016-2026 for the delivery of new housing. The statement in paragraph 6.4.2 seems to be inconsistent in this respect. Further clarification in the Core Strategy is suggested.

Q8a Employment Land Supply - Policy

Emerging RSS does not breakdown the employment land requirement by district. A number of studies at regional and county level have considered employment requirements at the local level. The SWRDA Workspace Strategy appears to be favoured. In terms of Purbeck, this indicates a market demand of 11.5 hectares (6.5 ha for office and 5 ha for industrial) for the plan period.

The Workspace Strategy also recommends that Winfrith Technology Centre should make provision for 5 hectares of employment for local needs and 15 hectares for inward investment. Holton Heath is also identified as a location for employment growth to meet Poole's short term deficit in employment land supply.

A total employment land supply figure of 35.75 hectares is identified which is significantly above the figure of 11.5 originally identified by the Workspace Strategy. This figure raises concerns about oversupply of employment land and housing balance. It is also compounded by the reference to meeting the needs for Poole which is recommended by the Workspace Strategy. It is suggested that a clear explanation is given as to why almost 36 hectares of available land has been identified to meet a market demand figure of 11.5 hectares.

The County Council recently raised similar issues in relation to Poole's Core Strategy and draft Site Allocations DPD. There is clearly a need for further joint work on employment land in South East Dorset to prevent a considerable oversupply and the potential to exacerbate housing balance issues.

Q8b Employment Land Supply – Existing Employment Sites

The proposed provision of employment land at both Winfrith Technology Centre and Holton Heath is potentially inconsistent with the proposed settlement strategy and transport aims. The settlement strategy proposes Upton (as part of the South East Dorset Strategically Significant City and Town) and Swanage and Wareham (as Policy B settlements) as the main locations for housing growth. These settlements are also the main existing centres of population, employment and services.

The District Council clearly recognises this contradiction in the sustainability appraisal and identifies that it will need to plan for commuting.

It is recognised that Winfrith Technology Centre and Holton Heath are existing employment areas and are located along the two main transport corridors in Purbeck which have the ability to make use of alternative modes of transport. However, the proposals for reducing the impact of commuting are not clearly identified in the Core Strategy. It is not clear whether the proposals of the Purbeck Transportation Strategy will meet the identified need to 'plan for commuting'. Clear references and links need to be made in the Core Strategy to explain why Winfrith Technology Centre and Holton Heath are the preferred locations for employment development and the proposals to reduce the impact of commuting. This should include reference to the County Council working with developers on transport assessments and the provision of travel plans to promote access to sites by alternative modes of transport.

Q10a Development Options

In transport terms, the following preliminary comments are made:

In general terms the A351 corridor has the most sustainable locations, in terms of Swanage and Wareham, for the location of new development. This corridor has the most potential to achieve the provision of and the use of alternative modes of transport.

In terms of specific locations:

Wareham

- In terms of a supermarket being provided on the edge of north Wareham along with proposed new residential development - the site to the north of the station does not appear to be large enough for a good sized supermarket. In terms of a large supermarket be provided on the edge of Wareham inside the bypass to serve Purbeck - In this edge of town location it would be accessible for Wareham, Swanage and Wool residents. Given the size of supermarkets being proposed it is unlikely to successfully stop leakage of trips to Poole.
- The three proposed urban extension sites to the north of Wareham and the site within the bypass by the school appear workable as they have the potential to be well linked to the existing settlement's facilities.
- Development beyond the bypass is generally not favoured. It would be severed by the bypass which would create a barrier to people walking and cycling to the town centre. The distance from the town centre also represents a barrier to people walking to the centre. The full transportation impacts, scale of development and potential mitigation measures required in this location would have to be very carefully assessed if development in this area is required.
- Further development in Wareham will help to increase its self containment and self sufficiency.

- Whilst additional traffic will use the A351 as a result of this development, the Purbeck Transportation Strategy will mitigate this impact by improving accessibility along the A351 corridor through better public transport, cycling and walking routes.

Swanage

- All the proposed sites appear workable as they have the potential to be well linked to the existing settlement's facilities by walking and cycling.
- Further development in Swanage will help to increase its self containment and self sufficiency but will inevitably add traffic to the whole length of the A351.
- Whilst additional traffic will use the A351 as a result of this development, the Purbeck Transportation Strategy will mitigate this impact by improving accessibility along the A351 corridor through better public transport, cycling and walking routes.

Upton

- The site accessed from Policeman's Lane would need off site highway improvements to serve it. Walking and cycling routes would need to be improved to the school and shops. Policeman's Lane would need selective widening (passing bays possibly) to allow two way movement of vehicles. One way traffic operation would not be favoured due to the likely increase of vehicle speeds which this measure tends to promote. Access on to the B3067 is good and should be encouraged as the main route to and from the site. A possible road closure for vehicles could be considered at some point along Sandy Lane to stop rat running. A possible road closure for vehicles at the corner of Watery Lane / Policeman's Lane could be investigated. Constraints to two way vehicular movements are imposed at this corner by the location of the water pumping station and by the narrowing of Watery Lane to single track. These constraints act as a natural traffic calming feature.

The library service has adopted the standard charge for developer contributions towards improving library provision necessitated by new building as recommended nationally by the Museums Libraries and Archives Council. [Please see more information on the Living Places Toolkit in relation to Q22 Green Infrastructure.]

Some of the libraries in the area are smaller than is recommended by the national guidelines for the population served. A significant increase in the local population would require an extension of the facilities and associated refurbishment of the present space with consequent additional demands on books, computers etc. The service is bidding for capital funds to refurbish and improve all libraries over a period. Substantial housing development in the catchment area of a library would be a reason for looking at escalating the library's priority within this programme, for example if the housing development areas suggested at Upton, Wareham, Swanage, Lytchett Matravers and Wool are confirmed.

Development in local service villages and Countryside: Table 4 indicates the preferred option for the distribution of new dwellings (2006-2026) for each settlement with a development boundary and countryside. It is expected that a small number of dwellings over and above these figures will be built in local service centres, for example Stoborough, and countryside areas. Whilst the need for some flexibility is recognised, it is not clear whether there is a limit to this growth in such locations and whether it is limited to rural exception affordable housing and agricultural dwellings only.

Q11a Countryside

It is not clear whether or not the green belt and countryside are overlapping policy designations. The definition of countryside in paragraph 8.2.1 indicates that it is all land outside of settlement boundaries and so would include Green Belt land. Please clarify whether this it is the intention that Countryside policy also applies in Green Belt areas.

It is also suggested that the definition of countryside and the purpose of the countryside designation set out in the first part of paragraph 8.2.1 should form part of the policy.

Q12a Green Belt

Given that the Local Plan is not formally adopted and the policy relating to Green Belt in the Bournemouth, Dorset and Poole Structure Plan was not formally saved it is suggested that it may be appropriate to consider defining the Green Belt boundaries through development of the Core Strategy.

Q16 Site Criteria for Gypsies, Travellers and Travelling Show People

This policy has the potential to duplicate what is intended to form part of the joint Gypsy and Traveller DPD. The policy should be developed in a way that takes into account the joint work and therefore prevent issues of confusion or inconsistency.

Q17a Wider Housing Needs

This policy encourages the provision of supported housing such as sheltered housing, nursing and care homes. However, it does not give an indication of the scale of provision required or any criteria in relation to the need for such provision.

Planning for the needs of an ageing population is identified as a key objective of the document. The broad strategy to tackle this objective is not clear. A key strand from a housing perspective should relate to independent living. Lifetime

Homes requirements may be an approach to consider in terms of ensuring that future homes will be designed to meet the needs of an ageing population.

Adult Services have advised that in terms of care for the elderly, there is a move away from building based services towards more care being provided in service users' homes. It is considered that the wholesale provision of private residential facilities creates an environment where older people and their carers and relatives assume that this is the only accommodation and care option available when people become frail and unable to live independently without support. We are seeking to create an environment and culture that recognises that there are other options, such as domiciliary care delivered in people's own homes, extra care housing and sheltered housing. By making people aware of these alternatives and increasing the provision of these alternatives, it is envisaged that the demand for 'mainstream' residential care for frail older people will fall. It is recognised, however, that there is a growing demand for specialist residential care and residential care with nursing, for people with dementia. Such private developments would be supported.

It would be helpful to consider an evidenced policy approach which discourages the provision of new private 'mainstream' care homes but supports the provision of specialist residential and residential with nursing care homes for people with dementia and that this is included in the Core Strategy or other Development Plan Document. This should include a proviso that where such a development takes place a percentage of the beds should be offered to the County Council for the provision of affordable bedspaces.

Q18 Biodiversity and Geodiversity

This policy and supporting text make general reference to a number of nature conservation and geological designations but it is not clear whether such designations will be identified on the Proposals Map. It raises the more general issue of how and when the Proposal Map will be developed.

Q19 Dorset Heaths International Designations

This policy has the potential to duplicate the policy of the emerging joint Heathlands Mitigation DPD. It is agreed that a policy reference is likely to be required to meet the requirements of the Habitats Regulations Assessment. However, the policy should be developed in a way that prevents confusion or inconsistency with the Heathlands Mitigation DPD.

Q20 Retail Provision

The hierarchy of centres is not consistent with the settlement strategy in Policy LD General Location of Development. In particular, the local shops type does not give any preference to Development Policy C settlements – key service villages and local service villages. Policy LD specifically refers to the provision or protection of village services in Development Policy C settlements. It would appear inconsistent that such settlements are not located at a higher level on the hierarchy than designated settlements not designated as Development Policy C settlements.

Q21 Community Facilities and Services

In terms of the Purbeck Schools Review, in July 2009 the County Council's Cabinet made an 'in principle' decision to restructure to a two-tier primary/secondary pattern of schooling by closing the middle schools on the grounds that this will remove the significant majority of the surplus places and ensure a viable and sustainable school system across the Purbeck area. It was also agreed that there is a second round of consultation in Wool and Swanage to determine the exact pattern of provision within the context of a two-tier pattern of schooling and with Bere Regis School to determine its location in a pyramid of schools. This consultation has taken place and a report, summarising the work that has been carried out and making further recommendations for Wool, Swanage and Bere Regis, is being taken to Community Overview Committee on 24th November and Cabinet on 2nd December. The report can be found at: <http://www1.dorsetforyou.com/Council/COMMIS2009.nsf/MIN?OpenView&Count=1000&id=55E4B8127F58645BC98DF8DFEDB2346D>.

Whilst the Review indicates that there will be sufficient space and flexibility to accommodate the quantity of additional pupils resulting from the proposed development (where the Western Sector /Lytchett Minster proposal is excluded), there is an issue about the quality of existing school facilities. There continues to be a need for significant investment in the Purbeck Schools, whether or not the pattern of provision changes. Any investment, which is made, will aim to make school provision fit for education in the 21st century and ensure it enhances the life chances for children and young people. For this reason, the opportunity to gain contributions towards the improvement of school facilities should be taken and reference added to this or an appropriate policy.

Q22 Green Infrastructure, Recreation and Sports Facilities

The emerging South East Dorset Green Infrastructure Strategy will develop an overarching framework for green infrastructure. In the meantime, I make some suggestions:

- Green infrastructure covers a range of functions. Some of these functions will fall within the realms of infrastructure that it is appropriate to require developer contributions or similar in order to support development. Given the benefits of green infrastructure to business and commercial interest it seems appropriate to require business and commercial (as well as residential) to contribute to green infrastructure.
- In terms of setting contribution levels, the South East Dorset Green Infrastructure Strategy will set out the evidence base. This will need to be formalised in DPD, SPD or charging schedule.

- The third paragraph of the policy needs to be rephrased to state that the South East Dorset Green Infrastructure Strategy will set the overarching framework, principles and standards (at the sub-regional level) to which developers can work towards.
- It would also be useful to identify on a map the key elements of a green infrastructure strategy for Purbeck (linking to the wider south east Dorset strategy) in the main Core Strategy. For examples see Weymouth and Portland, Charnwood.

In addition, it is strongly urged that the Recreation SPD be broadened to include access to cultural infrastructure and activity. There is useful national guidance on this in the Living Places Toolkit, please see below.

Living Places Toolkit

<http://www.living-places.org.uk/culture-and-sport-planning-toolkit/about-the-toolkit/>

The Culture and Sport Planning Toolkit is a practical source of information and advice for all practitioners involved in culture and planning. For the first time, this toolkit brings together a combination of existing and new tools to incorporate planning for culture and sport into new and existing developments.

Culture and sport planning is an integral part of creating and sustaining new and developing communities. This toolkit provides a plan-led and plan-together process for addressing culture and delivering cultural and sporting resources through planning for culture and sport.

The toolkit will raise the profile of culture and sport in the planning process by:

- helping planning and culture professionals find information on how to integrate planning for culture and sport into their existing infrastructure
- developing a greater consistency in how planning authorities assess the need for culture and sport and build this into their plans, and
- building and sharing a body of knowledge about the best approaches to planning for cultural and sporting infrastructure.

The toolkit is primarily aimed at planning and regeneration professionals working in regional and local authorities, private sector consultancies, developers, house builders and infrastructure providers. Cultural, leisure and sports officers in local authorities and delivery agencies will also find this toolkit useful.

Q31/Q32 Improving Accessibility & Transport Strategy for Purbeck

Feasibility work for the A35 / C6 corridor improvements including SE Bere Regis bypass scheme is at a very early stage. Construction of the scheme within the timescale of the Purbeck Transportation Strategy will require prioritisation for funding through the Regional Funding Allocation. This has not yet been achieved and, because of expected public spending cuts, is now unlikely within the foreseeable future. Whilst the County Council is committed to the implementation of the Purbeck Transportation Strategy there are many barriers to overcome when planning a scheme of this nature, the most immediate of which is the current lack of funding certainty. In view of this it is likely that there will be a review of the Purbeck Transportation Strategy to inform the County Council's next Local Transport Plan, which will be implemented from 2011.

In line with national government guidance and the emerging Local Transport Plan 3 vision, the current and likely continuing focus for the Purbeck Transportation Strategy will be delivery of cycleways, footways and public transport improvements. It is hoped that the first phase of the A351 shared use footway and cycleway will be implemented in Summer 2010. Seasonal public transport improvements have already been implemented from Norden Park and Ride – Kimmeridge, Wool – Lulworth and Swanage to Durlston Country Park.

General mitigation of the negative cumulative impacts of new development on the transport network will occur through implementation of the Purbeck Transportation Strategy. Sustainable travel patterns need to be established at the time of occupation of new development through the use of travel plans for new residential and employment areas. Provision of footways and cycleways need to be considered from all new developments. Smarter travel choices which have worked successfully in other urban areas could be tried in each of main settlements in Purbeck for example car clubs, promotion of car sharing, personalised travel planning.

A Scoping Report on the potential for waterborne transport was launched on the 11th Nov 2009. Funding must be found to carry out further feasibility work but the County Council has already committed to include waterborne transport in the next Local Transport Plan. For Purbeck there is potential to reduce carborne trips on the A351 and congestion at Studland through provision of a high quality, high frequency ferry service from Poole Quay / Sandbanks to Studland and Swanage. Reference to the development of waterborne transport should be made in the Core Strategy.

Implementation and Monitoring

There are a number of references to developer contributions in relation to affordable housing, green infrastructure and transport. However, there does not appear to be a comprehensive approach to seeking developer contributions as advocated by the introduction of the Community Infrastructure Levy. For example, Policy CF: 'Community Facilities and Services' does not refer specifically to developer contributions for community facilities. It would also be appropriate to consider adding a policy reference which enables a comprehensive developer contributions strategy to be prepared at a later stage.

It is also recommended that all the component strands of delivery are pulled together as a clear delivery plan in one place rather than throughout the document.

Core Strategy Policies

A number of policies, or parts of them, could be considered to form part of the spatial vision for the district eg. Countryside, green belt, affordable housing, green infrastructure and Purbeck Transport Strategy, and therefore should be included as part of the main core strategy. It is recognised that some of these policies also have a development management role and a degree of duplication/ complication would occur if separated.

Waste and Minerals

The document should take into account proposals in the minerals and waste local plans and the emerging LDFs. Currently, there is nothing specific to take issue with in this respect. However, the development management policies should include reference to the Ball Clay Consultation Area and the need to consult with Dorset County Council and the industry on planning applications submitted within the area.

The following issues for waste management should also be taken into account:

- New Household Recycling Centre at Prospect Farm – this will include facilities for commercial (SMEs etc) waste recycling though not disposal.
- As part of the Waste Pathfinder a depot and waste transfer and recycle bulking centre is being considered for the Purbeck area. Whilst this proposal is in its early stages potentially it may be subject to planning in the next 3-4 years.
- As part of the Waste Pathfinder either a Joint Waste Authority or Joint Committee for waste is being considered. This would mean an active role for Purbeck in both the waste collection and disposal services offered in Dorset as a whole.
- The Waste Local Plan clearly identifies Winfrith Technology Park as a location for waste management facilities. It is understood that a private company planning application for a waste related CHP (Combined Heat and Power) plant is imminent. Also key landfills for the area are located at Trigon.
- Long term waste service delivery across Purbeck needs to be assessed, as part of a fundamental review of the waste service across Dorset. This may impact on existing sites such as the Wareham Household Recycling Centre which could need to be enhanced or replaced in the future, to provide better services.
- In planning and design terms, the general changing nature of waste management in any developments (household or commercial) need to be taken into account to ensure room is made for storage and collection etc. This may also take into account links and synergies with energy provision, CO₂ reduction and potential for CHP and other energy efficient initiatives.
- Paragraph 13.4 of the summary of issues should also make reference to Mechanical Biological Treatment and the potential for other emerging waste technologies.

It may be necessary to gain further approval for preferred delivery elements to be provided by the County Council.

Please contact myself in the first instance if you wish to discuss any of these issues further.

Yours sincerely,

Gemma Yardley
Senior Spatial Planning Officer.



Director for Environment Miles Butler



INVESTOR IN PEOPLE

GRAINGER PLC

**PLANNING PURBECKS FUTURE -
CORE STRATEGY CONSULTATION DRAFT**

REPRESENTATIONS

OCTOBER 2009

TURLEYASSOCIATES

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Appendices:

Appendix One – Copy of Consultation
Questionnaire

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LPA Ref:
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Date of Issue: October 2009

TURLEYASSOCIATES

1. Introduction

- 1.1 The following representations have been prepared by Turley Associates on behalf of Grainger PLC. Comments are made in relation to several elements of the Core Strategy but are primarily focused on the following:
- Support for the general settlement hierarchy and overall development vision;
 - Support for the preferred option for development, which advocates distributing growth to Swanage, Upton, Wareham, Bere Regis, Lychett Matravers and Wool;
 - Objection to the inclusion of growth at Upton within District wide housing numbers;
 - Objection to the housing land supply assumptions; and
 - Objection to the affordable housing policies.
- 1.2 The representations are set out in Section 2.0 and respond to the questions set out in the questionnaire (which is attached at Appendix One)
- 1.3 Grainger PLC is the UK's largest listed residential landlord, with approximately £2.5bn of assets and £3.5bn of assets under management. A FTSE 250 Company, they own, acquire and trade regulated and market let tenanted properties and have substantial interests in home reversions and co-ownerships vehicles. They also undertake fund and asset management, property management and residential development. Grainger owns over 14,000 properties across the UK and 7,000 in Germany. They also manage another 3,600 properties through co-investment vehicles. The company is a leading industry spokesperson on landlord and tenant issues.
- 1.4 Grainger PLC has substantial experience in building forward effective relationships with local communities and bringing forward land for development which will deliver meaningful community benefits and will meet housing needs. We have a good understanding of the issues relevant to the emerging Core Strategy and the local housing market, particularly in respect of the need for affordable housing and the private rented sector.
- 1.5 Grainger PLC own a significant area of land at Bere Regis, part of which is being promoted for development through the LDF process. Section 3.0 summarises the development proposals.

2. Representations

2.1 The representations set out below support the key issues listed below. The representations are set out in a manner that responds to the issues identified in the Questionnaire:

- Support for the general settlement hierarchy and overall development vision;
- Support for the preferred option for development, which advocates distributing growth to Swanage, Upton, Wareham, Bere Regis, Lychett Matravers and Wool;
- Objection to the inclusion of growth at Upton within District wide housing numbers;
- Objection to the housing land supply assumptions; and
- Objection to the affordable housing policies.

Vision for Purbeck

- 2.2 The general thrust of the 'vision' is supported. However, the statement is overly detailed and would benefit from more precision.
- 2.3 The commitment to the key villages retaining their facilities and their sense of community is supported, although there should be recognition that physical development represents one means through which this can be achieved.
- 2.4 The desire for greater self-containment is supported. However, this should be stated alongside a need to ensure that the needs of smaller settlements (such as the key villages) are also met.

Spatial Vision Areas

- 2.5 The spatial vision for north west Purbeck is strongly supported. The recognition that Bere Regis already performs a valuable small market town village centre service role for the local community and its wider catchment area reflects the current position. The recognition the village will develop its role represents an appropriate way forward for a settlement where the potential exists to utilise the

benefits of small to medium scale development to enhance and improve its facilities.

- 2.6 The implication that new development will be linked to the provision of significant green space is also supported and accords with the approach that is proposed for the development of land within the control of Grainger PLC. These proposals could deliver housing development (including affordable housing) alongside a relocation of the existing primary school and the release of part of Grainger PLC's wider land ownership to provide additional green space for the village to relieve visitor pressure on ecologically sensitive areas. Such a development would focus firmly on the vision and would meet the needs of Bere Regis.

Spatial Objectives

- 2.7 The spatial objectives are supported. They represent an appropriate balance between the desire to respect character and the recognition that meeting development needs is of fundamental importance.

Policy LD – Location of Development

- 2.8 The policy is supported, with the settlement hierarchy representing an appropriate means through which to direct growth.
- 2.9 The inclusion of Bere Regis as a Small Town / Village is supported. The settlement offers a good range of facilities and provides opportunities to accommodate modest scale growth in a manner that maintains the character of the settlement, whilst promoting enhanced facilities to the benefit of the wider community.
- 2.10 Within the 'Development Policy C' villages, there is a diversity of different settlement types and sizes, as well as varying degrees of potential to accommodate growth. This should be recognised in the policy, with specific reference made to locations, such as Bere Regis, that offer firm potential.
- 2.11 The requirement for a review of settlement policy boundaries in Class, A, B and C settlement is supported. The LDF review provides an appropriate means through which to look comprehensively at the role and physical extent of these settlements.

Policy HS – Housing Supply

- 2.12 In considering the housing land supply policy and the related Table 2, it is evident that an overly optimistic view has been taken on a number of the elements of supply. In addition, the supply has included development at Upton (69 dwelling settlement expansion), which should be included within the 2,750 requirement for Area of Search 7B (i.e. excluded from the 2,400 dwelling requirement for the rest of the District).
- 2.13 The decision to disregard the 2,750 strategic allocation is misconceived. Nevertheless, we recognise that the issue of the District's Strategic housing requirement will be determined through the RSS process. Pending the final resolution of the strategic requirement we merely acknowledge the inclusion of the 2,400 dwelling element for the remainder of the District. The delivery of the strategic requirement is of fundamental importance to the achievement of the wider spatial strategy and as such, we welcome the recognition of Purbeck's role in delivering the RSS.
- 2.14 In terms of the elements of supply, these are referred to in turn below:
- 2.15 **Homes with Planning Permission** – The provision of 503 dwellings from this source must be viewed with caution and uncertainty. Whilst the sites may have planning permission, experience demonstrates that there are a number of reasons why they may not actually be developed. Land values, physical constraints, changing development aspirations and viability are but some of the circumstances which can either prevent development from coming forward or result in a reduced site capacity when a site is developed. Account needs to be taken of this, with a suggested discount of 10%. A 10% discount is the approach commonly adopted by LDF Inspectors. As such, the level of deliverable supply from this source should be amended to 453.
- 2.16 **Remaining 5 Year Supply** – These sites do not yet have the benefit of planning permission but are yet being relied upon. This is inappropriate and regard must be given to uncertainties both with the prospect of achieving permission and then the site capacity and physical development of the sites. To rely upon the 100% implementation from a source of this type is unrealistic and serves to undermine the housing land supply assessment. Whilst a higher level of discount could be justified, it is suggested that a 10% discount is appropriate. This would reduce the level of deliverable supply from this source to 181 units.
- 2.17 **Character Area Development Potential** – The inclusion of this source (i.e. a windfall) contradicts Government guidance and introduces significant uncertainty.

Whilst there will undoubtedly be sites that come forward that are currently unidentified, the purpose of the SHLAA and other site search initiatives is to minimise uncertainty and identify as many specific sources of land as possible. The inclusion of this element, even with a 50% discount, represents an undesirable approach which undermines the Core Strategy approach. It is suggested that whilst any discount is by definition arbitrary, there is little option to pursue such an approach, since no detailed site period search study has been prepared. Given the changing political attitudes to backland and infill development in particular, and the dwindling supply of suitable sites, any discount applied must be realistic. In view of the diminishing resource of suitable sites and the implications of other policies (such as affordable housing), a discount of 75% is considered appropriate. This would result in the delivery of 331 units from this source.

- 2.18 **Balance as Settlement Extensions** – This source represents a key element of housing land supply. It is a firm source, with a strong likelihood of delivery, due to the type and location of the sites and the opportunity to establish market demand and the landowners commitment to deliver a particular site. It is noted that as a consequence of changes to the other elements of supply above, there is a need to increase the level of supply from settlement extensions. As such, the level of supply to be identified on settlement extensions should be increased to 1,040 dwellings.
- 2.19 **SHLAA Sites** – Reference to the SHLAA sites is inappropriate. These sites have not been subject to an appropriate degree of testing and cannot be relied upon for the purposes of housing land supply. Their inclusion is misleading and gives the impression of a 'stock' of suitable supply. As such, this element should be deleted from Table 2.
- 2.20 The Core Strategy needs to take a more considered and precise approach to the assessment of housing land supply. The way in which the document is set out does not clearly demonstrate how the obligations set out in PPS3 will be met, particularly in terms of identifying sites and sources of supply for the first five years and also the following ten years of the plan period.
- 2.21 It is essential for the robustness of the Core Strategy that this information is set out clearly and is based upon a firm evidence base, which justifies each element of supply and the realistic timing of release. The inclusion of a windfall element undoubtedly undermines this and as such, it places even greater emphasis on ensuring that sufficient flexibility exists to allow for the underperformance of elements of supply. In this regard, a greater reliance on settlement extensions will deliver certainty and will create a more robust strategy.

Character Area Development Potential

- 2.22 As detailed above the inclusion of this source (i.e. a windfall) contradicts Government guidance and introduces significant uncertainty.
- 2.23 Whilst there will undoubtedly be sites that come forward that are currently unidentified, the purpose of the SHLAA and other site search initiatives is to minimise uncertainty and identify as many specific sources of land as possible. The inclusion of this element, even with a 50% discount, is undesirable.
- 2.24 Given the changing political attitudes to backland and infill development, and the dwindling supply of suitable sites, a realistic approach must be taken to any form of windfall sites. This should result in a severely discounted supply, or ideally, their removal from the housing land supply calculations.

Maintaining a 5 Year Land Supply

- 2.25 The maintenance of a five year supply of land for housing is important to ensure that housing needs are met and that there is a clear focus on ensuring that deliverable sources of supply are identified.
- 2.26 The decision to not phase sites is welcomed and represents a realistic approach.
- 2.27 It is essential that the settlement extension sites are allowed to come forward unhindered and indeed are proactively pursued. The principle of growth in the smaller settlements, such as Bere Regis is particularly important as it is essential that the deliver of the wider benefits associated with growth are not artificially delayed.

Development Options

- 2.28 The preferred option of distribution development around Swanage, Upton, Wareham and the Key Service Villages (including Bere Regis) is strongly supported.
- 2.29 The recognition of both the provision for settlement expansions and the desire to ensure that the needs of a range of settlements are being met represents a well considered and realistic approach to forming the development strategy.

- 2.30 Whilst certain settlements, such as Bere Regis have the potential to accommodate further development (in addition to that which is set out in Table 4), the strategy and broad distribution itself is supported.
- 2.31 The provision of a small settlement extension at Bere Regis of 50 dwellings is supported. This will deliver valuable growth for Bere Regis, which will support local services and enable the development of affordable housing to meet local needs.
- 2.32 Land is available (within the ownership of Grainger PLC) on the edge of Bere Regis that can deliver this level of development, in a manner that minimises environmental impact and promotes a greater degree of cohesiveness to the settlement, particularly where an integrated development of housing development and community facilities alongside each other can be delivered.
- 2.33 The settlement framework in Purbeck is well defined and it is clear that there are a range of strong environmental and social considerations which bear heavily upon the potential distribution strategy. The preferred option, unlike the 2 alternative distributions (Options A and B) is a reasonable response to the settlement hierarchy and will also limit the impact of development. The two concentrated growth options would both entail levels of development that would have a major and adverse impact on the character of the relevant settlements (Wareham and Swanage) and would also fail to address the needs of the other settlements.
- 2.34 The concentrated options would also fail to address affordable housing needs in the other settlements in the District and opportunities to deliver community infrastructure for the smaller settlements would be lost.

Policy AHT – Affordable Housing Tenure

- 2.35 The application of a tenure mix of 90% social rented and 10% intermediate is wholly unrealistic, undesirable for all affordable housing providers and a significant barrier to the effective delivery of affordable housing in the round.
- 2.36 Whilst it is apparent that there is a high level of need for social rented housing, this should not necessarily translate into a specific target. The tenure split is a prime consideration in both the viability of affordable housing schemes and relevant to the actual construction and future use. As such, these realisms should be an overriding factor.

- 2.37 A split of 70% social rented and 30% intermediate should be the minimum split considered. Whilst opportunities may exist in some limited circumstances to increase the level of social rented, it is inappropriate to seek this as a general policy target.

Policy AH – Affordable Housing

- 2.38 The percentage contributions being sought in Policy AH are inappropriate and unrealistic. They are based upon an evidence base that is out of date. The approach also fails to accord with emerging regional guidance.
- 2.39 The application of a 50% target for greenfield sites is too high. It differs from the conclusions of the housing needs assessment, which refers to a 40% target and it also represents a departure from the emerging RSS, which refers to 35%. Whilst the RSS states that targets should be more than this figure, it also states that:
- “In developing policies for affordable housing at the local level regard should be had to assessments of economic viability, scale of need and impact on overall levels of housing delivery.”*
- 2.40 These assessments have not been undertaken in a satisfactory manner and as such, there is no firm basis upon which to extend beyond 35% as a reasonable and justified level of affordable housing.
- 2.41 The approach to viability, as set out in the policy, represents an onerous and unnecessary process that will undoubtedly affect the propensity of land owners to bring their land forward for development.
- 2.42 The general presumption that an increase in the percentage being sought can somehow be mitigated by a viability assessment is also flawed. The viability assessment represents a significant disincentive to potential developers, on the basis of the complexity and risk associated with engaging such a process. In simple terms, the approach set out actively discourages the promotion of housing schemes, particularly at the financial margins, due to the complex and prescriptive nature of the assessment process.
- 2.43 The objective of an affordable housing policy should be to enhance the prospects of supply, rather than act as a disincentive. The Core Strategy should recognise that the realisation of increased levels of affordable housing supply is dependent upon the development industry being in a position to bring forward land. Such

support should be given in a positive manner, focussing on increasing the sources of supply, rather than applying mechanisms that test the bounds of viability on each and every scheme, to a point where the benefits of bringing forward land are lost.

- 2.44 As such, we consider that the policy should adopt a base level of 35% affordable housing provision.

3. Proposed Development at Bere Regis

- 3.1 Grainger PLC owns land to the south of Bere Regis (west of Egdon Close), which could accommodate residential development and other uses as required.
- 3.2 The extent of land under the control of Grainger PLC provides an opportunity to accommodate a settlement expansion in accordance with the preferred development strategy.
- 3.3 Alongside this, consideration can be given to bringing forward further land for community uses, such as the relocation of the school and for the delivery of public open space.
- 3.4 The Grainger PLC land holding could accommodate the levels of growth being identified in the emerging Core Strategy, without compromising any key environmental assets.
- 3.5 The development would deliver market and affordable dwellings to meet local needs.

Appendix One – Copy of Consultation Questionnaire

TURLEYASSOCIATES

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 / ~~No~~ (delete as appropriate)

Please explain:

See attached

Spatial Area Visions



2. Do you agree with the Spatial Area Visions?

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

Please explain:

See attached

Spatial Objectives	
Q?	<p>3. Do you agree with the Spatial Objectives? Yes / No (delete as appropriate) Please explain:</p> <p style="text-align: center;">See attached</p>

Policy LD – Location of Development	
Q?	<p>4 (a) Do you agree with this policy? Yes / No (delete as appropriate) Please explain:</p> <p style="text-align: center;">See attached</p> <p>4 (b) Do you agree with the Settlement Hierarchy in Policy LD? Yes / No (delete as appropriate) Please explain:</p> <p style="text-align: center;">See attached</p> <p>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:</p> <p style="text-align: center;">No comment</p>

Policy HS – Housing Supply	
Q?	<p>5. Do you agree with this policy? Yes / No (delete as appropriate) Please explain:</p> <p style="text-align: center;">See attached</p>

Character Area Development Potential

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

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

Please explain:

See attached

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:

See attached

Maintaining a 5 Year Land Supply

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

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

Please explain:

See attached

Policy ELS – Employment Land Supply

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

Yes / No (delete as appropriate)

Please explain:

No comment

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:

No comment

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:

No comment

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

Please explain:

No comment

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:

See attached

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

Please explain: No comment

Policy CO - Countryside



11 (a) Do you agree with this policy?

Yes / No (delete as appropriate)

Please explain:

No comment

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

Yes / No (delete as appropriate)

Please explain:

No comment

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

Yes / No (delete as appropriate)

Please explain:

No comment

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

Yes / No (delete as appropriate)

Please explain:

No comment

Policy GB – Green Belt



12 (a) Do you agree with this policy?

Yes / No (delete as appropriate)

Please explain:

No comment

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:

No comment

Policy AHT – Affordable Housing Tenure

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

See attached

Policy AH – Affordable Housing

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

See attached

Policy RES – Rural Exception Sites

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

No comment

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:

No comment

Policy WHN – Wider Housing Needs

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

No comment

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

~~Yes~~ / No (delete as appropriate)
Please explain:

No comment

Policy BIO – Biodiversity & Geodiversity

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

No comment

Policy DH – Dorset Heaths International Designations

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

No comment

Policy RP – Retail Provision

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

No comment

Policy CF – Community Facilities and Services

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

No comment

Policy GI – Green Infrastructure, Recreation and Sports Facilities

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

No comment

Policy FR – Flood Risk

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

No comment

Policy GP – Groundwater Protection

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

No comment

Policy CE – Coastal Erosion in Swanage

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

No comment

Policy SD – Sustainable Design

Q? 26. Do you agree with this policy?
Yes / No (delete as appropriate)
Please explain:

No comment

Policy REN – Renewable Energy

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

No comment

Policy HLH – Historic Environment, Landscape and Heritage

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

No comment

Policy E – Employment

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

No comment

Policy TA – Tourist Accommodation and Attractions

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

No comment

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

No comment

Policy IAT – Improving Accessibility and Transport

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

No comment

Policy AP – Implementing an Appropriate Transport Strategy for Purbeck

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

No comment

Sustainability Appraisal	
Q?	<p>33. Do you have any comments on the Sustainability Appraisal? Comments:</p> <p style="text-align: center;">No comment</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 <small>(Mr/Ms/Mrs/Miss/Other)</small>		Agent Title <small>(Mr/Ms/Mrs/Miss/Other)</small>	Mr
First Name:		Agent First Name:	John
Last Name:		Agent Last Name:	O'Donovan
Job Title*:		Agent Job Title:	Director
Organisation*:	Grainger PLC	Agent Organisation:	Turley Associates
Address:		Address:	Brunswick House 8-13 Brunswick Place Southampton
Postcode:		Postcode:	SO15 2AP
Telephone:		Telephone:	02380 724888
E-mail:		E-mail:	jodonovan@turleyassociates.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)

BELFAST	028 9089 7400
BIRMINGHAM	0121 233 0902
BRISTOL	0117 989 7000
EDINBURGH	0131 557 1099
GLASGOW	0141 248 9233
LEEDS	0113 386 3800
LONDON	020 7851 4010
MANCHESTER	0161 831 1300
SOUTHAMPTON	023 8072 4888

www.turleyassociates.co.uk

TURLEYASSOCIATES

Core Strategy Planning Purbeck's Future Response Form

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Vision for Purbeck



1. Do you agree with the District Vision?

Yes / No (delete as appropriate)

Please explain:

Spatial Area Visions



2. Do you agree with the Spatial Area Visions?

/ No (delete as appropriate)

Please explain:

The few houses proposed for Wool will not fund:-affordable housing, transport infrastructure charges and significant areas of new green space.

This is not a vision. It is a dream. If the dream is to become a vision it must be realistic. More housing would be essential.

Spatial Objectives



3. Do you agree with the Spatial Objectives?

No (delete as appropriate)

Please explain: More emphasis must be placed on the economy including residential development if needs are to be met, support given to local communities, a reduction in vulnerability to climate change is to be achieved the environment enhanced and transport system improved.

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 / 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 (delete as appropriate)

Please explain: The plan should accept responsibility for at least part of the 2,750 dwellings provided for in the RSS at Lytchett Minster. Bournemouth, Christchurch and East Dorset already have “areas of search”. Poole is constrained by borough boundaries. Assuming the burden can be spread to some degree the plan would be unsound if it did not make provision for at least another 1,000 homes in the district over 20 years. The council cannot ignore its responsibility to meet at least part of the identified need which has already been minimized through the RSS process.

Character Area Development Potential



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

No (delete as appropriate)

Please explain: It is better than trying to predict wind fall sites but does not go far enough in identifying sites which could deliver housing benefitting communities and helping to fund aspirations.

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: More land is needed to satisfy the objectives.

Maintaining a 5 Year Land Supply



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

No (delete as appropriate)

Please explain: Settlement extensions are more likely to provide affordable housing and therefore need to be brought forward.

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 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: This option benefits all of the larger communities and spreads the burdens of development. Wool is a sustainable settlement with good access to the conurbation by mainline train services, it has excellent schools, two local shopping centres, community facilities and significant employment opportunities at Winfrith. It will benefit from proposals in the transport strategy.

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

Q?

13. Do you agree with this policy?

No (delete as appropriate)

Please explain: A greater proportion of intermediate housing will be more acceptable to developers, it helps young households particularly onto and up the housing market and will in time release those subsidised units to others unable to compete in the open market. We suggest a 70%/30% split.

Policy AH – Affordable Housing

Q?

14. Do you agree with this policy?

No (delete as appropriate)

Please explain: An arbitrary geographical split has no justification. There would be more justification in a greenfield/ brownfield split .

Policy RES – Rural Exception Sites

Q?

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

Q?

16. Do you agree with this policy?

Yes / No (delete as appropriate)

Please explain:

Policy WHN – Wider Housing Needs

Q?

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

Q?

18. Do you agree with this policy?

Yes / No (delete as appropriate)

Please explain:

Policy DH – Dorset Heaths International Designations

Q?

19. Do you agree with this policy?

Yes / No (delete as appropriate)

Please explain:

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?

No (delete as appropriate)

Please explain: This is leaving the door open for the council to seek even more contributions, making development even less viable.

Policy GI – Green Infrastructure, Recreation and Sports Facilities

Q?

22. Do you agree with this policy?

No (delete as appropriate)

Please explain: The council need to specify standards and then use SPD to identify the capacity or otherwise of local facilities to determine if and where extra provision needs to be made.

Policy FR – Flood Risk

Q?

23. Do you agree with this policy?

Yes / No (delete as appropriate)

Please explain:

Policy GP – Groundwater Protection

Q?

24. Do you agree with this policy?

Yes / No (delete as appropriate)

Please explain:

Policy CE – Coastal Erosion in Swanage

Q?

25. Do you agree with this policy?

Yes / No (delete as appropriate)

Please explain:

Policy SD – Sustainable Design

Q?

26. Do you agree with this policy?

Yes / No (delete as appropriate)

Please explain:

Policy REN – Renewable Energy

Q?

27. Do you agree with this policy?

Yes / No (delete as appropriate)

Please explain:

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:

Policy TA – Tourist Accommodation and Attractions

Q?

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 (delete as appropriate)

Please explain: Wool is an accessible location with potential for improved rail links.

Policy AP – Implementing an Appropriate Transport Strategy for Purbeck



32. Do you agree with this policy?

Yes / No (delete as appropriate)

Please explain: The level of development planned will not increase significantly congestion or reduce significantly road safety. The aspirations in the Transport Strategy are not all likely to be achieved. Developer contributions should be closely linked to those aspects of the transport strategy most likely to benefit occupiers of the development and limited to a proportion of the costs reflecting the additional traffic generation from the development. The contributions should be used to implement the strategy not to pay for more consultants studies.

Developer contributions when added to all the other benefits which the council seek to achieve will reduce viability

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:	Naomi	Agent First Name:	Malcolm
Last Name:	Nash	Agent Last Name:	Brown
Job Title*:		Agent Job Title:	Director
Organisation*:		Agent Organisation:	Sibbett Gregory
Address:	7 Winbrook Fold, Winfrith Newburgh, Nr. Dorchester,	Address:	3, Winchester Place, Poole, Dorset
Postcode:	DT2 8LR	Postcode:	BH15 1NX
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

Core Strategy Planning Purbeck's Future Response Form

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

Vision for Purbeck



1. Do you agree with the District Vision?
Yes / No (delete as appropriate)
Please explain:

Spatial Area Visions



2. Do you agree with the Spatial Area Visions?
/ No (delete as appropriate)
Please explain:
The few houses proposed for Wool will not fund:-affordable housing, transport infrastructure charges and significant areas of new green space.
This is not a vision. It is a dream. If the dream is to become a vision it must be realistic. More housing would be essential.

Spatial Objectives



3. Do you agree with the Spatial Objectives?
No (delete as appropriate)
Please explain: More emphasis must be placed on the economy including residential development if needs are to be met, support given to local communities, a reduction in vulnerability to climate change is to be achieved the environment enhanced and transport system improved.

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 / 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 (delete as appropriate)

Please explain: The plan should accept responsibility for at least part of the 2,750 dwellings provided for in the RSS at Lytchett Minster. Bournemouth, Christchurch and East Dorset already have “areas of search”. Poole is constrained by borough boundaries. Assuming the burden can be spread to some degree the plan would be unsound if it did not make provision for at least another 1,000 homes in the district over 20 years. The council cannot ignore its responsibility to meet at least part of the identified need which has already been minimized through the RSS process.

Character Area Development Potential



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

No (delete as appropriate)

Please explain: It is better than trying to predict wind fall sites but does not go far enough in identifying sites which could deliver housing benefitting communities and helping to fund aspirations.

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: More land is needed to satisfy the objectives.

Maintaining a 5 Year Land Supply



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

No (delete as appropriate)

Please explain: Settlement extensions are more likely to provide affordable housing and therefore need to be brought forward.

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

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:

(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 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: This option benefits all of the larger communities and spreads the burdens of development. Wool is a sustainable settlement with good access to the conurbation by mainline train services, it has excellent schools, two local shopping centres, community facilities and significant employment opportunities at Winfrith. It will benefit from proposals in the transport strategy.

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:

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: A greater proportion of intermediate housing will be more acceptable to developers, it helps young households particularly onto and up the housing ladder and will in time release those subsidised units to others unable to compete in the open market.

Policy AH – Affordable Housing



14. Do you agree with this policy?

No (delete as appropriate)

Please explain: An arbitrary geographical split has no justification.

There would be more justification in a greenfield / brownfield split but provision at the level suggested will deter land owners from bringing land to the market. We suggest 30% on previously developed land and 40% on Greenfield sites.

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?
No (delete as appropriate)
Please explain: This is leaving the door open for the council to seek even more contributions, making development even less viable.

Policy GI – Green Infrastructure, Recreation and Sports Facilities



22. Do you agree with this policy?
No (delete as appropriate)
Please explain: The lpa need to specify standards and then use SPD to identify the capacity or otherwise of local facilities to determine if and where extra provision needs to be made.

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 (delete as appropriate)
Please explain: Wool is an accessible location with potential for improved rail links.

Policy AP – Implementing an Appropriate Transport Strategy for Purbeck



32. Do you agree with this policy?
Yes / No (delete as appropriate)
Please explain: The level of development planned will not increase significantly congestion or reduce significantly road safety. The aspirations in the Transport Strategy are not all likely to be achieved. Developer contributions should be closely linked to those aspects of the transport strategy most likely to benefit occupiers of the development and limited to a proportion of the costs reflecting the additional traffic generation from the development. The contributions should be used to implement the strategy not to pay for more consultants studies.
Developer contributions when added to all the other benefits which the council seek to achieve will reduce viability

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)	Mr. and Mrs.	Agent Title (Mr/Ms/Mrs/Miss/Other)	Mr.
First Name:	J	Agent First Name:	Malcolm
Last Name:	Baker	Agent Last Name:	Brown
Job Title*:		Agent Job Title:	Director
Organisation*:		Agent Organisation:	Sibbett Gregory
Address:	Barn End, Duck Street, Wool, Dorset	Address:	3, Winchester Place, Poole, Dorset
Postcode:	BH20 6DE	Postcode:	BH15 1NX
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)

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 Email: ldf@purbeck-dc.gov.uk

Vision for Purbeck



1. Do you agree with the District Vision?

Yes

Please explain:

It is comprehensive but rather long

Spatial Area Visions



2. Do you agree with the Spatial Area Visions?

No (delete as appropriate)

Please explain:

The visions only relate to the towns and key villages. A vision for the smaller villages and surrounding countryside in each area and the coast should be developed

Spatial Objectives



3. Do you agree with the Spatial Objectives?

Yes

Please explain:

Provided that objectives for the small villages and the coast are developed too.

Policy LD – Location of Development



4 (a) Do you agree with this policy?

No Please explain:

It is too restrictive as far as settlements outside the listed villages are concerned. A small amount of market housing on in fill sites and the possibility for some house extensions should be allowed in the smaller villages.

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

Yes

Please explain:

Provided that minor development in smaller villages is permitted as Development Policy D

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

Please explain:

As for 4a above.

Policy HS – Housing Supply



5. Do you agree with this policy?

Yes

Please explain:

This must follow from the RSS and Policy LD

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:

If more comes forward then numbers can be adjusted at periodic reviews in accordance with Plan, Monitor and Manage procedures

Maintaining a 5 Year Land Supply



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

Please explain:

The RSS targets should be used

Policy ELS – Employment Land Supply



8 (a) Do you agree with this policy?

Yes

Please explain:

It accords with Policy LD

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

Please explain:

Some new sites should be investigated if they would reduce commuting to work

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:

This Council does not believe a new larger supermarket is required in the District.

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

Please explain:

Current provision should be sufficient for local food needs and Wareham needs to retain its character as a small market town. People want to combine some food shopping with other retail experiences in larger conurbations. Better public transport would help.

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 preferred option gives the best distribution of development in the District but allowance should still be made for some development in the smaller villages

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

Please explain:

It is too proscriptive. As it is proposed that all the settlement boundaries are to be removed for the smaller villages they will then be deemed to be in the countryside and no development allowed. A small amount of market housing and extensions to existing dwellings should be catered for.

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 country side must be a priority, however the possibility of converting redundant farm buildings to market housing should not be ruled out provided other uses have been fully explored.

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

Please explain:

Conversion to market housing should be allowed when other uses have been excluded.

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

Yes

Please explain:

When considering farm diversification schemes it is important that noise and light pollution should be considered. Tranquility is one of the most valued qualities of the countryside closely followed by the night skies, recreational activities creating noise or light pollution should not be permitted

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?

No

Please explain:

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

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 in order to insure impartiality any study or appraisal required of non-compliant applications should be commissioned by the Council but paid for by the applicant

Policy RES – Rural Exception Sites



15. Do you agree with this policy?

Yes

Please explain:

Such a policy is necessary to qualify the exceptional conditions under which the provision of affordable housing in rural areas may be considered

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



16. Do you agree with this policy?

Yes

Please explain:

The policy is comprehensive

Policy WHN – Wider Housing Needs



17 (a) Do you agree with this policy?

Yes

Please explain:

It is sensible to provide this accommodation in the towns and key villages where there is more likelihood of the desirable support facilities and amenities being available

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

No

Please explain:

Policy BIO – Biodiversity & Geodiversity



18. Do you agree with this policy?

Yes on the whole

Please explain:

However bullet point 5 should be amended to read “ Where appropriate requiring development proposals to incorporate bio-diversity elements.....”

Policy DH – Dorset Heaths International Designations



19. Do you agree with this policy?

Yes as far as it goes

Please explain:

Agricultural buildings should be added to the list of those prohibited within 400m. of the heath.

Policy RP – Retail Provision



20. Do you agree with this policy?

No

Please explain:

There seems no logic to determining whether retail premises should be allowed according to a hierarchy of settlement size. A village shop may be far more valuable than a corner store in a market town where others already exist

Policy CF – Community Facilities and Services

Q?

21. Do you agree with this policy?

Yes

Please explain:

It appears to cover all eventualities

Policy GI – Green Infrastructure, Recreation and Sports Facilities

Q?

22. Do you agree with this policy?

No

Please explain:

It is not clear whether this applies to all development including extensions to existing or just to new build. It should only apply to settlement extensions and employment sites.

Policy FR – Flood Risk

Q?

23. Do you agree with this policy?

Yes

Please explain:

It appears to be sensible but we are not experts.

Policy GP – Groundwater Protection

Q?

24. Do you agree with this policy?

No

Please explain:

The policy should be amended to read “ Development within Ground Water Source Protection Areas, as defined on the Proposals Map, will ONLY be permitted if there is no risk to the quality or quantity of groundwater.”

Policy CE – Coastal Erosion in Swanage

Q?

25. Do you agree with this policy?

Yes

Please explain:

This is a sensible restriction.

Policy SD – Sustainable Design

Q?

26. Do you agree with this policy?

Yes

Please explain:

But para 3 should be amended to read “ In addition to the above the council will require proposals for development to

-
-
-

Policy REN – Renewable Energy

Q?

27. Do you agree with this policy?

No

Please explain:

Para 18.7.3 this guidance should apply to all renewable energy proposals not just “large scale” Consideration should be given to requiring all new housing to be fitted with solar heating panels.

It is not only internationally designated sites and habitats which require protection but all designated sites and habitats see Policy HLH

“Large scale” is not defined if the term is to continue to be used it must be specific.

Policy HLH – Historic Environment, Landscape and Heritage



28. Do you agree with this policy?
Yes
Please explain:
This policy will help to keep Purbeck “Special”

Policy E – Employment



29. Do you agree with this policy?
Yes
Please explain:
It is supported by Section 6.5 of this Strategy.

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? Yes
Please explain:
But only within settlement boundaries

Policy IAT – Improving Accessibility and Transport



31. Do you agree with this policy?
Yes
Please explain:
The need to increase the accessibility to services in a rural district such as Purbeck is self-evident and must be a priority.

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 added to the start of the first sentence.

Sustainability Appraisal



33. Do you have any comments on the Sustainability Appraisal?
Comments: The summary adds credence to the policies developed in the document.

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)	Captain	Agent Title (Mr/Ms/Mrs/Miss/Other)	
First Name:	Paul	Agent First Name:	
Last Name:	Badcock	Agent Last Name:	
Job Title*:	Councillor	Agent Job Title:	
Organisation*:	Affpuddle and Turnerspuddle Parish Council	Agent Organisation:	
Address:	Cruck Cottage Briantspuddle Dorchester DORSET	Address:	
Postcode:	DT2 7HT	Postcode:	
Telephone:	01929 471297	Telephone:	
E-mail:	paul@cruckcottage.freeserve.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



GOVERNMENT OFFICE FOR THE SOUTH WEST

Steve Dring
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Our reference: SW/THM/5822/06:1
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Fax: 0117 900 1906
E-mail: Simone.Wilding@gosw.gsi.gov.uk

23rd November 2009

Dear Steve,

Purbeck Core Strategy – Reg. 25 Preferred Options Consultation

Thank you for consulting GOSW on the above document. We welcome the work you have undertaken so far to progress this. You have clearly researched the various issues and presented them in a user-friendly document which stimulates a spatial planning approach. While I do appreciate the good level of progress you have made, I have serious concerns over whether or not the suggested preferred option can be justified as the most appropriate one and whether all reasonable alternatives have been considered. I set out below the reasons which have led me to this conclusion.

1. Level of Housing Requirement and Distribution

It is positive to see that in section 3.3 you have started to look at the district and how it functions in spatial terms and on this basis developed your spatial strategy. In setting out the characteristics of Purbeck you indicate at paragraph 2.1 that Purbeck is part of the Bournemouth and Poole Housing Market Area and that it falls within the “South East Dorset” [conurbation?]. As set out in the emerging RSS there are at a sub-regional level two main functional areas in Purbeck: a small part which forms part of the South East Dorset SSCT and the area outside the SSCT, the ‘rural hinterland’. To ensure conformity with the higher level plan and also to adequately address housing need in your area, it would therefore seem necessary that you develop this further in your Core Strategy. In other words, it would seem necessary to define in greater detail which area within Purbeck forms part of the SSCT and what is considered outside. While you seem to be going in this direction with the identification of the 5 different spatial areas within Purbeck, it is unclear whether the ‘North East’ area could be considered coterminus with Purbeck’s part of the SSCT?

In paragraph 1.14 you indicate that due to evidence that you have produced jointly with Natural England it is unlikely that the Western Sector for 2,750 dwellings included in the RSS Proposed Changes would pass Habitats Regulations Assessment at LDF level. Your authority will need to satisfy itself as well as the examining Inspector that your evidence is sufficiently strong to demonstrate this and to outweigh the emerging RSS which at this stage needs to be taken into account as a material consideration.

Paragraph 1.14 then further proposes to progress the Core Strategy exclusively on the 2,400 dwellings requirement and to distribute this across the entire district. It would seem questionable whether this conclusion is justified as it lumps different functional areas together and thus ignores the housing need arising in the SSCT *in addition to* that of the rural area’s needs. In other words, you will need to consider

how the housing need of the SSCT that was to be met through the Western Sector is going to be met in a different way. While Purbeck clearly cannot consider all alternatives at SSCT level, you should at least consider *what contribution* Purbeck can make. I.e. what you *can* do and what actions you have undertaken in conjunction with other Local Authorities in the SSCT area to re-assign the housing need that was being addressed by the Western Sector. Unless you can demonstrate that this is being delivered elsewhere in the SSCT – with a reasonable degree of certainty – you cannot simply ignore Purbeck’s part in meeting the SE Dorset’s SSCT’s housing needs.

On this basis it would seem necessary to test an alternative option (also as part of the on-going Sustainability Appraisal). This would need to identify as many houses as possible within Purbeck’s part of the SSCT area that can be accommodated without compromising Habitat Regulations and taking account of wider sustainable development considerations such as transport, access to services etc. In turn the 2,400 dwellings would need to be distributed over the remainder of the district.

In paragraph 1.2.3 you indicate that the Core Strategy consultation is not the place to discuss the level of housing requirement. Given the uncertainty over the strategic planning context for the near future, it may not be helpful to portray the level of housing requirement simply as a requirement of a higher level plan that needs to be fulfilled. This would seem to take the focus away from what is *needed* in the district to achieve your vision and strategic objectives in line with sustainable development principles. The overall level of housing to be provided clearly has a direct impact, in particular on your strategic objective 2, 3 and 8 – and to a lesser degree also the others. If there was no housing figure set by a strategic plan, you would still need to justify any overall housing proposal you put forward against the evidence of *need*, in particular household projections and the SHMA. Furthermore, you would also need to test the implications of different levels of housing as part of the Sustainability Appraisal, taking account of environmental, economic and social sustainability.

2. Sustainable Development

S39 of the Planning & Compulsory Purchase Act 2004 requires local planning authorities to prepare plans with the objective of contributing to the achievement of sustainable development. The UK Strategy for Sustainable Development 2005 commits the UK to pursue sustainable development, to enable all people throughout the world to satisfy their basic needs and enjoy a better quality of life, without compromising the quality of life of future generations. In the UK, that goal will be pursued in an integrated way through a sustainable, innovative and productive economy that delivers high levels of employment, and a just society that promotes social inclusion, sustainable communities and personal wellbeing. This will be done in ways that protect and enhance the physical and natural environment, and use resources and energy as efficiently as possible. Your authority therefore needs to satisfy itself, and the examining Inspector, that the Strategy contributes to sustainable development, including the ability of the rising generation to satisfy its basic needs (including housing needs), in a context of social inclusion, sustainable communities and personal wellbeing.

PPS12 sets out in paragraphs 4.39 to 4.43 the policy on sustainability appraisal as it relates to local development documents. This highlights that “the Sustainability Appraisal should perform a key role in providing a sound evidence base for the plan and form an integrated part of the plan preparation process. Sustainability assessment should inform the evaluation of alternatives. Sustainability assessment should provide a powerful means of proving to decision makers, and the public, that the plan is the most appropriate given reasonable alternatives.” I’m concerned that the current phrasing of your housing objective in the SA (under Headline objective: improving health and well-being) does not enable an assessment of whether enough housing is being provided. It would seem to focus too narrowly on the right type of housing and affordable housing and therefore seems inconsistent with PPS3. The latter clearly sets out at paragraph 10 the specific outcomes which the planning system should deliver including a sufficient quantity of housing. For a housing objective phrasing which would enable an assessment of the alternatives that is consistent with PPS 3 you could, for example, refer to the SA Report for the RSS. This uses the same high level objectives as your SA, but with respect to housing asks: does it “help make suitable housing available and affordable for everyone?” For further guidance on the Sustainability Appraisal of your plan please refer to the on-line plan making manual which formally replaces previous guidance on this matter: <http://www.pas.gov.uk/pas/core/page.do?pageId=152450>

3. Spatial Strategy: Balancing Homes, Jobs and Access to Services

This is not only a key spatial policy driver in the emerging RSS as set out in the settlement hierarchy, but also a fundamental sustainable development principle which runs through national planning policy including

e.g. PPS1 (para. 5 and 16), PPS3 (para 10 and 38), PPS 7 (para 3), and PPG13 (para 14). Purbeck has two existing strategic employment locations:

- 1) Winfrith Technology Centre (70ha in total, 20ha expected to come forward over plan period) and potential to accommodate an additional 3,000 jobs according to its promoters; and
- 2) Holton Heath/Admiralty Park (47ha in total, 13ha expected to come forward by 2026).

Since these are existing, commercially functioning locations these would seem 'fix points' around which the housing distribution needs to be explored to come to a view which distribution would represent the most sustainable option. In order to do this it would be helpful if you showed on a map the 'sustainable catchment area' of these 2 sites, e.g. what falls within a 20 minutes cycle distance, a reasonable public transport commute etc. Furthermore, given Wareham being the nearest 'settlement B' category centre to Winfrith it would seem particularly relevant to consider whether and how you can provide a sustainable link between Wareham and Winfrith so that you could justifiably argue that housing in Wareham is sustainably serving jobs at Winfrith.

Given Wareham's central location in the district, it would appear to provide the best accessibility for the whole of the district for the provision of higher order services. It would seem that Wareham is already fulfilling this function being the district's administrative heart and the location of the secondary school. Having a large proportion of the new housing proposed for rural Purbeck concentrated at Wareham, would therefore seem the most appropriate location in terms of reducing the need to travel through choice of location. Getting the strategic development location right is absolutely critical in setting the tracks in the right direction for sustainable travel patterns and to facilitate sustainable communities. This underlies the national planning objectives cited above and has been further demonstrated recently in "Planning for Sustainable Travel", a guide by the Commission for Integrated Travel¹. In paragraph 7.5.1 you indicate that all three options comply with national and regional policy, but indicate in the following sub-paragraph (2) 'protecting and enhancing the natural environment challenge' that: "Alternative Option A is of particular concern and mitigation may not be achievable". As in sustainable travel/creating sustainable communities terms concentrating growth at Wareham would seem to be substantially preferable, reasons to outweigh this consideration would need to raise even greater sustainability concerns. It would therefore seem necessary to explore further whether and how a more substantial extension to Wareham could be accommodated at Wareham, while at the same time ensuring that this can be done in line with Habitats Regulations.

4. Strategic/Spatial Objectives

It is positive to see a relatively strong read-across between the five main challenges identified in section 3.2 and the spatial objectives set out in section 4.4. It would, however, be preferable for these to be referred to as 'Strategic Objectives' to ensure consistency with PPS 12 which in paragraph 4.1. (2) lists 'strategic objectives for the area' as one of the critical elements that Core Strategies must include. You could also further strengthen your Core Strategy and the strategic objectives by making them clearer and more focused. E.g. 1, 6 and 7 all seem to be highlighting different aspects of the same objective. On the other hand it seems surprising not to see mitigating against/adapting to climate change highlighted as one of the key challenges and 'only' in place 5 amongst the strategic objectives (are these in priority order?). To ensure consistency with PPS1 and its supplement 'Planning and Climate Change' this would seem to merit better reflection in the Core Strategy (i.e. highlighting climate change as a key challenge and setting out mitigation as well as adaptation to Climate Changes as strategic objective). In this vein each objective would seem to benefit from drawing out the key aspects that you are seeking to achieve (preferably in priority order) to provide a hook for the implementation and monitoring framework. E.g. for Strategic Objective 2 it would seem necessary to clarify that Purbeck's housing need consists of 2 elements: a) rural Purbeck's need and b) Purbeck's part of the SSCT need (as elaborated above under 1).

With regards to monitoring you have made a good start in setting out indicators which you consider relevant to each of the strategic objectives. In going forward you should develop these further into a SMART framework for each of the strategic objectives. I.e. setting out not only the indicators, but also the targets and key, time-related milestones and considering when contingencies would be triggered (e.g. Poole Core Strategy contains good examples). To demonstrate that your plan is realistically deliverable you also need to indicate priorities, who, delivers what by when (should be known for the priorities, or at least there should be a reasonable prospect of it being realistic). You also need to ensure that the CS is sufficiently flexible to be able to react to potentially changing circumstances. You may also want to consider narrowing down the range of indicators you want to use to ensure that your monitoring framework is focused and manageable.

5. Vision

¹ <http://www.plan4sustainabletravel.org>

You have clearly put a lot of effort in identifying a locally distinctive vision which takes forward the aspirations of the Sustainable Community Strategy and the aspirations of the community expressed in previous consultations. In particular, the area-based visions work well to provide greater detail on how the different parts of the district are proposed to develop. Arguably each of the area visions (some more than others) need to become more succinct, focused and clear in what is being aspired to. More importantly these still need to relate more directly to the overall vision for Purbeck. In other words, the Purbeck vision needs to capture the key elements of the individual areas, e.g. refer to the key towns and their roles within the district, and show how these will work together. It would seem that as part of that it would also include the role of the A351 corridor taking away the need to list it separately.

6. Green Belt

I understand from our meeting on the 18 November 2009 that the Green Belt boundary in Purbeck seems substantially less straight forward than suggested in paragraph 8.3.4. In particular, there are several material considerations which seem to suggest that the Green Belt boundary as set out in the Local Plan needs reviewing:

- Policies from the BDP Structure Plan relating to Green Belt were accidentally not saved.
- The southern boundary as currently defined appears to be simply ‘the edge of the map’ rather than a logically defined area in accordance with PPG2.
- Different options for settlement extensions to Lytchet Matravers.

While the proposed approach would seem a pragmatic way forward, it could be made out to be avoiding some difficult choices which need to be made in the Core Strategy. You may therefore want to consider setting the Green Belt boundary in the Core Strategy, which may also take away the need for a subsequent Site Allocations DPD in the short to medium term. In this case the argument whether or not to set the Green Belt boundaries in the Core Strategy or in a sub-sequent DPD therefore seems finely balanced. While setting them in the Core Strategy would seem more onerous and time-consuming in the short-term, it would appear to be the ‘cleaner’ and possibly also quicker option in the medium-term.

7. Implementation and Delivery

As PPS 12 highlights in paragraph 4.1 (3) and 4.4 respectively a delivery strategy which sets out how you are going to achieve the vision and strategic objectives is central to the Core Strategy. This needs to set out “as far as practicable when, where and by whom (...) and the resources required have been given due consideration and have a realistic prospect of being provided in the life of the strategy. If this is not the case, the strategy will be undeliverable”. Furthermore, deliverability and flexibility are key considerations in establishing whether or not a Core Strategy is effective – which in turn is one of the 3 fundamental assessments in determining whether or not a Core Strategy is sound (PPS 12 paragraph 4.44). See also my comments above in relation to the need for a SMART monitoring framework for the strategic objectives. Arguably the preferred option which you have currently set out would not seem to lead to your strategic objectives being met. In particular, how are you going to mitigate against e.g.:

- unsustainable travel patterns arising from the dislocation between jobs in Winfrith/Holton Heath on the one hand and homes mainly in Swanage on the other hand?
- the impact on the A351?
- there not being any direct relationship between small scale additional development and viability of rural services?

8. Infrastructure (Associated to 3 and 7 above)

By publication the plan will need to be clear about which key pieces of infrastructure are required to enable the delivery of the spatial strategy, how these are going to be delivered, by when and by whom. Ideally you would also show this on the key diagram. While the consultation document lists a number of schemes (e.g. in policy ATS: implementing an Appropriate Transport Strategy for Purbeck), it is difficult to ascertain their relative importance for delivery and to which degree their delivery is secured. This is particularly important should Purbeck District Council intend to introduce a CIL charging mechanism or alternative mechanism to raise funds from development to contribute to the funding of such infrastructure.

9. Cross-boundary Issues

While you indicate in paragraph 2.1 that Purbeck ‘has close associations with the Unitary Authorities of Bournemouth and Poole’, the spatial strategy does not seem to reflect this in many ways. Particularly with regards to how you see Purbeck’s part of the SSCT developing in future and what this in reverse means for the rest of the district would seem to require much more explicit consideration.

10. Dealing with Flood Risk

To ensure consistency with PPS 25 it would seem necessary to strengthen proposed policy FR: Flood Risk recognising that a sequential approach to locating vulnerable development needs to be undertaken and that normally this will only be allowed in Flood Zone 1. While the last paragraph of the policy goes in this direction, it would seem preferable to make this clear in the first paragraph of the policy. This could also highlight that for housing development such sequential assessment has already been undertaken by your authority and been reflected in the proposed housing distribution.

I hope that you may find these comments useful. Please do not hesitate to call if you have any further queries.

Yours Sincerely

Simone Wilding MSc MRTPI
Senior Planning Manager
Dorset and Somerset

CS076 PULM (Plan for Upton and Lytchett Minster Steering Group)



PULM
c/o 1 Moorland Parade
Moorland Way
Upton
Poole
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BH16 5NF

26th November 2009

Dear sir,

Plan for Upton and Lytchett Minster (PULM) Steering Committee Response to PDC Consultation on Core Strategy 2009 'Planning Purbeck's Future'

We would like to draw your attention to the PULM submission to the above consultation. This has been agreed with the Town Plan Steering Committee. The submission represents the Committee's considered response taking account of the Town Plan, the evidence base it draws upon, and public opinion sampled at various public events organised by PULM in the past three years.

This submission in the main follows the content of 'Planning Purbeck's Future' and addresses the specific questions asked within that document where they relate to Lytchett Minster and Upton. It also includes additional comment on the text where appropriate.

An initial comment is that PULM is generally very pleased that the Core Strategy has taken into account the Town Plan for Upton and Lytchett Minster and welcomes future opportunities to work with PDC on formulating more detailed policy in the town, or on specific issues as they emerge.

PULM would like to reinforce the message that the Town Plan strongly supports the need for Upton to be recognised as a place in its own right (i.e. not a suburb of Poole). Among the improvements residents have identified is the need for a well-defined centre to provide a central focus and help to build a much greater sense of place, character and identity than it has at present.

PULM would also like to draw attention to another key finding from the Town Plan, namely that as the second largest town in Purbeck, Upton is short of facilities and some important service provision relative to other similarly-sized towns in Dorset. It is clear that Upton is often overlooked and that its proximity to Poole may have been a disadvantage in terms of attracting support for facilities of its own. This particularly affects those less able to access facilities in the wider Poole and Purbeck areas. It is important that this is borne in mind when formulating policy and future plans for Upton and the neighbouring settlements of the "Town" (i.e. of Lytchett Minster and Upton).

Comments

Section 3.7 generally captures the Issues and Challenges for the town in relation to planning. PULM welcomes the opportunity to discuss priorities in relation to optimising the list of sought-after facilities against the potential for developer funding as part of ongoing discussions on the future of the Town Centre (following the Planning for Real ® exercise earlier this year).

Q1. The Vision for Purbeck seems to be a good one, noting in particular that "Its three towns will be distinctive and thriving with good access to facilities to meet everyday needs." is a guiding principle that has perhaps been over-looked in Upton over many years.

Q2. The Spatial Area Vision for Upton seems again to be a good one.

Q3. The Spatial Objectives are sensible. It is perhaps questionable though that "4. Support local communities." and "8. Promote a prosperous local economy." are objectives per se. An alternative wording could be "Preserve or strengthen local communities." and "Ensure a prosperous local economy."

Q4. Policy on general location of development.

(a) and (b). The settlement hierarchy puts Upton, as part of the SE Dorset SSCT, ahead of Swanage and Wareham. The concept of the SE Dorset SSCT is flawed for many reasons. The conurbation from Upton to Christchurch is not functionally a single city given its geographic constraints (notably its coast and protected habitats), lack of major transport routes and disparate local government and service provision. The PDC Core Strategy should recognise Upton according to the Vision for Purbeck as "distinctive" in its own right and not primarily as part of the SE Dorset SSCT. For this reason, and Upton's unique position between two designated heathlands, it should not be viewed as a more sustainable location in which to develop than Wareham and Swanage. In fact, given the priorities for development (low cost housing) and local demographics (younger average age and more children than other settlements in Purbeck), the lack of amenities within Upton itself relative to either Wareham and Swanage suggest that it is less well placed to absorb development in a sustainable way.

The policy also proposes to remove the settlement boundary for Lytchett Minster, thereby constraining all development to comply with the policies CO: Countryside and RE: Rural Exception Sites, i.e. to be affordable housing only. This could potentially ensure that any small plots coming forward are then developed for much needed affordable housing. But equally the policy could deter such plots from being developed at all, thereby excluding them from making a contribution to Purbeck's overall housing target. Presumably the policy reflects some investigation into its likely impact in this respect.

(c) Clearly the success of Rural Exception Sites in delivering affordable housing relies on them not having the potential for market housing at any time in the foreseeable future. A view expressed in Town Plan surveys was that social housing provision can adversely affect the social balance in an area. This may inhibit the development of such sites, or may create social problems in small finely balanced communities for the future. It is therefore important in such areas to ensure that the whole community supports the need, and that it is developed for use by local people or key workers only. This point also applies in settlements such as Lytchett Minster where the settlement boundary is proposed for removal.

Q5. The policy on housing supply is sensible. The provision of 2,400 houses for Purbeck District as a whole would seem to be a reasonable compromise in relation to the RSS numbers for planning purposes (though the 2,100 originally put forward remains a more desirable figure). The decision not to interpret Upton as part of the SE Dorset SSCT in this respect is supported by PULM, and the decision not to recognise the proposed 2,750 dwellings within Area of Search 7B at Lytchett Minster within the Core Strategy is very strongly supported.

Q6 (a) and (b). The development potential has no doubt taken account of the Government guidelines on density for "urban" areas, which are generally felt (by

informed residents) to be too high for towns within Purbeck District. The Town Plan for Upton and Lytchett Minster states that "66% oppose new housing in the Town", that "There is strong opposition to current and future flat building" and that "People are not happy with the increasing intensification of development in Upton." Similar views almost certainly prevail in the other settlements. As such, 50% should be a minimum figure on the reduction.

Q7. In relation to Lytchett Minster and Upton, given that no large settlement extensions are proposed, it does not seem unreasonable that the Core Strategy does not propose phasing.

Q8. No views on the employment sites, although it is worth noting that public transport links and cycle links from NE Purbeck to Holton Heath Industrial Estate, Admiralty Park and Winfrith Technology Centre need to be improved. This would relieve pressure from commuting on the A351 (especially in the summer when tourism adds to congestion, but when cycling is most viable as an alternative to car use in commuting to these employment centres).

Q9. No views as the question relates solely to supermarket provision in Swanage and Wareham.

Q10. All options (Preferred, Alternative A and Alternative B) include "Improving the centre of Upton to create more community focus". This is welcome. They also all include a requirement for 315 dwellings in Upton within the settlement boundary. Given the constraints from the 400m heathland buffer zone, this will concentrate development around Dorchester Road and Blandford Road South, largely in the form of garden infilling. As noted in response to Q6 above, the Town Plan for Upton and Lytchett Minster states that "66% oppose new housing in the Town" and that "There is strong opposition to current and future flat building" and that "People are not happy with the increasing intensification of development in Upton." The "requirement" for 315 homes in the limited land space available will result in pressure for high density developments and will potentially have a very significant and adverse effect on the character of the town - noting that these roads are major thoroughfares and that this area includes the centre for which more community focus is sought. It does not accord with the views expressed in the Town Plan. It is also worth noting that the demographics in Upton suggest that a higher proportion of new homes will be taken up by families with children, and high density will result in inadequate amenity space for those children. Greater dialogue with the community is required on this issue. Although there is very strong opposition to the large scale development proposed as the Western Extension, the balance between infilling and limited settlement extension for the wider Lytchett Minster and Upton area has not been the subject of consultation. Also, it is important that significant new development be accompanied by clear demonstration that facilities are being improved to accommodate the extra numbers. The Town Plan notes that "Alongside the dislike of new development is a demand that if it is to take place existing facilities should be improved and new ones provided."

Q11. The countryside policy is sensible and welcome.

Q12. The policy in relation to maintaining the Green Belt is sensible and welcome. As noted for Q10, there should be more community engagement and debate on the relative merits of potentially excessive infilling against the use of limited settlement extension and Rural Exception Sites. The Town Plan surveys did not specifically seek views on small scale Green Field development (though some residents provided comments on this issue). At the Town Plan launch event in May 2008, a

questionnaire was provided on issues around the proposed Western Extension. Findings are given in Appendix A of this letter. From this small sample of residents (69 respondents), it can be inferred that the acceptance of, or opposition to, limited Green Field development would be on a case-by-case basis. There was clear opposition to the Western Extension (all but one respondent). Those who objected to any Green Field development were around 32%. (Around Upton, "Green Field" equates to "Green Belt".)

Q13 & 14. In relation to the policy on affordable housing, we do not agree with the balance between social rented housing and intermediate housing to rent or purchase: 90% social rented is too high. It will lead to developments being a mix of social rented and premium, with little in between. Shared equity, or other schemes which promote more householder responsibility, could be squeezed out by the policy. Large numbers of council houses were unburdened from public responsibility and sold to their occupants in the past. Inadequately catering for those *able* to move "up" the housing ladder results in perpetually higher demand for the most affordable forms of housing. The PULM response to the PDC public consultation on Affordable Housing Interim Planning Guidance and Rural Exception Site Checklist (letter date 11th December 2008) concludes that it would be preferable to have a 75:25 mix (as was assumed by the consultants used by PDC). The response also makes a number of other points in relation to the type of housing that should be promoted as affordable housing (in the wider sense) – see Q17 below.

Q15. In relation to the policy on rural exception sites, the PULM response to the PDC public consultation on Affordable Housing Interim Planning Guidance and Rural Exception Site Checklist (letter date 11th December 2008) includes the following conclusion: "*It is recommended that guidance on Rural Exception Sites should be stronger with respect to safeguarding local ecology and natural beauty.*" The Rural Exception Site policy states that the scheme should be "of character appropriate to the location". The wording could perhaps be stronger and more explicit.

Q16. No views on site criteria for gypsies etc other than to strongly support the need to work in partnership with local residents when trying to establish sites.

Q17. In relation to the policy on wider housing needs, the PULM response to the PDC public consultation on Affordable Housing Interim Planning Guidance and Rural Exception Site Checklist (letter date 11th December 2008) includes the following points in relation to wider housing needs.

"The following could be worthy of consideration.

- 1. Use of more mobile homes to provide a source of affordable housing.*
- 2. Purchase by the local authority of flats and small houses as the market bottoms out.*
- 3. Incentivise private purchase of flats and small houses as the market bottoms out for future rental as social housing. This could involve either private individuals, or institutions such as companies or pension funds.*
- 4. Encourage schemes with employers, or groups of employers, to assist housing provision for key workers, or for workers addressing local skill shortages.*
- 5. Incentivise more co-occupancy by extended families, or through sharing or lodging, to help to increase occupancy rates.*
- 6. Encourage more development of sheltered accommodation for local mature residents with incentives to encourage people to vacate their existing properties. This not only addresses a housing need but potentially frees up more market housing, or properties for conversion to affordable housing. Well-designed sheltered accommodation embedded within communities, and allowing a degree of independent living (and, for example, spare communal accommodation for visiting relatives), could potentially be higher density, more environmentally friendly, and more accessible than existing properties. They are less likely to be opposed by local residents than other schemes. It may also be possible to reach agreement with Natural England about the provision of such accommodation within the 400m buffer zone.*

It would also be worthwhile to consider the development of a young people's hostel (or "Foyer") in perhaps a couple of key locations in Purbeck. These could serve as a first step for independent living for local young people (especially those without sufficient points to qualify for affordable housing). They could also serve young people moving into the area either to take up permanent jobs or for seasonal work. Swanage, and somewhere within walking distance of Wareham station, would be obvious locations to start."

Q18. The policy on biodiversity and geodiversity is sensible and welcome.

Q19. The policy on Dorset heaths is sensible and welcome. However the specific nature of the "Access and parking management measures" envisaged should be the subject of separate public consultation. Although the heathlands are clearly important natural habitats, their value as a local amenity cannot be underestimated. There is clearly a balance to be struck between recreation and conservation. The increased housing numbers in the area adversely affect this balance. But many local residents who have used and respected these open spaces for many years would be deeply upset at having access significantly restricted or denied. The aesthetic quality of an area is as much a reason to preserve it as the biodiversity it contains. An area has no aesthetic quality when those who admire and respect it are denied access.

Q20. The policy on retail provision refers to Upton as a "District Centre". It is not clear what this means, especially when Wareham and Swanage are referred to as "Town Centres" and Upton is also referred to as Purbeck's second largest town earlier in the document. Current provision is more consistent with the definition of a "Local Centre" in that per head of population it is probably similar to Wool. It is certainly a long way short of Wareham or Swanage, though the relative proximity of a number of supermarkets and Poole town centre are clearly important factors. Other commensurate local centres within Poole Borough do however sustain a significantly

larger retail provision than Upton (e.g. Broadstone). This should be possible in Upton. The "enhancement of the centre" of Upton stated in the policy is strongly supported, as is recognition of the "key importance" of the Greenridge pub site. It is also important to have a clear definition of the centre. This may need to be larger than (or offset from) what is currently recognised as the centre in PDC planning policy. This should be part of ongoing dialogue between PDC, the Town Council and PULM.

Q21. The policy on community facilities and services is sensible and welcome. It is noted that Healthcare facilities in Upton are not mentioned explicitly, but do in any case fall under "Community facilities identified through Town and Parish Plans." In relation to "Safeguarding Existing Facilities and Services", the four criteria are sensible and very welcome. It is important that these are actively and robustly taken into account. Recent experience with the Greenridge site in Upton suggests that there is significant room for "interpretation" within such criteria.

Q22. The policy on green infrastructure, recreation and sports facilities accords well with local views expressed during PULM evidence gathering that increasing development should be accompanied by the provision of more facilities.

Q23. The policy on flood risk is sensible and welcome.

Q24. The policy on groundwater protection is sensible and welcome.

Q25. The policy on coastal erosion is sensible and welcome.

Q26. The policy on sustainable design is sensible and welcome. The points relating to demonstrating regard for neighbour amenity etc will be particularly welcome to many residents where infilling has been a major feature of development in recent years. Also, the Town Plan for Upton and Lytchett Minster includes a recognition of many resident comments on the importance of trees as part of the character and amenity of the town. This could be reflected by including specific words such as "(including respect for the role of trees in regard to landscape and biodiversity)" in the relevant wording.

Q27. Renewable energy was outside the general scope of the Town Plan, though some respondents to questionnaires did cite "the environment" (i.e. beyond the immediate surrounds of Upton) as an important issue. The need to strike the right balance between the benefit of renewable sources and the potential harm to the landscape and wildlife is sensibly stated in the policy. Wind turbines are probably the most contentious issue surrounding renewable energy. Early engagement with local people is important. The policy notes that a renewable project should "not cause harm to residential amenity". This recognition is welcome.

Q28. The policy on historic environment, landscape and heritage is sensible and welcome.

Q29. The policy on employment is sensible and welcome. The Town Plan for Upton and Lytchett Minster includes a section on business and employment, which stemmed from consultation with numerous local employers. Lack of space and restrictions on expansion in rural areas were cited as constraints by a few. The policy addresses this. A perhaps more important issue though was poor transport links. It is an important component of the objective to "Promote a prosperous local economy." Conversely, the potential impact of extra traffic is not recognised as a consideration in this policy (unlike the next policy on tourist accommodation and attractions).

However, it is noted that the policy on improving accessibility and transport covers all land uses.

Q30. The policy on tourist accommodation and attractions is sensible and welcome. With regard to allowing tourist accommodation within the AONB there would be a danger that tourist accommodation within settlements could be developed for housing in exchange for new accommodation within the AONB.

Q31. The policy on improving accessibility and transport is sensible and welcome. However, a common complaint in relation to the impact of new developments relates to inadequate parking provision and the effect that this then has on the surrounding neighbourhood. A common sense approach is needed that recognises that in an area such as Purbeck there will always be a need to make car journeys and as such parking provision should be appropriate to the expected occupancy of any new dwelling. There are no areas within Purbeck where public transport obviates the need for car use. This has been demonstrated clearly in Upton. The inadequacy of public transport, and provision for other forms of transport that do not involve private use of a car, are significant findings.

Q32. The policy on implementing an appropriate transport strategy for Purbeck is sensible and welcome. The policy to mitigate the impact of additional road trips is preferable to the RSS policy of "demand management" – a concept that would not work in an area such as Purbeck where public transport, cycling and walking are not realistic alternatives to car use for much of the economic activity in the district. The provision of extra cycle routes to include connection to Upton would however be very welcome. A safe designated cycling route is still sought for the many children who cycle between Lytchett Minster School and Upton. The cycle route around Poole Harbour needs to be completed too. Any improvements to the general road traffic situation in the centre of Upton would also be very welcome. The target of an extra 315 or 384 homes (i.e. >10% expansion) would add significantly to congestion in Upton. These extra homes are likely to be built by piecemeal infilling. It is important to ensure that developer contributions to the Purbeck Transportation Strategy are levied on developments of all sizes (pro rata) to ensure that the cumulative effect of many small developments is adequately accounted for.

PULM contact details

See header for address

Alternatively, telephone:

Richard Tazewell (Chairman of Steering Committee) – 01202 632967

Richard Hiles (Steering Committee) – 01202 631545

Gwyneth Brooks (Steering Committee and DCA) – 01929 554667

Yours faithfully,

Richard Hiles and Dave Green

(on behalf of the Plan for Upton and Lytchett Minster Steering Committee)

Appendix A: Findings from Resident Surveys at Town Plan Launch Day 24th May 2008, Upton Community Centre

The Western Extension

Residents were asked which statement, if any, they agree with:

1. I am totally opposed to any development on the Green Field land around Lytchett Minster and Upton for all sorts of reasons.
2. I am totally opposed to the building of 2500+ homes on the Green Field land around Lytchett Minster and Upton, but as a rule think that proposed Green Field development in the Parish should be judged on a case by case basis.
3. I think that limited development on Green Field land in the Parish is acceptable where the land has little ecological importance and no more than around 100 homes would be built.
4. I think that building between Upton and Lytchett Minster is acceptable to link the two communities into a single "Town", but am opposed to building on the fields to the North and West of Lytchett Minster.
5. I think that building 2500+ homes on Green Field land around Upton and Lytchett Minster is desirable and welcome the opportunities such a proposal would bring.

Results (from 69 respondents)

Various combinations were selected, but the key findings are:

Included	Number	Percentage	Interpretation
1, 2, 3 OR 4	67	97%	Against proposed Western Extension
1 only	22	32%	Against Green Field development in Parish (as in 1 above)
2, 3, 4 OR 5	45	65%	Green Field development in Parish should be judged case-by-case
3	25	36%	Limited Green Field development is acceptable (as in 3 above)
4	5	7%	Link Upton and Lytchett Minster (as in 4 above)
5	1	1 - 2 %	Support Western Extension (as in 5 above)



Core Strategy Planning Purbeck’s Future

Response on behalf of Bloors in relation to strategic land interests at the ‘Western Sector’ at Lytchett Minster

Personal Details		Agents Details (if applicable)	
Title:		Agent Title:	Mr
First Name:		Agent First Name:	Andrew
Last Name:		Agent Last Name:	Elliott
Job Title:		Agent Job Title:	Technical Director
Organisation:	JS Bloor (Newbury) Ltd	Agent Organisation:	Terence O'Rourke Ltd
Address:		Address:	Everdene House Deansleigh Road Bournemouth Dorset
Postcode:		Postcode:	BH7 7DU
Telephone:		Telephone:	01202 421142
E-mail:		E-mail:	andrew.elliott@torltd.co.uk

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

Vision for Purbeck

Q? 1. Do you agree with the District Vision?

Yes. JS Bloor (Newbury) Ltd (Bloors) supports in particular the recognition in the vision that Purbeck towns should thrive and that the District must provide homes to meet both local needs *and those of the wider housing market area*.

Spatial Area Visions

Q? 2. Do you agree with the Spatial Area Visions?

We do not agree the vision for north eastern Purbeck.

For north east Purbeck the spatial vision requires reference to the 'western sector land at Lytchett Minster' for mixed development. PPS12, Local Spatial Planning (2008), requires a Development Plan Document to be in general conformity with regional policy (paragraph 4.2). Without consideration of the western sector the core strategy would be found unsound. To avoid this, the western sector should be considered and assessed as part of this strategy and through this consultation process.

Spatial Objectives

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

No. Spatial objective 2 needs to be consistent with the District Vision which appropriately recognises that Purbeck must meet its own housing needs and *contribute towards meeting the wider needs of the South East Dorset housing market area*.

There should also be a spatial objective that references the amendments required to the green belt; we would suggest wording which states that "the green belt will be amended accordingly to allow sustainable development".

Policy LD – Location of Development

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

No. Development Policy A should recognise the area of search for a strategic development area for the western sector in the emerging South West Regional Spatial Strategy. It should therefore include the 'western sector land at Lytchett Minster' for mixed development including 2,750 dwellings.

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

As stated above, the hierarchy must include the 'western sector land at Lytchett Minster' for mixed development including 2,750 dwellings and its relationship to the South East Dorset conurbation.

4 (c) Do you agree that 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 comment.

Policy HS – Housing Supply

Q?

5. Do you agree with this policy?

No. PPS12 (Local Spatial Planning, 2008) requires the core strategy to be in "general conformity with the regional spatial strategy" (paragraph 4.33). It should therefore include a housing requirement with an allowance for a strategic allocation - the 'western sector land at Lytchett Minster' - for mixed development including 2,750 dwellings as proposed through the Secretary of State's Proposed Changes to the South West Regional Spatial Strategy.

Bloors disagrees with the conclusion of the Council that the western sector proposal is likely to fail to satisfy the Habitats Regulations. This should be robustly tested through the Local Development Framework. This will help to ensure the timely and efficient progress of the core strategy as required by PPS12 (2008) (paragraph 4.55).

Character Area Development Potential

Q?

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

Bloors considers that it is only possible to agree with the housing position statement dated 1 April 2008 (which we understand is due to be updated) if you agree with the findings of the SHLAA and the Townscape Character Assessment (a document that has yet to be published for public consultation). As such, Bloors considers that it needs to reflect further on how comprehensive and intensive the capacity analysis has been in identifying sites and the extent to which it has been informed by industry and market intelligence.

Figure 'f', character area development potential, seems an arbitrary figure that is not based on a robust evidence base. Bloors understands that Purbeck District Council may have experienced an increase in windfall sites over the

past five years. However, they do not consider that this meets the requirements of PPS3 (Housing) (paragraph 59) which states: *“Allowances for windfalls should not be included in the first 10 years of land supply unless Local Planning Authorities can provide robust evidence of genuine local circumstances that prevent specific site being identified. In these circumstances, an allowance should be included but should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends”*. This is more of a concern considering that there is a heavy reliance on windfall development to deliver 25% of the District’s housing supply. Bloors considers that Purbeck District Council needs to provide much more robust evidence to support these assumptions.

Criterion ‘h’ seems irrelevant to this assessment and should not feature. As it states on Purbeck District Council’s internet page in relation to the SHLAA, *“It is important to recognise that the SHLAA does not determine whether a site should be given planning permission and developed.”* Therefore we do not see the relevance of including this figure in this table since there is no certainty this site should even get planning permission let alone be delivered.

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

At this stage Bloors is not convinced that sufficient evidence exists to support a windfall development allowance set at 50% of the windfalls predicted by the capacity study.

PPS12, Local Spatial Planning, (2008) requires that for a Development Plan Document to be found sound it should be based on *“robust and credible evidence”*. The findings of the Townscape Character Assessment and other recent studies have yet to be fed back into the Strategic Housing Land Availability Assessment. For instance, the Townscape Character Assessment remains a draft document and has not been subject to any public consultation. Due to the lack of consultation, we do not consider it to form a sound evidence base.

Bloors is particularly concerned about the inclusion of some existing employment sites as potential housing sites within the character assessment. Without market testing and public consultation there is less certainty that these actively used sites will be delivered. As such, any document that relies on this study cannot be considered to form part of a robust and credible evidence base.

Likewise, Bloors considers the 50% level as arbitrary because it does not appear to have taken account of future market trends. The most recent impacts on the development industry of the economic slow down are not considered in this housing position statement as it dates back to April 2008.

As mentioned, there is no certainty that these sites can be delivered and this is recognised by the Council itself. Bloors therefore considers that an assumption that 50% of sites will be delivered is unrealistic, without an up to date

evidence base to support this assumption.

Maintaining a 5 Year Land Supply

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

No. PPS12 (paragraph 4.44) requires that for the Core Strategy to be found sound it should be effective, and to achieve this it must be flexible and deliverable. A phasing provision for settlement extensions would not allow sufficient flexibility and may stifle delivery. Sufficient flexibility also needs to be retained to meet the housing requirements set out in the emerging South West Regional Spatial Strategy.

Policy ELS – Employment Land Supply

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

No. Bloors considers that new employment created as part of a comprehensive western sector development at Lytchett Minster is an essential component of the future supply of jobs, but that the emerging policy document fails to give the strategic direction to deliver this. Paragraph 6.5.1.2 of the consultation document states that between 1,735 and 5,300 jobs are to be created in the remainder of the Poole travel to work area outside the Borough of Poole, and that Purbeck will work with neighbouring authorities to manage the supply of employment land across the South East Dorset sub region to deliver the balance of the jobs required.

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?

See above comments.

Policy RFS – Retail Floor Space Supply

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

No comment.

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?

The preferred option for development in the District should include the Western Sector land at Lytchett Minster for mixed development including the 2,750 dwellings proposed through the Secretary of State's Proposed Changes to the South West Regional Spatial Strategy.

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

As stated above, what is missing is the inclusion of the 'western sector land at Lytchett Minster' for mixed development including 2,750 dwellings in order to be in "general conformity" with the Secretary of State's Proposed Changes to the South West Regional Spatial Strategy.

Policy CO - Countryside

Q?

11 (a) Do you agree with this policy?
11 (b) Should a sequential approach be followed in the re-use of rural buildings?
11 (c) Should other uses be considered for the re-use of rural buildings?
11 (d)
Are there any other countryside related issues that should be addressed by the policy?

No comment.

Policy GB – Green Belt

Q?

12 (a) Do you agree with this policy?

The green belt review should consider the draft South West Regional Spatial Strategy strategic development area for the western sector and the need for green belt review to deliver this mixed development. Likewise, as a strategic amendment to the green belt, this should be considered through the Core Strategy.

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 comment.

Policy AHT – Affordable Housing Tenure

Q? 13. Do you agree with this policy?

No.

The requirements of the policy conflict with the approach outlined in paragraph 8.4.4 that suggests a more reasonable and flexible position. Likewise, the delivery of a very high proportion of social rented homes as part of larger developments is contrary to PPS3 which seeks a mix of housing, both market and affordable, particularly in terms of tenure and price, to support a wide variety of households in all areas, both urban and rural. The proposed policy approach therefore runs contrary to the theme of creating mixed and balanced communities.

Policy AH – Affordable Housing

Q? 14. Do you agree with this policy?

No. Bloors does not agree because the *requirement* of 50% appears out of kilter with the proportion of provision envisaged by the emerging South West Regional Spatial Strategy, which requires local planning authorities to set *targets* for at least 35% affordable housing. PPS3: Housing, clearly states that local development documents should set “targets” for the amount of affordable housing and that the policy wording should be “consistent with national policy” (PPS12 paragraph 4.33). This policy should therefore be reworded to indicate that it is a target.

Policy RES – Rural Exception Sites

Q? 15. Do you agree with this policy?

No comment.

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

Q? 16. Do you agree with this policy?

No comment.

Policy WHN – Wider Housing Needs

Q? 17 (a) Do you agree with this policy?

No comment.

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

No comment.

Policy BIO – Biodiversity & Geodiversity

Q? 18. Do you agree with this policy?

No.

This policy requires linkage with a green infrastructure strategy and the potential provision of suitable accessible natural green space as part of the avoidance and mitigation packages of strategic developments.

Policy DH – Dorset Heaths International Designations

Q? 19. Do you agree with this policy?

Bloors considers that a major element of the District's strategy in this policy area is the provision of strategic suitable accessible natural green space as part of a comprehensive development of the 'western sector land at Lytchett Minster', designed to avoid and / or mitigate the impacts of the development itself and of the recreational needs and pressures associated with the South East Dorset conurbation.

Policy RP – Retail Provision

Q? 20. Do you agree with this policy?

No comment.

Policy CF – Community Facilities and Services

Q? 21. Do you agree with this policy?

The consideration of the need for and location of major new community facilities cannot wait until the site allocations plan. This will have strategic implication and must be considered as part of the core strategy.

Policy GI – Green Infrastructure, Recreation and Sports Facilities

Q? 22. Do you agree with this policy?

No.

Bloors considers that there is a need for better alignment and interlinkage between this policy and Policies BIO and DH. Likewise, it is difficult to comment in full on this policy prior to the publication of the Green Infrastructure Strategy and the Recreational and Open Space Strategy and the information gathered in support of them.

Nevertheless, Bloors considers that a major element of the District's strategy in this policy area is the provision of strategic, suitable, accessible and natural green space as part of a comprehensive development of the 'western sector land at Lytchett Minster'. This would be designed to avoid and / or mitigate the impacts of the development itself and the recreational needs and pressures associated with the South East Dorset conurbation.

Policy FR – Flood Risk

Q? 23. Do you agree with this policy?

No. The final sentence of this policy should be removed as it is prejudicial.

Policy GP – Groundwater Protection

Q? 24. Do you agree with this policy?

No. The wording should be amended to make reference to development within groundwater source protection areas being permitted where there is no *significant* risk to the quality or quantity of groundwater.

Policy CE – Coastal Erosion in Swanage

Q? 25. Do you agree with this policy?

No comment.

Policy IAT – Improving Accessibility and Transport

Q? 31. Do you agree with this policy?

Pending the outcome of the South East Dorset Multi Modal Transport Study, which will be a critical part of the evidence base, Bloors has no comment on this policy.

Policy AP – Implementing an Appropriate Transport Strategy for Purbeck

Q? 32. Do you agree with this policy?

Pending the outcome of the South East Dorset Multi Modal Transport Study, which will be a critical part of the evidence base, Bloors has no comment on this policy.

Sustainability Appraisal

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

As it stands the sustainability appraisal (SA) of the core strategy is incomplete and unsound.

The SA is flawed by the lack of an assessment of the strategic development option for mixed development at the ‘western sector land at Lytchett Minster’ as proposed through the Secretary of State’s Proposed Changes the South West Regional Spatial Strategy. The full and complete appraisal of this option is a critical technical issue, notwithstanding the uncomfortable local political matters that this may raise. It is considered that the exclusion of this option from consideration “*as there are indications that the amount and the location could lead to adverse impact on protected sites and therefore be contrary to the Habitats Regulations*” is insufficient on its own as a technical analysis of the possible sustainability benefits and disbenefits of progressing this development option. A much more rigorous and open assessment is required through the core strategy process.

There are no clear criteria for assessing the nine development options in table 3 of the SA, and therefore a lack of robust evidence to support the findings of this options appraisal. This seriously questions the extent to which the preferred options subject to consultation are supported by evidence.

Policy SD – Sustainable Design

Q? 26. Do you agree with this policy?

No. This policy approach is too restrictive and repetitive. For instance, the final bullet points requires a gold or silver building for life score but Life Time Homes will be brought into Building Regulations in 2011.

Policy REN – Renewable Energy

Q? 27. Do you agree with this policy?

No. It is considered that the second paragraph of this policy involves a requirement that is not adequately justified at this time. However, recognition of the impact on feasibility and viability is supported. It is not clear if the District Council has conducted any specific feasibility or viability testing of the policy requirement.

Policy HLH – Historic Environment, Landscape and Heritage

Q? 28. Do you agree with this policy?

No. This policy is primarily a development management tool. It is questioned whether the policy is needed in a core strategy document.

Policy E – Employment

Q? 29. Do you agree with this policy?

No. The policy should provide scope for the inclusion of employment land within strategic urban extensions where appropriate. Greater emphasis is required on the merits of mixed use development as part of a sustainable development approach.

Policy TA – Tourist Accommodation and Attractions

Q? 30 (a) Do you agree with the policy wording?
30 (b) Should new tourist accommodation be allowed within the AONB?

No comment.

30th November 2009



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Dear Mr Dring

**SUPPORTING REPRESENTATIONS ON BEHALF OF THE SCOTT ESTATE
 WASHPOND LANE – THE PREFERRED SETTLEMENT EXTENSION FOR SWANAGE**

Further to our meeting dated 6th October, we have on behalf of our client, the Scott Estate submitted a Core Strategy Questionnaire Response Form. In principle, our questionnaire response supports many of the Council's strategy and objectives. With regard to Question 10 (Preferred Option for Development) we enclose the following information to highlight our client's land interests and consultations with known interested parties. Swanage is subject to a settlement expansion for 206 dwellings. Future development is also expected to contribute to deliver a number of new community and recreational facilities (as listed in para 3.8.5.9 of the Core Strategy). At this stage the Council have identified two sites in Swanage as their preferred urban extension options – the Caravan Park and Grammar School site (Map 16). The Estate disagrees with the Council's selection of these preferred option sites and assessment process.

The enclosed Figure 1 – 4 demonstrates to the Council that the Washpond Lane site should instead be considered as the preferred settlement extension site for Swanage. I summarise the key issues from Figure 1 – 4 below:-

Figure 1 – Site location of Washpond Lane and preferred option sites

The plan highlights the distances of each site from the town centre's transport interchange (railway station, bus depot and taxi rank):-

- The Caravan Park is marginally the closest site to the travel interchange, located approximately 1000m away. The Grammar School is located furthest away at over 1165m. Both sites occupy hillside locations and are poorly related to consolidate Swanage's urban form. From the town centre, pedestrian journeys to these sites would be subject to a physically arduous, undulating walk and both sites are presently not well served by existing public transport. Residential development at these locations would therefore be more likely to increase car use.
- In comparison, Washpond Lane is located approximately 1100m from the town centre - as close to the town centre as the Caravan Park and better than the Grammar School. It's geographical context and location allows pedestrians and cyclists differing access links to the town centre. This would make it the most accessible location to reduce car journeys in accordance with the Council's Core Strategy Policy IAT. The site is located next to the A351, Swanage's principal road. Along this route, regular bus services directly pass the site providing a link to key destinations such as the Bournemouth-Poole conurbation. The site would be far better suited to 'maximise the use of alternative and sustainable forms of travel' (criteria 2), given its accessibility to bus services and the potential for cycle/pedestrian links to the town centre, than either of the Council's preferred option sites. Conversely, development at the

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Council's preferred option sites would inevitably require new public transport facilities to meet this policy requirement.

Figure 2 – Indicative Masterplan

We highlight the indicative drawing's following objectives:-

- Create a mixed use development that would provide a new 'gateway' entrance to Swanage;
- Create a more welcoming arrival for tourists and a new focus of activity to benefit local residents;
- Deliver a diverse and sustainable housing mix, which would be designed to assimilate to its setting and surroundings;
- Deliver a new hospital / health facility, adopting a bold, striking architectural design and positioned to front the A351 which would provide a much needed focal point to denote visitors arrival in Swanage. Furthermore discussion are continuing with other interested parties about the site suitability for other local services and community uses e.g. new ambulance station;
- An appropriate development that would protect and enhance the site's attractiveness, landscape qualities and existing wildlife habitats; and
- An appropriate development that presents a good opportunity to provide a harmonious and complimentary relationship with the neighbouring Swanage Middle School which is subject to intensified education uses and possibly as a new 'community hub' for Swanage.

Figure 3 – Indicative Site Access Plan.

A site access report and plan has been prepared by Traffic consulting engineers Upton McGougan. The enclosed plan demonstrates:-

- To serve a large scale development the proposed site access would be off Victoria Road, adjacent to the Chapel. Figure 3 shows that this is achievable without third party land being required (subject to usual County Highway agreement);
- An indicative roundabout design demonstrates how a site access would provide wider benefits to the surrounding road network. Its design would provide a safe means of site access and improve the A351 junction with the High Street and also could provide a memorable experience for visitors and denote a point of arrival for Swanage; and
- Provide pedestrian / cycle links with the adjacent Aigburth and Ancaster Road.

Figure 4 – Comparison of Washpond Lane site with Caravan Park / Grammar School

The table records key facts of the three sites drawing reference to the Council's SHLAA. Following this is an analysis of the three sites with regard to development and sustainability criteria:-

Grammar School

In our opinion, the Council's reference to the Grammar School as brownfield is misleading and is only restricted to the footprint of the existing school buildings that measure approximately 2015sqm. Only 10% of the site coverage is therefore suitable to be considered as brownfield. 90% coverage of this site are the playing field and tennis court. As playing fields this part of the site is subject to the need to provide replacement facilities in accordance with the national guidance tests set out in PPG 17. This is a fundamental planning policy constraint.

Caravan Park

The majority of the Caravan Park appears to be a site for static caravans which could be argued to be brownfield land 65%. It would however appear that part of the site is not being used for static caravans but possibly is being used by tourists, to accommodate touring caravans. This part of the site is greenfield land 35%. The partial brownfield merits of the Caravan Park need to be balanced with its hillside location, landscape impacts and access difficulties (via an existing residential suburb). Furthermore, no information

has been submitted with regard to this site's loss to tourism use and the local service benefits that proposed housing development could deliver to meet the needs of local people.

Washpond Lane

In contrast, our supporting information demonstrate that development of the mixed use development proposal for Washpond Lane would provide a concentrated range of local services and community facilities and also deliver an appropriate contribution to local affordable housing needs.

Consultation with key consultees

The enclosed indicative masterplan has been prepared in discussions with Prime, a specialist developer of medical services, who have been awarded the contract to provide Swanage with a new hospital, medical centre and possibly ambulance station. The indicative masterplan shows that the Washpond Lane site is suitable to accommodate a new hospital / medical centre facility together with the opportunity to incorporate other complimentary healthcare or community uses. Prime have been in continued discussions with Swanage GPs and the Dorset Primary Care Trust regarding the site's suitability. In response, preliminary comments from the GPs and PCT have very been supportive of the Washpond Lane site given its potential to deliver an appropriate sized medical building, access to public transport, proximity to the town centre and its potential for a synergy of facilities with the neighbouring school site

In addition, consultation with Dorset County Council Education Department have confirmed that neighbouring Swanage Middle School will remain in continued education use, perhaps as the site to 'relocate' Hurston Primary School. In addition, the Middle School's extensive grounds are being considered as a site for a 'community hub' role, whereby the grounds would be better utilised and improved to provide enhanced sporting pitches / evening education classes etc. This presents a great opportunity to highlight the potential harmonious and interactive relationship the site could have with Washpond Lane. We have liaised with the County Council's Project Manager who very much likes this idea of a synergy in community facilities and further discussions are planned for the new year.

Conclusion

- The Council's assessment that the two preferred option sites are considered as brownfield land is incorrect. Large parts of both sites would develop existing Greenfield land. Furthermore, the loss of playing field land at the Grammar School site and the loss of tourist facilities at the Caravan Park are subject to national planning policy tests which have not been highlighted or addressed.
- The Washpond Lane site should be designated as the Council's preferred option site because it would deliver a mix of uses including residential, healthcare development (with significant areas of public open space) that would concentrate development at one location. Its location, links and relationship with Swanage Town Centre and its neighbours are superior than the Council's preferred option sites. The indicative masterplan illustrates a new focus of activity to benefit both future and existing local residents and provide a fantastic opportunity for a new 'gateway' entrance and a more welcoming arrival for Swanage.
- Unlike development at two smaller Grammar School and Caravan Park sites where deliverability is not known, the Washpond Lane site would deliver.
 - a mixed use development with local services / community facilities
 - a logical consolidation to the urban settlement;
 - the 'rounding-off' the settlement pattern; and
 - the best option to facilitate sustainable transport objectives and reduce the need to travel.

Please contact Cliff Lane or myself should you wish to discuss this matter further.

a

Yours sincerely

Philip Holdcroft
Associate
Savills Planning

Enc: Figure 1 - 4

CC: David Pardoe Savills
Simon Greenwood Savills
Cliff Lane Savills

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<p>Would development encourage more sustainable travel patterns?</p>	<p>Within walking and cycling distance to Swanage town centre and local facilities at nearby Hurton (Figure 1). Pedestrian routes between the site and town centre are level. The concentration of a mixed-use development at one location, close to the town centre with good public transport links would be easier to facilitate sustainable transport objectives and the best opportunity to reduce the need to travel.</p>	<p>From the town centre, pedestrian journeys to the site would be subject to a physically arduous hillside walk. Residential development at this location would be more likely to increase private car use.</p>	<p>From the town centre, pedestrian journeys to this site would be subject to a physically arduous hillside walk. Residential development at this location would be more likely to increase private car use.</p>
<p>Relationship with surrounding built form and townscape.</p>	<p>The site is both well situated and connected to provide a concentrated range of local services and community facilities to benefit its residential surroundings. Development at this site could provide a new focus of activity to benefit both future and existing local residents.</p> <p>A mixed use development at this site would provide a fantastic opportunity for a new 'gateway' entrance and a more welcoming arrival for Swanage. Visually, the development could adopt a bold, strong architectural design and be positioned to front the A351 which would provide a much needed focal point to denote visitors arrival in Swanage.</p> <p>A roundabout design could not only provide a safe means of site access which would improve the existing and dangerous A351 junction with the High Street but could provide a memorable experience for visitors and denote a point of arrival for Swanage.</p> <p>The site's good pedestrian links to the town centre and its public transport opportunities would all support the viability and vitality of the town centre.</p>	<p>Development at this would not concentrate development close to existing local facilities.</p> <p>The site offers little scope to create a positive townscape addition or gateway to Swanage.</p> <p>Instead, as this site is poorly situated and is the furthest located option site from the town centre residential development would extend the urban settlement. This would have an adverse impact on both its countryside surroundings and wider townscape legibility.</p>	<p>Development at this would not concentrate development close to existing local facilities.</p> <p>Residential development of the site has the potential to be visually prominent at the location when viewed from surrounding vantage points and would be unlikely to offer any townscape benefits.</p>
<p>Relationship with Swanage Town Centre.</p>	<p>Development of the site would present a more sporadic development pattern, that would not round-off the urban area and is both poorly situated and connected to maximise use of the town centre facilities.</p>	<p>Development of the site would present a more sporadic development pattern, that would not round-off the urban area and is both poorly situated and connected to maximise use of the town centre facilities.</p>	<p>Development of the site would present a more sporadic development pattern, that would not round-off the urban area and is both poorly situated and connected to maximise use of the town centre facilities.</p>

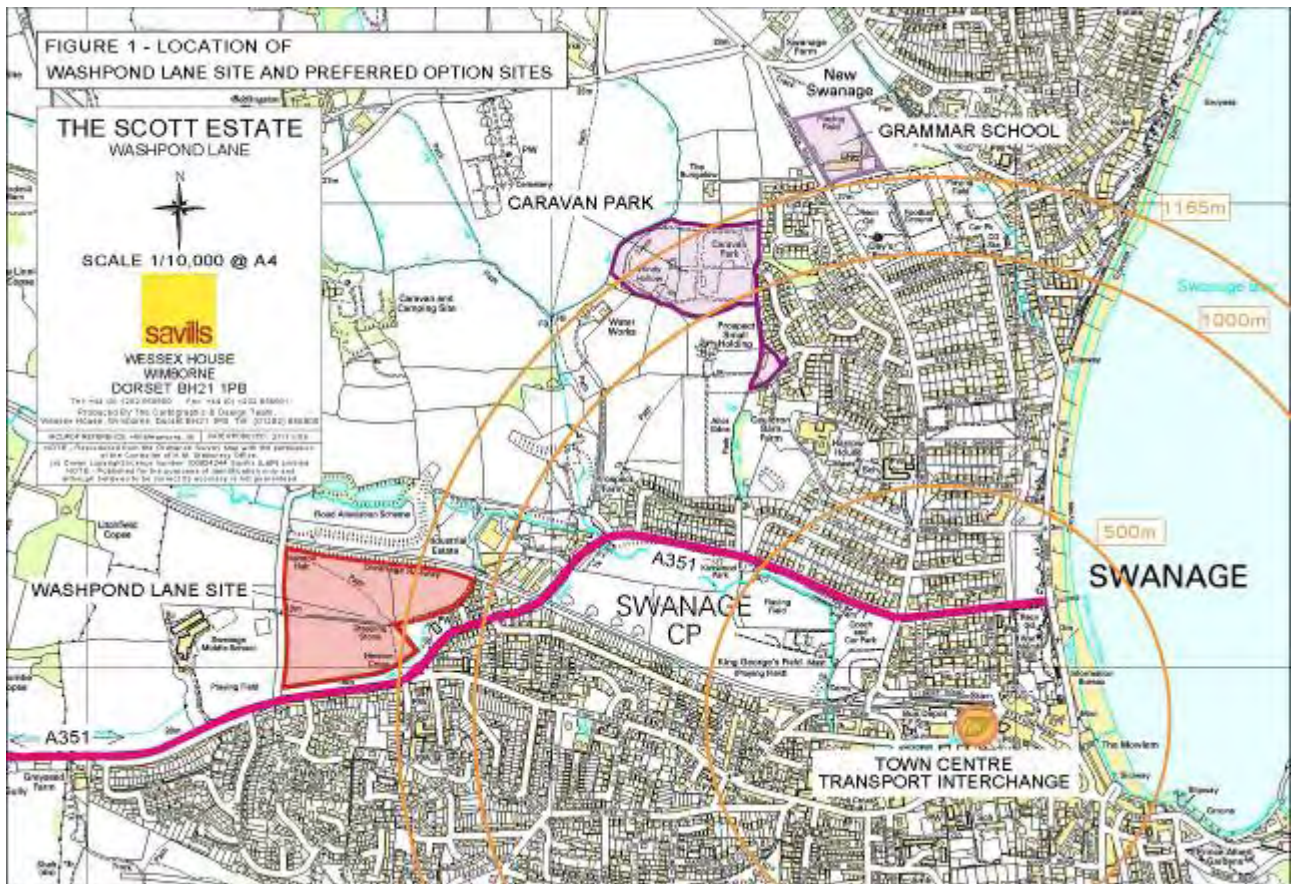


Figure 4: Comparison of Washpond Lane site with Caravan Park / Grammar School sites

black text - key fact
 red text - issue / item unknown
 blue text - Devills commentary / analysis

Issues	Washpond Lane	Grammar School and (and other adjoining land)	Caravan Park
Key Characteristics			
Ownership	Single ownership	Single ownership and possible neighbouring sites?	Single ownership
Land area	8.99ha	2.7ha and possible neighbouring sites?	5.06ha
Existing use	Agricultural	Redundant school and playing fields	Caravan park
Distance from Town Centre transport interchange	Approximately 1100m	Approximately 1100m	Approximately 1000m
Purbeck District Council SHLAA comments (key issues)			
Access	Site access would be required from Victoria Road. Washpond Lane should not be used. This is a rural road and very narrow. Access road should not cut through hedges or be on the ridge. Access road should be as close to Church as possible. Comment A site access appraisal has been prepared by transport consultants Upton McGougan to address these concerns (summarised below).	Existing access to site although this may require improvement depending on the scale of development. New road may be required between Northbrook Rd and Uwell Rd. Highway pressure on Washpond Lane may need to be addressed. Comment The nature of a new link road and increased highway movements on Washpond Lane could have third party land ownership and visibility splay / line of sight problems and adverse impact on local character / visual prominence which would need to be resolved.	Existing site access may require improvement. Comment The nature of these access works could have third party land ownership and visibility splay / line of sight problems which would need to be resolved.
Flood risk	The site is not located within an area of flood risk.	The site is not located within an area of flood risk.	Currently much green space on site which would reduce impact of run-off. Additional development may lead to surface water problems elsewhere.
Landscape design/size	Area of Outstanding Natural Beauty	Area of Outstanding Natural Beauty	Area of Outstanding Natural Beauty
Site topography	Very undulating site with high prominent ridge. Low area of floodplain and low area adjoining the river. Nature area within floodplain as green area of open space. Comment The site is not within the floodplain (as per the Council's earlier comments). An illustrative concept plan, Figure 2, has been prepared to highlight Washpond Lane's potential development areas, mix of uses and retained open spaces.	Low-lying and very flat site which is unlikely to compromise site capacity and phasing of development. Comment The site is not low lying but occupies the most elevated position of the three development site. Development at the site has the potential to be visually prominent and would be unlikely to offer any townscape benefits.	Site is sloping and fairly steeply in places. This, together with its prominence in relation to surrounding areas is likely to affect site capacity and building height. Mitigation - A good quality of design, events and landscaping would be required. Comment Residential development of the site has the potential to be visually prominent at the location when viewed from surrounding vantage points and would be unlikely to offer any townscape benefits.

Townscape / context	This demonstrates a development that would protect and enhance the site's attractiveness, landscape qualities and existing wildlife habitats. The site's north-western ridge is retained as an open space. South of site within Conservation Area and development on much of site likely to adversely affect landscape character. Developable site should be within conservation area. Update Conservation Area boundary has now been retained. The site is no longer within the CA boundary.	As with most of Swanage the area is quite prominent and can be seen from a distance. The existing school building should be retained. Careful design, landscaping and levels required. Comment As above, development at the site has the potential to be visually prominent and would be unlikely to offer any townscape benefits.	Prominent and elevated site, although permanent development would not have an additional negative impact on townscape or landscape character. Height of permanent development is likely to be an issue to prominence of site. Comment As above, development at the site has the potential to be visually prominent and would be unlikely to offer any townscape benefits.
Site potential / supply	Council estimation 100 units Comment The site has capacity for 150 units with land available for other mixed uses and public open space	Council estimation 80 units	Council estimation 100 units
		Total 180 units	
		Comment Comprehensive residential development of these sites for residential use would still not deliver the Council's requirement for 200 dwellings. Furthermore, by adopting a comprehensive approach leaves no capacity for other uses.	

Comparative analysis			
Issues	Washpond Lane	Grammar School site	Caravan Park
Is site access achievable?	A site access appraisal has been prepared by transport consultants Upton McQuiggin. The findings from the report include: <ul style="list-style-type: none"> Site access off Victoria Road, to serve a large scale development, is achievable without third party land being required (subject to usual County Highway agreement); The optimum location for the new site access would be adjacent to Chapel (as suggested by PCC); An indicative site access design (Figure 3) demonstrates how a roundabout could provide access and improvements to the surrounding road network; Roundabout design offer scope for a new gateway entrance to Sewage, and Opportunity exists to provide pedestrian / cycle links with Algbourgh (and Anker Road). 	The Council's reference to the provision of a link road is a considerable requirement not only in terms of adverse impact on local character / visual prominence but also in terms of issues such as land ownership, viability, safety, cost, paving etc. This would need to be resolved and could effectively stymie development at the Grammar School. In addition, site access via Washpond Lane is presently unsuitable for any increased car journeys. Development at the site would need highway evaluation and extensive mitigation to address increased road movements; highway safety; junction improvements; visual impacts etc.	The Council agree that development at this site would require improvements to the existing site access. The nature of these works could have third party land ownership and visibility splay / line-of-sight problems which would need to be resolved. A residential development at this site would increase traffic levels through a residential area which would present a real danger of highway accidents.
Indicative land uses	Savills' indicative masterplan and layout specification (Figure 3) identifies the site's potential for mixed use development: 4.4% of the site is identified for housing development and could accommodate 150 dwellings. 1.3% of the site is identified for: <ul style="list-style-type: none"> a new polyclinic / community hospital; a pharmacy; further healthcare related facilities (e.g. ambulance station) to meet a known local need. 3.2% of the site will remain undeveloped as public open space: Sewage Childrens Centre and childcare provision – Potential to accommodate New site for combined community hospital, medical centre and ambulance station – To be included (as above) More adult care and sheltered housing – Potential to accommodate Extend entertainment scheme along Shore Road – Not applicable Community and multi-function centre to develop learning facilities – Possible inclusion on neighbouring site that would provide a complimentary relationship with Washpond Lane site Improved Day Centre – Possible inclusion on neighbouring site would provide a complimentary relationship Develop cultural and heritage venues and facilities – Potential to accommodate Improved transport facilities – To be included (as above).	A scheme for 60 dwellings would almost certainly result in the site's total land coverage Development on this smaller site would be unable to deliver local services / community facilities to meet the needs of local people	A scheme for 100 dwellings would almost certainly have significant adverse landscape and visual implications. Development on the smaller site would be unable to deliver local services / community facilities to meet the needs of local people
Provision of identified local services and community needs? (para 3.5.5.8)	See above	As above, development on these smaller sites would be unable to deliver extensive local services / community facilities to meet the needs of local people in addition to the housing.	As above

	Development of quality toilets and baby changing facilities – Not applicable Develop performance and exhibition space – Not applicable Greenpace to reduce visitor pressure on Hartland Moor and Godington Heath – Not applicable More allotments – Potential to accommodate on neighbouring South Dabale land Sports centre with indoor sports hall – Possible inclusion on neighbouring site that would provide a complimentary relationship with Washpond Lane site Improve Sewage Football Club ground – Not applicable New pavilion for King Georges Playing Fields – Not applicable Multi Use Games Area / Synthetic Turf Pitch – Not applicable Growth of cultural and heritage trails – Not applicable Improved quality of footpaths, cycle routes and oneways – To be included (as above) Development of wet weather activities and facilities – Not applicable Improved bus links to X33 – Not applicable Greenfield – Agricultural land	Part brownfield (10%) and part greenfield (90%) The re-development of the Grammar School building (approximately 2075sqm) would meet the definition of a brownfield development. This represents only 10% coverage of the site. The majority of site consists of a playing field and hard surfaced tennis courts. This represents 90% coverage of the site. The site should not, in principle, be considered as a brownfield site	Part brownfield (65%) and part Greenfield (35%) The Caravan Park appears to be a site for static caravans which could be argued to be brownfield land. This represents approximately 65% coverage of the site. The remainder part of the site (2.1ha) would appear as not being used full time but other would appear to have a seasonal use for tourists (to accommodate touring caravans). This part of the site is greenfield land. This area represents approximately 35% coverage of the site The site should not be considered as a brownfield site
Loss of playing fields?	No loss of playing fields	Has the school's playing fields been assessed within the Council's PING 17, open space audit? These greater parts of the site are not brownfield land	The site should not be considered as a brownfield site
Would development safeguard and strengthen landscape character / site's biodiversity?	Key landscape descriptors include: <ul style="list-style-type: none"> Relief and enhance the stark rustic character. The site's developable areas have been carefully selected with regard to topography, views, landscape features. In particular, the Council's comments regarding the prominent ridge and undulating part of the site (north-west location) is shown to be retained as open space. The extensive, undeveloped parts of the site would provide suitable areas for public open space, and The retention and enhancement of the site's hedgerows, trees and watercourse would seek to maximise the site's biodiversity qualities 	The self containment of these sites, their landscape impact and the possible enhanced development site	Biodiversity considerations cannot be fully assessed without understanding

24 November 2009

OUR REF: WIPL 54838

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Dear Sirs

ON BEHALF OF THE MONKEY WORLD - APE RESCUE CENTRE

COMMENTS ON 'PLANNING PURBECK'S FUTURE' (CORE STRATEGY CONSULTATION)

On behalf of the Monkey World - Ape Rescue Centre, in addition to the completed questionnaire, we would like to provide comment on the above consultation document.

As you will be aware, Monkey World has now been established for 20 years. It is committed to Dorset and to continuing its primate rescue work and to continue to care for it's inhabitants in the long term. It's mission is quite simple: to do all it can to maximise the prospects for primate conservation and welfare. It is part of the aim of the Centre to educate its visitors and to ensure the best possible facilities not just for the primates but also for visitors young and old.

The site has now become a tourist destination in its own right and continuation of this is essential to be able to implement the mission. The Centre is consistently nominated in the top 10 tourist attractions in the UK in the national press and more recently recognised by the World Wildlife Fund as such. Monkey World will continue to play a full part in the essential arena of primate rescue, as well as taking an active and beneficial role in the local community and economy through schools, job generation and other initiatives.

The Centre currently employs 65 full time and an additional 75 employees in the summer and contributes an estimated £35m to the local economy (study conducted by the Lulworth Estate). In this regard, it is essential that the Council recognises, through its planning policies, the importance of supporting existing 'tourist attractions' to the local and regional economy. The focus of the Core Strategy document, insofar as it addresses 'the economy', is on traditional, office and industrial economic activity.

We welcome the reference given to the Regional Tourist Strategy and the background paper (Summary of Issues) which outlines the Council's own Tourism Strategy. Unfortunately, we do not believe that the draft policies for the Core Strategy recognise the importance of tourist-related development to the local economy, nor does it provide a suitably positive planning framework for such development.

Policy TA (Tourist Accommodation and Attractions) rightly addresses the need to support and promote a variety of accommodation types for visitors to the area. The Centre is directly instrumental in supporting local accommodation and links from its own website to local accommodation has proved highly successful. The policy also addresses the Councils preference for new 'attractions' in the countryside - in accordance with Policy CO (Countryside) and for other attractions in settlements. Neither policy however (nor elsewhere in the emerging Core Strategy) provides any reference to the support which the Council will give to existing tourist-related facilities and development.

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Recommendations for such a positive planning framework have been explicitly described in the Council's own Purbeck Tourism Strategy (2008-2013) (Section 4: Considerations for Planning Policy). This includes that:

All tourism developments should:

- *Meet Development plan policies and subject to timings to be in accord with the future Local Development Framework*
- *Be sympathetic to, maintain or enhance the historic natural and environmental character of the immediate area*
- *Not be detrimental to the local environment, landscape or ecology, particularly with regard to AONB, APA, SAC and SSSI designations*
- *Not threaten the preservation of Purbeck's key tourism natural assets*

Support for the inclusion of a more soundly based, and positive planning framework for tourism, is set out in the Government's policy in PPS4 (Planning for prosperous economies). This includes Policy EC15, which provides explicit guidance for the delivery of a positive and supportive planning framework for tourism in rural areas, the underlined elements are of particular relevance:

Policy EC15: Local development frameworks: tourism in rural areas

To help deliver the Government's tourism strategy, local planning authorities should support sustainable rural tourism and leisure developments that benefit rural businesses, communities and visitors and which utilise and enrich, rather than harm, the character of the countryside, its towns, villages, buildings and other features. Local planning authorities should, through their local development frameworks:

1. *support the provision of tourist and visitor facilities in appropriate locations where identified needs are not met by existing facilities in rural service centres*
2. *wherever possible, plan to locate tourist and visitor facilities in existing or replacement buildings, particularly where they are located outside existing settlements. Facilities requiring new buildings in the countryside should normally be provided in, or close to, service centres or villages but may be justified in other locations where the required facilities are needed in conjunction with a particular countryside attraction and there are no suitable existing buildings or developed sites available for re-use*
3. *recognise that in areas statutorily designated for their natural or cultural heritage qualities, there will be scope for tourist and leisure related developments, subject to appropriate control over their number, form and location to ensure the particular qualities or features that justified the designation are conserved*
4. *allow appropriate facilities needed to enhance visitors' enjoyment, and/or improve the financial viability, of a particular countryside feature or attraction, providing they will not detract from the attractiveness or importance of the feature, or the surrounding countryside*
5. *adopt a positive approach to proposed extensions to existing tourist accommodation where the scale of the extension is appropriate to its location and where the extension may help to ensure the future viability of such businesses*
6. *ensure that new or expanded holiday and touring caravan sites and chalet developments are not prominent in the landscape and that any visual intrusion is minimised by effective, high-quality screening and*
7. *support the provision of other forms of self-catering holiday accommodation in rural areas where this would accord with sustainable development objectives*

In addition, the emerging SW RSS provides a positive policy for the promotion of 'Sustainable Tourism', in its chapter on 'Enhancing Economic Prosperity and Quality of Employment Opportunity, Policy TO1. The explanatory text to that policy explicitly recognises that:

"In order to achieve more sustainable tourism, the region's approach is to enhance the tourism 'offer' by investing in existing attractions and destinations, rather than investing in new attractions" (para 8.5.6).

The Core Strategy should provide positive local guidance to influence such decisions.



Suggested changes:

In order to provide assistance to the Council, we would welcome the opportunity to address the issues raised in this response with the Council. If appropriate it might be useful to consider the issue of the tourist economy with other interested parties, who we understand will be making similar representations.

In the interim, we would suggest that the existing documents be revised as follows:

1. Add Monkey World (and other major tourist attractions) to Map 4: Context in South West Purbeck (and other context maps, where relevant);
2. Include references to Monkey World and other major attractions in the 'Vision for SW Purbeck' (para 4.33);
3. Include reference to major tourist attractions in the 'Vision for Purbeck'; and
4. Policies CO: Countryside and TA Tourism Accommodation and Attractions should be revised to include a criteria-based approach to the Council's approach for the consideration of applications for development at existing tourist attractions, to reflect that in the Tourism Strategy, PPS4 (EC15) and SWRSS.

Should you have any queries, then please do let me know.

Yours sincerely

Robert Lofthouse
Savills

cc. *Monkey World*

E:\PLANNING\JOBS\Monkey World\LDF\Core Strategy\L241109PDC.doc

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?
No
Please explain:
References should be included in the overall Purbeck Vision of the important role played by tourism – including in terms of the local economy - and the importance of supporting tourist attractions in the District.

Spatial Area Visions

- Q?** 2. Do you agree with the Spatial Area Visions?
No
Please explain:

Add Monkey World and other major tourist attractions to Map 4: Context in South West Purbeck (and other context maps, where relevant)

Include references to Monkey World and other major attractions in the 'Vision for SW Purbeck' (para 4.33)

Policy CO - Countryside



11 (a) Do you agree with this policy?

No

Policy does not address how the Council will approach proposals to support existing 'tourist attractions' in the countryside, which are major attractions to the area.

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

Yes

Policy CO: Countryside should include a criteria-based approach to the Council's approach for the consideration of applications for development at existing tourist attractions, to reflect that in the Tourism Strategy, PPS4 (EC15) and SW RSS.

Policy TA – Tourist Accommodation and Attractions



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

No -

Please explain:

There should be recognition and reference in the Core Strategy policy to the Council's positive approach to development related to existing 'Tourist Attractions'. Such an approach would accord with Government policy in emerging PPS4 and the Council's own Tourism Strategy (2008).

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:	ROBERT
Last Name:		Agent Last Name:	LOFTHOUSE
Job Title*:		Agent Job Title:	
Organisation*:	MONKEY WORLD – APE RESCUE CENTRE	Agent Organisation:	Savills
Address:	WAREHAM	Address:	WESSEX HOUSE PRIORS WALK EAST BOROUGH WIMBORNE DORSET
Postcode:	BH20 6HH	Postcode:	BH21 1PB
Telephone:		Telephone:	01202 856909
E-mail:		E-mail:	rlofthouse@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)

CS080 Dorset Gardens Trust



From - Christopher Clarke BA MA MRTPI,
Conservation Committee, DGT
6 Redcotts Road,
Wimborne,
Dorset BH21 1ET
01202-883585
<cmc.ryelands@talktalk.net>

24 November 2009

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

Dear Sirs,

Public Consultation Draft Core Strategy

On behalf of the Dorset Gardens Trust [DGT], I am responding to your publication of the Public Consultation Draft of the Council's Core Strategy.

The DGT is one of 36 Trusts affiliated to the national Association of Garden Trusts. The Trust is actively involved in researching historic parks and gardens as well as assisting in their conservation and restoration, and through the AGT is a consultee on planning applications affecting parks and gardens on the English Heritage register.

Since 1991, the Trust has researched parks and gardens in the County with a view to ensuring that there is a recognition of this particular asset. Historically, there has been a well-established recognition of buildings, archaeological remains and nature conservation issues, and these now have well-understood and respected schemes of national protection. Parks and gardens have not always had the same recognition. The English Heritage list is also very small: there are only 37 sites listed in Dorset five of which are in Purbeck. These are Charborough Park, Creech Grange and Encombe (listed grade 2*), and Durlston Castle and Lulworth Castle (listed grade 2).

1) relevant policies within the Purbeck LDF.

The DGT seeks to have policies (in whichever way is appropriate) within LDFs to cover this particular heritage element. The Trust has been successful in having such a policy included within the old-style Local Plan for West Dorset, but since then the introduction of the LDF system has meant that little further progress has been possible.

Draft PPS15 acts as a platform for heritage assets to be brought together on a common basis, which is welcomed. It may well be that your Core Strategy will reflect this in due course, but in whichever way this is set out, the DGT would want to see historic parks and gardens referred with the same level of consideration and protection as other heritage assets. The attached paper sets out the DGT's position on this, and some suggested wording that may be of assistance as you formulate our own policies.

2) local lists

The use of local lists of assets is a matter that does not always find favour with local planning authorities. However, current consultation by English Heritage directed at local authorities indicates that local information, if properly justified, can be helpful in creating the local Environmental Record.

The DGT has undertaken considerable research into other possible gardens and managed landscapes of potential interest in Dorset, which has resulted in a considerable degree of knowledge and expertise. The work is nearly always carried out with the agreement of the landowner, and is undertaken by researchers who have been trained by the Trust. A total of over 40 sites have now been included in the DGT List of Parks and Gardens of Local Significance with reasoned justification, and we are working with Dorset County Council to include these on the HER. The Trust also has notes in progress on over 200 more. The Trust has been able to secure the addition of one site onto the EH list, but otherwise the Trust seeks to encourage planning authorities to embrace local lists.

I enclose a second document, setting out the Trust's basis for considering parks and gardens which is based on EH's own criteria. Provided that the local information base is robust, then local groups have a lot to offer to the creation of local records. The Trust commends a policy which refers to the HER as an important resource, and gives protection to sites that are included within it.

In Purbeck, the Trust believes that there are five sites that merit being considered for local protection, and will seek to have these added to the County HER as time allows. These are Bindon Abbey, Brownsea Castle, Moreton House, Smedmore and Steeple Manor. I can provide the basic justification for these if you wish to see it.

If your forthcoming Strategy is able to address these concerns, then it will be much appreciated by the DGT.

Yours sincerely,

Christopher Clarke
For the Dorset Gardens Trust



GUIDELINES FOR THE IDENTIFICATION OF PARKS, GARDENS AND HISTORIC LANDSCAPE IN DORSET OF COUNTY IMPORTANCE

Introduction

1. Many sites of historic parks and gardens in Dorset may not reach the English Heritage criteria for inclusion as nationally important in their Register. That does not mean they are not important in Dorset. They may be physically smaller, less well researched, partially intact, or reworked many times. Alternatively they could be well maintained example of less well regarded designers. They remain part of the history, character and culture of Dorset.
2. Because local sites may be less thoroughly documented, difficult to assign definitively to a particular designer, have attracted less research effort or be partially complete, it has been considered prudent to have a flexible system of classifying them. Merely to look at sites that have failed to satisfy English Heritage criteria would overlook those sites of County interest that have not attracted English Heritage's attention.
3. Local sites need the protection and support of policies that relate to their situation and context as well the specific sites themselves. The direct and indirect implications of nearby new and existing development, or changes of management and use, need to be taken into account.
4. A version of the English Heritage assessment could have been used, but might have missed local or regional characteristics. To be recognised more widely as a designed landscape of County status has needed a more objective local process. The County status threshold has been crossed by a 'mix and match' system, depending on at least one of the criteria from the list below being met.

Criteria

5. The Dorset Gardens Trust has concluded that the following criteria should form the basis for the selection of gardens, parks and historic landscape of County importance:
 - (i) Sites formed before 1750, where evidence remains of the original layout.
 - (ii) Sites laid out between 1750 and 1820, where there is significant survival of the original design.
 - (iii) Sites between 1820 and 1880, which survive intact or where a significant element has survived intact.
 - (iv) Sites laid out between 1880 and 1939, which survive relatively intact.
 - (v) Regionally important post war sites, which are more than 30 years old.
6. Criteria (i) – (v) include reference to age and as a result are often rare. Scarcity is a complex definition, but takes account of scarcity of a type of site in a particular locality or county. Distribution comes under the same heading.
 - (vi) Sites which were influential in the development of taste in the county, either through reputation or literary reference.
 - (vii) Sites which retain examples of the style of layout or work of a designer or owner of regional importance or, which have marked usage of local materials and methods.
7. In Sites (vi) and (vii) quality is always difficult to define, but small sites or remnants of sites of high quality may be as important as larger or more intact sites of less worth.
 - (viii) Sites having an association with significant persons or historical events, where the visual quality of the site illustrates and confirms the historical association.
 - (ix) Sites with strong group value. These may be a part of an historic designed landscape or a component in a good example of a planned landscape.
 - (x) Sites of particular social, economic or cultural significance in the region or county. These may include urban or industrial landscapes, public parks cemeteries or graveyards; also other types of gardens, such as allotments and common open spaces.
 - (xi) Sites in joint or fragmented ownership, whose totality or parts may be at risk. Development threat or fragility could be a contributory factor.

- (xii) Sites containing features such as follies, eye-catchers, lodges, icehouses, ha-has, old boundary walls or fences, walks and drives either intact or in disrepair, whether listed or not.

Conclusion

8. The selected parks and gardens of County importance have fallen into one or more of these categories. Nevertheless these criteria may not be sufficiently comprehensive and may allow some important sites to fall through the net. They may need adjustment in the future. In the mean time a greater awareness of designed landscapes in Dorset of County importance should be achieved.

DORSET GARDENS TRUST - 30th July 2005



Dorset Gardens Trust

Registered Charity No 1000743

Protection for Historic Parks and Gardens of Local and Regional Interest in Local Planning Authority Policies

1. Dorset Gardens Trust [DGT] is very keen to facilitate the protection, conservation, and enhancement of historic parks and gardens of local and regional interest and value, in addition to those of national and international interest on the Register maintained by English Heritage [EH].
2. With this aim clearly in mind DGT has investigated the parks and gardens across the county. Helped by experienced surveyors it has identified, Council area by Council area, those historic sites that are not already on the EH Register and meet a number of defined criteria for historic interest and value.
3. These criteria, derived from those used by EH, have been carefully reviewed and adjusted to suit the Dorset situation over a number of years. They are, however, applicable to other counties and other council areas. The criteria are fully explained in the attached paper.
4. This work by DGT flows from PPG 15 which emphasises that it is fundamental to the Government's policies for environmental stewardship that there should be effective protection for all aspects of the historic environment. Local Planning Authorities may, therefore, be reasonably expected to adopt this as a core strategy. Fairly obviously identification of historic parks and gardens is the first step in the conservation and protection of these important elements of the historic environment that contribute to the local landscape character and quality.
5. DGT would, therefore, like to see all the local authorities in Dorset adopting policies to identify, conserve, and restore historic parks and gardens as well as protecting them from inappropriate and insensitive development proposals.
6. The Trust has also been mindful that, just as in the case of an historic Listed Building, the setting of a park or garden is also worthy of protection and conservation.
7. However, as the sites of local or sub-regional significance do not achieve all the criteria required to gain a place on the EH Register of Historic Parks and Gardens they do not automatically gain the protection of policies that local planning authorities usually afford to sites on the Register. Nevertheless, these local sites that are slightly less well known, possibly less well preserved or partially complete, or by less fashionable designers make a significant

contribution to the character and local distinctiveness to the towns, villages, and countryside across Dorset.

8. As an initial step, DGT sought to have relevant policies for historic parks and gardens of local and regional interest included in the West Dorset District Local Plan. Officers and the Council were initially receptive, but under pressure from Government Office South West removed the agreed policies. DGT took the matter to the Local Plan Public Inquiry [2006] where the Inspector emphatically supported DGT, and reinstated the policies.
9. From this experience, the Trust draws confidence that other Local Planning Authorities will be supported by the Planning Inspectorate when they include policies for the protection, conservation, and enhancement of historic parks and gardens in their evolving Local Development Frameworks.
10. Dorset Gardens Trust therefore commends to each Local Planning Authority the following policy wording for Core Strategies and Development Plan Documents:
 - a. The identification, conservation and, if appropriate, the restoration of historic parks and gardens will be sought and facilitated.
 - b. The Council will seek to protect historic parks and gardens of regional and county importance from development that would have an adverse effect on their historic character, appearance, and setting.
 - c. Development that would adversely affect the historic character, appearance, or setting of historic parks or gardens of county interest and importance will not be permitted.

The lists and descriptions of parks and gardens in your authority's area are available.

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