

# Planning Purbeck's Future



**Core Strategy - Copies of Representations made  
Part 6 – CS100 - CS111**

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# CS100 Dorset County Council – Duplicate of 70

Please see CS 070 in Part 4



Date: 21 December 2009  
Our Ref: LA/60/2  
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Dear Sirs

## **Planning Purbeck's future; Core strategy public consultation draft**

Thank you for seeking the views of Natural England about this draft core strategy document. We have the following comments.

I have dealt with the issue in the order that they appear in the draft Core Strategy. However, because some issues are dealt with in all 3 documents some of the comments below apply to the HRA and the SA. Two issues – recreational access to heaths and water quality - that are a particular concern of Natural England cut across all 3 documents and I have considered each in separate sections at the end of the letter

1.1.4 Natural England welcomes the decision of the Council to omit the western sector from the core strategy consultation. We see the issues surrounding the habitats regulations assessment of the housing allocation in the following way.

The Western Sector was added to the RSS on the recommendation of the report of the panel of the Examination in Public, so it was not subject to the original HRA of the draft RSS. The draft revised RSS was accompanied by an HRA but there was no consultation (Natural England must be consulted under the Habitat Regulations) and indeed it did not consider the Western Sector specifically. Thus Natural England's view has not yet been considered as part of the formal process. Without a finalised HRA that has taken into consideration the view of the statutory consultee (and given Natural England's view) there must be doubt about whether the Western Sector allocation will remain within the final RSS. Moreover, in our view the testing of the impact of the allocation on internationally designated sites was similar in the level of detail to that that would be required for a Core Strategy. In the above circumstances and given the conclusion of the above testing we believe that there was little choice but to omit the Western Sector.

The HRA of the higher tier plan – the RSS - is important because in practice it is difficult for the core Strategy to assess 'in combination' effects (see comments on the HRA) so it must rely to a large extent on the RSS having assessed these sub regionally. In this context the draft revised RSS considered the overall allocation in SE Dorset as made up of urban extensions, including the Western Sector (which the EIP panel considered could deliver its own mitigation). Impacts would be different from those looked at in the RSS if the housing from the Western Sector allocation were spread throughout the rest of the SSCT either as new urban extensions or as infill. In our view a new study at sub regional level with a revised HRA would be necessary if this were to be done.

## Vision for different parts of the District

These are notably lacking in any environmental content or reference to the rural parts of these areas. This is an important omission because different parts of the District have different characteristics and therefore may require a different type of planning policy to maintain or enhance their special features.

Thus the southern shores of Poole Harbour and its hinterland of heaths and associated habitats has long been recognised as one of the most important areas for nature conservation in the country. But it is also important because of its wild landscapes and quiet nature and is quite unlike some of the farmed landscapes in other parts of Purbeck. The vision for Wild Purbeck is recognised within the policy of Biodiversity and Geodiversity, but neither this nor any other desire for enhancement of rural areas is mentioned in the area vision. This omission is important because policy for dealing with planning issues such as campsites and re-use of buildings that may affect these areas should flow from a vision of what is trying to be achieved in different places. A one size fits all policy that deals with the things in the same way throughout the District is not appropriate in an area where some parts have a landscape that is of a quality and sensitivity equivalent to a National Park whereas other areas are not so sensitive.

Other documents may refer to these issues and be useful in this respect (eg the AoNB management plan)

### Development Options

Natural England gives cautious support to the preferred option. However, without some further work options for mitigation it is not possible to give a firm view. We note that all the options involve development which presents a number of difficult sustainability problems – transportation, landscape, nature conservation – and believe that the problem in delivering sustainable development anywhere in Purbeck is not highlighted sufficiently in the sustainability appraisal.

For the preferred option the need for new green infrastructure in Swanage is not emphasised sufficiently (7.2.9). Open space is required not just in relation to the AONB (7.2.10).

We agree that Option A would present the greatest risk to internationally designated heathland sites. We believe impacts on the AONB for this option are not given sufficient weight in the analysis.

### Section 8.2 Countryside, Text and Policy.

Account should be taken of differences between different areas of the countryside of the District. Thus the policy is under a spatial objective to respect the character and distinctiveness of the countryside yet nowhere are the distinctive elements that should be respected identified (see also comment on vision).

### Policy BIO: Biodiversity and Geodiversity

Natural England welcomes this policy but notes that it does not cover SSSI designations. Whilst in general circumstances the Core Strategy can rely on national guidance, and in other cases policies in relation to international sites will result in SSSI protection, there are some specific issues where these mechanisms are not likely to be sufficient. Thus the issue of water quality in Purbeck's rivers has already been raised in relation to pollution problems in Poole Harbour. We would recommend that a similar policy is needed in relation to development and the avoidance of deteriorating quality for the SSSI rivers. A further specific area where a more detailed SSSI policy would be beneficial is in relation to coastal erosion (see below).

Nature Map p 76. This needs updating to include NNRs at Sandford and Stoborough Heath (Sunnyside).

### Policy DH – Dorset Heaths International Designations



Natural England welcomes this policy and supports the principle of defining types of development not permitted within 400m. For tourist accommodation, if selecting examples of development typical of Purbeck, camp sites and caravan parks are more common than hotels. Some C2 development such as retirement homes should also be caught whereas other types of C2 should not be (see attached note).

For the 400m to 5km zone, contributions towards mitigation measures should not just be made by C2 development but also by other types listed under the 400m part of the policy, if this cannot be achieved as part of the development itself.

Finally we believe that the Core strategy and the heathland DPD should consider existing issues related to heathland, where they are relevant to planning, as part of the process of establishing necessary conservation measures for the heathland SACs under Article 6.1 of the Habitats Directive. In this respect it is important that the SAC status of the heaths is mentioned under 8.9.6.1, not just the SPA designation.

#### Policy GI: Green Infrastructure, Recreation and Sports Facilities

Natural England welcomes this policy but notes that it only covers circumstances where green infrastructure is necessary in relation to new development. Whilst such development provides good opportunities for its provision and requires a strong policy to secure good provision there are still green infrastructure needs in relation to existing development. The policy needs to be widened to encourage green infrastructure in areas of the District where it is deficient in relation to existing development.

#### Policy CE: Coastal erosion in Swanage

Natural England support the principle of limiting development in areas vulnerable to coastal erosion and to base the area affected on predicted rates of erosion as defined in the SMP. However we believe that an additional factors should be considered – the international and national designations of the coast, the policy for the coastline in the SMP, and the implications for existing development.

There are other parts of the District where coastal erosion is an issue that has a bearing on planning policy most notably the shoreline north of Swanage (part of Purbeck Ridge East SSSI and Studland).

#### Spatial objective 5

There are insufficient links made between biodiversity and climate change. The great importance of the natural environment of Purbeck a carbon sink, particularly within salt marshes and valley mires is not acknowledged. Nature conservation can have a large role in both mitigating and adapting to climate change. Examples are given below; many of these are particularly relevant to the natural habitats in Purbeck.

- Using saltmarsh and other coastal habitats to protect, and in some cases replace, sea walls – this is less costly and a more sustainable way of accommodating high tides and reducing the wave energy hitting shores.
- Keeping blanket bogs and salt marshes in good condition to help our water supply and carbon storage.
- Restoring floodplains, wetlands and saltmarsh to provide further water supplies, carbon storage and flood protection.
- Increasing the number of trees and woodlands in both rural and urban areas to boost the amount of carbon stored in vegetation and soils, provide shade and shelter for people and livestock, provide a source of renewable energy and an extra source of income for farmers, and reduce the risks of soil erosion, flood damage and water pollution; all will be important as the climate continues to change.

#### **Water Quality**

The issue of water quality needs further consideration.

## HRA

First in relation for to Poole Harbour, issues are well explained in the HRA (although we have some specific queries outlined below). We would add that research on the effects of nutrient on saltmarsh indicates that rates of accretion are slowed by fertilisation. This will in turn affect the ability of saltmarsh to keep pace with sea level rise and is therefore a further mechanism whereby nutrient inputs may affect the ecological integrity of the Ramsar and SPA.

Considering the importance of the issue and the implications for development there is a lack of reference or policy relating to the issue within the core strategy itself. Here the critical recommendation of the HRA is that mitigation is likely to be required in order to ensure that the Habitat Regulations tests are met. We would support the need for agreement of a timetable of actions (9.4.1) but appreciate that at present, some crucial information is not available. In our view these actions should focus on an options appraisal of scenarios for reducing nitrogen input to the Harbour.

In the above circumstances we would recommend that the core strategy includes policy that:-

- Links provision of housing with provision of any essential infrastructure needed for mitigation so there can be no breach of the Habitat Regulations and
- Provides a basis that, if necessary, would allow developer contributions to be levied and put towards any essential infrastructure

### Specific comments on HRA

9.3.14 It would be useful if the preliminary assessment were made available. Did the assessment of capacity take into account the issue of eutrophication of Poole Harbour or was it merely to maintain current standards?

9.3.15 It is our understanding that phased piecemeal improvements to these works would be unlikely to result in any significant improvement to discharge standards in respect of N whereas if a single scheme was implemented it could deliver such improvements. Decisions about upgrading these STW need to take full account of the eutrophication issue in Poole Harbour.

9.3.16 This is misleading both because it is not specified whether 'capacity' takes into account the issue of eutrophication and because a consent review under the Habitat Regulations is required.

9.3.20 The study is one stage of the process of the review of consents under the Habitat Regulations. It deals with issues in relation to the SPA only and does not consider the Ramsar site.

### 9.4.1

3<sup>rd</sup> bullet. More consideration will need to be given as to how 'sufficient' capacity might be determined.

4<sup>th</sup> bullet. Again a distinction needs to be drawn between capacity to deal with increased flows and capacity to tackle N.

### 9.5.3

The conclusion should be that appropriate policy needs to be included within the plan to ensure that adverse effects on Poole Harbour are avoided.

## Sustainability appraisal

According to the SA (page 12) the quality of rivers is generally good, and is likely to continue to improve (page 14) and this is no doubt the case for some measures of quality. However, levels of phosphorus in the Frome and for Bere Stream exceed water quality standards for favourable condition of an SSSI. Measures to improve the quality of the Frome by further reducing phosphorus at Dorchester SWT are being implemented and Wessex Water has been funded to

investigate their continued contribution to phosphorus levels in both rivers and the implications of planned development growth.

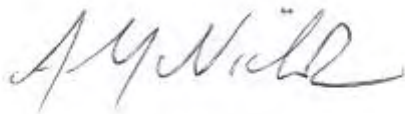
In the Frome the level of nitrate has been rising steadily at least the last 30 years so that concentrations of nitrate are 3 times as high now as they were in 1965 and the trend continues to be an upward one.

Levels of nitrogen in Poole Harbour are such that the Harbour is classified as eutrophic (see HRA). The SA omits any mention of water quality in Poole Harbour.

#### Recreational Impacts on heathland HRA

5.9.2 We would question this conclusion of the because it is quite possible that individual plans that each do not have a significant effect would, in combination, have a significant effect. The argument presented only holds if the plan has no effect rather than no significant effect, which is of course a tougher test than that of the Habitat Regulations. In this respect we believe that the higher tier plan – the RSS - is a key element of an in combination assessment.

Yours faithfully



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27 November 2009

Steve Dring  
Planning Policy  
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Dorset  
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Dear Mr Dring

**Purbeck Core Strategy Public Consultation Draft**

Thank you for consulting the South West of England Regional Development Agency (South West RDA) with regard to the above document dated 7 September 2009. We welcome the progressing of Purbeck's Local Development Framework (LDF) Core Strategy. The Core Strategy will be an important document in securing planned and sustainable growth for Purbeck. It holds the potential to help deliver the Regional Economic Strategy (RES), to further fulfil the economic potential, and to enrich the prosperity, of the district and of South East Dorset.

The Agency has considered the draft Core Strategy in terms of its ability to deliver the RES, its Delivery Framework and Spatial Implications – Place Matters (the RES spatial annex). Building on our previous response to the earlier Preferred Options consultation in November 2006, and our July 2008 response to the Western Extension in North East Purbeck Issues and Options consultation, we make the following comments.

**Western Extension**

The RES identifies the Bournemouth/Poole conurbation as harbouring potential for a far more significant role in strengthening the South West region's economic base. Its Spatial Annex identifies the conurbation as one of the region's best economic performers in recent years and identifies potential for an additional 42,000 jobs in the travel to work area (TTWA) during the period to 2026. The Annex recognises pressures for spatial expansion in supporting economic growth and identifies the high quality environment that surrounds the existing urban area as both a key asset and a tough challenge to enabling that growth.

Having last year responded to the Western Extension in North East Purbeck Issues and Options consultation, the South West RDA notes the absence of plans to provide for the proposed urban extension to Bournemouth and Poole within the Core Strategy Preferred Options document. It will be important that options and plans, which proactively provide for the most sustainable and successful outcomes, including, crucially, in meeting housing need, have been prepared should final provision be made for the urban extension.

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These plans should adopt a whole-economy approach that incorporates, but extends beyond, the provision of housing. Prepared for the South West RDA, 'The Demand and Supply of Employment Land and Premises' (DTZ, 2007), for example, identifies potential for the areas of search around Poole to accommodate businesses that sit alongside and complement residential uses. 'The Bournemouth Dorset Poole Workspace Strategy and Delivery Plan' (GVA Grimley, 2008), which was prepared in co-operation with Purbeck District Council, similarly supports a mixed use approach and the inclusion of employment areas as a component of urban extensions in South East Dorset.

The GVA Grimley Workspace Strategy also promotes a co-ordinated approach to planning for infrastructure. The South West RDA welcomes the draft Core Strategy's identification of infrastructure needs and gaps on a descriptive basis. It will be important to holistically identify strategic infrastructure needs and anticipated costs within the district and across South East Dorset as the Core Strategy and Purbeck LDF progress. Through this work, infrastructure constraints alongside opportunities that inform solutions should be identified. This includes public transport infrastructure. Such an approach will help to facilitate growth and secure greater certainty as to the appropriate shape and phasing of emergent development and the sustainability credentials with which it comes forward.

#### **Employment Land to Meet the Needs of Business**

The South West RDA welcomes the draft Core Strategy's recognition of the need to accommodate employment land at key locations and towns across Purbeck. As such, we support provision being made for a minimum of 11.5ha of employment land over the period to 2026, in line with the evidence provided by 'The Bournemouth Dorset Poole Workspace Strategy'. In profiling the delivery of the required employment sites and premises (and supporting infrastructure) over the plan period, it will be necessary to respond to the likely timing of business demand for both quality and type of space. For example, the GVA Grimley study indicates that there could be a particular pinch-point relating to the demand for office space in the short-term.

We welcome underlying ambitions for diversification of the existing economic base. The RES supports balanced growth that respects differences within and between different settlements. Its Delivery Framework supports the economic strengthening of local towns as hubs of wider rural areas. Delivery of employment land to support growth at key towns across the district will be important in enhancing the vibrancy and viability of those towns. It will help to support the growth of local businesses and, potentially, to provide improved links between local education institutions and business. We would welcome the delivery of incubator facilities to help support new and emerging businesses.

The Agency also welcomes provision, as set out in the draft Core Strategy, for employment land at sub-regionally significant locations within the district. The mix, choice and depth of identified sites are important assets to South East Dorset and, as identified by GVA Grimley, there may be opportunities for knowledge-based and technology clustering. Accessibility constraints, especially at Admiralty Park, that are also explored within the GVA Grimley Workspace Strategy, are recognised as are wider infrastructure considerations. The South West RDA notes the forthcoming 'Winfrith Technology Centre, Bovington, Wool Area Action Plan' (AAP) as set out

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within the Purbeck Local Development Scheme (LDS). It will be important that the AAP and Purbeck's wider LDF facilitates financially viable solutions to realising the potential of the strategic employment locations identified within the Core Strategy. Comprehensive infrastructure planning work and a viability-sensitive developer contributions approach therein will be important.

#### **Low Carbon Economy**

Sections 8.16 and 8.17 of the draft Core Strategy refer to Sustainable Design and Renewable Energy respectively. The RES Delivery Framework encourages development that meets the highest design and sustainability standards. We therefore welcome the promotion of development that attains high Building for Life standards. Purbeck's forthcoming Design Supplementary Planning Document (SPD) presents clear opportunities to facilitate growth, where it might otherwise be unacceptable, through development that, alongside social needs, respects landscape, visual amenity and wider environmental limits.

The RES identifies the region's capacity to become a renewable energy leader. Its Delivery Framework promotes the delivery of sustainable energy supplies across the region. The South West RDA welcomes the work that is underway to identify landscape sensitivities in Purbeck, particularly with respect to renewable energy provision. The RES promotes implementation of the Regional Renewable Energy Strategy which seeks greater transparency and planning guidance to help deliver renewable energy facilities. The analysis of landscape sensitivities in Purbeck holds the potential to play an important role in identifying opportunities for renewable energy provision. The Agency would welcome strategic explication of those opportunities within future iterations of the Core Strategy, with the incorporation of a more detailed approach as a component of the forthcoming Site Specific Allocations DPD.

#### **Conclusions**

The Purbeck Core Strategy will play a keen role in helping to realise the economic potential of Purbeck and South East Dorset. The draft document's flexible and ambitious approach to enhancing and diversifying employment opportunities within the district is welcome. It will be important to more proactively plan for other land uses (including housing) and strategic infrastructure in supporting sustainable development within the district and anticipated sub-regional growth, particularly centred on the Bournemouth / Poole conurbation.

I hope these comments are useful. Should you wish to discuss any of them further, please do not hesitate to contact me or Jessica Potter, (interim) Planning Manager.

Yours sincerely,

**Fergus Pate**  
Planning Adviser

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

### Vision for Purbeck



1. Do you agree with the District Vision?

Yes

(delete as appropriate)

Please explain:

*Strategy is better to be based on a vision that encompasses the whole of Purbeck rather than in one area only.*

### Spatial Area Visions



2. Do you agree with the Spatial Area Visions?

Yes (delete as appropriate)

Please explain:

### Spatial Objectives



3. Do you agree with the Spatial Objectives?

Yes (delete as appropriate)

Please explain:

*Available housing, however, is unlikely to meet the demand for it in Purbeck.*

### Policy LD – Location of Development



4 (a) Do you agree with this policy?

No (delete as appropriate)

Please explain:

*(a) Density is too high (b) Development of north east Purbeck – if 69 dwellings are agreed for Upton, this is acceptable, provided that they are sited on the Wareham side of the A351 road link.*

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

Yes (delete as appropriate)

Please explain:

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)?

Yes (delete as appropriate)

Please explain:

*Affordable housing should be for local people, village dwellings should be kept for local people and a policy is needed to address this issue.*

### Policy HS – Housing Supply



5. Do you agree with this policy?

No (delete as appropriate)

Please explain:

*A proposed minimum of 2,400 dwellings over the period 2006 – 2026 is too many for the area.*

### Character Area Development Potential



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

Yes (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 (delete as appropriate)

Please explain:

*Difficult to quantify, however 50% should be an adequate provision figure.*

### Maintaining a 5 Year Land Supply



7. Should the Core Strategy include phasing for settlement extensions? Yes (delete as appropriate)

Please explain:

*If possible, Purbeck District Council should consider a policy to ensure a percentage of development for local people, e.g. similar to current policies for National Parks in other parts of the United Kingdom.*

### Policy ELS – Employment Land Supply



8 (a) Do you agree with this policy?

Yes (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 (delete as appropriate) – allow existing sites to continue to expand.

Please explain:

*It is difficult to expand employment sites in Wareham since there is little further land available.*

### 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:

*Fully agree with policy to spread development over whole area as best option for Purbeck.*

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

Please explain:

## Policy CO - Countryside



11 (a) Do you agree with this policy?

Yes (delete as appropriate)

Please explain:

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

(delete as appropriate)

Please explain:

*The hierarchical approach prioritises local business re-use, which is commendable, and is a practical and viable approach for all aspects of re-use..*

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

Please explain:

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

No (delete as appropriate)

Please explain:

## Policy GB – Green Belt



12 (a) Do you agree with this policy?

No (delete as appropriate)

Please explain:

*Do not agree with any green belt expansion at Upton, Wareham or Lytchett Matravers.*

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

Yes (delete as appropriate)

Please explain:

*Yes, but these sites must be kept small.*

## Policy AHT – Affordable Housing Tenure



13. Do you agree with this policy?

Yes (delete as appropriate)

Please explain:



### Policy AH – Affordable Housing



14. Do you agree with this policy?

Yes (delete as appropriate)

Please explain:

### Policy RES – Rural Exception Sites



15. Do you agree with this policy?

Yes (delete as appropriate)

Please explain:

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



16. Do you agree with this policy?

Yes (delete as appropriate)

Please explain:

*Agree general policy, however these sites should not be located near residential areas and existing provision is sufficient.*

### Policy WHN – Wider Housing Needs



17 (a) Do you agree with this policy?

Yes (delete as appropriate)

Please explain:

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

No (delete as appropriate)

Please explain:

### Policy BIO – Biodiversity & Geodiversity



18. Do you agree with this policy?

Yes (delete as appropriate)

Please explain:

### Policy DH – Dorset Heaths International Designations



19. Do you agree with this policy?

Yes (delete as appropriate)

Please explain:

*Would welcome the enhancement of area around Wareham Rail Station in terms of some form of retail provision.*

### Policy RP – Retail Provision



20. Do you agree with this policy?

Yes (delete as appropriate)

Please explain:

### Policy CF – Community Facilities and Services



21. Do you agree with this policy?

Yes (delete as appropriate)

Please explain:

### Policy GI – Green Infrastructure, Recreation and Sports Facilities



22. Do you agree with this policy?

Yes (delete as appropriate)

Please explain:

### Policy FR – Flood Risk



23. Do you agree with this policy?  
Yes (delete as appropriate)  
Please explain:

### Policy GP – Groundwater Protection



24. Do you agree with this policy?  
Yes (delete as appropriate)  
Please explain:

### Policy CE – Coastal Erosion in Swanage



25. Do you agree with this policy?  
Yes (delete as appropriate)  
Please explain:

### Policy SD – Sustainable Design



26. Do you agree with this policy?  
Yes (delete as appropriate)  
Please explain:

### Policy REN – Renewable Energy



27. Do you agree with this policy?  
Yes (delete as appropriate)  
Please explain:

### Policy HLH – Historic Environment, Landscape and Heritage



28. Do you agree with this policy?  
Yes (delete as appropriate)  
Please explain:

### Policy E – Employment



29. Do you agree with this policy?  
Yes (delete as appropriate)  
Please explain:

### Policy TA – Tourist Accommodation and Attractions



30 (a) Do you agree with the policy wording?  
Yes (delete as appropriate)  
Please explain:

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

*Focus on enhancement of existing sites to preserve the character and nature of the unique Purbeck AONB.*

**Policy IAT – Improving Accessibility and Transport**

**Q?** 31. Do you agree with this policy?  
 Yes (delete as appropriate)  
 Please explain:  
 (a) *A safer cycleway through Wareham Town is needed.*  
 (b) *A more local bus service that meets the needs of Wareham residents is recommended for inclusion in the policy, especially if a new large supermarket is to be incorporated within the town e.g. a 'hopper' service.*

**Policy AP – Implementing an Appropriate Transport Strategy for Purbeck**

**Q?** 32. Do you agree with this policy?  
 Yes (delete as appropriate)  
 Please explain:

**Sustainability Appraisal**

**Q?** 33. Do you have any comments on the Sustainability Appraisal?  
 Comments:  
*No comments, an excellent appraisal.*

**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:	Rodney	Agent First Name:	
Last Name:	Curtis	Agent Last Name:	
Job Title*:	Town Clerk	Agent Job Title:	
Organisation*:	Wareham Town Council	Agent Organisation:	
Address:	Town Hall East Street Wareham Dorset	Address:	
Postcode:	BH20 4NS	Postcode:	
Telephone:	01929 553006/550771	Telephone:	
E-mail:	<a href="mailto:clerk@wareham-tc.gov.uk">clerk@wareham-tc.gov.uk</a>	E-mail:	

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

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

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



Little Keep Offices  
Off Bridport Road  
Dorchester  
Dorset  
DT1 1AH

Ref:AM/ts

Mr Steve Dring  
Planning Services  
Purbeck District Council  
Westport House  
Worgret Road  
Wareham BH20 4PP

Telephone: 01305 361058  
07920 565907

Email: [andrew.morris@dorset-pct.nhs.uk](mailto:andrew.morris@dorset-pct.nhs.uk)  
[www.dorset-pct.nhs.uk](http://www.dorset-pct.nhs.uk)

11 December 2009

Dear Steve

### **Response to public consultation: Planning Purbeck's Future**

Thank you for the opportunity to comment on the options for proposed developments in Purbeck. It is, of course, important for all public services to be aware of proposed infrastructure changes, and in the case of the NHS there are two major considerations:

1. The potential impact on demand for health services resulting from the population increase stimulated by housing development;
2. The opportunity for service change and re-configuration afforded by potential infrastructure changes facilitated by local development.

It is important to note that these two factors are not mutually exclusive, and ideally should be planned together. Further, as services seek to become more comprehensive and integrated, future changes in delivery of NHS services must be considered alongside other public services and of particular relevance here is social care.

I should be clear that proposals for change and development in NHS services and/or facilities in Purbeck would always be developed in conjunction with the plans of the Purbeck Locality Commissioning Group, who would in turn lead consultation with local stakeholders, community groups and the public at large.

One further point – NHS Dorset has recently updated (and will soon be publishing) the Strategic Plan for a Healthier Dorset. To support this we are developing an Implementation Plan. This will include an Estates and Facilities Plan, which we expect to be published in draft form by 31 March 2010. Therefore responding to your consultation on proposals for Purbeck fits appropriately into this timescale.

The comments below represent a strategic planning response to your consultation – individual developments would be subject to approval by the NHS Dorset Trust Board and subject to the usual business case development based on rigorous cost-benefit analysis.

In general, NHS Dorset supports the Preferred Option for distributed development in Purbeck, and specific comments relating to their impact in South East Purbeck and Central Purbeck are given below.

## **South East Purbeck - Swanage**

NHS Dorset supports the Preferred Option in your proposals for South East Purbeck. As you are aware, NHS Dorset has been in discussion for some time about community services development in Swanage. We are aware of the aspirations of the Swanage GPs to develop improved primary care premises, with the anticipation of supporting a more diverse range of services. We are also aware of concerns amongst the local community about the need to offer more integrated care between the practice and the community hospital. Further, we see opportunity to offer more appropriate and additional services round the clock by integrating services onto one site. For these reasons we would be keen to explore the potential of a new development site incorporating a “polysystem” approach which could incorporate a combined health centre, healthy living centre, community services, residential/nursing home care, supported housing, day care and (possibly) leisure services approach. The preferred site from those indicated in the documentation would probably be alongside the A351/Washpond Lane.

## **Central Purbeck - Wareham**

Again we would support the Preferred Option in the consultation proposals. For similar reasons we are open to pursuing the potential for a combined health centre, healthy living centre, community services, supported housing, care/nursing home development with possibly more definitive links with education and leisure facilities resulting from any schools redevelopment. We further see potential benefits in relocating fire service and ambulance services in this single “health campus” approach. Although any such development would of necessity sit outside the current bypass, there is a degree of attraction in co-locating so many facilities thereby offering the potential to develop a supporting local transport infrastructure.

Finally, any health services development would need to take a holistic view of Purbeck, rather than favouring one particular development above any another. This would also need to sit within the wider context of the Strategic Plan for a Healthier Dorset, reflecting priorities for services and infrastructure across the whole county. It is absolutely explicit that any potential development should remain affordable within the future financial planning assumptions for the NHS and other public services. That said, we see opportunities for synergy between agencies within Purbeck which could enable better services and facilities to be made available within a reducing cost envelope.

I hope this is helpful, and I look forward to further discussion in due course.

Yours sincerely

A handwritten signature in black ink, appearing to read 'A. Morris', followed by a long horizontal line extending to the right.

**Andrew Morris**  
Head of System Reform

1801/106

**STUDLAND PARISH COUNCIL**

**Parish Clerk**

21 Court Road, SWANAGE, Dorset, BH19 1JB  
Tel (01929) 425481  
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Purbeck District Council  
Planning Policy  
Worgret Road  
Wareham  
Dorset  
BH20 4PP

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

10<sup>th</sup> November 2009

Dear Sirs,

Re: The Core Strategy and Additional Housing in Swanage

It has been brought to the attention of the Studland Parish Council that the Grammar School site may be used for additional housing.

The Parish Council would like to have their objection to this noted, mainly on the grounds of potentially increased traffic on the Studland to Corfe Road.

Yours faithfully

Sandra Gamage  
Parish Clerk



1914/107

Jon Brooke (for PEAT)  
79 East Street  
Wareham  
Dorset BH20 4NW



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

November 27, 2009

Dear Mr Dring,

This letter contains the initial response of PEAT (Purbeck Environmental Action Team) to the Public Consultation on the proposed Core Strategy – Planning Purbeck’s Future.

Over the last year PEAT has started a Transition Towns Initiative (Transition Purbeck) covering the area defined in the consultation document as the South East Spatial Area plus Wareham.

The aim of a Transition Towns Initiative is to promote awareness, discussion, planning for and action on a local scale to build resilience to, and to mitigate the twin threats of climate change and peak oil. (for more information see <http://www.transitiontowns.org>).

At a recent open meeting (21/10/09) attended by around 20 people, Planning Purbeck’s Future was an agenda item and was discussed at some length.

Without resorting to the specific and formal language of planning, the general feelings of the meeting were as follows:

In general the meeting welcomed the opportunity to take part in the planning process and recognised that planning will play an important part in meeting the challenges of Transition.

However, several of the members present were not aware of the current consultation process, having not received copies of the Summary Leaflet, and concerns were raised that the process was not as inclusive as it could be.

The single biggest concern of the meeting was over the rather leading question regarding the location of a new supermarket. The unanimous feeling of the meeting was that a new supermarket in either Wareham or Swanage (or both) would have a negative impact on the future resilience of the fragile, but developing local food chain and on existing local retailers, as well as having a negative impact on the character of the towns.

Also, given the recent development of the Sainsbury's supermarket in Wareham and also the huge growth of online grocery shopping it was felt that there was simply no present or future need for a further supermarket in either town. It is unclear as to whether these factors had been considered as part of the Council's retail assessment.

Instead PEAT would like to see more support for the provision of small scale diverse retail outlets, in particular village shops and shops showing a willingness to develop links into the local food chain. This is not just important as a means of mitigating climate change, but also in terms of building resilience in the supply chain in the face of inevitable future fuel cost rises due to the imminent (yet still apparently widely overlooked within the planning system) arrival of peak oil, and the decline in the global supply of oil thereafter.

As a direct criticism of the consultation process, it was felt that there was no justification offered within either the Summary Leaflet or the Full Document of the need for a new supermarket, no consideration of the possible impacts, and yet the decision (that one or more additional supermarkets was needed) was presented as a fait-accompli.

Despite the feeling within PEAT that there is no need for any additional supermarkets, there was some further discussion of the different options presented in the document.

**With regard to the Preferred Option** – a large supermarket in Wareham, the feeling of the meeting was that the 'leakage' of shoppers from Wareham is not necessarily a significant problem, given that many people shop for groceries before or after work in either Poole or Dorchester or in conjunction with shopping trips for other items. Our local knowledge leads us to question the assumption that a new supermarket would reduce the numbers of car journeys and we would like to see evidence for this much more clearly set out and rigorously analysed.

Indeed our feeling was that, on the contrary, a new supermarket in Wareham would lead to more car journeys along the A351 through Corfe, given that there are relatively few daily commuters from Swanage into Poole or Dorchester - so any shopping trips that they made to Wareham would more likely be additional trips.

It was also felt that neither of the sites proposed in the document would be suitable for a new supermarket in Wareham as either one of them would draw business away from the town centre and increase local traffic congestion.

**With regards to Option A** - a large supermarket in Swanage, the main fear expressed was that recent growth in local food production and retailing in and around Swanage would be threatened by a larger supermarket there. It was also felt that this would not be just a direct threat to individual businesses, but would be generally responsible for taking money out of the local economy.

There was also a strong view that a large Swanage supermarket would generate a growth in traffic of HGVs along the A351 as well as additional car traffic due to shoppers coming from Wareham. Again, these would be new car journeys, exclusively for shopping, not combined with commuter travel.

**With regard to Option B** - medium sized supermarkets in Wareham and Swanage, this was thought to bring all of the disadvantages to both towns relating to the threat to local retailers and the local food chain, and to the character of the towns.

Having given our response to part of the consultation document in lay terms, we were nevertheless aware that our opinions might carry more weight if we could relate them more closely to formal planning procedures.

Our first objection comes from looking at the Spatial Objectives in the Core Strategy Full Public Consultation Document itself.

Whilst Spatial Objective 4, Support Local Communities, includes policies RFS: Retail Floor Space Supply and RP, Retail Provision, we believe that a new supermarket will not in any way support local communities. However, perhaps more importantly, we believe that a new supermarket would also be contrary to other spatial objectives, in particular:

Spatial Objective 1: Respect the character and distinctiveness of Purbeck's settlements and countryside

Spatial Objective 5: Reduce vulnerability to climate change and dependence on fossil fuels

Spatial Objective 7: Conserve and enhance the landscape, historic environment and cultural heritage of the District

Spatial Objective 8: Promote a prosperous local economy

With more time and space we could easily flesh out these ideas, but the point, we feel, is that they give planners reasonable grounds to choose not to make provision for a new supermarket.



However, we also believe that there are other reasons to object to the inclusion of supermarket provision in the Core Strategy, deeper within the planning guidance, both within the draft RSS and within various PPSs.

Although the RSS is currently awaiting final review and publication, the Draft Revised Regional Spatial Strategy for the South West Incorporating the Secretary of States Proposed Changes, says about Development at Market and Coastal Towns (our emphasis added):

**3.4.2** The RSS intends that these towns should be focal points for locally significant development including provision for the bulk of district housing provision outside the SSCTs. **Local Authorities should base their proposals for development at these towns on a clear, evidence-based understanding of their changing roles and functions, particularly for work and service delivery.** This requires a sound understanding of how they function and the hierarchy of relationships between small villages, between villages and 'market towns', and between these communities and the SSCTs. In some districts there may be few or no towns which meet all the criteria of Development Policy B, and in these cases districts should take account of the functional role of settlements beyond their boundaries as well as identifying those settlements with the potential to play a more strategic role locally and allocate development accordingly. Local Accessibility Assessments should be used to help identify those settlements. Development in towns identified under Development Policy B should be specifically geared to meeting local objectives – including tackling pockets of deprivation, meeting needs for affordable housing, **addressing the impacts of larger shopping centres on local town centres and delivering elements of local economic strategies, for instance, to respond to declining traditional industries.**

The highlighted sections give us grounds to question whether there is an evidence-based requirement for additional supermarkets, and we would also argue that again, the impact of additional supermarkets on both local town centres and the traditional industries of fishing and local-scale agriculture would be detrimental economically and to the character of the area, particularly in the AONB. Indeed the Purbeck Community Plan puts it this way:

Agriculture and fishing, not unexpectedly, have above average representation across most of the area at 2.8% for Purbeck compared with 0.9% for Britain. Despite providing a relatively small number of jobs agriculture, fishing and land management are vital sectors in Purbeck as they give the area its distinctive nature and quality.

Clearly these are matters of judgement, but we feel that guidance in PPS1 and in particular, in the Proposed Changes to PPS6: Planning for Town Centres Consultation Document, backs our judgement, and shows the future direction of policy on large supermarket developments in small towns.

Firstly, the ministerial foreword to the proposed new PPS6 puts the case in lay terms (our emphasis added):

**...Throughout the eighties and early nineties, unchecked enthusiasm for big out-of-town shopping centres eroded the vitality of our town and city centres. Investment**

trickled away: small businesses simply could not compete: people were left with a dwindling choice of local shops and boarded up windows became an all-too common sight on the high street...

...Today, however, evidence shows that it is time to revisit how specific parts of the framework is working in practice. In particular, the "need test" is a blunt tool that is not achieving the ends it was designed for. Kate Barker's Review of Land Use Planning found that it tends to distort competition, denying consumers choice. Too often it causes planners to get caught up in debate about technical definitions, and overlook the vital question of what the proposed development actually means for the town centre and the people who rely on it. In last year's Planning White Paper Planning for a Sustainable Future we set out our intention to remove the need test. At the same time we also said that we would introduce a new impact test which enables local authorities to more thoroughly assess how proposed developments would affect town centres in the broadest sense - including how it would impact on consumer choice and competition...

However, we note that in the document itself it says (our emphasis added):

#### Form of proposed changes

In the context of the above objectives it is proposed to refine the policy approach to planning for town centres in PPS6, rather than to make significant policy changes. **It is proposed to strengthen the Government's policy on positive planning for town centres** (Chapter 2). These changes are set out in Part 2a of this document. There is no proposed change to the requirement for planning authorities to assess the need for new town centre development or to take account of scale, impact and accessibility considerations or the sequential approach in selecting sites for development in development plans.

The main changes relate to how some planning applications should be considered and tested. **The proposals remove the requirement for an applicant to demonstrate 'need' for a proposal which is in an edge of centre or out of centre location and which is not in accordance with an up to date development plan strategy.** The policy replaces the existing impact assessment with a new impact assessment framework which applicants for proposals outside town centres need to undertake in certain circumstances. Key features of the new test are:

- Broader focus with emphasis on economic, social and environmental as well as strategic planning impacts that enables positive and negative town centre and wider impacts to be taken into account.
- Identification of key impacts which applicants must assess, including: impact on planned in-centre investment; whether the proposal is of an appropriate scale (the previous 'scale' test); and, impacts on in-centre trade/turnover which should take account of current and future consumer expenditure capacity. Where negative impacts are likely to be significant this will normally justify the refusal of planning permission.
- Identification of a number of wider impacts which should be considered, including: accessibility (the previous 'accessibility' test) and sustainable transport considerations; impact on traffic; effects on employment and regeneration; and how the proposal will make efficient and effective use of land. Where there are likely to be some adverse impacts but these are likely to be outweighed by significant wider benefits arising from the proposal, the proposal should normally be approved.

The new impact test includes the requirement for applicants to consider the appropriateness of the scale of development, and for local authorities to ensure that proposed locations for new development are accessible by a choice of means of transport and to consider the impact on car use, traffic and congestion arising from a proposal. Design quality, including (for the first time) how the proposal will help mitigate the impacts of climate change, also forms part of the new test. The requirement for an



applicant to search for the most central sites (the 'sequential approach') is retained as a separate consideration.

The proposed changes strengthen the references to competition considerations by listing the promotion of competition between retailers as one of the Government's key objectives for town centres. The changes also include a requirement for proposals to be assessed on the extent to which they promote consumer choice and retail diversity.

The proposed changes also clarify what should be expected from impact assessments and have made it clear that judgements about the extent of any impacts should be informed by the development plan, local assessments of the health of town centres and any other relevant published local information.

To ensure consistency with the emerging Planning Policy Statement on planning for sustainable economic development (PPS4), the changes also introduce references to the need for planning authorities to plan for sustainable economic growth, to have flexible policies which are responsive to change, and to take account of Regional Economic Strategies when planning for town centres, and town centre uses.

The intention is clearly signalled in the first highlighted section – strengthened positive planning for town centres – which would clearly count against either of the proposed locations for supermarkets within Wareham, which are not in-centre. The proposed guidance then goes on to outline the new impact test that would have to be applied, and which we welcome, as we feel that it supports our view that development of retailing in Wareham and Swanage should be small scale and diverse.

**However, it would seem from the second highlighted section that this proposed new guidance (the impact assessment) would not be applied to new out of centre supermarkets if they were part of a proposal already included in an up to date development plan!!**

Does this explain why the specific question of supermarket provision is included in the proposed Core Strategy at such a specific level of detail (proposal of sites), when other areas such as transport and education are treated in a much more general way?

At the very least PEAT would like to see any proposed new supermarket be given the full impact assessment proposed in the forthcoming PPS6 guidance, which does appear to address some of our concerns regarding sustainability and local resilience. **This would seem to require the removal of the proposed specific sites from the Core Strategy document.** If this is the case then PEAT feels that this information should have been made clearer in the consultation document.

PEAT feels that any planning application for a new supermarket in Wareham or Swanage will galvanize opinion and undoubtedly generate a strong anti-campaign. If it then transpires that measures had already been put in place, through inclusion of the proposed sites in the Core Strategy that this would be, at the very least, anti-democratic.



Such measures would also seem to be contrary to guidance in PPS1, which says (our emphasis added):

## National Planning Policies

### KEY PRINCIPLES

13. The following key principles should be applied to ensure that development plans and decisions taken on planning applications contribute to the delivery of sustainable development:

(i) Development plans should ensure that sustainable development is pursued in an integrated manner, in line with the principles for sustainable development set out in the UK strategy. Regional planning bodies and local planning authorities should ensure that development plans promote outcomes in which **environmental, economic and social** objectives are achieved together over time.

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

(iii) A spatial planning approach should be at the heart of planning for sustainable development (see paragraphs 30 – 32 below).

(iv) Planning policies should promote high quality inclusive design in the layout of new developments and individual buildings in terms of function and impact, not just for the short term but over the lifetime of the development. Design which fails to take the opportunities available for improving the character and quality of an area should not be accepted (see paragraphs 33 – 39 below).

(v) Development plans should also contain clear, comprehensive and inclusive access policies – **in terms of both location and external physical access**. Such policies should consider people's diverse needs and aim to break down unnecessary barriers and exclusions in a manner that benefits the entire community.

(vi) **Community involvement is an essential element in delivering sustainable development** and creating sustainable and safe communities. In developing the vision for their areas, planning authorities should ensure that communities are able to contribute to ideas about how that vision can be achieved, have the opportunity to participate in the process of drawing up the vision, strategy and specific plan policies, and to be involved in development proposals. (See also paragraphs 40 – 44 below).

26. In preparing development plans, planning authorities should:

(i) Recognise the needs and broader interests of the community to secure a better quality of life for the community as a whole.

(ii) Ensure that plans are drawn up over appropriate time scales, and do not focus on the short term or ignore longer term impacts and the needs of communities in the future. Planning authorities should consider both whether policies have short term benefits **which may have long term costs**, but also whether short term detriments (which are capable of being mitigated) may be offset by longer term benefits which are realistically achievable.

(iii) Not impose disproportionate costs, in terms of environmental and social impacts, or by unnecessarily constraining otherwise beneficial economic or social development.

(iv) Have regard to the resources likely to be available for implementation and the costs likely to be incurred, and be realistic about what can be implemented over the period of the plan.

(v) Take account of the range of effects (both negative and positive) on the environment, as well as the positive effects of development in terms of economic benefits and social well being. Effects should be properly identified and assessed through the sustainability appraisal process, taking account of the current quality of the environment in the area and any existing environmental issues relevant to the plan.

(vi) Ensure that plans and policies are properly based on analysis and evidence. Where the outcome of that analysis and evidence remains uncertain, policy makers should exercise and demonstrate soundly based judgement, taking account of the other principles set out in this paragraph. Where justifiable on the basis of the evidence available, a precautionary approach to proposals for development may be necessary.

(vii) Take full account of the need for transparency, information and participation.

(viii) Recognise that the impact of proposed development may adversely affect people who do not benefit directly. Local planning authorities can use planning conditions or obligations to ameliorate such impacts.

So, to conclude our comments on the question of supermarkets, PEAT believes that there is no demonstrable need for additional supermarkets in Swanage or Wareham, and that the arguments for such developments will in fact weaken in the future.

PEAT also believes that the national and regional guidance on such developments is also moving in the direction of our arguments.

And finally, PEAT believes that in order to ensure that any future retail development undergoes the full rigour of an impact assessment as proposed in the forthcoming PPS 6 document, that at the very least, **specific locations for such a development should be excluded from the Core Strategy Document.**

Whilst PEAT's commentary concentrates on the issue of supermarkets, this has largely been as a reaction to the plans already outlined in the Consultation Document. Perhaps what is more difficult for PEAT (or any other consultees) to comment on are other options that might be (but aren't) included in the Core Strategy. Whilst the Consultation Document includes some extremely aspirational key challenges, it is not clear from the document what the thinking is beyond that or how they will be met.

For example, one key challenge outlined in the Consultation Document is "Providing housing people can afford". Whilst at first sight this might simply be taken to mean the initial purchase price of the house, we would like to see some thought given to the lifetime costs of housing. If at the same time consideration is also given to two of the District vision statements as set out in the document "Reduce vulnerability to climate

change and dependence upon fossil fuels.” and “Ensure high quality, sustainable design.” then one avenue would seem to be to specifically include policies in the Core Strategy that lay out a minimum expected Code for Sustainable Homes Levels ahead of, or at the least complementary to, the tightening requirements of Part L of the building regulations. Again this seems to be backed up by national planning guidance. For example in the Planning and Climate Change Supplement to PPS1, which says (our emphasis added):

30. Planning authorities, developers and other partners in the provision of new development should engage constructively and imaginatively to encourage the delivery of sustainable buildings. Accordingly, planning policies should support innovation and investment in sustainable buildings and should not, unless there are exceptional reasons, deter novel or cutting-edge developments. Planning authorities should help to achieve the national timetable for reducing carbon emissions from domestic and non-domestic buildings.

31. There will be situations where it could be appropriate for planning authorities to anticipate levels of building sustainability in advance of those set out nationally. When proposing any local requirements for sustainable buildings planning authorities must be able to demonstrate clearly the local circumstances that warrant and allow this. These could include, for example, where:

- there are clear opportunities for significant use of decentralised and renewable or low- carbon energy; or
- without the requirement, for example on water efficiency, the envisaged development would be unacceptable for its proposed location.

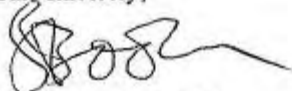
32. **When proposing any local requirement for sustainable buildings planning authorities should:**

- focus on development area or site-specific opportunities;
- specify the requirement in terms of achievement of nationally described sustainable buildings standards, for example in the case of housing by expecting identified housing proposals to be delivered at a specific level of the Code for Sustainable Homes;

Likewise, this sort of policy could also be included for public buildings. It would seem that tens of millions of pounds might be spent on new school buildings sometime during the early part of the Core Strategy time frame and so PEAT would like to see a policy in the Core Strategy on the sustainability of public buildings.

Finally we also note that one of the Key Challenges laid out in the consultation Document is “Relieving congestion on the A351” and that one of the District Visions starts “Provide an integrated transport system...” But again these items do not get beyond the aspirational. Frankly, it is difficult to be a consultee on these items when there is no steer whatsoever on how they might be incorporated into the Core Strategy. Again PEAT feels that more work needs to be done on these issues before public consultation. It does not seem to be a very balanced document when the provision of supermarkets has been considered to the point of allocation of specific sites, when at the same time apparently no thought has been given to other equally important challenges.

Yours sincerely,



Jon Brooke (for PEAT)



1931/108

**WAREHAM & DISTRICT CHAMBER OF TRADE**  
**CHAIR: MARK HOWLETT, FARWELLS 8 NORTH STREET**  
**SECRETARY: KAREN WARD, THE WILLOWS, NORTH BESTWALL**

PLANNING PURBECKS FUTURE

Dear Sir,

On behalf of the Chamber I would like to make the following comments on your consultation document 'HAVE YOUR SAY, ON PLANNING PURBECKS FUTURE'.

We understand that Central Government are forcing all local authorities to undertake studies such as these As there is a national need for more housing.

Our concerns for Wareham are:

- We don't believe that there are enough brown field sites for the proposed number of dwellings
- A new supermarket MAYBE necessary should 2400 new dwellings be built  
Apart from shopping centre what about extra school places, Doctors Surgeries etc
- The identified sites for the Supermarket on the consultation document, are wholly unacceptable due to the proximity of the school and the impact on local residents. Residents have purchased their properties because we are a SMALL MARKET TOWN, not a concrete suburb of Poole or Dorchester.
- We believe the data used is out of date, as the shopping facilities in Wareham Town Centre have improved significantly in recent months
- How much information has been extracted from all the parish and Town plans that were completed only recently?
- We have difficulty in reasoning with the suggestions as Wareham and the wider district are surrounded by SSI sites, RAMSAR, AONB, and of course A WORLD HERITAGE SITE. How does this fit in with your existing policies?
- Our highway infrastructure is already woefully inadequate, with no prospect of any improvements, to attract and generate so much more traffic would be irresponsible, even if a cycle lane, more trains and buses were provided, we feel would make very little difference to the highway network.
- What is perfectly clear, is that we live, work, visit the Purbecks because of what it is and what it has to offer. If we wanted to live in a larger Town, we would have.
- Wareham and the Purbecks are too special to over develop, we owe it to ourselves and future generations to maintain what we have. Enhancements where needed, yes, but massive overdevelopment then NO.

We would welcome the opportunity as a Chamber to sit round the table with PDC for further discussions, and to clarify exactly what is, and could be achieved to the benefit of all.

Yours Sincerely

Mark Howlett

PS If the crossing at Wareham station closes permanently, then the whole consultation will be meaningless, as you will be creating TWO towns, rather than uniting the whole of Wareham's community.

Please can we arrange a meeting to discuss in detail the Chambers views, and how we can move forward together. Thank you.



1930/109

CLERK TO THE CHALDON HERRING PARISH COUNCIL

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Alan Davies  
Planning Department  
Purbeck District Council  
Westport House  
Worgret Road  
Wareham  
Dorset BH20 4PP

Forwarded to STEVE Dering

05 November 2009

Dear Mr Davies

**Ref: Planning Purbeck's Future**

I write on behalf of the Chaldon Herring Parish Council which discussed the latest Consultation Document at a recent meeting.

Over recent years, and particularly following the South West Regional Spatial Strategy, the Council has regularly discussed options for further development in the Parish and has indeed identified potential sites. It is felt that it is important to retain the option to build in small Parishes in order to keep villages viable for future generations. This is in line with the strong feelings expressed by the Parishioners of Chaldon Herring who contributed actively to the Parish Plan. While it is recognised that affordable housing is required, as specified in the Consultation Document, this should not be the only type of development considered.

We ask you to take particular note of the contributions to this debate of the smaller Parishes, where developments which may seem insignificant in the larger scale of the District, could be crucial to the life of the Community.

Yours sincerely,

Joanne Selfe  
Parish Clerk



## CS110 Corfe Castle Parish Council

CorfeCastlePC@aol.com [mailto:CorfeCastlePC@aol.com]

Dear Steve

Councillors discussed the presentation at the Town Hall based on Cllr Greens conversation with you.

There was some concern over the apparently limited opportunities for housing construction within the village despite the various items of information that have been passed to the District Council over a period of time (Cllr Dragon will be keen to direct you to this) and the participation of Councillors in planning workshops. The Council is surprised that the major land owners have not been approached despite their willingness to be involved and come up with sites for exception housing to satisfy local need (National Trust and Mr Bond). There is a great need for accommodation of all sizes for the young and elderly local population as evidenced by our Housing Register but in particular single and two bed units are required.

Also, concern was expressed at the District Council enthusiasm to site more houses and businesses in Swanage. It would appear that most industrial/warehouse units in Swanage are very difficult to let or sell and the lack of employment opportunities in that town will mean, in the opinion of the Parish Council, the suggested housing (circa 250 houses) is for holiday use not local people. A major concern is the need for all construction materials, tradesmen and the new occupiers to have to come through Corfe Castle if development goes ahead anywhere within Swanage. They suggest for the above reasons most development should occur in the Wareham area which has far superior transport connections (still not good) in the absence of any prospect of developing the old Cordite Factory at Sandford.

Feel free to ring me if you think this is the best way to assist the Councillors in their deliberations.

Regards

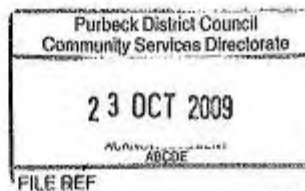
Jeff Dunn

Clerk to Corfe Castle Parish Council (01929) 555266

1740/111

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6 October 2009

Dear Planning Services

**Response to Potential Proposed Planning on Northmoor Allotment Site Submitted by Northmoor Allotment Holders Association**

The Northmoor Allotment Holders Association is opposed to any proposed development on the Northmoor Allotment site. Its members have found the consultation document to be a little lengthy and confusing, and would therefore ask that this letter be accepted as part of the formal consultation.

As you are aware, Governments are predicting world food shortages and are promoting more self sufficiency in food production. Allowing communities to grow their own fruit and vegetables reduces the need to import food produce and reduces carbon emissions used in the transportation of food. Small gardens or no gardens at all, mean that this is not possible for many members of the community without allotments being provided.

Keeping the site will help maintain the Open Space Provision for the area, the site is self sustainable with very little input required by local government. The allotment site has only been classified as green belt for 20 years, removing it from green belt after such a short period would make a mockery of the green belt provision. The current classification for the site is 'designated open space' and as such should have a longer future than 20 years if its activity is going to attract investment by persons using it.

The site is well established, with a strong community spirit and ties. It is fully tenanted, and has a large waiting list that increases year on year, despite proactive activity by the management committee to reduce numbers. Any plot that becomes vacant on the site is now only offered one quarter of a plot at a time, to allow the maximum number of people to benefit from the area. At the current allocation rate, the last person on the list will have to wait three years before being offered a plot. It is a very popular and sought after allotment. A number of sites are shared by families crossing three generations. The community spirit is reflected in the fact that the ashes of a former tenant were sprinkled at the edge of the site (with permission from the Town Council), a memorial seat is also placed on the site in memory of another tenant.



Its central location is paramount in maintaining effective commuting to and from the site. Most tenants are within walking distance of their plot, reducing the need to use fossil fuelled modes of transport. The location also ensures good security due to its residential boundaries and distance from major roads. It is a safe site with many of its residents living at the perimeter which discourages intruders. The overlooked position also enables tenants to feel safe and secure if they are on the site alone.

Not only does the allotment provide food, but it also provides a much needed leisure activity that cuts across age groups and boundaries, and draws the community together. The tenants of the site range from couples, families with young children, the Purbeck Centre (who use it as a facility for adults using their services), to older and retired members of the community. It provides much needed exercise and the opportunity to socialise, a valuable resource in itself. Tenants swap and share produce with one another and other members of the community. Many plot holders have won prizes in the 'Best Kept Allotment' competition since the event has started. A happy community has a reduced crime level and promotes mental and physical health and well-being.

The site also has an apiary that accommodates four bee keepers; the apiary is registered on bee base, the Governments National Beekeepers Unit, and is regularly checked by the County Bee Inspector. As you will no doubt be aware as a result of recent media coverage, the honey bee is under threat; the apiary is therefore a valuable resource to the area in its own right. The site also houses chickens.

The site has a diverse range of wildlife, including slow worms and adders, badgers often visit the site, all of these are protected species. It is home to a wide range of insects and birds that live on the site and in the hedgerows that bound it.

The Governments urban green spaces policy statement published in October 2002 as part of the public space report *Living Places – Cleaner, Safer, Greener* states: "The Government is committed to the creation of networks of accessible, good quality parks and diverse green spaces in all our towns and cities"

Any closure or relocation of the site would be inappropriate due to the deep connections that people have with the area, and its perfect position that is valued and sought after by the local community. It would remove an extremely "diverse green space" that is sustainable and treasured by its tenants.

Well supported allotment provision is a crucial local service, which we believe we have the right to expect. The Council has provided this well for nearly 30 years, and the Association thanks you for that. We would ask that the Council continues in its provision by ensuring our allotment site is not used for future development.

Yours sincerely



Mr Brian Wakelam  
On behalf of the Northmoor Allotment Holders Association.