## Issue 16.1

The policy for growth in this area for the period until 2026/27 is unsound in relation to both national guidance and local needs, for the reasons set out below.

Within the vision for South East Purbeck the Core Strategy states that the setting of the town within the AONB will be enhanced. Whilst this is in line with the definition of environmental sustainability contained in the NPPF, the allocation of 900 dwellings to South-East Purbeck is inconsistent with this aim. Large-scale settlement extensions will erode the quality of the natural environment, and are inconsistent with the aims of policies CO and LHH to restrict development outside of existing settlement boundaries to small-scale measures, which will not have a detrimental impact on the local environment.

The vision for South East Purbeck also states that the 'special historic character of the town' will be enhanced, which is in itself in-line with the aim of environmental sustainability. However, this aim is undermined by the requirement for such a large amount of 'windfall development' within the existing settlement boundary. It is acknowledged that re-development of brownfield sites, such as Kings Court business centre and the police station are likely to deliver additional housing. However, if the level of windfall development is to be met, it is highly likely to lead to increased pressure to demolish existing family homes for their replacement with flats. The impact of such development can clearly be seen in the area north of the railway station bounded by Gilbert Road, Rempstone Road, Ilminster Road and Victoria Avenue, where very few of the original Victorian residences remain. If such development is encouraged, it will inevitably have a detrimental impact on the historic character of large areas of the town, especially at Durlston and on the De Moulham estate, north of Victoria Avenue.

The market element of this new housing provision is unlikely to meet local needs. Flats are rarely designed and marketed as homes for families who work in Swanage. Furthermore, as acknowledged in paragraph 6.1.1 of the Core Strategy, average house prices are eleven times the median average wage, ensuring that most of these dwellings will encourage inward migration and fuel the growth in second homes, which already amount to at least 16 per cent of dwellings in Swanage. In failing to sufficiently address affordability and expansion in second home ownership, the policy for growth in this area does not support the sustainable goal of 'supporting strong, vibrant and healthy communities'.

Policy SE also fails to ensure sustainable growth because it is not supported by significant improvements to the local transport network. In autumn 2009 the Highways Agency objected to 1,000 additional dwellings in and around Swanage, because of the lack of employment opportunities and the necessity for out-commuting. Although the Town Council supports many of the proposed transport improvements contained in

paragraph 7.5.10, there is insufficient evidence to establish that these measures are adequate to provide transport links for commuters that will prevent exacerbation of the congestion along the A351, which is described in Map 15 of the Core Strategy as 'a giant cul de sac'. Policy SE is, therefore, inconsistent with the requirements of the NPPF to minimise pollution and move to a low carbon economy.

It is proposed that Policy SE should allocate a smaller amount of development to South-East Purbeck during the plan period. Although unlikely to address all of the issues raised above, amending the policy to supply 'around 600 dwellings' will ensure that development is at a more sustainable level, than that which is proposed. It is highly likely that additional house-building will occur after the end of the plan period in 2026/27, and an effectual deferral of a significant part of the allocation of 900 dwellings until after that date will provide greater opportunity to assess the impact of the proposed improvements to the local transport network and increased employment provision.

## **Issue 16.2**

The allocation of 200 dwellings to settlement extensions at Swanage, as part of a strategy to deliver 900 additional dwellings in South-East Purbeck, is clearly of strategic importance for the district, not least for its relationship with transport and employment policies highlighted above.

The Town Council fully supports the development of a subsequent plan for the allocation of residential development land, whatever the eventual content of the adopted Core Strategy. As the only locally elected body with the sole purpose of representing the electors of Swanage, the Town Council is committed to working in partnership with the District Council and the Town and Community Partnership to develop a Swanage local plan which has the broadest possible support within the community. Proposals are already being developed for extensive public consultation, focussed on the neighbourhoods within the parish, with the aim of engaging the broadest possible cross-section of local residents.

## Issue 16.3

The Town Council does not believe that the relationship between housing and employment provision in Swanage has been properly explored, and as a consequence Policy SE fails to support sustainable economic development. The initial version of Policy ELS, as contained in the pre-submission Core Strategy, made it clear that the majority of new employment opportunities will be provided at Holton Heath and Winfrith, involving lengthy commutes for any resident of new development in Swanage. The short section on employment within paragraph 7.5.10 is wholly inadequate, focusing solely on the Prospect Business Park. Although the Vision for South East Purbeck proposes the 'development of niche businesses' and 'a broad business portfolio', Policy SE makes little reference to how this is to be accommodated beyond vague reference to 'enhancement of the area around the railway station and the redevelopment

of the Pierhead café'. Support for the tourist industry and the maritime economy should be expressed in this policy.

Martin Ayres Town Clerk

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