

**Comments on PDC statement on the implications to the core strategy of the publication of the  
NPPF**

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**Save Herston Fields**

**June 2012**

**1.0 Introduction**

**1.4** Whilst we recognise that it is not necessary to repeat policies that are in the NPPF we feel that Purbeck has such a unique geology, landscape and habitat that the Council should be making additional policy in relation to protecting AONB, especially to ensure that it meets the soundness tests for sustainability.

**2.0 The implications of the NPPF to the Core Strategy**

**2.1.1** There is much reliance on suitable mitigation being found, that is not yet proven in order to deliver the housing numbers. Surely PDC needs to look at sites that are less sensitive/brownfield and not in European protected sites, AONB or Green Belt before relying on finding suitable mitigation.

**2.1.2** As per 1.4 above we believe that “acknowledgement” does not adequately express the need to protect our special circumstances.

**2.2 Section 1: Building a strong competitive economy**

The wording of this section is unacceptable. It seems that PDC do not have an economic vision and strategy which positively and proactively encourages sustainable growth, relying almost entirely on house building. They are merely considering one. What will happen when all the houses are built? What jobs will the people do and how far are they expected to travel on an unsustainable travel infrastructure? It is 12.6 miles to Holton Heath, 19 miles to central Poole and 13 miles, via ferry (£7 return), to Bournemouth.

The NPPF also states that planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Why then does the Core Strategy allocate even more land at Prospect Farm in Swanage, where the existing site remains unbuilt. There is clearly no understanding or evidence to show what will boost sustainable economic growth in Swanage.

**2.3 Section 2: Ensuring the vitality of town centres**

We have a number of observations regarding the soundness of Proposed Modifications. These can be summarised as follows:

- Whilst we are comforted by the fact that revised Policy reflects more appropriately the needs of residents in Purbeck (insofar as it reflects the findings of the NLP Retail Impact Assessment - unlike the proposal for a new out of centre foodstore in Wareham), we are concerned that it does not go far enough to protect the ongoing vitality and viability of Swanage Town Centre. In the absence of a clear policy allocation to accommodate additional retail within the town centre, we are concerned that this leaves the door open for out of centre retail floorspace to come forward (in the knowledge that there is capacity for additional retail floorspace). This is compounded by the fact that the proposed threshold for requiring an assessment of retail impact is far too high (1,000 sqm), taking into account the type of retail provision that already exists within the Town Centre (ie small scale local provision). It does not account for the fact that even a small amount of out of centre retail floorspace in Swanage has the potential to undermine the vitality and viability of the town centre.

- In addition, we are concerned that the evidence base to support Revised Policy (ie the latest NLP Retail Study) overstates to a certain extent surplus capacity for additional retail floorspace in Swanage. Our reasoning is thus:

- In converting available convenience goods expenditure to floorspace figures, NLP has applied a convenience goods turnover of circa £11,000 per sqm. We suspect this figure may be a slight underestimate, taking into account the average turnovers of foodstore operators in the UK (such as Tesco and Sainsburys).

- In applying national averages to take into account non store retail trade, we also suspect NLP has significantly underestimated the extent to which Purbeck residents undertake their main food shopping online - it is reasonable to suggest that a higher proportion of Purbeck residents undertake their main food shop online (compared to that of the national average), taking into into account the limited number of medium to large food store provision within the District. In underestimating online expenditure, NLP will have overstated capacity for additional retail floorspace within the District.

- We note that capacity for food provision has been adjusted to reflect the latest forecast of population growth and the housing strategy. It is apparent however that capacity for non food retail has not been revisited - this is an oversight and must be addressed by PDC.

- Whilst in principle we support a marginal uplift in retail floorspace in Swanage Town Centre to support the needs of the local community, we note that this would be most appropriate as part of a wider initiative to expand the existing Health Centre adjacent to the existing Co-op store and to deliver a broader range of local services available to Swanage residents. This type of initiative could be brought forward as part of the forthcoming Swanage Area Action Plan with adequate provisions outlined within the emerging Core Strategy.

- Lastly, we note that there is insufficient provision within the proposed Core Strategy to prevent excessive non food provision coming forward as part of a proposal to extend the existing convenience goods retail floorspace. The proliferation of non food retail floorspace as part of an

extension to the Co-op, for example, is likely to be to the detriment of independent non food shopping provision within the remainder of the town centre.

- We have also noted that the modifications state that Policy CEN will provide the focus for service provision, whereas Swanage has the highest population and highest housing allocation in the District. We have been told by PDC that in order to preserve services in Swanage we need to bear the increase in housing allocation being proposed. We feel therefore that this Strategy is not sound and sustainable for Swanage. For example: There is currently a consultation being undertaken on health services where options are to focus service in Wareham. The Core Strategy would appear to support this proposal, thus potentially losing key services in Swanage.
- The statement re focussing services in Wareham also contradicts the Transport Policy IAT that states improving accessibility within Purbeck will be achieved through better provision of local services and facilities!

## **2.5 Section 4: Promoting sustainable transport**

We strongly refute that the Purbeck Transportation Strategy mitigates any adverse impact of this growth. We have seen Dorset County Council Committee agendas that state the budget for transport has substantially reduced. Therefore any substantial and effective management systems will not be put in place. There will definitely not be better, or sufficient, public transport linked to housing growth to help improve the self sufficiency of Swanage, and probably other towns and villages. We are still unclear when the rail link will be open (noted; map 15 in Core Strategy states 2012) and just how much traffic this will mitigate.

## **2.7 Section 6: Delivering a wide choice of high quality homes.**

It is interesting to note that Natural England feels that extension settlements in Swanage are achievable but queries any Dorset Green proposals. Mitigation is just one element for sustainable development and it feels there has been scant regard for the other elements when determining housing allocation numbers in Swanage. Where are the policies to say when enough is enough for housing allocation in certain areas? It seems Wool is the only place where PDC feels this is the case. Why can't their criteria be checked against other areas to give an indication of where growth may be sustainable in the future?

There has been no Housing Needs Survey for Swanage therefore need has not been proven. The latest housing allocations system/process is now Dorset wide allowing any applicant to state anywhere in Dorset as their preferred option. We need a housing strategy that prioritises local allocations (PDC spatial areas maybe), for need, linked with jobs, as has been done in new town developments. What protection have we got that market housing will be predominantly family housing and not second homes or Executive luxury (as per Sandbanks and more recently Glebe Estate in Studland- within PDC).

The Core Strategy should be more explicit on density as there is evidence that town scape character assessments are not currently working in Swanage, see Cranborne Road area.

## **2.11 Section 10: Meeting the challenge of climate change, flooding and coastal change.**

It seems highly unlikely that the transport strategy will reduce carbon emissions, what evidence is there for this statement?

Should we not be striving for new develop to be higher than national targets if we are unable to mitigate transport target emissions? The approach to this whole section appears more reactive and passive. We would like to see a much more proactive approach to create a sustainable community, particularly as Swanage is in a vulnerable position from all of the climate changes. PDC do not seem to have recognised that “run off” flooding is not just a town centre probability but extends all along the valley to Herston. There is no mention of water quality in Swanage Bay that has breached the quality requirements on a number of occasions, even without additional housing.

### **2.12 Section 11: Conserving and enhancing the natural environment.**

There appears to be limited protection for AoNB, with policies and guidelines still to be developed. Surely these should be an essential companion to the Core Strategy if we are to protect our unique landscape for future generations.

### **2.13 Section 12: Conserving and enhancing the historic environment**

## **Plan Making**

### **2.15.1 Local Plans**

There seems to be key omissions from the Core Strategy that could render Purbeck unsustainable, depending on future plans to allocate housing, retail and employment sites, as well as no economic strategy or firm Gypsy and Traveller proposals, and a seemingly unproven Transport Strategy.

It is questionable whether residents of Purbeck would agree that the Core Strategy has been prepared following extensive and meaningful engagement with the community and whether it truly reflects spatial aspirations.

Overall it is not clear whether the Core Strategy does meet para 157 of the NPPF.

### **2.16 Using a proportionate evidence base**

We are unable to determine whether the evidence is proportionate as the numbers keep moving and many seem to be based on “adjusted” national figures. We are also unclear if the CIL and or Section 106 are realistic and achievable. It appears that the 40% and 50% are questionable as an open book approach is being taken that would indicate that movement on percentages is expected (indeed we can find no evidence of 50% being achieved, particularly in a small, isolated coastal town). There is also no presumption that the affordable housing will be provided in the spatial area where the market housing is built, thus reducing sustainability.

### **2.18 Examining Local Plans**

PDC themselves are saying that mitigation will be required and that there is a shortfall in meeting housing needs. A more imaginative and creative sustainable approach is required, for example

exploring the Dorset Green approach. A partial review does not sound strategic and could be market led and reactive.

### **2.19: Planning Policy for Traveller sites**

It is interesting to note that the Core Strategy in Hull was considered unsound because of the same lack of allocation.