

Purbeck Local development Framework

Core Strategy DPD

Independent Examination

Matters and Issues for the Examination

Written Response from Save Herston Fields

(please note that the rep numbers also include references to individuals, who for the sake of this document are representatives of the Save Herston Fields Group)

18th April 2012

Basis for the Overall Approach (chapters 1-4)

1.2 We do not believe that the overall spatial strategy is justified. The emphasis on building in Swanage will have a negative impact on the environmental characteristics of the town – at the expense of loss of irreplaceable AONB. The provision of SANGS in the South East Purbeck region is unsustainable as there will be a net loss of green space by building on settlement extensions.

Furthermore, the transport infrastructure is not adequate for anything other than light industrial type employment within the town, and the building of increased numbers of houses will require a longer commute for local residents, as the bulk of employment is outside of the town. This strategy encourages commuting, which is not friendly to the environment, and also places more burden on the road system, which is already congested

1.3 -

1.4 We do not believe that the distribution of proposed housing, employment and retail is justified, as Swanage and South East Purbeck is having a much larger proportion of development allotted to it than the rest of the district. This formula has been in place for over 15 years, with Swanage consistently bearing the highest percentage of development (and therefore expansion) within the district.

1.5

General Location of Development (Policy LP)

- 2.1 It would seem that by asking landowners what land they have available for potential building has had a dramatic effect on the demographic for settlements. This “developer led” approach is suspect, as it offers a huge financial incentive for the landowners and developers to push forward the land for development, often with blatant disregard to what is actually wanted or needed.
- 2.2 There is too much emphasis to development of South east Purbeck, which lacks employment and transport infrastructure, and has little chance of that situation improving at all by nature of the geographical and environmental constraints.
- 2.4 Greenbelt is by default regarded as being “special land”, however, AONB has a higher status of protection than green belt, yet settlement extensions in the AONB are being considered, and this should be questioned

Matter 4
Rep. no. 5545 (KG)
5542 (SHF)
5310 (M&C H)

Housing and Housing Supply

Developer led approach rather than strategic or holistic. Confirmed in SHLAA – only used submitted sites.

Core Strategy and consultation only based on submitted out of settlement sites, no strategic consultation or planning exercise. There was no mention of in- settlement sites or impact on AONB.

Affordable Housing and Gypsy and Travellers Sites

5.1 There is a significant need for affordable housing in the District, but the requests distort the true need for affordable housing. There is a desire for people who currently live outside the District to move here, but the true need is for affordable housing for people who already live here. According to Freedom of Information request to Purbeck District Council in September 2010 1250 households already living in Purbeck were part of that list, every other request was from outside of Purbeck

Reasons for saying why the proposed sites in Swanage, particularly Herston Fields, have not adequately met the needs of gypsies, travellers and travelling show people or, indeed, Swanage:

- No evidence of local need.
- No evidence of historic demand.
- They are within an AoNB (and Herston site is next to the Conservation area) and site may compromise AoNB designation.

- Access and infrastructure would be difficult and very expensive. (This is stated in the PDC report by Baker Associates)
- Proposed site is in a Flood Zone 3/2.
- Loss of only open, flat, space in Herston, used for recreational purposes by local residents, (application for Village Green status pending).
- Impact on tourism, the main economy in Swanage,
- with no jobs for Gypsy and Traveller community, or any other locals.
- May require purchase by the strapped for cash Council.
- Petition of 3000 people said no to any development on Herston Fields.

Extensive, costly planting would be required to reduce the visual impact. (This is stated in the PDC report by Baker Associates)

Employment (Policies ELS and E)

6.1

Unfortunately there is no clear economic vision and strategy for Swanage (S.E Purbeck) there is little being done to encourage sustainable growth as NPPF paragraph 21 advises. It would seem the unique socio economic profile of its habitants as it stands have not been taken into account and indeed the proposed 37.5% allocation of houses would mean 1.5 working adults per household (900 households) would need jobs? That equals either increased unemployment or huge pressure on our existing infrastructure (the A351, poor public transport and a ferry that has a minimal capacity to cross over to Sandbanks) as those with jobs in larger conurbations and outlying areas with more employment commute. Also really un-eco friendly in terms of increased fuel emissions as more people commute.

6.2

Worth noting that on last checking, Dorset County Councils own website showed that in the years 2009, 98 people were unemployed, in 2010 this was 94, however these figures precede the worst of government and council cutbacks and economic contraction. They also show a predominance of male un-employment. Even more stark are the figures published for the towns overall employment patterns which in 2009 were, of those with jobs 55% were in full-time and 45% part-time. Also as a seaside town seasonal work will play a part leaving some working age people unemployed for months at a time until the tourist season begins. All the above categorically show that for Swanage no opportunities for additional employment provision had been properly assessed. As for Prospect Business Park which had been extolled as a long awaited addition to the town and one that would mean diversity in employment and a more robust economy. It remains an undeveloped wasteland! Alas a natural cul-de-sac such as Swanage presents with its poor infra-structure a less than attractive prospect (no pun intended) for companies that already exist in more accessible places, with distribution lines set up and running like clockwork on main roads that link seamlessly with other towns. Small and start up business are extremely unlikely to have the economic ability to take up a plot or need a plot of that size.

6.3

No, as per previous points made regarding A351, ferry and public transport.

Green Infrastructure, Recreation and Sports facilities

- 9.1** We are concerned about settlement extensions in respect to AONB. Any settlement extension within the AONB should be disallowed because of its importance. Erosion of AONB is permanent, and SANGS cannot offer a replacement as there is a net loss of green space! National Guidance states: 'Loss of green infrastructure will only be acceptable where it is allowed for as part of an adopted Development Plan Document or is necessary, on balance, to achieve the policy aims of the Core Strategy. Appropriate mitigation of lost green infrastructure assets will be required'.

There is no replacement for Herston Fields which has been a green space within the AONB, and easily accessible by foot, and has been used for recreational purposes by the community for as long as anyone can remember. Although Save Herston Fields as a group have now assimilated evidence and intend applying for village green status. This was also suggested as a strategy by the conservation officer when one of the fields was recently removed from the Herston conservation area.

The fields serve as an important corridor for wildlife.

Countryside (Policy CO)

- 10.1 Allowing settlement extensions in AONB offers NO protection for AONB. Therefore settlement extensions in the region of AONB should not be permissible, as it renders the designation as being pointless!
- 10.2 The Council should be doing whatever they can to re-use land before even considering using green belt land or allowing settlement extensions.

Biodiversity and Geodiversity (Policies Bio , Dh and PH)

11.1 How can a SANG be justified when there is a net loss of green space? We can understand how they might work in a city environment, but not in a rural environment. The SPA Strategy of choosing SANG sites in such areas and accelerating unnaturally the increase in visitors will mean that these areas will reach full capacity sooner. Rather than accelerating the number of visitors to such sites, housing targets should be lowered and more open space obtained and maintained by PDC to relieve growing pressure on all our countryside, both the SPA and the AONB. The SANG Strategy will damage the AONB through urbanisation by the addition of unnatural infrastructure to attract dog walkers. It is important to distinguish between SANG land that can be accessed by a substantial number of residents on foot, and that which requires, for most, a car journey to reach.

Central Purbeck

- 14.1 Wareham and Central Purbeck offer significant opportunities for social and economic benefit. Being at the the Centre of Purbeck, it is a natural hub for transport infrastructure, and as such offers the opportunity for an increase in employment land (at Holton Heath), and the significant benefits which the transport infrastructure offers in that respect. But pressure to build out of town supermarkets should be avoided in order to preserve the economic wellbeing of small town centre businesses. Has the spectre of 10,000 new homes at Upton been taken into consideration, and the impact that this size of development could have on the whole of Purbeck?
- 14.2 –
- 14.3 Additional housing requires additional employment prospects, the lack of provision of employmet allocation is therefore not justified, or sustainable

South West Purbeck

- 15.2 It would seem that the South West Purbeck area has much to offer, in terms of employment land, lower land prices, and easy integration into existing transport infrastructure such as rail and main roads. It also offers land which is outside of AONB, and should be considered as a key area for development.

South East Purbeck

Core Strategy based on land values (to achieve 50:50 affordable housing), rather than any impact on environment, economy or social issues. For example Dorset LEP has drawn up projects to meet criteria of national Growing Places Fund. One project is Upton Farm to build 10000 homes and 13700 jobs. Could this not be considered as part of the overall numbers required for the Dorset South/South East. It is also noted that if this ratio is applied to SE Purbeck, 1233 jobs should be identified for the 900 homes. The Core Strategy does not include anything about numbers of jobs to be created or how they will be achieved.

Noted that reports on opposition to Western Extension could easily apply, if not more so, to SE Purbeck.

There is no mention of impact on AONB.

16.1 There is too much emphasis on development in South East Purbeck – further development threatens AONB, there is little scope for an increase in employment land, and Swanage is at the end of a long cul-de-sac, with only one road in and out, which suffers from heavy peak-time congestion, and during the tourist season is heavily congested. Most employment is not local, and requires commuting. This increases reliance on the transport system, and is not environmentally friendly!

16.2 The allocation for 200 houses on out of settlement extensions is in addition to a further allocation of 700 dwellings to be built within the town. The burden of growth is too great, especially as Swanage has seen the highest percentage of growth in the whole of Purbeck in the last 15 years.

We want to see a lower housing allocation in SE Purbeck with minimal (only the Grammar school site ,where planning has already been agreed) out of settlement development and a more creative approach to affordable/social housing e.g loans offered by the Council, self- build, land trusts and exploration of a policy similar to National Parks.

Landscape, Historical Environment, and Heritage

- 19.1 Concerns over destruction of AONB which is a key part of the landscape, and arguably the historic environment, as well as the heritage of Purbeck. Tourist come here for the landscape, and tourism is one of the key employers for the district