

Planning Purbeck's Future



Proposed Changes to Pre-Submission Core Strategy Consultation
1 September – 13 October 2011
Summary of Representations on the Process



Core Strategy Proposed Changes to Pre-Submission: Comments on Process

Name **Plan sound?** **Comment on Legal soundness**

Proposed Change: Process

Arne Parish Council	Legally Compliant	
CPRE	Legally Compliant	
Education Swanage	Legally Compliant	
National Grid Property Holdings Ltd	Legally Compliant	
Save Herston Fields	Legally Compliant	The public consultation is inaccessible to the public, their ability to comprehend the consultation and how to respond is questionable, allowing PDC to progress a strategy which is opposed by many people. The process lacks transparency.
Trustes of W H Drax 1962	Legally Compliant	The proposed changes are considered legally made and prepared with due process.
Wareham St Martin Parish Council	Legally Compliant	
Wyatt Homes	Legally Compliant	Due process has been followed to accord with national guidance and, indeed, the level of consultation has exceeded that normally expected.
Ashvilla Estates Ltd	Not Legally Compliant	Support inclusion of SANGs in Core Strategy but believe not effective for the housing proposed at Wareham & therefore not compliant with Habitat Regs and is not deliverable. Not properly assessed alternative development or mitigation sites and has not adopted the most appropriate strategy for growth at Wareham.
Wareham Town Trust	Not Legally Compliant	Exceptional circumstances do not exist for altering Green Belt boundaries and there was little opportunity for the public to comment on this. The document does not reflect PDC's position where councillors voted not to have a supermarket. The Core Strategy has been prepared on the basis of the RSS with no public consultation on the appropriate level of development for this special area. Housing numbers are based on predictions, rather than a proper assessment taking account of environmental capacity. Preparing of retrospective supplementary planning guidance is not considered best practice.
Welfare Dwellings	Not Legally Compliant	PPS12 Para. 4.10 states Core Strategy should make proper provision for such uncertainty & does not place undue reliance on critical elements of infrastructure whose funding is unknown. Test should be whether there is

Name **Plan sound? Comment on Legal soundness**

reasonable prospect of provision. Funding for proposed Free School is unknown. May rely on landowner donating land. May depend on Govt funding but this is uncertain. PS124 is significant change not 'proportionate' as required by PPS12 para 4.25. There have been some informal discussions between officers and owner's representatives, but nothing conclusive as required by PPS12 4.27. Not aware of any credible evidence base, only an aspiration with no testing of alternatives as required by PPS12 para 4.36.

ZBV (Winfrith) Ltd **Not Legally
Compliant**

The Core Strategy does not have proper regard to the RSS and national policy, as required by paragraph 4.1 of PPS12. In particular the approach and evidence for housing targets and delivery strategy are concerning. There is uncertainty surrounding delivery of economic growth. 1000 new homes around Wool has not been properly investigated, especially as the Council has dismissed the Western Sector in the RSS. The housing trajectory and Policy HS are unclear and the Character Area Potential assessment should not carry any weight.

Rees W

Perplexed as to why CS has yet another round of revision & modification. New additions in this extra round do not add any real value but have resulted in considerable delay & expense. Some additions appear to obfuscate some of the otherwise clearly stated positions in last 'final' version. However tentatively support document & modifications, especially removal of Wool from strategic housing requirement. Concern that some proposed changes appear to be trying to water down commitment to prevention of more large-scale development in Wool. The original council decision to remove Wool should be upheld.

Atkinson G **Legally
Compliant**

Drayson C **Legally
Compliant**

Gleeson
Developments Ltd **Legally
Compliant**

Harman N **Legally
Compliant**

O'Connor H **Legally
Compliant**

Patrick E A **Legally
Compliant**

Pratten D **Legally
Compliant**

Thomas, P **Legally
Compliant**

Tooley S **Legally
Compliant**

Name	Plan sound?	Comment on Legal soundness
Cousins J	Not Legally Compliant	
Hobbs C & M	Not Legally Compliant	PC7 & PC37/38 Separation of these key issues is wrong and it is of paramount importance that these are combined for consideration. At the end of the day this pre-submission document is based on a the fundamentally flawed 'Core Strategy' the very real and constant issue that is and has been ignored is the justification and need for 2400 homes in Purbeck. There does not seem to be any guarantee of the amount of affordable/social housing that will be included in this number. SE Purbecks quota is to provide 900 new builds of which 200 will be out of the current settlement area which surely cannot be a practice or suitable way forward.
Scott Estate	Not Legally Compliant	
SW Housing Association Registered Providers	Not Legally Compliant	
Wareham Chamber of Trade	Not Legally Compliant	Whole consultation process has been flawed throughout.
Wareham Town Council	Not Legally Compliant	The process would not appear to have been carried out in accordance with national guidance for 4 reasons: 1. Contrary to national guidance, the plan proposes the moving of green belt boundaries, which should be regarded as permanent and only altered under exceptional circumstances (Planning Policy Guidance 2 1995 (updated March 2001). The moving of the green belt boundary had been pre-determined with little opportunity for the public to comment on this vital issue. 2. The current draft does not reflect the decision of Purbeck District Council on 5th October 2010 to remove 2000sqm supermarket at Worgret Road, Wareham from the draft Core Strategy. In upholding the decision of Council in October 2010 the Core Strategy would need to provide a robust framework which supports vitality and viability for town centres and resists inappropriate development which would have a negative impact. 3. This Core Strategy was developed on the basis of the Regional Spatial Strategy and, whilst this will no longer apply under the new legislation, there has been no public engagement or consultation regarding the level of development considered appropriate in this special area. Calculations of housing numbers etc. have been based on predictions rather than on a proper reassessment of the appropriate level of development in recognition of the capacity of this special area with its many environmental constraints. 4. Preparation of retrospective supplementary planning guidance as proposed for example for the Recreational Strategy Review is not considered best practice.
Williams Y	Not Legally Compliant	Worgret Rd site (PC 92 & PC94) not legally defined anywhere in document. Change of use of school playing field contravenes the requirements of statutory instrument 1999 Schedule 2 and people of Purbeck not been consulted

Name **Plan sound? Comment on Legal soundness**

regarding middle school playing field site.

Questions the legality of referring to 'subsequent plans' for 'controversial' developments, i.e. retail floorspace, alterations to greenbelt and loss of playing fields when there has been no public consultation. Alterantive SANGs have not been identified on map (P93)

Council Response to comments on Process:

ISSUES: Concerns that Core Strategy has not been prepared in accordance with the regulations, concerns over particualr issues and some found the process difficult to understand.

COUNCIL'S RESPONSE: The Proposed Changes consultation was undertaken in line with the Purbeck Statement of Community Involvement, Purbeck Local Development Scheme, national policy and guidance from Planning Inspectorate.

ACTIONS: None required