



**Extraordinary Council Meeting – Wednesday 10<sup>th</sup> March 2021**

**Agenda Item 3)**

**Dorset Council – public consultation on the draft Dorset Local Plan - to consider the Town Council's response to the consultation (following Councillor workshop on 1<sup>st</sup> March 2021)**

### **SECTION 13: SWANAGE**

#### **Swanage Local Plan (SLP) 2016-2027**

The proposals for Swanage outlined within the draft Dorset Local Plan are not sufficiently aligned with the policies and objectives of the adopted Swanage Local Plan which currently covers new development up to 2027.

The Town Council's overarching desire is to see the Swanage Local Plan retained as a Supplementary Planning Document.

Prior to its adoption in 2017 the SLP was developed over a 5-year period of active engagement with Swanage residents and therefore carries the broad support of the local community. The Town Council requests that this is kept in place until 2027 which will allow the Town Council time to consider the development of a Neighbourhood Plan, whilst still providing the town with the protection of existing SLP policies until 2027.

If the plan *cannot* be retained then more of its content should be incorporated into the Dorset Local Plan. The Swanage-specific section of the plan (6 pages) is very brief in comparison with that for similar sized towns (e.g. Blandford, Bridport, Sherborne and Wimborne all of which cover between 10 and 20 pages).

#### **Policy SWAN1: Swanage Town Centre**

The Town Council is pleased to note that this policy retains the boundary and designation of retail frontages, as set out in policy STC of the SLP.

The Town Council has no objection to Policy SWAN1 and the opportunities for expansion around the Co-Operative Food Store, Kings Court Business Centre (former Town Council Depot site) and Post Office, and the potential relocation of current town centre uses to the Kings Court site, as set out in policy TCR of the SLP.

However, the Town Council does have some concerns over the deliverability of the proposal as set out in policy SWAN1. This policy has been in development for close-on a decade and there is no indication that the relevant parties are actively engaged in taking forward this proposal. Furthermore, concerns have been raised that the existing retail offering in the town centre by the larger food stores is inadequate and expensive for local people (there are pockets of deprivation in the town). The impact of not providing an adequate shopping experience in the town is that a sizeable number of local residents regularly drive out of town to shop, therefore driving the local economy down, and adding to the traffic and environmental issues affecting the already congested A351. This would be exacerbated by the residents of the proposed 150 new homes in the proposed settlement extension.

In light of the above concerns, the Town Council would encourage Dorset Council to explore alternative options to meet the identified need for increased retail floorspace. In support of this, reference is made to point **13.1.5. of the Plan** 'The main challenge for the Swanage area is to ensure its sustainability is maintained and enhanced by reducing the need for residents to travel out of the town for work, shopping and leisure. This all needs to be achieved whilst protecting the outstanding natural environment that makes it popular.'

#### **Policy SWAN2: Northbrook Road East**

The Town Council has no objection to this policy, in so far as it is consistent with Policy SS of the SLP.

#### **Policy SWAN3: Land to the west of Prospect Allotments**

The Town Council strongly objects to the allocation of 150 houses on land to the west of Prospect Allotments set out in Policy SWAN3, which was not considered as part of the public consultation carried out prior to adoption of the SLP only four years ago.

Significant development has already been undertaken/is being undertaken in the town, namely Smith's Farm (20 units), planning permission for the former St Mary's School site (30 units), the development west of Northbrook Road (90 units - not all complete/sold), and the (lapsed) planning permission for 52 units on the east side of Northbrook Road and application for outline planning permission for a possible further 39 houses on the old Grammar School site (potential for a further 91 units). The total of new properties exceeds the Swanage Local Plan allocation of 200 new homes (of which 50% should be affordable) in accordance with policy SE (South East Purbeck) of PLP1. The Town Council believes that these numbers, which do not include the many other developments which have also been approved since adoption of the SLP, are more than adequate for the town/local community given the lack of additional infrastructure, facilities and employment.

The Council feels that the proposal for 150 new homes on this site, which is currently used as farmland, is in an Area of Outstanding Natural Beauty (AONB), and outside of the existing settlement boundary, is unacceptable for reasons of inadequate infrastructure, public services and transport; landscape impact; potential flooding; and no increase in the supply of employment land.

- Any development in this location is contrary to policy. The Council has stated that 'residential development would represent an uncharacteristic extension beyond the well-defined settlement boundary' (see SHLAA site assessment 2019 [DCP Shela - Site details \(westdorset-weymouth.gov.uk\)](https://www.westdorset-weymouth.gov.uk)).
- It is not acceptable to allocate large settlement extensions outside of the settlement boundary, in the open countryside and thereby having a detrimental impact on the AONB. The proposed development would detract from the quality of the local environment, the site being visually prominent upon the entrance to Swanage along the A351. The draft Dorset Local Plan requires all development to conserve and enhance the landscape. However, due to the topography and elevated position of the site this would be impossible to achieve and would cause harm to the landscape character and adversely affect its natural beauty. This means that any development in this area would be prominent and have a greater impact on the AONB.

- The draft Local Plan policy ENVV4 states that within the AONB major development should be refused unless there are exceptional circumstances. In respect of development in Swanage, exceptional circumstances have not been demonstrated.
- The site is within 5km of protected heathlands but there is no mention of the heathland mitigation required to accommodate such a sizeable development.
- All new development is required to be sustainable. This cannot be achieved in Swanage as Swanage does not have the infrastructure and no evidence has been provided to suggest that this can be mitigated. Any development in Swanage would not reduce the need to travel due to the limited employment, retail and leisure opportunities available. Concerns are also held regarding the inadequacy of local community services e.g. doctors/dentists' surgeries and schools, most of which are already oversubscribed, and limited public transport services.
- Major concerns are held regarding the inadequate transport infrastructure, in particular the A351, which already suffers regular instances of acute traffic congestion and gridlock throughout the year, and the environmental impact of this. The Town Council would also refer Dorset Council to the recent consultation undertaken by the Purbeck Transport Action Group, and the Group's recently published Purbeck Transport Strategy.

In light of the above concerns, reference is again made to point **13.1.5. of the Plan** 'The main challenge for the Swanage area is to ensure its sustainability is maintained and enhanced by reducing the need for residents to travel out of the town for work, shopping and leisure. This all needs to be achieved whilst protecting the outstanding natural environment that makes it popular.'

#### **Policy SWAN4: Swanage townscape character and development**

The SWAN4 policy focuses only on compliance with the Swanage Townscape Character Assessment 2012.

Swanage Local Plan Policy STCD: Townscape Character and Development identified two areas of 'high townscape value' (Swanage and Herston Conservation Areas) and four areas of 'distinctive local character' at Ballard Estate, De Moulham Estate (north and south of Beach Gardens) and Durlston (former 'houses in large gardens' policy area).

The Town Council requests that Policy STCD of the SLP is retained and incorporated into Policy SWAN4 of the draft Dorset Local Plan as it is vitally important that any new development should protect and enhance the local characteristics of these areas in order to maintain the special character of the town. To that end the Town Council would welcome further engagement with Dorset Council around the designation of further such areas, e.g. the Edwardian development of 'New Swanage'.

## **Section 2: Development Strategy**

### **DEV1: Overall Housing Numbers**

The Town Council would wish to raise concerns regarding the method of calculation/basis upon which the level of development required across the county has been determined. Ultimately, housing numbers need to reflect local need not national housing targets.

The number of new homes proposed in the Plan appears to be in excess of Dorset's local housing need in the plan period. It has been calculated using the government's Standard Method for assessing housing growth and seems to have been accepted without challenge by Dorset Council. The Town Council would ask whether the government's recently published response to the 'Changes to the current planning system' consultation will have any impact on proposals in the draft Dorset Local Plan?

<https://www.gov.uk/government/consultations/changes-to-the-current-planning-system/outcome/government-response-to-the-local-housing-need-proposals-in-changes-to-the-current-planning-system>

## **2.8. Meeting the need for employment land**

### **Section 5 Economy – 5.3 Key Employment Sites and Map - ECON1**

It is noted that Victoria Avenue Industrial Estate, Prospect Business Park and Kings Court Business Centre are included on the map of Swanage in the Plan, and are listed as key employment sites in Appendix 6. The Town Council is supportive of this in so far as it is in accordance with Policy ES of the SLP. The status of Kings Court, however, should remain as set out in Policy KCD of the Swanage Local Plan.

**Swanage Section 13.3.2** states that 'The employment sites that serve the town are both vibrant but have little space available for further development. Future employment space could be met through regeneration of the town providing office and starter units.' This acknowledgement of the limited employment opportunities and the limited scope for growth at these sites underpins many of the Town Council's concerns regarding the number of proposed new homes for the town (policies SWAN2 & SWAN3).

### **Section 3: Environment**

Please note that the Town Council's Environmental Policy Working Party will be giving further consideration to the Town Council's response to Section 3 prior to the Extraordinary Meeting.

The Town Council welcomes the devotion of a significant section of the draft Dorset Local Plan to environmental issues. However, the Town Council would encourage Dorset Council to be bolder in its approach, requiring sustainable building design principles to be applied to all new development to minimise environmental impact, and making all new development carbon neutral.

### **3.2. Green infrastructure strategic approach**

Whilst the Town Council welcomes the wording of the Green Infrastructure Strategic Approach this is no substitute for the town's own Green Infrastructure Strategy which was adopted in June 2018.

Under the existing SLP, Policy SGI ensures that all development must take into account improvements to the green infrastructure of Swanage in accordance with the Swanage Green Infrastructure Strategy (GIS). A number of years' work was put into the research, creation and development of the Swanage GIS and the Town Council would therefore request that it is retained as a Supplementary Planning Document. This approach appears to be being used elsewhere in the DLP, for example in the reference to the Dorchester Transport and Environment Plan in Policy D5.

## **Swanage Allotments**

The SLP Policy SA: Swanage Allotments supports the provision of allotments outside of the Swanage settlement boundary, providing these do not harm the Area of Outstanding Natural Beauty.

The Town Council would request that this policy is retained and incorporated into the Swanage Section of the draft Dorset Local Plan. This would be important in providing opportunities for accessible allotment plots around the parish to minimise travelling distances, and to facilitate a potential future social housing scheme on part of the existing allotment site.

## **Section 4: Housing**

### **4.2. Housing Mix**

**Policy HOUS1** provides for housing mix across the county and the Town Council supports this approach. However, it also requests that policy SHM of the SLP is also retained as a helpful defence against new-build second homes in Swanage.

### **HOUS2: Affordable housing**

The Town Council supports the percentage of affordable housing in new development set out in Policy HOUS2. Although 35 per cent represents a reduction on rates within the Purbeck Local Plan, it is hoped that this can be robustly enforced as it has been subject to viability testing.

It is noted that in the Swanage Introduction, point 13.1.1., there is no mention of younger people or social housing. It is felt that Swanage needs more genuinely affordable housing for local people, to rent or buy, and that this should be included in the housing need strategy for the town.

The Town Council is actively working to establish a community-led housing project and would welcome a discussion with Dorset Council regarding the allocation of potential sites in the Dorset Local Plan for community-led social housing. The Council requests retention of the wording around the Prospect Allotment site, which was consulted upon as part of the Swanage Local Plan and carries a degree of public support (together with Policy SA, discussed below). The Town Council is reluctant to lose the clear 'hook' for the development of affordable housing at this location (see paragraphs 172 to 177 of the Swanage Local Plan).

### **Section 4.7. Second homes**

The Town Council requests that the wording of Policy H14: Second Homes of the draft Purbeck Local Plan is retained and incorporated into Section 4.7. of the draft Dorset Local Plan.

This is of particular relevance to Swanage, and also many other villages and coastal areas in the county which have the appearance of 'ghost-towns'/'ghost-streets' in certain areas, e.g. Worth Matravers. Parts of Swanage have been subject to flat development and have no permanent residents living in them at all, many others have less than 50% permanent residents.

It is felt that the negative impacts of second homes start to outweigh the positive impacts when the proportion of second homes crosses a certain threshold, e.g. Swanage is noted as 17.8%, although this figure is somewhat historic and could potentially be a lot higher (as noted in the Purbeck District Council Parish Housing Needs Survey Report for Swanage April 2016, whereby holiday lets pay Business Rates and not Council Tax and are therefore not included in the figure of 17%).

Although the Town Council recognises that second home ownership does bring some economic benefits (e.g. to the local building maintenance sector), the detrimental effect on local communities has been noted in the area, as follows:

- Increasing property prices continue to attract the interest of speculative buyers.
- Closure of previously long-standing businesses, including pubs and small convenience type shops/post offices.
- Local groups/clubs have suffered with dwindling membership numbers, e.g. local Chamber of Trade and the Purbeck Society, and some have even disbanded e.g. the longstanding Swanage Lions Club.
- Limited renting/purchasing opportunities for local residents on low incomes - increased house prices and premium rents seen, and a large number of properties are only available for 'seasonal' short-term renting.
- Concerns regarding more vulnerable residents e.g. the elderly, being left somewhat 'isolated' in these areas/developments.
- Not considered to be an efficient use of a scarce resource. Given that the area cannot supply all housing to meet demand, then we have to consider a restriction on that demand.

An error has been noted in the draft Dorset Local Plan document – the second homes figure for Swanage has been quoted as 1% instead of 17.8%.

#### **Section 4.11. Gypsies, Travellers and travelling showpeople**

The Town Council is not in support of the proposed Washpond Lane site as a large portion of the site is inappropriate for this development as it is subject to flooding (is in a flood zone). The site was previously rejected for this use following a Dorset wide public consultation which ran from November 2011 to Feb 2012. Please see [Dorset Consultation Final Report of Issues and Options Consultation 2011-12](#), page 46 refers.

Also, in view of the location of the site, the Town Council does not believe that it would be best for gypsy and traveller communities because it would be isolating for them.

Were the site to be developed in any way the Town Council believes it should be for a community use.

#### **Section 6: Community Infrastructure**

##### **Policy COM4**

Swanage Town Council welcomes the countywide protection of public open spaces. However, it once again requests that the additional local protection provided by the Swanage Local Plan, in Policy OSR, should be retained.

## **Section 6.7. Transport network**

The Town Council supports Dorset Council's policy to reduce traffic impacts and again reiterates its concerns regarding the A351 which already suffers regular instances of acute traffic congestion and gridlock, and the environmental impact of this.

In recent years sizeable sums of money have been spent on the onward rail connection of the Swanage Railway to Wareham from its current passenger-carrying terminus at Norden. The Town Council is disappointed to note that there is no mention of continuing Dorset Council support for this important project in the draft Dorset Local Plan, which fits in with Dorset Council's aims of sustainability of transport modes and sustainable tourism.

## **Consultation process**

Major concerns are held by the Town Council regarding the timing of such an important consultation, during a national lockdown period, and its shortcomings e.g. website functionality/navigation. The Town Council raises the question as to whether this complies with best practice on consultation.

Comments are made that any references to policies regarding Swanage in the main body of the draft Dorset Local Plan should either also be included in the Swanage Section of the Plan, or at least have a link from the Swanage Section through to the main Plan as it was difficult to link relevance of policies to Swanage.

A sizeable number of concerns/questions have also been received from local residents including:

- That the consultation is being undertaken during a national lockdown period.
- A large proportion of the local community had been unaware that the consultation was taking place.
- Leaflet drops have been undertaken in some areas by local residents themselves to make more people aware, which had created some confusion amongst residents, many of whom contacted or submitted their emails/letters/responses to the Town Council instead of Dorset Council.
- The Dorset Council website is difficult to navigate and 'off-putting' to some residents, issues also experienced with functionality of the website when trying to find information within the consultation documents, and when trying to complete the online questionnaire.
- Concerns regarding the limited public consultation that has taken place in Swanage.
- The consultation documents are sizeable and a paper copy of the plan is only available from Swanage Library, a fact which many residents were unaware of.
- In view of the above limitations, a recommendation is made that Dorset Council should consider extending the timescale for the consultation to give residents more time to overcome these issues, or consider delaying the consultation to later in the year when face to face consultation could be undertaken.

### **Prepared by:**

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