



Dorset Council Consultation Response Document:

Proposed Main Modifications to the Purbeck Local Plan

Contents

| | |
|--|-----------|
| Context for consultation on proposed Main Modifications..... | 12 |
| Consultation on proposed Main Modifications | 14 |
| Composite schedule of proposed Main Modifications | 14 |
| Covid-19 pandemic | 14 |
| Consultation on composite schedule of proposed Main Modifications | 15 |
| Who was consulted? | 16 |
| How the publication occurred | 16 |
| Responses on proposed Main Modifications..... | 19 |
| Council summary of relevant matters of issues raised through consultation relating to proposed Main Modifications..... | 22 |
| Proposed Main Modification 1: Chapter 1, Introduction, paragraph 3 | 25 |
| Summary of matters / issues raised in responses | 25 |
| Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound | 25 |
| Council Response | 26 |
| Proposed Main Modification 2: Chapter 1, Introduction, paragraph 7 | 28 |
| Summary of matters / issues raised in responses | 28 |
| Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound | 28 |
| Council Response | 28 |
| Proposed Main Modification 3: Chapter 2, Vision and Objectives, paragraphs 43 and 44..... | 30 |
| Summary of matters / issues raised in responses | 30 |
| Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound | 30 |
| Council Response | 30 |
| Proposed Main Modification 5: Chapter 2, Vision and Objectives, Policy V1: Spatial strategy for sustainable communities | 32 |
| Summary of matters / issues raised in responses | 32 |
| Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound | 32 |
| Council Response | 33 |
| Proposed Main Modification 6: Chapter 2, Vision and Objectives, paragraphs 45 to 48..... | 35 |

| | |
|--|-----------|
| Summary of matters / issues raised in responses | 35 |
| Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound | 35 |
| Council Response | 36 |
| Proposed Main Modification 7: Chapter 2, Vision and Objectives, Policy V2..... | 38 |
| Summary of matters / issues raised in responses | 38 |
| Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound | 38 |
| Council Response | 39 |
| Proposed Main Modification 8: Chapter 3 Environment, paragraphs 52, 53, and 54 . | 41 |
| Summary of matters / issues raised in responses | 41 |
| Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound | 41 |
| Council Response | 41 |
| Proposed Main Modification 9: Chapter 3, Environment, Policy E1 | 42 |
| Summary of matters / issues raised in responses | 42 |
| Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound | 42 |
| Council Response | 42 |
| Proposed Main Modification 10: Chapter 3, Environment, insert new paragraph between paragraphs 59 and 60..... | 43 |
| Summary of matters / issues raised in responses | 43 |
| Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound | 43 |
| Council Response | 43 |
| Proposed Main Modification 14: Chapter 3, Environment, paragraph 81 | 44 |
| Summary of matters / issues raised in responses | 44 |
| Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound | 44 |
| Council Response | 44 |
| Proposed Main Modification 15: Chapter 3, Environment, paragraph 83 (insertions and deletions)..... | 45 |
| Summary of matters / issues raised in responses: | 45 |
| Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound | 45 |
| Council Response | 45 |

| | |
|--|-----------|
| Proposed Main Modification 16: Chapter 3, Environment, paragraph 85 (insertions) | 47 |
| | 47 |
| Summary of matters / issues raised in responses:..... | 47 |
| Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound..... | 47 |
| Council Response | 47 |
| Proposed Main Modification 19: Chapter 3, Environment, Policy E7 | 49 |
| Summary of matters / issues raised in responses | 49 |
| Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound | 49 |
| Council Response | 49 |
| Proposed Main Modification 20: Chapter 3, Environment, Policy E8..... | 50 |
| Summary of matters / issues raised in responses | 50 |
| Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound | 50 |
| Council Response | 50 |
| Proposed Main Modification 21: Chapter 3, Environment, Policy E9..... | 52 |
| Summary of matters / issues raised in responses:..... | 52 |
| Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound | 52 |
| Council Response | 53 |
| Proposed Main Modification 23: Chapter 3, Environment, Policy E10..... | 54 |
| Summary of matters / issues raised in responses | 54 |
| Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound | 54 |
| Council Response | 54 |
| Proposed Main Modification 24: Chapter 3, Environment, Policy E12..... | 56 |
| Summary of matters / issues raised in responses | 56 |
| Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound | 56 |
| Council Response | 56 |
| Proposed Main Modification 25: Chapter 4, Housing, paragraph 110 and 111, insertions and deletions..... | 57 |
| Summary of matters / issues raised in responses | 57 |
| Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound..... | 57 |

| | |
|--|-----------|
| Council Response | 57 |
| Proposed Main Modification 26: Chapter 4, Housing, Policy H1 | 59 |
| Summary of matters / issues raised in responses | 59 |
| Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound | 59 |
| Council Response | 60 |
| Proposed Main Modification 27: Chapter 4, Housing, paragraph 114..... | 61 |
| Summary of matters / issues raised in responses | 61 |
| Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound | 61 |
| Council Response | 61 |
| Proposed Main Modification 28: Chapter 4, Housing, paragraphs 116 and 118..... | 63 |
| Summary of matters / issues raised in responses | 63 |
| Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound | 63 |
| Council Response | 63 |
| Proposed Main Modification 29: Chapter 4, Housing, Trajectory | 64 |
| Summary of matters / issues raised in responses | 64 |
| Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound | 64 |
| Council Response | 65 |
| Proposed Main Modification 30: Chapter 4, Housing, Policy H2 | 66 |
| Summary of matters / issues raised in responses | 66 |
| Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound | 66 |
| Council Response | 66 |
| Proposed Main Modification 31: Chapter 4, Housing, paragraph 118..... | 68 |
| Summary of matters / issues raised in responses | 68 |
| Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound | 68 |
| Council Response | 68 |
| Proposed Main Modification 32: Chapter 4, Housing, Policy H3 | 69 |
| Summary of matters / issues raised in responses | 69 |
| Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound | 69 |
| Council Response | 70 |

| | |
|--|-----------|
| Proposed Main Modification 35: Chapter 4, Housing, Policy H4 | 72 |
| Summary of matters / issues raised in responses | 72 |
| Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound | 72 |
| Council Response | 73 |
| Proposed Main Modification 36: Chapter 4, Housing, paragraphs 127, 128, 129, 130 and 131 | 75 |
| Summary of matters / issues raised in responses | 75 |
| Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound | 75 |
| Council Response | 75 |
| Proposed Main Modification 37: Chapter 4, Housing, changes to paragraph 133 and insert new paragraph after | 77 |
| Summary of matters / issues raised in responses | 77 |
| Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound | 77 |
| Council Response | 77 |
| Proposed Main Modification 38: Chapter 4, Housing, Policy H5 | 78 |
| Summary of matters / issues raised in responses | 78 |
| Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound | 79 |
| Council Response | 80 |
| Proposed Main Modification 39: Chapter 4, Housing, paragraph 134..... | 82 |
| Summary of matters / issues raised in responses | 82 |
| Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound | 82 |
| Council Response | 82 |
| Proposed Main Modification 40: Chapter 4, Housing, Policy H6 | 83 |
| Summary of matters / issues raised in responses | 83 |
| Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound | 83 |
| Council Response | 83 |
| Proposed Main Modification 41: Chapter 4, Housing, Policy H7 | 85 |
| Summary of matters / issues raised in responses | 85 |
| Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound | 85 |

| | |
|--|-----------|
| Council Response | 85 |
| Proposed Main Modification 42: Chapter 4, Housing, Paragraphs 148 and 149 (insertions and deletions) | 86 |
| Summary of matters / issues raised in responses | 86 |
| Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound | 86 |
| Council Response | 86 |
| Proposed Main Modification 43: Chapter 4, Housing, Policy H8 | 88 |
| Summary of matters / issues raised in responses | 88 |
| Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound | 88 |
| Council Response | 89 |
| Proposed Main Modification 45: Chapter 4, Housing, Policy H9 | 91 |
| Summary of matters / issues raised in responses | 91 |
| Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound | 91 |
| Council Response | 91 |
| Proposed Main Modification 49: Chapter 4, Housing, Paragraphs 171 and 172, Alterations / Insertions / Deletions | 92 |
| Summary of matters / issues raised in responses | 92 |
| Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound | 92 |
| Council Response | 92 |
| Proposed Main Modification 50: Chapter 4, Housing, paragraph 176 and 177..... | 93 |
| Summary of matters / issues raised in responses | 93 |
| Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound | 93 |
| Council Response | 93 |
| Proposed Main Modification 52: Chapter 4, Housing, Policy H12 | 94 |
| Summary of matters / issues raised in responses | 94 |
| Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound | 94 |
| Council Response | 94 |
| Proposed Main Modification 53: Chapter 4, Housing, Insert New Paragraph (after 181)..... | 96 |
| Summary of matters / issues raised in responses | 96 |

| | |
|--|------------|
| Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound | 96 |
| Council Response | 96 |
| Proposed Main Modification 54: Chapter 4, Housing, Policy H13 | 97 |
| Summary of matters / issues raised in responses | 97 |
| Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound | 97 |
| Council Response | 97 |
| Proposed Main Modification 57: Chapter 4, Housing, Policy H14 | 98 |
| Summary of matters / issues raised in responses | 98 |
| Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound | 98 |
| Council Response | 98 |
| Proposed Main Modification 59: Chapter 4, Housing, Paragraphs 191 and 192 | 99 |
| Summary of matters / issues raised in responses | 99 |
| Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound | 99 |
| Council Response | 99 |
| Proposed Main Modification 60: Chapter 4, Housing, Policy H15 | 100 |
| Summary of matters / issues raised in responses | 100 |
| Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound | 100 |
| Council Response | 100 |
| Proposed Main Modification 61: Chapter 5, Economy, Policy EE1 | 101 |
| Summary of matters / issues raised in responses | 101 |
| Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound | 101 |
| Council Response | 102 |
| Proposed Main Modification 63: Chapter 5, Economy, Policy EE2 | 104 |
| Summary of matters / issues raised in responses | 104 |
| Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound | 104 |
| Council Response | 104 |
| Proposed Main Modification 65: Chapter 5, Economy Policy EE3 | 105 |
| Summary of matters / issues raised in responses | 105 |

| | |
|--|------------|
| Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound | 105 |
| Council Response | 105 |
| Proposed Main Modification 66: Chapter 5 Economy, Policy EE4 | 107 |
| Summary of matters / issues raised in responses | 107 |
| Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound | 107 |
| Council Response | 107 |
| Proposed Main Modification 69: Chapter 6, Infrastructure, Policy I1 | 109 |
| Summary of matters / issues raised in responses | 109 |
| Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound | 109 |
| Council Response | 109 |
| Proposed Main Modification 72: Chapter 6, Infrastructure, paragraph 249 | 110 |
| Summary of matters / issues raised in responses | 110 |
| Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound | 110 |
| Council Response | 110 |
| Proposed Main Modification 73: Chapter 6, Infrastructure, Policy I3 | 111 |
| Summary of matters / issues raised in responses | 111 |
| Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound | 111 |
| Council Response | 111 |
| Proposed Main Modification 77: Chapter 6, Infrastructure, Policy I5 | 112 |
| Summary of matters / issues raised in responses | 112 |
| Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound | 112 |
| Council Response | 113 |
| Proposed Main Modification 78: Chapter 6, Infrastructure, Policy I6 | 115 |
| Summary of matters / issues raised in responses | 115 |
| Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound | 115 |
| Council Response | 115 |
| Proposed Main Modification 81: Chapter 6, Infrastructure, Policy I7 | 116 |
| Summary of matters / issues raised in responses | 116 |

| | |
|---|------------|
| Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound | 116 |
| Council Response | 116 |
| Proposed Main Modification 82: Chapter 7, Implementation delivery and monitoring framework, monitoring framework | 117 |
| Summary of matters / issues raised in responses | 117 |
| Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound | 117 |
| Council Response | 117 |
| Proposed Main Modification 84: Insert Appendix 1 | 118 |
| Summary of matters / issues raised in responses | 118 |
| Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound | 118 |
| Council Response | 118 |
| Proposed Main Modification 85: Insert Appendix 2 | 119 |
| Summary of matters / issues raised in responses | 119 |
| Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound | 119 |
| Council Response | 119 |
| Council summary of matters / issues raised through consultation relating to accompanying documents | 120 |
| Accompanying document: Habitats Regulation Assessment (HRA) [MMCD3] | 120 |
| Summary of matters / issues raised in responses | 120 |
| Changes which the respondent considers are necessary to make the Purbeck Local Plan legally compliant..... | 121 |
| Council Response | 121 |
| Accompanying document: Sustainability Appraisal (SA) [MMCD4]..... | 132 |
| Summary of matters / issues raised in responses | 132 |
| Changes which the respondent considers are necessary to make the Purbeck Local Plan legally compliant..... | 132 |
| Council response..... | 132 |
| Accompanying document: SD93 | 133 |
| Summary of matters / issues raised in responses | 133 |
| Changes which the respondent considers are necessary to make the Purbeck Local Plan effective | 133 |
| Council Response | 133 |

| | |
|---|------------|
| Accompanying document: Local Plan Policies Map | 134 |
| Summary of matters / issues raised in responses | 134 |
| Changes which the respondent considers are necessary to make the Purbeck Local Plan effective | 134 |
| Council Response | 134 |

Appendices

| | |
|--|-----|
| Appendix 1 – Consultation response form..... | 136 |
| Appendix 2 - Notification letter for consultation on proposed Main Modifications | 151 |

Context for consultation on proposed Main Modifications

1. This document relates to the Purbeck Local Plan (2018 – 2034). The local plan was submitted for examination by the Secretary of State in January 2019. A Planning Inspector was appointed to examine the local plan and a series of public hearing sessions were held in July, August and October 2019. The hearing sessions were held to allow examination of the following matters identified by the Planning Inspector:
 - Matter A: Legal compliance and procedural requirements;
 - Matter B: Housing need and requirements;
 - Matter C: Green Belt;
 - Matter D: The strategy for development;
 - Matter E: Housing;
 - Matter F: Environment;
 - Matter G: Economy;
 - Matter H: Infrastructure; and
 - Matter I: Implementation, delivery and monitoring. (A full copy of the Planning Inspector's Matters, Issues and Questions is available on the council's website by following this link: [cor10-2019-05-10-matters-issues-and-questions-final.pdf \(dorsetcouncil.gov.uk\)](https://www.dorsetcouncil.gov.uk/cor10-2019-05-10-matters-issues-and-questions-final.pdf)).
2. During the examination (prior to any further consultations) the council asked the Inspector to recommend Main Modifications to the local plan to resolve soundness and legal compliance issues.
3. The council received a Post Hearing Note from the Planning Inspector in March 2020 following the last hearing session in 2019. (The Planning Inspector's Post Hearing Note is available on the council's website by following this link: [post-hearings-note-20-03-2020.pdf \(dorsetcouncil.gov.uk\)](https://www.dorsetcouncil.gov.uk/post-hearings-note-20-03-2020.pdf)). The Planning Inspector's note takes account of:
 - Responses from interested parties on the scope and content of the local plan (the responses which the council received on the scope and content of the local plan through earlier consultation are summarised in reports presented on its website which can be viewed by following this link: [Past Consultations and Evidence - Dorset Council](https://www.dorsetcouncil.gov.uk/past-consultations-and-evidence)).
 - Responses from interested parties on whether they consider the pre-submission draft of the Purbeck Local Plan is sound and legally compliant. (The responses on the pre-submission draft Purbeck Local Plan are presented on the council's website and can be accessed by

following this link: [Responses received to the Purbeck Local Plan regulation 19 publication draft policies - Dorset Council](#)).

- Responses from interested parties on the Inspector's Matters, Issues and Questions (published in advance of the examination hearing sessions to provide a framework for discussion of key issues during the hearing sessions). (Representor comments in response to the Inspector's Matters, Issues and Questions are presented on the 'examination' page of the council's web site which can be viewed by following this link: [Purbeck Local Plan Examination - Dorset Council](#)).
 - The verbal representations made by participants during the examination hearing sessions held in 2019.
4. The Inspector's note sets out a series of changes that she considered needed to be made to the local plan, and schedule of suggested Main Modifications (SD14), to make the local plan sound and legally compliant.

Consultation on proposed Main Modifications

Composite schedule of proposed Main Modifications

5. In response to the Inspector's Post Hearing Note the council prepared an updated composite schedule of proposed Main Modifications (MMCD1). This schedule superseded the earlier schedule of Main Modifications (SD14) that was published during the examination hearing sessions. The Inspector also asked the council to prepare:
 - an updated / revised Habitats Regulation Assessment (HRA). (The revised HRA considers the implications of proposed Main Modifications and addresses a number of matters raised in written representations and in verbal contributions to the hearing sessions¹);
 - an updated Sustainability Appraisal (SA). (The revised SA considers the implications of proposed Main Modifications and the findings of the appropriate assessment in the HRA);
 - an updated report to show a deliverable five year supply of housing land beginning with the year when the local plan is likely to be adopted; and
 - details of changes to the local plan policies map made in response to changes or corrections to the local plan.

Covid-19 pandemic

6. The consultation was undertaken during the Covid-19 pandemic. In response to the pandemic the government has enacted legislation to secure social distancing to limit the spread of Covid-19. In response to these laws, and the need to maintain social distancing, the council has closed council offices to members of the public, and where possible has required staff to use digital technology in order to allow them to work remotely from their homes.
7. Before beginning the consultation the council reviewed whether it would be appropriate to delay this next stage of the examination process because of Covid-19. It decided to continue with the consultation because:
 - the local plan plays a key role in delivering the homes, and employment land, needed in the Purbeck area (in the short and medium term); and
 - the policies in the local plan, including those relating to housing allocations and employment land, will enable economic growth and support recovery from the impacts of the Covid-19 pandemic.
8. Delaying the consultation would also be likely to delay economic recovery in the Purbeck area. The council's decision to continue with the consultation is consistent with a Written Ministerial Statement (May 2020) from government,

¹ Summarised in further detail in paragraphs 5 and 6 of the Planning Inspector's Post Hearing Note.

which states that councils and the Planning Inspectorate should seek to ensure that the planning process continues to operate effectively to support economic recovery. (The Written Ministerial Statement is available to view on the government's website by following this link: [Written statements - Written questions, answers and statements - UK Parliament](#)).

Consultation on composite schedule of proposed Main Modifications

9. The council published its revised schedule of proposed Main Modifications and associated documents (including those requested by the Planning Inspector detailed above), on 13th November 2020. The council initially arranged for the consultation to take place over 8 weeks (closing on Friday 8th January 2021). During the consultation the council became aware of errors in the proposed composite schedule of Main Modifications. It issued a document summarising these errors and published an updated composite schedule of Main Modifications on 3rd December 2020. To give interested parties the opportunity to consider these revisions the council extended the duration of the consultation to end on the 15th January 2021. (From the date when the updated composite schedule of Main Modifications was published, on the 3rd December, interested parties had 6 weeks to consider the revisions and make their response). The total duration of the consultation, and the 6 week period between the date when the updated composite schedule of Main Modifications was published and the closing date for the consultation, were both consistent with the guidance provided by the Planning Inspectorate relating to consultation on Main Modifications. The Planning Inspectorate Procedure Guide for Local Plan Examinations can be accessed from government's website by following this link: [Procedure Guide for Local Plan Examinations - GOV.UK \(www.gov.uk\)](#).
10. With the exception of making documents available to inspect at council and town council offices, the consultation was carried out in accordance with the council's Statement of Community Involvement 2020 (the council's Statement of Community Involvement can be viewed by following this link its website: [december-2020-updated-dorset-council-statement-of-community-involvement.pdf \(dorsetcouncil.gov.uk\)](#)). The council made changes to its Statement of Community Involvement (SCI) in response to social distancing restrictions which were being applied to restrict the spread of Covid-19².

² The council was also mindful of the Town and Country Planning (Local Planning, Development Management Procedure, Listed Buildings etc.) (England) (Coronavirus) (Amendment) Regulations 2020. These regulations adjusted the council's responsibilities in respect to Regulation 18 and 19 consultations relating to emerging local plan plans. (Procedure Guide for Local Plan Examinations states that: 'the nature and duration of the consultation should reflect that of the consultation held at Regulation 19 stage'). Regulation 35 was amended by the 2020 Order so that a document is deemed to be made available when published on a council's website. The requirement to make documents available for inspection is removed by the 2020 Order and there is no requirement to provide hard copies of documents.

11. The Council designed its response form to obtain people's views on whether they considered that the proposed Main Modifications (where appropriate having regard to supporting documents) were sound and legally compliant. (See Appendix 1 for a copy of the council's response form).
12. The response form was available to complete online (the Council's stated preference) or on paper. The form allowed respondents to specify which proposed Main Modification they were commenting on. Responses submitted electronically or in paper copy were accepted provided they were received by the deadline (15 January 2021) for making representation. The council treated any representations received after 15th January 2021 as late and not duly made. These responses have not been forwarded to the Inspector for her consideration.

Who was consulted?

13. Apart from making documents available to inspect at council and town council offices, the consultation was carried out in accordance with the requirements set out within the council's Statement of Community Involvement (the council's Statement of Community Involvement can be access by following this link to its website: [december-2020-updated-dorset-council-statement-of-community-involvement.pdf \(dorsetcouncil.gov.uk\)](https://www.dorsetcouncil.gov.uk/media/1234567890/december-2020-updated-dorset-council-statement-of-community-involvement.pdf)).
14. In accordance with the process relating to consultations undertaken for Regulation 19 of The Town and Country Planning (Local Planning) (England) Regulations 2012, all specific and general consultees were notified when the proposed Main Modifications would be published by either letter or email. A copy of the notification letter is presented in Appendix 2 of this document. The general consultees who were notified include community groups, voluntary groups, landowners and agents who had previously asked to be consulted. (The general and specific consultation bodies are listed in Appendix 8 of the council's Regulation 22 consultation statement [SD07] which can be viewed by following this link to the council's website: [Purbeck Local Plan Submission - Dorset Council](https://www.dorsetcouncil.gov.uk/media/1234567890/Purbeck-Local-Plan-Submission-Dorset-Council))
15. As with the earlier Regulation 19 pre-submission publication of the Purbeck Local Plan, the Council also notified those residents and local businesses, who were recorded on its database.

How the publication occurred

16. The Written Ministerial Statement (May 2020) prepared by government to provide guidance to councils when carrying out their functions in relation to planning states that:

'During these exceptional circumstances, the Government considers that online inspection of documents should be the default position across all planning regimes...'
(<https://www.parliament.uk/business/publications/written-questions-answers-statements/written-statement/Commons/2020-05-13/HCWS235/>).

17. Taking account of relevant laws and policies relating to Covid-19 and the ministerial statement, the following methods were used to give notice that the proposed Main Modifications had been published / make documents available for comment:

- all documents were accessible from the council's website (the council's website also included an online representation form);
- physical copies of selected key documents were made available to loan through an order and collect service at local libraries (including Lytchett Matravers, Wareham, Wool, Swanage and Dorchester – the procedure for loaning documents followed the council's policies for preventing the spread of Covid-19);
- the council placed public notices in local newspapers (Dorset and Bournemouth Echo);
- the council organised a press release;
- the council asked Town and Parish Councils to erect posters on local notice boards;
- interested parties were given the opportunity to make responses using a paper form that was posted to the council or by editing an electronic copy of the response which was attached an e-mail;
- everyone on the Council's local plan database (refreshed post introduction of the General Data Protection Regulations 2018) was notified of the consultation either in writing or by email (see appendix 6 for a copy of the notification letter); and
- details of the proposed Main Modification were publicised using social media.

18. Other than making copies of the consultation documents available for inspection at council and town council offices in Purbeck, the methods used to notify consultation bodies / interested parties are consistent with those which the council used as notification that the pre-submission draft Purbeck Local Plan had been published.

19. In accordance with government's Written Ministerial Statement, the council encouraged interested parties to respond digitally using either:

- an online survey form; or
- an electronic copy of the form attached to an e-mail.

20. The council recognises that some people will have not been able to access documents through its website or to make their response digitally (a small proportion of people and organisations on its database had also expressly indicated that they wished to be contacted and updated by post).

21. The council took specific steps to ensure that these people and organisations had the opportunity to engage with the consultation. These included:

- communicating by post with those people, and organisations, who indicated that this was their preferred method of contact;
- making copies of the consultation documents available for loan from local libraries;
- arranging for posters to be erected in the local community to publicise the consultation; and
- ensuring that officers were available on the telephone to answer questions relating to the consultation documents and the consultation during normal office hours over the consultation period.

22. The council is satisfied that the consultation was carried out fairly and that interested parties have been given the opportunity to make representation on the proposed Main Modifications.

Responses on proposed Main Modifications

23. The council received a total of 40 responses on the proposed Main Modifications. The number of representations received is lower than at earlier stages during the plan making process. The council considers that the lower level of response reflects the limited nature of the most recent consultation (which is restricted to a consideration of proposed Main Modifications and attendant documents) and the earlier opportunities to make representation / participate in the examination hearing sessions that were held in summer and autumn of 2019.

| Consultation | Level of response |
|---|-----------------------|
| Regulation 18 issues and options consultation (2015) | 484 representations |
| Regulation 18 Partial review options consultation (2016) | 3,300 representations |
| Regulation 18 new homes for Purbeck consultation (2018) | 6,762 representations |
| Regulation 19 pre-submission draft Purbeck Local Plan | 195 representations |
| Proposed Main Modifications to the Purbeck Local Plan | 40 representations |

Table 1: Representations on local plan consultations

24. The table below lists all respondents who raised comment through the current consultation. Where a respondent has previously made representation the council has referred to their consultee reference (those respondents who had not already made representation have not been assigned consultee references) and assigned each respondent a consultation reference.

| Respondent | Consultee reference | Consultation reference |
|--|---------------------|------------------------|
| Robin Caudell | 1190127 | 01 |
| Rob Holden | 1189740 | 02 |
| Dr Mary Sparks on behalf of Langton Matravers Parish Council | 1187733 | 03 |
| Bob Sharples on behalf of Sport England | 996269 | 04 |
| Steve Smith on behalf of Wool Parish Council | 1189783 | 05 |
| Richard Brown on behalf of the Dorset Area of Outstanding Natural Beauty Team | 1188577 | 06 |
| Martin Miller (Terence O'Rourke) on behalf of Moreton Estate | 1190993 | 07 |
| Martin Miller (Terence O'Rourke) on behalf of Rempstone Estate | 1191014 | 08 |
| Clare Lees | 1189887 | 09 |

| Respondent | Consultee reference | Consultation reference |
|---|----------------------------|-------------------------------|
| Dr David Evans on behalf of Wareham Neighbourhood Plan Steering Group | 1188328 | 10 |
| Dr David Evans on behalf of Wareham Neighbourhood Plan Steering Group | 1188328 | 11 |
| Wendy Riddle | 1188362 | 12 |
| Graeme Tulley | 1191258 | 13 |
| Bernard White | 1186981 | 14 |
| F.M. Redman | | 15 |
| Chapman Lily Planning on behalf of Birchmere Ltd | 1190858 | 16 |
| Turley on behalf of Wyatt Homes | 1190022 | 17 |
| M N Hill on behalf of Moreton Parish Council | 1188470 | 18 |
| Mr A Elliot (Terence O'Rouke) Bloor Homes Southern | 1190247 | 19 |
| Cllr Barry Quinn on behalf of East Stoke Parish Council | | 20 |
| Emily Blake on behalf of West Lulworth Parish Council | 1190735 | 21 |
| G M Rigler on behalf of the Campaign for the Protection of Rural England | | 22 |
| Wareham Town Council | | 23 |
| Southern Gas Network | | 24 |
| Mr Andrew Wilson | 1187806 | 25 |
| Alan Bagley | 1191476 | 26 |
| Dr A C Warne | 1190865 | 27 |
| Natural England | 1186743 | 28 |
| Savills on behalf of Wool Urban Extension Landowners | 1190693 | 29 |
| Wessex Water | 1190241 | 30 |
| Historic England | | 31 |
| Dr. A Langley | 1191908 | 32 |
| Freeths on behalf of Peter Bowyer (on behalf of CPRE) and Dr A. Langley | | 33 |
| The Planning Bureau on behalf of The Retirement Housing Consortium | 1192742 | 34 |
| Rachel Palmer | 1185234/1187112 | 35 |
| Pro Vision Planning and Design on behalf of Charborough Estate | 1190180 | 36 |
| Carter Jonas on behalf of Welbeck Land | 1188067 | 37 |

| Respondent | Consultee reference | Consultation reference |
|--|----------------------------|-------------------------------|
| Avison Young, Central Square South on behalf of Nuclear Decommissioning Authority | 996330 | 38 |
| Origin 3 on behalf of Halsall Homes | 1191135 | 39 |
| Office for Nuclear Regulation | | 40 |

Table 2: Council summary of responses to proposed Main Modifications and consultation documents

Council summary of relevant matters of issues raised through consultation relating to proposed Main Modifications

25. This section of the consultation report includes the council's summary of the matters and issues which it considers were raised in responses to the consultation. Copies of the responses are presented in full in three separate documents. The council has only sought to summarise those matters and issues raised through responses which it considers could be relevant to whether the proposed Main Modifications to the Purbeck Local Plan (2018-2034) (taking account of related documents) are legally compliant and sound. Where a response indicates support for a proposed Main Modification or supporting consultation document it has not been recorded in this report. Similarly, if a response includes matters or issues which the council felt were outside the scope of the current consultation it may not have been summarised in this part of the report.
26. The table below summarises which of the proposed Main Modifications or consultation documents the council has received representations on, the number of respondents and the number of relevant matters or issues relating to each representation.

| Reference proposed Main Modification or consultation document | Number of respondents | Number of relevant matters and issues raised by respondents |
|---|-----------------------|---|
| Proposed Main Modification 1 | 2 | 8 |
| Proposed Main Modification 2 | 3 | 3 |
| Proposed Main Modification 3 | 2 | 3 |
| Proposed Main Modification 5 | 5 | 7 |
| Proposed Main Modification 6 | 4 | 10 |
| Proposed Main Modification 7 | 4 | 6 |
| Proposed Main Modification 8 | 1 | 1 |
| Proposed Main Modification 9 | 1 | 1 |
| Proposed Main Modification 10 | 1 | 1 |
| Proposed Main Modification 14 | 2 | 2 |
| Proposed Main Modification 15 | 1 | 1 |
| Proposed Main Modification 16 | 2 | 4 |
| Proposed Main Modification 19 | 2 | 2 |
| Proposed Main Modification 20 | 3 | 5 |
| Proposed Main Modification 21 | 4 | 6 |
| Proposed Main Modification 23 | 2 | 5 |
| Proposed Main Modification 24 | 1 | 1 |
| Proposed Main Modification 25 | 2 | 4 |
| Proposed Main Modification 26 | 4 | 6 |
| Proposed Main Modification 27 | 2 | 5 |
| Proposed Main Modification 28 | 2 | 2 |
| Proposed Main Modification 29 | 2 | 6 |
| Proposed Main Modification 30 | 2 | 5 |
| Proposed Main Modification 31 | 1 | 1 |

| Reference proposed Main Modification or consultation document | Number of respondents | Number of relevant matters and issues raised by respondents |
|---|-----------------------|---|
| Proposed Main Modification 32 | 5 | 9 |
| Proposed Main Modification 35 | 4 | 7 |
| Proposed Main Modification 36 | 3 | 3 |
| Proposed Main Modification 37 | 2 | 2 |
| Proposed Main Modification 38 | 9 | 11 |
| Proposed Main Modification 39 | 1 | 1 |
| Proposed Main Modification 40 | 3 | 4 |
| Proposed Main Modification 41 | 2 | 2 |
| Proposed Main Modification 42 | 2 | 3 |
| Proposed Main Modification 43 | 5 | 6 |
| Proposed Main Modification 45 | 2 | 1 |
| Proposed Main Modification 49 | 1 | 1 |
| Proposed Main Modification 50 | 1 | 1 |
| Proposed Main Modification 52 | 2 | 2 |
| Proposed Main Modification 53 | 1 | 1 |
| Proposed Main Modification 54 | 1 | 1 |
| Proposed Main Modification 57 | 2 | 2 |
| Proposed Main Modification 59 | 1 | 1 |
| Proposed Main Modification 60 | 1 | 1 |
| Proposed Main Modification 61 | 4 | 7 |
| Proposed Main Modification 63 | 1 | 1 |
| Proposed Main Modification 65 | 2 | 2 |
| Proposed Main Modification 66 | 3 | 3 |
| Proposed Main Modification 69 | 1 | 1 |
| Proposed Main Modification 72 | 1 | 1 |
| Proposed Main Modification 73 | 1 | 2 |
| Proposed Main Modification 77 | 3 | 8 |
| Proposed Main Modification 78 | 1 | 1 |
| Proposed Main Modification 81 | 1 | 1 |
| Proposed Main Modification 82 | 3 | 3 |
| Proposed Main Modification 84 | 1 | 1 |
| Proposed Main Modification 85 | 1 | 1 |
| Habitats Regulation Assessment [MMCD3] | 5 | 8 |
| Sustainability Appraisal [MMCD4] | 1 | 1 |
| SD93 | 1 | 1 |
| Local Plan Policies Map | 3 | 2 |

Table 3: Council summary of responses to proposed Main Modifications and consultation documents

27. As well as summarising the matters and issues raised in responses the council has also summarised the changes suggested by the respondent which they consider would make the proposed Main Modification legally compliant or sound.

Where the respondent had not suggested a remedy, the council has marked this with N/A.

28. The council has also sought to provide a response to the matters or issue raised by the respondent. It has not presented further evidence on the matter or issue, rather it has sought to:

- draw the Inspector's attention to published evidence or policy which it considers addresses the matter or issue; or
- indicate where further revisions to the proposed Main Modification should be made in response to the representation; or
- indicate where it would not object to the Inspector considering a minor adjustment to the proposed Main Modification.

Proposed Main Modification 1: Chapter 1, Introduction, paragraph 3

Summary of matters / issues raised in responses

29. The council received responses relating to this proposed Main Modification raising the following matters / issues:

- a) Policy E2 should be treated as a strategic policy, reflecting its significance and reference in national policy. (Mr N Hill on behalf of Moreton Parish Council).
- b) Policy E3 should be treated as a strategic policy, reflecting its significance and reference in national policy. (Mr N Hill on behalf of Moreton Parish Council).
- c) Policy E11 should be treated as a strategic policy. (Mr N Hill on behalf of Moreton Parish Council).
- d) Policy EE3 and EE4 should be treated as strategic because of their local significance and reference to national planning policy. (Mr N Hill on behalf of Moreton Parish Council).
- e) Policy I5 should not be treated as a strategic policy because it relates to delivery of the holiday park. (Mr N Hill on behalf of Moreton Parish Council).
- f) Policy I6 should not be treated as a strategic policy because other organisations will have responsibility for delivery. (Mr N Hill on behalf of Moreton Parish Council).
- g) Delete reference in MM1 to the capped housing figure in the Purbeck Local Plan. (Mr N Hill on behalf of Moreton Parish Council).
- h) Historic England considers that 'Policy E2: Historic Environment' should be treated as a strategic policy in the table inserted after paragraph 3, taking account of paragraph 20 of the National Planning Policy Framework (NPPF) 2019 and as part of a positive strategy for the conservation and enjoyment of the historic environment required by paragraph 185 of the NPPF 2019. (Historic England).

Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound

30. Respondents have suggested the following changes:

- a) N/A.
- b) N/A.
- c) N/A.
- d) N/A.

- e) N/A.
- f) N/A.
- g) N/A.
- h) Re-define policy as strategic. (Historic England).

Council Response

31. The council has sought to respond to the matters / issues raised in responses by drawing the Inspector's attention to published evidence and national policy and guidance. Where appropriate it has also indicated where it considers it might be appropriate to consider revision to a proposed Main Modification.

- a) The council has explained in SD91 ([sd91-council-response-to-actions-8-9-and-10-final.pdf \(dorsetcouncil.gov.uk\)](#)) that this policy should be treated as non-strategic because its 'policy aims are connected with achieving high quality development with specific reference to heritage assets.'
- b) The council has explained in SD91 ([sd91-council-response-to-actions-8-9-and-10-final.pdf \(dorsetcouncil.gov.uk\)](#)) that this policy should be treated as non-strategic because its 'policy aims are connected with securing development on suitable sites (having regard to specific criteria) that contributes toward the mitigation of climate change.'
- c) The council has explained in SD91 ([sd91-council-response-to-actions-8-9-and-10-final.pdf \(dorsetcouncil.gov.uk\)](#)) that this policy should be treated as non-strategic because 'the policy relates to specific sewage treatment and pumping stations in Purbeck.'
- d) The council has explained in SD91 ([sd91-council-response-to-actions-8-9-and-10-final.pdf \(dorsetcouncil.gov.uk\)](#)) that this policy should be treated as non-strategic because 'the policy identifies local and town centres in individual settlements across Purbeck.'
- e) The council has explained in SD91 ([sd91-council-response-to-actions-8-9-and-10-final.pdf \(dorsetcouncil.gov.uk\)](#)) that this policy should be treated as strategic because it 'supports the Council's approach to mitigating/avoiding the effects of development in the Council's mitigation strategies relating to European sites.'
- f) The council has explained in SD91 ([sd91-council-response-to-actions-8-9-and-10-final.pdf \(dorsetcouncil.gov.uk\)](#)) that this policy should be treated as strategic because it 'relates to delivery of wider objectives around health/social care infrastructure.'
- g) The Planning Inspector states at paragraph 15 of her Post Hearing Note that 'The PPG indicates that strategic policies adopted with a cap applied, as would be the case here, may require an early review and updating to ensure that any housing need above the capped level is

planned for as soon as is reasonably possible.’ She goes onto state at paragraph 20 that ‘The Council has drafted some modifications (MM28, MM45 and MM46) in relation to the timetable for the delivery of the Dorset Local Plan and the minimum local housing need figure. However, further modification is required to these to indicate that the new Local Plan will serve as the vehicle for an early review in relation to ensuring that any housing need above the capped level is provided for as soon as possible and that thereafter the policies in the Plan should be reviewed every five years and updated as necessary in accordance with the Framework and the Regulations.’ The proposed Main Modification seeks to respond to the matter raised in the Planning Inspector’s note.

h) See council response at paragraph 29 a).

Proposed Main Modification 2: Chapter 1, Introduction, paragraph 7

Summary of matters / issues raised in responses

32. The council received responses relating to this proposed Main Modification raising the following matters / issues:

- a) Proposed Main Modification is unclear and ambiguous. (Mr N Hill on behalf of Moreton Parish Council).
- b) Introduce a reference to the townscape character appraisals (which are adopted Supplementary Planning Documents) in Appendix 1 of the local plan. (Savills on behalf of The Lulworth Estate, Redwood Partnership and Mr Andrew Jackson).
- c) Clarify which takes precedence / carries greater weight as a consideration: an SPD or planning policies in the local plan? (Dr A C Warne).

Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound

33. Respondents have suggested the following changes:

- a) Delete text in the second bullet: '~~interpret these policies (through an objective consideration of the language used in the policy, read in its proper context)~~' and replace with '**The Local Plan policies have been written so as to be clear and unambiguous. The policies say what they mean and mean what they say.**' And replace the final paragraph with: '**The documents listed in the appendix do not form part of the development plan, but provide guidance to applicants. The list of documents is not exclusive or exhaustive. Other documents may be relevant to applicants. The Council will advise applicants which documents it considers relevant to the proposed application.**' (Mr N Hill on behalf of Moreton Parish Council).
- b) Insert the following text into Appendix 1: '**Townscape character appraisal SPDs for Swanage, Wareham, North Wareham, Upton, Bere Regis, Bovington, Corfe Castle, Lytchett Matravers and Wool (2012). (referred to at: paragraph 104 in respect to Policy E12: Design).**' (Savills on behalf of The Lulworth Estate, Redwood Partnership and Mr Andrew Jackson).
- c) N/A.

Council Response

34. The council has sought to respond to the matters / issues raised in responses by drawing the Inspector's attention to published evidence and national policy and guidance. Where appropriate it has also indicated where it considers it might be appropriate to consider revision to a proposed Main Modification.

- a) The council notes the suggested change to the proposed Main Modification but does not consider they are necessary to clarify its meaning.
- b) The council does not object to the suggested change to proposed Main Modification 84 (Appendix 1 of the local plan which lists 'Other documents referred to in the Purbeck Local Plan').
- c) Planning practice guidance states that 'Supplementary planning documents (SPDs) should build upon and provide more detailed advice or guidance on policies in an adopted local plan. As they do not form part of the development plan, they cannot introduce new planning policies into the development plan. They are however a material consideration in decision-making. They should not add unnecessarily to the financial burdens on development.' (Paragraph: 008 Reference ID: 61-008-20190315). The council considers that the proposed Main Modification is consistent with planning practice guidance on this matter and paragraph A6 in the Annex of the Planning Inspector's Post Hearing Note (March 2020).

Proposed Main Modification 3: Chapter 2, Vision and Objectives, paragraphs 43 and 44

Summary of matters / issues raised in responses

35. The council received responses relating to this proposed Main Modification raising the following matters / issues:

- a) Inserted text inaccurate as Moreton Station is not an accessible location. (Mr N Hill on behalf of Moreton Parish Council).
- b) Object to removing reference to Wareham as a location where the plan proposes changes to Green Belt boundaries. (Mr N Hill on behalf of Moreton Parish Council).
- c) Green Belt release around Wareham should continue as initially proposed to provide homes or as a fall-back position if homes are not delivered on the brownfield sites inside Wareham's settlement boundary. (Carter Jonas on behalf of Wellbeck Land).

Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound

36. Respondents have suggested the following changes:

- a) N/A.
- b) N/A.
- c) N/A.

Council Response

37. The council has sought to respond to the matters / issues raised in responses by drawing the Inspector's attention to published evidence and national policy and guidance. Where appropriate it has also indicated where it considers it might be appropriate to consider revision to a proposed Main Modification.

- a) Council notes response but does not agree with conclusion.
- b) National planning policy states that 'Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans.' (Paragraph 136). Taking account of updated housing land supply identified in emerging Wareham Neighbourhood Plan (SD124: [sd124-wareham-neighbourhood-plan-supply-091019.pdf \(dorsetcouncil.gov.uk\)](https://www.dorsetcouncil.gov.uk/media/124476/SD124-wareham-neighbourhood-plan-supply-091019.pdf)), and the council's updated '5 Year Housing Land Supply 2020' report (MMCD5: [purbeck-5-yhls-2020-final-redacted.pdf \(dorsetcouncil.gov.uk\)](https://www.dorsetcouncil.gov.uk/media/124476/purbeck-5-yhls-2020-final-redacted.pdf)) the council no longer considers that there is a justification for changes to Green Belt boundaries around Wareham.

- c) The council is satisfied that the housing sites identified in its updated '5 Year Housing Land Supply 2020' report (see paragraph 22 b) above) are either deliverable or developable in accordance with the definitions provided in the National Planning Policy Framework. The council no longer considers that there is a justification for changes to Green Belt boundaries around Wareham following identification of suitable brownfield sites within the town's existing settlement boundary.

Proposed Main Modification 5: Chapter 2, Vision and Objectives, Policy V1: Spatial strategy for sustainable communities

Summary of matters / issues raised in responses

38. The council received responses relating to this proposed Main Modification raising the following matters / issues:

- a) Housing allocations at Redbridge Pit / Moreton Station are inconsistent with national policy, and the council's approach in the proposed small sites policy (Policy H8), in respect to development in the countryside. (Mr N Hill on behalf of Moreton Parish Council).
- b) The local plan allocates more homes than are needed at Redbridge Pit / Moreton Station. (Mr N Hill on behalf of Moreton Parish Council).
- c) Proposed mitigation is not adequate to avoid adverse impact on habitat sites. (Mr A C Warne).
- d) Lack of consideration of the impact on Sites of Special Scientific Interest. (Mr A C Warne).
- e) The reduction of the housing (207 homes) requirement for Wareham (V1) is not justified and the housing sites identified in the Wareham Neighbourhood Plan are not deliverable. (Carter Jonas on behalf of Wellbeck Land).
- f) Housing requirements should be determined by strategic policies in the local plan rather than neighbourhood plans. (Carter Jonas on behalf of Wellbeck Land).
- g) Housing requirement, including the need for extra care accommodation, is not justified. (Mr S Smith on behalf of Wool Parish Council) (Mr A Wilson).

Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound

39. Respondents have suggested the following changes:

- a) N/A.
- b) N/A.
- c) N/A.
- d) N/A.
- e) N/A.
- f) N/A.

g) N/A.

Council Response

40. The council has sought to respond to the matters / issues raised in responses by drawing the Inspector's attention to published evidence and national policy and guidance. Where appropriate it has also indicated where it considers it might be appropriate to consider revision to a proposed Main Modification.

- a) The council is not proposing substantive changes through proposed Main Modifications to its spatial approach to meeting housing needs in Purbeck. Planning policy gives the council discretion to select an appropriate strategy (paragraph 35 of the National Planning Policy Framework) which identifies suitable sites that can deliver new homes in Purbeck.
- b) The council has used the government's method to assess the numbers of homes needed in Purbeck as a whole (see paragraph 13 of the Planning Inspector's Post Hearing Note: [post-hearings-note-20-03-2020.pdf \(dorsetcouncil.gov.uk\)](https://www.dorsetcouncil.gov.uk/media/2020/03/post-hearings-note-20-03-2020.pdf)). The submission draft Purbeck Local Plan includes an explanation of the 'Spatial strategy for sustainable communities' and the council has considered the implications around meeting the housing requirement that was defined during the examination through SD85: Housing Need ([sd85-housing-need-12-08-2019.pdf \(dorsetcouncil.gov.uk\)](https://www.dorsetcouncil.gov.uk/media/2019/08/sd85-housing-need-12-08-2019.pdf)).
- c) The council has conducted a Habitats Regulation Assessment (HRA) of the Purbeck Local Plan and updated this to take account of proposed Main Modifications (MMCD3: [purbeck-lp-main-modifications-hra-231020-final.pdf \(dorsetcouncil.gov.uk\)](https://www.dorsetcouncil.gov.uk/media/2020/03/purbeck-lp-main-modifications-hra-231020-final.pdf)). In summary the HRA states: 'This HRA has screened all policies and allocations for likely significant effects on European sites. Due to their proximity, allocations will require effective mitigation in line with the established strategic approaches for the Dorset Heathlands and Poole Harbour. For the housing sites, it is anticipated that adherence to the strategic mitigation approaches will provide adequate protection for the European sites, but it will be important for site specific considerations to be taken into account for each mitigation package. There are identified uncertainties and need for project level HRA in relation to some employment sites. At the plan level, it is concluded that adverse effects on European sites can be prevented with adequate safeguards at the project level.' (Page 3).
- d) The Purbeck Local Plan includes strategic policies relating to Sites of Special Scientific Interest (Policies E7, E8 and E9). Natural England and other interested parties have been given the opportunity to make representation on development strategies and planning policies in the emerging local plan.
- e) The council's updated '5 Year Housing Land Supply 2020' report (MMCD5: [purbeck-5-yhls-2020-final-redacted.pdf \(dorsetcouncil.gov.uk\)](https://www.dorsetcouncil.gov.uk/media/2020/03/purbeck-5-yhls-2020-final-redacted.pdf)) identifies sites in the emerging Wareham

Neighbourhood Plan which will contribute to housing land supply in Purbeck. The council's report clarifies that 'The windfall sites are not included in the total number of homes proposed for Wareham as they are counted within the overall windfall figures for the Purbeck region of Dorset Council.' (Paragraph 48). The council is satisfied that requirement for homes in Policy V1 is appropriately justified. The council is satisfied that the housing sites identified in its updated '5 Year Housing Land Supply 2020' report (see paragraph 22 b) above) are either deliverable or developable in accordance with the definitions provided in the National Planning Policy Framework.

- f) The council's local plan sets out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations (in accordance with paragraph 65 of the National Planning Policy Framework).
- g) The council has presented evidence around the need for extra care accommodation in the course of the examination (see SD115 'Planning the care provision in Purbeck': [sd115-councils-response-to-actions-33-34-and-47-03-10-2019.pdf \(dorsetcouncil.gov.uk\)](https://www.dorsetcouncil.gov.uk/media/1000000/sd115-councils-response-to-actions-33-34-and-47-03-10-2019.pdf)).

Proposed Main Modification 6: Chapter 2, Vision and Objectives, paragraphs 45 to 48

Summary of matters / issues raised in responses

41. The council received responses relating to this proposed Main Modification raising the following matters / issues:

- a) Continued objection to Green Belt strategy and approach. (Terence O'Rourke on behalf of Bloor Homes).
- b) Paragraph 46 as revised is unclear and ambiguous. (Mr N Hill on behalf of Moreton Parish Council).
- c) Delivery of strategic SANG cannot be considered as an exceptional circumstance. (Mr N Hill on behalf of Moreton Parish Council).
- d) The council has not considered reasonable alternatives for strategic SANG. (Mr N Hill on behalf of Moreton Parish Council).
- e) Object in principle to release of Green Belt to allow development as a holiday park on the basis that changes to Green Belt boundaries are not fully evidenced and justified. (Freeths on behalf of P Bowyer (representing CPRE) and Dr A Langley).
- f) Object in principle to release of Green Belt to enable delivery of SANG on the basis that changes to Green Belt boundaries are not fully evidenced and justified. (Freeths on behalf of P Bowyer (representing CPRE) and Dr A Langley).
- g) Object on the basis that proposed SANG at Morden will not provide strategic mitigation to development in the north of Purbeck. (Freeths on behalf of P Bowyer (representing CPRE) and Dr A Langley).
- h) Compensatory measures do not amount to exceptional circumstances, and positive environmental management cannot be given weight as this is a requirement for net gains in biodiversity. (Freeths on behalf of P Bowyer (representing CPRE) and Dr A Langley).
- i) There are no adequate safeguards around delivery of the SANG if land for the holiday park is released from the Green Belt. Council failed to consider the need to support the transition to low carbon future. (Freeths on behalf of P Bowyer (representing CPRE) and Dr A Langley).
- j) Proposed housing allocations not sustainable. (Dr A C Warne).

Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound

42. Respondents have suggested the following changes:

- a) N/A.

- b) Name the settlements in Paragraph 46. (Mr N Hill on behalf of Moreton Parish Council).
- c) N/A.
- d) N/A.
- e) Delete all references to releasing Green Belt land for a holiday park at Morden Park. (Freeths on behalf of P Bowyer (representing CPRE) and Dr A Langley).
- f) Delete all references to releasing Green Belt land as facilitating and enabling delivery of a SANG at Morden Park. (Freeths on behalf of P Bowyer (representing CPRE) and Dr A Langley).
- g) Delete all references to a SANG at Morden Park that in turn will mitigate the effects of new homes on protected heathland in the north of Purbeck. (Freeths on behalf of P Bowyer (representing CPRE) and Dr A Langley).
- h) See above. (Freeths on behalf of P Bowyer (representing CPRE) and Dr A Langley).
- i) See above. (Freeths on behalf of P Bowyer (representing CPRE) and Dr A Langley).
- j) N/A.

Council Response

43. The council has sought to respond to the matters / issues raised in responses by drawing the Inspector's attention to published evidence and national policy and guidance. Where appropriate it has also indicated where it considers it might be appropriate to consider revision to a proposed Main Modification.

- a) Council notes response.
- b) Council notes response.
- c) The council notes response.
- d) The council has considered this and other representations relating to proposed changes to Green Belt boundaries at Morden (supporting text to Policy V2 as referenced in Proposed Main Modifications 6 and 7) and delivery of a holiday park and strategic SANG (supporting text and Policy I5 as referenced in proposed Main Modifications 76 and 77). In respect to Policy V2 after considering the issues and matters raised through this representation, and those made by Freeths (on behalf of P Bowyer (representing CPRE) and Dr A Langley)), the council is persuaded that a further revision to this proposed Main Modification is necessary. This revision would comprise deleting reference to release of Green Belt land for holiday homes at Morden from this part of the

local plan (with specific reference to the council's examination of alternative sites for proposed strategic SANG in SD93).

- e) See the council's response in paragraph 43 d).
- f) See the council's response in paragraph 43 d).
- g) The council considers that the proposed SANG at Morden could provide strategic mitigation. The council's Habitat Regulation Assessment (HRA) considers the effectiveness of the proposed strategic SANG at Morden (paragraphs 5.62 to 5.66 MMCD 3: [purbeck-lp-main-modifications-hra-231020-final.pdf \(dorsetcouncil.gov.uk\)](https://www.dorsetcouncil.gov.uk/media/231020-final-purbeck-lp-main-modifications-hra-231020-final.pdf)). And the council has received direction from Natural England on this matter (see Appendix 2 SD93: [ne-sang-advice-to-purbeck-inc-prefferre-options.pdf \(dorsetcouncil.gov.uk\)](https://www.dorsetcouncil.gov.uk/media/ne-sang-advice-to-purbeck-inc-prefferre-options.pdf)).
- h) The council notes but does not agree with the assertion raised in the representation (paragraph 138 of the National Planning Policy Framework does not state that compensatory improvements to remaining Green Belt must be limited to serving this role alone).
- i) Council notes response.
- j) Council notes response.

Proposed Main Modification 7: Chapter 2, Vision and Objectives, Policy V2

Summary of matters / issues raised in responses

44. The council received responses relating to this proposed Main Modification raising the following matters / issues:

- a) Continued objection to Green Belt strategy and approach. (Terence O'Rourke on behalf of Bloor Homes).
- b) Policy V2 inconsistent with national planning policy relating to the Green Belt. Policy V2 should reflect policy in the NPPF relating to the fundamental aims of Green Belt / Green Belt purposes. Council should ascribe greater weight to the retention of the Green Belt. (Freeths on behalf of P Bowyer (representing CPRE) and Dr A Langley).
- c) Exceptional circumstances not fully evidenced and justified. Council not demonstrated that it has fully examined alternatives. Council not taken account and given sufficient weight to paragraph 138 of the National Planning Policy Framework. Green Belt release is not proportionate. The council's evidence does not demonstrate that a SANG is needed at Morden. Not evidenced that the council has considered alternative options. Other options presented in the SD93 would achieve a better balance between harm to Green Belt, new homes delivered and SANG capacity. (Freeths on behalf of P Bowyer (representing CPRE) and Dr A Langley).
- d) Delivery of the SANG will be subsidised through developer contributions collected by the council. (Freeths on behalf of P Bowyer (representing CPRE) and Dr A Langley).
- e) Release of Green Belt not justified through the exploration of alternatives – specifically brownfield land. (Mr A Bagley).
- f) Proposed Main Modification is not based on robust and credible evidence (SD93). Council has not justified (through robust evidence) its decision to consider changes to Green Belt boundaries at Morden. There is sufficient land at Bere Farm to deliver a strategic SANG. Respondents disputes the council's conclusions (in SD93) on the time it would take to establish SANG at Lytchett Minster / Bere Farm when compared to Morden. The council has not consistently or rigorously evaluated the alternatives before considering release of Green Belt at Morden. (Ms Clare Lees).

Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound

45. Respondents have suggested the following changes:

- a) N/A.

- b) Re-instate the deleted paragraphs a. – d in policy V2 including protecting Green Belt to safeguard the countryside from encroachment. (Freeths on behalf of P Bowyer (representing CPRE) and Dr A Langley).
- c) Delete all reference to Green Belt release at Morden Park. And delete the references to SANG generally in the Green Belt because it is not a Green Belt policy per se. (Freeths on behalf of P Bowyer (representing CPRE) and Dr A Langley).
- d) Delete all reference to a holiday park and a SANG at Morden Park. (Freeths on behalf of P Bowyer (representing CPRE) and Dr A Langley).
- e) N/A.
- f) N/A.

Council Response

46. The council has sought to respond to the matters / issues raised in responses by drawing the Inspector's attention to published evidence and national policy and guidance. Where appropriate it has also indicated where it considers it might be appropriate to consider revision to a proposed Main Modification.

- a) Council notes response.
- b) The council does not agree that Policy V2 is inconsistent with national planning policy. Paragraph 16. f) of the National Planning Policy Framework states that plans should *'serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).'*
- c) The council has outlined what it considers are exceptional circumstances in SD56 'Green Belt Study 2018 – Pre-submission' (<https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/purbeck/local-plan-review-purbeck/pdfs/sd56-2018-10-08-green-belt-study.pdf>). After considering representations, with specific reference to the council's examination of alternative sites for proposed strategic SANG in SD93, the council is persuaded of the need for a further revision to the proposed Main Modification to Policy V2. This revision would involve deleting references to release of Green Belt land for holiday homes at Morden from Policy V2.
- d) The council notes the matters raised in response but makes no further comment in the context of its request to delete references to release of Green Belt land for holiday homes at Morden from Policy V2.
- e) The council has considered the potential to deliver new homes on previously developed land through 'SD19 – Housing background paper' (<sd19-2019-01-17-housing-background-paper.pdf> (dorsetcouncil.gov.uk)). The evidence indicates that there is insufficient capacity on suitable brownfield land to meet the areas housing requirement.

- f) The council has stated that references to release of Green Belt land for holiday homes at Morden should be deleted from Policy V2 through a revision to the proposed Main Modification.

Proposed Main Modification 8: Chapter 3 Environment, paragraphs 52, 53, and 54

Summary of matters / issues raised in responses

47. The council received a response relating to this proposed Main Modification raising the following matters / issues:

- a) Proposed Main Modification does not reference national parks. The local plan is biased against the natural environment and in favour of the built environment. (Dr A C Warne).

Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound

48. Respondents have suggested the following changes:

- a) N/A.

Council Response

49. The council has sought to respond to the matters / issues raised in responses by drawing the Inspector's attention to published evidence and national policy and guidance. Where appropriate it has also indicated where it considers it might be appropriate to consider revision to a proposed Main Modification.

- a) There are no national parks in the Purbeck area. The council awaits the government's response to the recommendations in the Landscapes Review Final Report (informally known as the Glover Review, which was published on 21st September 2019) in respect to the possible new national parks described in the report. The council is not able to endorse the recommendations of the Landscape Review or otherwise at this early stage. The council does not accept that the local plan policies shows bias toward either natural or built environment.

Proposed Main Modification 9: Chapter 3, Environment, Policy E1

Summary of matters / issues raised in responses

50. The council received a response relating to this proposed Main Modification raising the following matters / issues:

- a) The boundary of the Area of Outstanding Natural Beauty should include Egdon Heaths. The policies / strategies in the local plan show a bias towards the Area of Outstanding Natural Beauty. (Dr A C Warne).

Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound

51. Respondents have suggested the following changes:

- a) N/A.

Council Response

52. The council has sought to respond to the matters / issues raised in responses by drawing the Inspector's attention to published evidence and national policy and guidance. Where appropriate it has also indicated where it considers it might be appropriate to consider revision to a proposed Main Modification.

- a) Areas of Outstanding Natural Beauty can only be defined through the Countryside and Rights of Way Act 2000 by Natural England. (Natural England may also vary boundaries through this legislation). There is not an opportunity to vary the boundaries of the Dorset Area of Outstanding Natural Beauty through the Purbeck Local Plan. The council does not accept that there is a bias in the policies of the Purbeck Local Plan toward the Area of Outstanding Natural Beauty.

Proposed Main Modification 10: Chapter 3, Environment, insert new paragraph between paragraphs 59 and 60

Summary of matters / issues raised in responses

53. The council received a response relating to this proposed Main Modification raising the following matters / issues:

- a) Policy E2 confuses natural and man-made environments. (Dr A C Warne).

Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound

54. Respondents have suggested the following changes:

- a) N/A.

Council Response

55. The council has sought to respond to the matters / issues raised in responses by drawing the Inspector's attention to published evidence and national policy and guidance. Where appropriate it has also indicated where it considers it might be appropriate to consider revision to a proposed Main Modification.

- b) World Heritage Sites are defined as 'designated heritage assets' in the National Planning Policy Framework. The change to Policy E2 in the proposed Main Modification is consistent with national planning policy.

Proposed Main Modification 14: Chapter 3, Environment, paragraph 81

Summary of matters / issues raised in responses

56. The council received responses relating to this proposed Main Modification raising the following matters / issues:

- a) Correction to drafting. (Natural England).
- b) Proposed Main Modification unclear. (Dr A C Warne).

Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound

57. Respondents have suggested the following changes:

- a) The paragraph should refer to Dorset **Heathlands** SPA. (Natural England).
- b) N/A.

Council Response

58. The council has sought to respond to the matters / issues raised in responses by drawing the Inspector's attention to published evidence and national policy and guidance. Where appropriate it has also indicated where it considers it might be appropriate to consider revision to a proposed Main Modification.

- a) The council notes the response and does not object to re-drafting suggested by the respondent.
- b) Council notes comment.

Proposed Main Modification 15: Chapter 3, Environment, paragraph 83 (insertions and deletions)

Summary of matters / issues raised in responses:

59. The council received a response relating to this proposed Main Modification raising the following matters / issues:

- a) HRA not assessed in-combination impacts and therefore defective - HRA needs to assess the impact of planned development in the Purbeck Local Plan on St Albans to Durlston Head and Isle of Portland to Studland Cliffs SAC in-combination with other plans and projects. Assessment could take account of balance of planned growth between Bournemouth, Christchurch and Poole Council and Dorset Council and / or general growth in visitor pressure from more distant sources (Dr A Langley).

Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound

60. Respondents have suggested the following changes:

- a) N/A.

Council Response

61. The council has sought to respond to the matters / issues raised in responses by drawing the Inspector's attention to published evidence and national policy and guidance. Where appropriate it has also indicated where it considers it might be appropriate to consider revision to a proposed Main Modification.

- a) The council's Habitat Regulation Assessment (MMCD3: [purbeck-lp-main-modifications-hra-231020-final.pdf \(dorsetcouncil.gov.uk\)](https://www.dorsetcouncil.gov.uk/media/231020-final.pdf)) concluded adverse effects on integrity for coastal sites (Isle of Portland to Studland Cliffs SAC, St. Albans to Durlston Head SAC) from recreation are ruled out, alone or in-combination given the scale and distribution of growth, the relevant site interest, monitoring results and the existing infrastructure in-place at the coastal sites. Guidance on Habitats Regulations Assessment highlights that the underlying intention of the in-combination provision is to take account of cumulative effects. An appropriate assessment need not be extended further than is necessary to fulfil the key purpose – to ensure that a plan or project is authorised only to the extent that it will not, either alone or in combination with other plans or projects, adversely affect the integrity of the European site. In the case of coastal recreation, the European sites are part of a World Heritage Site with a National Trail that runs the length of the coastline. Sites such as Studland and Durlston have the necessary infrastructure and staffing in place to manage the large number of visitors. Impacts relate to SAC habitats and any issues associated with local housing growth are likely to be undetectable given

the levels of use and the infrastructure in place to manage recreation and the numbers of tourists.

Proposed Main Modification 16: Chapter 3, Environment, paragraph 85 (insertions)

Summary of matters / issues raised in responses:

62. The council received responses relating to this proposed Main Modification raising the following matters / issues:

- a) Conclusion at para 9.42 of Habitats Regulation Assessment not supported with evidence. The evidence presented is not relevant and further evidence is needed relating to: baseline and forecasts of increases in connected planned development (including in-combination effects with other plans and projects). (Dr A Langley)
- b) The council should apply a precautionary approach around the potential effects given uncertainties. (Dr A Langley).
- c) The proposals relating to interim strategy do not provide the necessary certainty that development will not adversely affect the integrity of habitat sites. (Dr A Langley).
- d) Impact of existing slurry pit on proposed SANG (to serve proposed homes at Wool) at Coombe / North Wood has not been considered. (Dr A C Warne).

Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound

63. Respondents have suggested the following changes:

- a) N/A.
- b) N/A.
- c) N/A.
- d) N/A.

Council Response

64. The council has sought to respond to the matters / issues raised in responses by drawing the Inspector's attention to published evidence and national policy and guidance. Where appropriate it has also indicated where it considers it might be appropriate to consider revision to a proposed Main Modification.

- a) Council notes response and is satisfied that the local plan is legally compliant with Habitats Regulations 2017.
- b) Council notes response and is satisfied that the local plan is legally compliant with Habitats Regulations 2017.

- c) Council notes response and is satisfied that the local plan is legally compliant with Habitats Regulations 2017. The council has adopted a Dorset Heathlands Interim Air Quality Strategy ([Decision - Dorset Heathlands Interim Air Quality Strategy - Dorset Council](#)) on 2nd March 2021.
- d) Dr Warne's comment is not related to a proposed modification. The impact and relevance of the existing slurry pit was discussed during the hearings.

Proposed Main Modification 19: Chapter 3, Environment, Policy E7

Summary of matters / issues raised in responses

65. The council received responses relating to this proposed Main Modification raising the following matters / issues:

- a) The wording of this policy omits to say what developments are 'in combination' with and therefore does not fully describe HRA requirements. (Dr A Langley).
- b) This section of the local plan should also refer to other legislation relating to protection of habitats (Wildlife and Countryside Act 1981 and NERC Act 2006). The policy presents a negative view of the environment compared to policy E2. (Dr A C Warne).

Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound

66. Respondents have suggested the following changes:

- a) 'Development will only be permitted where it would not lead to an adverse effect upon the integrity, either alone or in-combination **with other plans and projects**, directly or indirectly,...' (Dr A Langley).
- b) N/A.

Council Response

67. The council has sought to respond to the matters / issues raised in responses by drawing the Inspector's attention to published evidence and national policy and guidance. Where appropriate it has also indicated where it considers it might be appropriate to consider revision to a proposed Main Modification.

- a) The council does not consider that Dr Langley's suggested additional text in the first paragraph is necessary to make the policy legally compliant or sound (as requirements are defined in the legislation) but the council does not object to the suggested change.
- b) Dr Warne's comment is not related to the modifications. This section of the plan specifically relates to sites protected by virtue of being designated as Special Protection Area, and/or Special Area of Conservation and/or Ramsar at a national, European and international level.

Proposed Main Modification 20: Chapter 3, Environment, Policy E8

Summary of matters / issues raised in responses

68. The council received responses relating to this proposed Main Modification raising the following matters / issues:

- a) The first paragraph of E8 has the same defect as noted for E7. (Dr A Langley).
- b) There is a missing “on” in the sentence following point b). (Dr A Langley).
- c) There is an inconsistency in the final paragraphs of Policies E8 and E9, one says ‘case by case’ and one ‘says site by site’. (Natural England).
- d) The council has not considered impacts on functionally related land around habitat sites. (Dr A C Warne).
- e) The council’s approach to Corfe Common is not consistent with other habitat sites. (Dr A C Warne).

Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound

69. Respondents have suggested the following changes:

- a) ‘Development will only be permitted where it would not lead to an adverse effect upon the integrity, either alone or in-combination **with other plans and projects**, directly or indirectly,...’ (Dr A Langley).
- b) ‘The impacts of other non-residential development proposals **on** protected heathlands will ...’ (Dr A Langley).
- c) N/A.
- d) N/A.
- e) Provide further explanation in justification relating to the proposed Main Modification for the exception in respect to Corfe Common. (Dr A C Warne).

Council Response

70. The council has sought to respond to the matters / issues raised in responses by drawing the Inspector’s attention to published evidence and national policy and guidance. Where appropriate it has also indicated where it considers it might be appropriate to consider revision to a proposed Main Modification.

- a) The council does not consider that Dr Langley’s suggested additional text in the first paragraph is necessary to make the policy legally

compliant or sound (as requirements are defined in the legislation) but the council does not object to the suggested change.

- b) The council does not object to the suggested change.
- c) The council does not consider that the distinction between 'case by case' and 'site by site' is materially relevant to the legal compliance of this policy but does not object to a change to proposed Main Modifications to ensure consistency.
- d) The council's Habitat Regulations Assessment (MMCD3: [purbeck-lp-main-modifications-hra-231020-final.pdf \(dorsetcouncil.gov.uk\)](https://www.dorsetcouncil.gov.uk/media/231020-final.pdf)) considers functionally linked land near protected sites.
- e) MM18 explains why the council has treated Corfe Common differently in respect to the 400m area that is defined around other Dorset heathlands protected sites. Corfe Common is a Special Area Conservation and Ramsar but not a Special Protection Area (SPA) and, therefore, does not have the features of the SPA which justify defining the 400 metre area around these habitats. As stated in the re-drafted policy each development proposal will be considered on a site by site basis.

Proposed Main Modification 21: Chapter 3, Environment, Policy E9

Summary of matters / issues raised in responses:

71. The council received responses relating to this proposed Main Modification raising the following matters / issues:

- a) The first paragraph of E9 has the same defect as E7. (Dr A Langley).
- b) The wording under Nitrogen Neutrality of “and does not have an adverse effect on the integrity of the site” just repeats the requirement of the first paragraph and is superfluous. (Dr A Langley).
- c) Under heading ‘Recreational Effects’ revise wording “*to ensure that additional effects arising from recreational activity do not have an adverse effect on the integrity of the site.*” It is not clear if these effects are from the project alone and what the test of no adverse effect includes (e.g. just this project in isolation, this project plus others in the local plan, or all plans and projects?). The overarching Habitats Regulation Assessment requirement is covered in the first paragraph of E9, so this sub-section can relate to just a single project, as it does for Nitrogen Neutrality. (Dr A Langley).
- d) There is an inconsistency in the final paragraphs of Policies E8 and E9, one says ‘case by case’ and one says ‘site by site’. (Natural England).
- e) Offsetting the impact of nitrates emissions through changes in land management is not likely to be effective in the short term (potential time lag of 30-35 years before changes in management reduce nitrates discharged into the harbour). (Dr A C Warne).
- f) Drainage catchment (including those areas showing sewage treatment works) is not accurately shown on (respondent references homes at Lytchett Matravers). (Mr R Holden).

Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound

72. Respondents have suggested the following changes:

- a) ‘Development will only be permitted where it would not lead to an adverse effect upon the integrity, either alone or in-combination **with other plans and projects**, directly or indirectly,...’ (Dr A Langley).
- b) Suggest removing the superfluous phrase in Nitrogen Neutrality. (Dr A Langley).
- c) Suggest changing the wording for Recreational Effects to: **“Development proposals for any net increase in homes, tourist accommodation or a tourist attraction around the edges of the harbour (as defined on the local plan policies map) will provide**

measures to avoid or mitigate their additional effects arising from recreational activity. (Dr A Langley).

- d) N/A.
- e) N/A.
- f) Consult Wessex Water who will be able to provide an accurate sewage catchment. Remove the reference to "drainage catchment" and replace with "sewage catchment" as drainage catchment can be taken to mean the sewage catchment or the natural catchment which are not the same. (Mr R Holden).

Council Response

73. The council has sought to respond to the matters / issues raised in responses by drawing the Inspector's attention to published evidence and national policy and guidance. Where appropriate it has also indicated where it considers it might be appropriate to consider revision to a proposed Main Modification.

- a) The council does not consider that Dr Langley's suggested additional text in the first paragraph is necessary to make the policy legally compliant or sound (as requirements are defined in the legislation) but the council does not object to the suggested change.
- b) The council does not consider that Dr Langley's suggested removal of text in the second paragraph to avoid repetition is necessary to make the policy legally compliant or sound but the council does not object to the suggested change.
- c) The council does not consider that Dr Langley's suggested text changes in the third paragraph are necessary to make the policy legally compliant or sound but the council does not object to the suggested change.
- d) The council does not consider that the distinction between 'case by case' and 'site by site' is materially relevant to the legal compliance of this policy but does not object to a change to proposed Main Modifications to ensure consistency.
- e) Dr Warne's comment is not related to a modification. This issue was raised and discussed during the examination hearing sessions.
- f) The Poole Harbour drainage catchment identified on the council's local plan policies map is based on information provided by Wessex Water.

Proposed Main Modification 23: Chapter 3, Environment, Policy E10

Summary of matters / issues raised in responses

74. The council received responses relating to this proposed Main Modification raising the following matters / issues:

- a) Plan fails to evidence that mitigation measures will prevent the decline of priority species / other protected species within development sites or proposed Suitable Alternative Natural Greenspace (SANG). (Ms R Palmer on behalf of Wool Flora and Fauna).
- b) Plan fails to demonstrate that development will not cause a decline of protected species in hedgerows. (Ms R Palmer on behalf of Wool Flora and Fauna).
- c) Plan contrary to paragraph 8 c) of the National Planning Policy Framework. (Ms R Palmer on behalf of Wool Flora and Fauna).
- d) Role of development sites as functionally linked habitats needs to be considered. (Dr A C Warne).
- e) Difficult / impossible to achieve net gains in biodiversity on some of the sites which the council has made policy allocations for development through the local plan. (Dr A C Warne).

Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound

75. Respondents have suggested the following changes:

- a) N/A.
- b) N/A.
- c) N/A.
- d) N/A.
- e) N/A.

Council Response

76. The council has sought to respond to the matters / issues raised in responses by drawing the Inspector's attention to published evidence and national policy and guidance. Where appropriate it has also indicated where it considers it might be appropriate to consider revision to a proposed Main Modification.

- a) The council does not consider that the comments raised in representation relate to the proposed Main Modifications. As the council explained in the hearings the council expects full details of measures to

mitigate / compensate for losses in biodiversity to be considered at planning application stage.

- b) The council does not consider that the comments raised in representation relate to the proposed Main Modifications. As the council explained in the hearings the council expects full details of measures to mitigate / compensate for losses in biodiversity to be considered at planning application stage.
- c) The council does not consider that the comments raised in representation relate to the proposed Main Modifications. The council is satisfied that the local plan is consistent with the referenced paragraph from national planning policy.
- d) The council does not consider that the comments raised in representation relate to the proposed Main Modifications.
- e) The council does not consider that the comments raised in representation relate to the proposed Main Modifications. As the council explained in the hearings the council expects full details of measures to mitigate / compensate for losses in biodiversity to be considered at planning application stage.

Proposed Main Modification 24: Chapter 3, Environment, Policy E12

Summary of matters / issues raised in responses

77. The council received a response relating to this proposed Main Modification raising the following matters / issues:

- a) It is not sound to include renewable energy only 'where possible'. Government plans to retrofit all the existing housing stock so that it becomes carbon neutral by 2050 and it would be ridiculous to build new homes which are not carbon neutral from the outset. (Mr B White).

Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound

78. Respondents have suggested the following changes:

- a) All new homes must be designed to be powered by renewable energy only. (Mr B White).

Council Response

79. The council has sought to respond to the matters / issues raised in responses by drawing the Inspector's attention to published evidence and national policy and guidance. Where appropriate it has also indicated where it considers it might be appropriate to consider revision to a proposed Main Modification.

- a) The council has not proposed a Main Modification to criterion d) of Policy E12.. The council considers that its approach to this matter is consistent with Building Regulations and national planning policy.

Proposed Main Modification 25: Chapter 4, Housing, paragraph 110 and 111, insertions and deletions

Summary of matters / issues raised in responses

80. The council received responses relating to this proposed Main Modification raising the following matters / issues:

- a) Deletion of text relating to how the council has defined the housing requirement means that this part of the local plan is not justified. (Mr N Hill on behalf of Moreton Parish Council).
- b) The word capped in reference to housing requirement in MM25 is incompatible with the word around in MM5 in reference to housing numbers for housing allocations. (Mr N Hill on behalf of Moreton Parish Council).
- c) Additional wording to paragraph 110 should refer to requirement to review policies in the NPPF. (Mr N Hill on behalf of Moreton Parish Council).
- d) The council has not justified that its development strategy is sustainable. (West Lulworth Parish Council).

Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound

81. Respondents have suggested the following changes:

- a) Do not delete explanatory text in paragraph 110. (Mr N Hill on behalf of Moreton Parish Council).
- b) Replace the word capped (in reference to housing requirement) with around so that consistent with MM5. (Mr N Hill on behalf of Moreton Parish Council).
- c) Paragraph 110 clarify that review of the local plan mandated by the national planning policy. (Mr N Hill on behalf of Moreton Parish Council).
- d) N/A.

Council Response

82. The council has sought to respond to the matters / issues raised in responses by drawing the Inspector's attention to published evidence and national policy and guidance. Where appropriate it has also indicated where it considers it might be appropriate to consider revision to a proposed Main Modification.

- a) The council considers that the proposed Main Modification to paragraph 110 of the local plan is consistent with national planning policy and evidence relating to housing need in Purbeck.

- b) The proposed Main Modification to paragraph 110 seeks to address a matter raised in the Planning Inspector's Post Hearing Note (paragraph 20) where the Inspector states that '*...further modification is required to these [in reference to the timetable for delivery and minimum local housing requirement] to indicate that the new Local Plan will serve as the vehicle for an early review in relation to ensuring that any housing need above the capped level is provided for as soon as possible and that thereafter the policies in the Plan should be reviewed every five years and updated as necessary in accordance with the Framework and Regulations.*' The council does not consider that there is an inconsistency with reference to the use of the words 'around' in other housing policies (where its use is appropriate for effective use of land) and 'capped' in paragraph 110 (which specifically relates to the housing requirement for the Purbeck area).
- c) The council notes the issue raised in comment but considers that this part of the local plan is consistent with national planning policy.
- d) The council does not consider that the comments raised in the representation from West Lulworth Parish Council relate to the proposed Main Modifications. The council is satisfied that it has selected an appropriate development strategy and that the local plan is legally compliant.

Proposed Main Modification 26: Chapter 4, Housing, Policy H1

Summary of matters / issues raised in responses

83. The council received responses relating to this proposed Main Modification raising the following matters / issues:

- a) Purbeck Local Plan fails to set strategic housing requirements for designated neighbourhood plan areas. (Mr N Hill on behalf of Moreton Parish Council).
- b) Housing requirements for neighbourhood plan areas are not justified. (Mr N Hill on behalf of Moreton Parish Council).
- c) No evidence of joint working with neighbouring councils. (Mr N Hill on behalf of Moreton Parish Council).
- d) Housing requirements for designated neighbourhood plan areas should refer to the strategic allocations in the local plan. (Savills on behalf of The Lulworth Estate, Redwood Partnership and Mr Andrew Jackson).
- e) Updated housing requirement has not been subject to public consultation. (West Lulworth Parish Council).
- f) Revise the table in policy H1 in respect to Wool and Lytchett Matravers so that it makes references to the strategic allocations made through the local plan. (Turley Associates on behalf of Wyatt Homes).

Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound

84. Respondents have suggested the following changes:

- a) The local plan should set out strategic requirements for each settlement in Purbeck. (Mr N Hill on behalf of Moreton Parish Council).
- b) N/A.
- c) N/A.
- d) 'Emerging neighbourhood plan does not seek to allocate housing sites, no specific housing requirement in accordance with the Council's housing strategy **beyond the 470 homes allocated by this plan (Policy H5)**' (Savills on behalf of The Lulworth Estate, Redwood Partnership and Mr Andrew Jackson).
- e) N/A.
- f) 'Made neighbourhood plan does not seek to allocate housing sites, no specific housing requirement in accordance with the Council's housing strategy **beyond the 150 homes allocated by this plan (Policy H6)**'

Council Response

85. The council has sought to respond to the matters / issues raised in responses by drawing the Inspector's attention to published evidence and national policy and guidance. Where appropriate it has also indicated where it considers it might be appropriate to consider revision to a proposed Main Modification.

- a) The council has identified housing requirements for the designated neighbourhood plan areas of Bere Regis and Wareham in Policies H1 and H2 (which is subject to proposed Main Modification 30). Both policies H1 and H2 are strategic policies (proposed Main Modification 1). In those instances where the council has not been able to identify a housing requirement it has clarified this in the Policy.
- b) After working closely with local communities, and having regard to its strategy for meeting the area's housing needs, the council is satisfied that the housing requirements for neighbourhood plan areas are justified.
- c) The council has worked closely with neighbouring councils when preparing the Purbeck Local Plan as evidenced through 'Regulation 22 consultation statement' (SD07: [sd07-2019-01-23-regulation-22-consultation-statement.v4-docx.pdf \(dorsetcouncil.gov.uk\)](https://www.dorsetcouncil.gov.uk/media/1000000/sd07-2019-01-23-regulation-22-consultation-statement.v4-docx.pdf)) and the 'Duty to cooperate compliance statement' (SD09: [sd09-2019-01-19-duty-to-cooperate-statement.pdf \(dorsetcouncil.gov.uk\)](https://www.dorsetcouncil.gov.uk/media/1000000/sd09-2019-01-19-duty-to-cooperate-statement.pdf)).
- d) The council notes the response and would raise no objections to the change suggested by the respondent outlined in paragraph 82 d).
- e) The housing requirement for Purbeck area was discussed in the course of the examination hearings and interested parties have been given the opportunity to comment on proposed Main Modifications (including revised housing requirement),
- f) The council notes the response and would raise no objections to the change suggested by the respondent outlined in paragraph 82 f).

Proposed Main Modification 27: Chapter 4, Housing, paragraph 114

Summary of matters / issues raised in responses

86. The council received responses relating to this proposed Main Modification raising the following matters / issues:

- a) No explanation for the change in yield from housing sites in Swanage (unconsented allocations from the Swanage Local Plan 2017). (Mr N Hill on behalf of Moreton Parish Council).
- b) No explanation in respect to planned development in Swanage between 2027 and 2034. (Mr N Hill on behalf of Moreton Parish Council).
- c) Statement in the fourth bullet point (relating to Wareham Neighbourhood Plan) unclear and ambiguous. Clarification required in respect to: 5YHLS, windfall for Wareham incorporated into the windfall for the whole of Purbeck area and further evidence around housing land supply (on council owned sites which include a mix of care accommodation and dwellinghouses). (Mr N Hill on behalf of Moreton Parish Council).
- d) The reduction in the housing (207 homes) requirement for Wareham is not justified and the housing sites identified in the Wareham Neighbourhood Plan are not deliverable. (Carter Jonas on behalf of Welbeck Land).
- e) Housing requirement should be determined by strategic policies in the local plan. (Carter Jonas on behalf of Welbeck Land).

Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound

87. Respondents have suggested the following changes:

- a) N/A.
- b) N/A.
- c) N/A.
- d) N/A.
- e) N/A.

Council Response

88. The council has sought to respond to the matters / issues raised in responses by drawing the Inspector's attention to published evidence and national policy and guidance. Where appropriate it has also indicated where it considers it might be appropriate to consider revision to a proposed Main Modification.

- a) The changes in the estimated numbers of homes to be delivered from local plan allocations in Swanage, from 150 dwellings to 40 dwellings, reflects the latest evidence presented in the five-year housing land supply report (MMCD5: [purbeck-5-yhls-2020-final-redacted.pdf \(dorsetcouncil.gov.uk\)](https://www.dorsetcouncil.gov.uk/media/1000000/purbeck-5-yhls-2020-final-redacted.pdf)).
- b) The council's five-year housing land supply report (MMCD5) provides details of 'predicted build out of sites' in Table 13. The council has presented evidence in Appendix 2 of its report to support the expected build out rates from 'major development' sites with planning permission.
- c) The council's five-year housing land supply report (MMCD5) identifies a 5.15 year housing land supply. For Wareham neighbourhood plan area, paragraphs 43 to 56 of the report clarify that the council has separated those homes which it expects to be delivered as windfall from those homes which it expects to be delivered through policy allocations as different sources of supply. These paragraphs of the report also describe the calculations which the council has used to determine the contributions made to housing land supply by care accommodation.
- d) The council considers that the reduction in housing numbers for Wareham from 300 to 207 are justified. The adjustment reflects the council's decision to separate these sources of supply when defining the housing requirement for this neighbourhood plan area.
- e) The council considers that the housing requirement for Wareham neighbourhood plan area is determined by a strategic policy. Strategic policies V1, H1 and H2 specify the housing requirement for the Wareham neighbourhood plan area.

Proposed Main Modification 28: Chapter 4, Housing, paragraphs 116 and 118

Summary of matters / issues raised in responses

89. The council received responses relating to this proposed Main Modification raising the following matters / issues:

- a) Caravan sites (where there is no limitation on use) run by Royale Life Park Home sites at East Stoke and Bere Regis could contribute to the supply of small and medium sized sites. (East Stoke Parish Council).
- b) Revise paragraphs 116 and 118 for consistency in respect to other proposed Main Modifications and to give effect to the changes identified as necessary by the Planning Inspector. (Turley Associates on behalf of Wyatt Homes)

Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound

90. Respondents have suggested the following changes:

- a) N/A.
- b) These amendments will allow approximately 240 homes to be built at extensions to these settlements (around 90 ~~houses~~ homes at Upton and around 150 homes ~~houses~~ at Lytchett Matravers), which will contribute towards providing a balanced spread of housing development across the District. (Turley Associates on behalf of Wyatt Homes).

Council Response

91. The council has sought to respond to the matters / issues raised in responses by drawing the Inspector's attention to published evidence and national policy and guidance. Where appropriate it has also indicated where it considers it might be appropriate to consider revision to a proposed Main Modification.

- a) The sites referred to in the comments made by East Stoke Parish Council are not medium or small sites. The council has referred to both caravan sites as major sites, which contribute towards housing supply, in Appendix 2 of the of its five-year housing land supply.
- b) The council notes comment and does not object to proposed changes in paragraph 90 b).

Proposed Main Modification 29: Chapter 4, Housing, Trajectory

Summary of matters / issues raised in responses

92. The council received responses relating to this proposed Main Modification raising the following matters / issues:

- a) Housing trajectory chart has no name and the axes are not labelled. (Mr N Hill on behalf of Moreton Parish Council).
- b) Colours used in the chart unclear. (Mr N Hill on behalf of Moreton Parish Council).
- c) Clarification on supporting data for categories in the chart. (Mr N Hill on behalf of Moreton Parish Council).
- d) Variations in the rates of housing delivery over the plan period. (Mr N Hill on behalf of Moreton Parish Council).
- e) Chart does not identify the number of homes to be delivered over the plan period. (Mr N Hill on behalf of Moreton Parish Council).
- f) The local plan relies on new homes delivered as windfall – this creates uncertainty and undermines the plan led approach. (West Lulworth Parish Council).

Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound

93. Respondents have suggested the following changes:

- a) Insert a title for the chart, insert a title for the left hand axis titled 'Number of houses', insert a title for the right hand axis titled Cumulative 'Number of Houses', insert scales for axes. (Mr N Hill on behalf of Moreton Parish Council).
- b) Use seven very different and distinct colours to show the 7 different categories of development. (Mr N Hill on behalf of Moreton Parish Council).
- c) The Amended text chart should have links to data showing the 2018-34 yearly values for each category of development. (Mr N Hill on behalf of Moreton Parish Council).
- d) N/A.
- e) The chart should have a cumulative housing line to show the growth profile of development houses. (Mr N Hill on behalf of Moreton Parish Council).
- f) N/A.

Council Response

94. The council has sought to respond to the matters / issues raised in responses by drawing the Inspector's attention to published evidence and national policy and guidance. Where appropriate it has also indicated where it considers it might be appropriate to consider revision to a proposed Main Modification.

- a) The council notes the comments raised in the response and is amenable to inserting a title for the chart (the housing trajectory chart has no name in the original submission version of the plan) and labelling the axes subject to direction from the Inspector.
- b) The council notes the comments raised in the response and would consider revisions to the colours used subject to direction from the Inspector.
- c) The council has presented supporting data for the chart in its five-year housing land supply report (MMCD5: [purbeck-5-yhls-2020-final-redacted.pdf \(dorsetcouncil.gov.uk\)](#)).
- d) The variations in the rates of housing delivery over the plan period reflect the evidence on expected build out rates provided by landowners / developers, the council's estimates on windfall delivery (based on previous windfall delivery rates) and an estimate of the numbers of homes delivered on small sites. The council's evidence on this matter is presented in its five-year housing land supply report (MMCD5).
- e) The council's submission draft housing trajectory does not identify the number of homes to be delivered over the local plan period. The council would take direction from the Planning Inspector on this matter.
- f) Councils may legitimately rely on windfall development as a source of housing land supply. The council considers that the numbers of homes it has relied upon to be delivered as windfall are justified on previous delivery rates. The council has also clarified that it does not expect new homes to be delivered as windfall until years 2023 to 2024 and 2024 to 2025.

Proposed Main Modification 30: Chapter 4, Housing, Policy H2

Summary of matters / issues raised in responses

95. The council received responses relating to this proposed Main Modification raising the following matters / issues:

- a) Clarify housing land supply from extant permissions (table in Appendix 2 of small and medium sized sites indicates contribution 152/153). Why aren't the other extant permissions, which the council estimates will contribute 323 to the supply, also referred to in Appendix 2? (Mr N Hill on behalf of Moreton Parish Council).
- b) The council should not take account of the supply of homes from Wareham as the neighbourhood plan is not made. Housing land supply should be adjusted to take out references to Wareham. (Mr N Hill on behalf of Moreton Parish Council).
- c) The council should clarify the changes in expected housing delivery from land supply in Swanage and through Wareham neighbourhood plan. (Mr N Hill on behalf of Moreton Parish Council).
- d) The local plan relies too heavily on windfall development. (West Lulworth Parish Council).
- e) Not clear where the further homes (in excess of the housing requirement of 2,880) will be delivered. (West Lulworth Parish Council).

Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound

96. Respondents have suggested the following changes:

- a) N/A.
- b) N/A.
- c) N/A.
- d) N/A.
- e) N/A.

Council Response

97. The council has sought to respond to the matters / issues raised in responses by drawing the Inspector's attention to published evidence and national policy and guidance. Where appropriate it has also indicated where it considers it might be appropriate to consider revision to a proposed Main Modification.

- a) Appendix 2 (proposed Main Modification 85) identifies those small and medium sized sites which the council considers could deliver homes in

accordance with paragraph 68 of the National Planning Policy Framework (this includes possible small sites, allocated sites in made and emerging neighbourhood plans and those sites which have planning permission). The numbers of homes which the council expects to be delivered from sites with planning permission (152) reflects the number in 'Appendix 1: Minor sites with planning permission' in the council's five year housing land supply report (MMCD5: [purbeck-5-yhls-2020-final-redacted.pdf \(dorsetcouncil.gov.uk\)](https://www.dorsetcouncil.gov.uk/media/1000000/purbeck-5-yhls-2020-final-redacted.pdf)). Appendix 2 only lists small and medium sized sites as defined in paragraph 68 of the National Planning Policy Framework.

- b) The council is satisfied that sites identified in the Wareham Neighbourhood Plan will deliver homes in accordance with the trajectory (Table 13 of the council's five-year housing land supply report, MMCD5).
- c) The council's five-year housing land supply report clarifies and justifies the expected delivery of homes from sites allocated in adopted (Swanage Local Plan 2017: see paragraph 36 and 37 of MMCD5) and emerging plans (Wareham Neighbourhood Plan: see paragraphs 43 to 56 of MMCD5).
- d) The council considers that the estimates of windfall development identified in the housing land supply are reasonable and justified (see paragraphs 58 to 61 of the council's five-year housing land supply report).
- e) The council's five-year housing land supply report (MMCD5) identifies where it expects new homes to be delivered.

Proposed Main Modification 31: Chapter 4, Housing, paragraph 118

Summary of matters / issues raised in responses

98. The council received a response relating to this proposed Main Modification raising the following matters / issues:

- a) Proposed Main Modification unclear and ambiguous. (Mr N Hill on behalf of Moreton Parish Council).

Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound

99. Respondents have suggested the following changes:

- a) N/A.

Council Response

100. The council has sought to respond to the matters / issues raised in responses by drawing the Inspector's attention to published evidence and national policy and guidance. Where appropriate it has also indicated where it considers it might be appropriate to consider revision to a proposed Main Modification.

- a) Council notes the response.

Proposed Main Modification 32: Chapter 4, Housing, Policy H3

Summary of matters / issues raised in responses

101. The council received responses relating to this proposed Main Modification raising the following matters / issues:

- a) Suggest separating criterion (g) into two specific requirements (relating to broadband and electric vehicle charging points). (Mr N Hill on behalf of Moreton Parish Council).
- b) Developer contributions to nearby GP practice required for planned development at Moreton Station / Redbridge Pit. (Mr N Hill on behalf of Moreton Parish Council).
- c) Provision of electric charging point for electric vehicle should be a requirement. (Mr N Hill on behalf of Moreton Parish Council).
- d) This refers at d. and e. to adverse effects on Poole Harbour but deletes reference at c to the Dorset Heathlands – is this correct? (Natural England).
- e) Affordable homes will not be affordable for local people. (West Lulworth Parish Council).
- f) Include a requirement to provide charging points for electric vehicles at all homes allocated through policies H4 to H7. (West Lulworth Parish Council).
- g) Comment on criteria m. (West Lulworth Parish Council).
- h) Policy allocation for new homes at Lytchett Matravers inconsistent with criteria H3 (l), as respondent considers that development at the proposed site will not avoid harm to biodiversity. (Mr A Bagley).
- i) Government definition of affordable homes does not equate to affordability in Purbeck because of low incomes in this area. (Mr B White).

Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound

102. Respondents have suggested the following changes:

- a) N/A.
- b) N/A.
- c) N/A.
- d) N/A.
- e) N/A.

- f) N/A.
- g) N/A.
- h) N/A.
- i) Revise definition of affordable homes for the Purbeck area to reflect local incomes. (Mr B White).

Council Response

103. The council has sought to respond to the matters / issues raised in responses by drawing the Inspector's attention to published evidence and national policy and guidance. Where appropriate it has also indicated where it considers it might be appropriate to consider revision to a proposed Main Modification.

- a) Council notes response but does not consider that revision to the proposed Main Modification is necessary.
- b) In reference to health care facilities in Crossways (Atrium Health Centre), Table 1 of the council's updated Infrastructure Delivery Plan ([infrastructure-development-plan-with-cover.pdf \(dorsetcouncil.gov.uk\)](https://www.dorsetcouncil.gov.uk/infrastructure-development-plan-with-cover.pdf)) clarifies that *'This surgery will serve the new development at Moreton Station/Redbridge Pit which will be expected to make a contribution to an extension of the surgery in Crossways.'* Further details on the level of contribution are provided in Appendix 4 of the Infrastructure Delivery Plan and 'Policy I1: Developer contributions to deliver Purbeck's infrastructure'. Criterion h. of Policy H4: Moreton Station/Redbridge Pit (proposed Main Modification 35) specifically relates to financial contributions for local health infrastructure.
- c) The council notes the comments but has provided justification for the proposed Main Modification to criterion g. of Policy H3. Namely: *'To ensure that the local plan is effective and justified. The proposed Main Modification revises the requirement relating to electric vehicle charging points (as drafted, this criterion was not justified or effective). Further site specific consultation may be required with energy suppliers to ensure capacity in the existing electricity network to supply vehicle charging points on development sites, and the allowance in the viability assessment (£500 per dwelling) may not be sufficient to meet costs. The proposed Main Modification reflects these uncertainties.'*
- d) The council notes the response and has provided justification for the proposed Main Modification. Namely: *'To ensure the local plan is effective. The proposed Main Modification avoids duplication and ensures clarity, through deletion of criterion c. The requirement for site specific habitat mitigation, through Suitable Alternative Natural Green Spaces (SANGS), has been added to housing allocations Policies: H4, H5, H6 and H7 through a further proposed Main Modification listed in this schedule.'*

- e) The council has not proposed changes to the definition of 'affordable housing' through proposed Main Modifications. The definition of 'affordable housing' in the Purbeck Local Plan is consistent with the definition provided in the National Planning Policy Framework.
- f) See council response above (paragraph 101 c)).
- g) The council has not proposed Main Modifications to criteria m. of Policy H3.
- h) This issue was discussed at the hearing sessions relating to Matter E: Housing. The council published supplementary evidence on this issue in the course of the hearings (this evidence is available on its website: [Microsoft Word - 2017-06-26 Land east of Wareham Rd Ecological Appraisal Rev A.docx \(dorsetcouncil.gov.uk\)](#)). The council's justification for the proposed Main Modification was: '*To ensure that the local plan is consistent with national policy in respect to biodiversity. The proposed Main Modification reflects the requirement to seek net gains for biodiversity (paragraph 175 d) of the National Planning Policy Framework.*'
- i) See council response above (paragraph 101 e)).

Proposed Main Modification 35: Chapter 4, Housing, Policy H4

Summary of matters / issues raised in responses

104. The council received responses relating to this proposed Main Modification raising the following matters / issues:

- a) Comment on the reference to SANGs avoiding adverse impact from development. SANGs mitigate adverse impacts and cannot address all likely significant effects. (Dr A Langley).
- b) The proposed housing allocation is not positioned directly adjoining the boundary of an existing settlement. (Mr N Hill on behalf of Moreton Parish Council).
- c) Query the change (justification and evidence) from care home units to extra care home units. (Mr N Hill on behalf of Moreton Parish Council).
- d) Tenure of homes on the site adjusted without appropriate justification. Homes for the elderly not needed in Moreton Station. (Mr N Hill on behalf of Moreton Parish Council).
- e) Not a sustainable location for growth. (Mr N Hill on behalf of Moreton Parish Council).
- f) Wessex Water notes potential for variation in housing numbers. Calls for the council/developer to work with Wessex Water on the phasing of development so that it can adjust its long-term plans relating to capacity in the Warmwell sewage treatment works. Wessex Water will consider whether improvements to Warmwell sewage treatment works are needed. (Wessex Water).
- g) Parts of proposed Main Modification unclear / inconsistent. Criterion (ai) fails to have the word "Around" preceding the 65 extra care units and so is at odds with other parts of the policy. Criterion (aii) contains reference to "its overall housing requirements" which is not defined and could either mean 10% of "Around 490 new homes" (i.e. around 49 units) or "Around 490 homes plus around 65 extra care units" (i.e. around 55 units). Criterion (c) of the policy requires the site to provide 350 square metres of convenience retail floorspace; to be consistent with other proposed changes to this policy and in order to provide some flexibility, the word "around" should be added before defining the amount of floor space sought. (Mr Martin Miller, Terence O'Rourke, on behalf of the Moreton Estate).

Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound

105. Respondents have suggested the following changes:

- a) 'partially to mitigate the adverse effects from the new homes on European sites.' (Dr A Langley). Or 'to demonstrate that the mitigation

provided is effective over the lifetime of the development' (Dr A Langley).

- b) N/A.
- c) N/A.
- d) N/A.
- e) N/A.
- f) N/A.
- g) The word 'around' should precede '65 extra care units' for consistency with other parts of this policy. The policy needs to clarify whether the 10% relates to the 490 new homes or the 490 new homes plus 65 extra care units. The word 'around' should precede '350 square metres of convenience retail floorspace' to be consistent with other proposed changes to this policy and to provide some element of flexibility to meet the requirements of commercial operators. (Mr Martin Miller Terrence O'Rourke on behalf of the Moreton Estate).

Council Response

106. The council has sought to respond to the matters / issues raised in responses by drawing the Inspector's attention to published evidence and national policy and guidance. Where appropriate it has also indicated where it considers it might be appropriate to consider revision to a proposed Main Modification.

- a) The council notes comments.
- b) The respondent's comments do not relate to the proposed Main Modifications. The council is satisfied that it has prepared an appropriate development strategy for new homes that is capable of supporting sustainable patterns of growth in Purbeck (Housing need in Purbeck, assessing and seeking to meet identified need: SD85 [[sd85-housing-need-12-08-2019.pdf \(dorsetcouncil.gov.uk\)](#)]).
- c) The council has prepared and presented evidence relating to care accommodation as part of the consultation on proposed Main Modifications (Care home provision modification to improve clarity: SD95 [[sd95-proposed-changes-to-care-provision-12-08-2019.pdf \(dorsetcouncil.gov.uk\)](#)] and Planning the care provision for the Purbeck area in response to actions 33, 34 and 47 arising from the Purbeck Local Plan 2018-2034 examination in public':SD115 [[sd115-councils-response-to-actions-33-34-and-47-03-10-2019.pdf \(dorsetcouncil.gov.uk\)](#)]).
- d) The council has prepared evidence to justify the mix and type of homes in Policy H4 (see references in response at paragraph 104 c)).
- e) The council notes the comment.

- f) The council notes the comments from Wessex Water and the opportunities for prior engagement around investment in sewage treatment works before a planning application is submitted.
- g) The council notes the comments and, subject to the Inspector's direction, would be amenable to the changes suggested by the respondent. (The council notes that changes to similar drafting in other housing allocations policies may be required).

Proposed Main Modification 36: Chapter 4, Housing, paragraphs 127, 128, 129, 130 and 131

Summary of matters / issues raised in responses

107. The council received responses relating to this proposed Main Modification raising the following matters / issues:

- a) Proposed numbers of new homes to be delivered at Wool now unclear. (West Lulworth Parish Council).
- b) Proposed housing numbers in policies are potentially now inconsistent with those numbers presented in the consultation. (West Lulworth Parish Council).
- c) Housing requirement, including the need for extra care accommodation, is not justified. (Mr S Smith on behalf of Wool Parish Council) (Mr A Wilson).

Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound

108. Respondents have suggested the following changes:

- a) N/A.
- b) N/A.
- c) N/A.

Council Response

109. The council has sought to respond to the matters / issues raised in responses by drawing the Inspector's attention to published evidence and national policy and guidance. Where appropriate it has also indicated where it considers it might be appropriate to consider revision to a proposed Main Modification.

- a) The council notes the proposed comments. Respondents have been given an opportunity to consider and make representations on the proposed Main Modifications through the recent consultation. The proposed Main Modification will allow effective use of land on the sites around Wool in accordance with national planning policy. The council has not sought to increase or reduce the extent of the proposed housing allocations around Wool.
- b) The council notes the proposed comments. Respondents have been given an opportunity to consider and make representations on the proposed Main Modifications through the recent consultation. There will be a further opportunity to make comment on subsequent planning applications.

- c) The council has prepared and presented evidence relating to care accommodation as part of the consultation on proposed Main Modifications (Care home provision modification to improve clarity: SD95 [[sd95-proposed-changes-to-care-provision-12-08-2019.pdf](https://www.dorsetcouncil.gov.uk/media/12082019/sd95-proposed-changes-to-care-provision-12-08-2019.pdf) ([dorsetcouncil.gov.uk](https://www.dorsetcouncil.gov.uk))] and Planning the care provision for the Purbeck area in response to actions 33, 34 and 47 arising from the Purbeck Local Plan 2018-2034 examination in public':SD115 [[sd115-councils-response-to-actions-33-34-and-47-03-10-2019.pdf](https://www.dorsetcouncil.gov.uk/media/03102019/sd115-councils-response-to-actions-33-34-and-47-03-10-2019.pdf) ([dorsetcouncil.gov.uk](https://www.dorsetcouncil.gov.uk))]).

Proposed Main Modification 37: Chapter 4, Housing, changes to paragraph 133 and insert new paragraph after

Summary of matters / issues raised in responses

110. The council received responses relating to this proposed Main Modification raising the following matters / issues:

- a) Statement around extension of Wool Primary School not effective as not possible to extend the school. (Mr S Smith on behalf of Wool Parish Council) (Mr A Wilson).
- b) Allocation of ancient woodland as a SANG inconsistent with national planning policy relating to irreplaceable habitats. (Mr S Smith on behalf of Wool Parish Council) (Mr A Wilson).

Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound

111. Respondents have suggested the following changes:

- a) N/A.
- b) N/A.

Council Response

112. The council has sought to respond to the matters / issues raised in responses by drawing the Inspector's attention to published evidence and national policy and guidance. Where appropriate it has also indicated where it considers it might be appropriate to consider revision to a proposed Main Modification.

- a) The proposed Main Modification does not substantively change paragraph 133. The impacts of proposed housing development on Wool, including supporting infrastructure, were discussed at length during examination hearing sessions.
- b) The council notes comments. The proposed Main Modification outlines mitigation measures to avoid loss or deterioration of the Ancient Woodland.

Proposed Main Modification 38: Chapter 4, Housing, Policy H5

Summary of matters / issues raised in responses

113. The council received responses relating to this proposed Main Modification raising the following matters / issues:

- a) Reference to SANGs avoiding adverse impact from development. SANGs mitigate adverse impacts and cannot address all likely significant effects. (Dr A Langley).
- b) Include Wool within a 'Wild Belt'. (Ms R Palmer on behalf of Wool Flora and Fauna).
- c) Criterion (e) of Policy H5 (relating to off-site improvements to Wool Railway Station) should be revised because this land is not within the landowner's control. (Savills on behalf of The Lulworth Estate, Redwood Partnership and Mr Andrew Jackson)
- d) Comment over the reference to community facilities. (Savills on behalf of The Lulworth Estate, Redwood Partnership and Mr Andrew Jackson).
- e) Coombe / North Wood inappropriate for use as SANG because of conservation value. (Dr A C Warne).
- f) Development at Wool may potentially impact on land which is functionally related to habitat sites. (Dr A C Warne).
- g) Council should precisely define housing numbers in allocations policy (H5). (West Lulworth Parish Council).
- h) Wessex Water notes potential for variation in housing numbers. Calls for the council / developer to work with Wessex Water on the phasing of development so that it can adjust its long-term plans relating to capacity in the East Burton Crossroads sewage treatment works. Wessex Water will consider whether improvements to East Burton Crossroads sewage treatment works are needed. (Wessex Water).
- i) Housing requirement, including the need for extra care accommodation, is not justified. (Mr S Smith on behalf of Wool Parish Council) (Mr A Wilson).
- j) Infrastructure requirements for development not justified or phased to ensure effectiveness. (Mr S Smith on behalf of Wool Parish Council) (Mr A Wilson).
- k) Postpone consideration/decisions on the Purbeck Local Plan in anticipation of new government policy. Not clear that there is a housing market for proposed homes in Wool or that extra care accommodation is needed. Review housing land supply post Covid-19 pandemic, taking account of newly available brownfield land (e.g. office space/shops). SANG for proposed homes will be provided at North Wood rather than

Coombe Wood. Further details on management of recreational space that includes Scheduled Monument for land to the West of Chalk Pit lane are needed. Wool is not a sustainable location for growth. (Ms W Riddle).

Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound

114. Respondents have suggested the following changes:

- a) '**partially** to **mitigate** the adverse effects from the new homes on European sites.' Or 'to demonstrate that **the mitigation provided is effective** over the lifetime of the development' (Dr A Langley).
- b) N/A.
- c) Revise criterion (e) from 'provide details of improvements to the travel interchange at Wool station'. to '**provide financial contributions toward improvements..**'. (Savills on behalf of The Lulworth Estate, Redwood Partnership and Mr Andrew Jackson).
- d) Changes to each of the parts of the policy which relates to the specific sites: i) 'Land to the west of Chalk Pit Lane and Oakdene Road, Land as shown on the policies map will help to meet the District's housing needs by providing up to around 320 new homes, **and** around 65 bed extra care units, ~~community facilities and infrastructure~~. Subject to the requirements **set out at criteria a-j above and the** other policies in this plan, development on this site will be expected to.....', ii) 'Land to the north east of Burton Cross Roundabout, Land as shown on the policies map will help to meet the District's housing needs by providing up to around 90 new homes, ~~community facilities and infrastructure~~. Subject to the requirements **set out at criteria a-j above and the** other policies in this plan, development on this site will be expected to.....', iii) 'Land to the north west of Burton Cross Roundabout, Land as shown on the policies map will help to meet the District's housing needs by providing up to around 30 new homes, ~~community facilities and infrastructure~~. Subject to the requirements **set out at criteria a-j above and the** other policies in this plan, development on this site will be expected to.....' and iv) 'Land to the north of the railway line, Land as shown on the policies map will help to meet the District's housing needs by providing up to around 30 new homes, ~~community facilities and infrastructure~~. Subject to the requirements **set out at criteria a-j above and the** other policies in this plan, development on this site will be expected to.....' (Savills on behalf of The Lulworth Estate, Redwood Partnership and Mr Andrew Jackson).
- e) N/A.
- f) N/A.
- g) N/A.

- h) N/A.
- i) N/A.
- j) N/A.
- k) N/A.

Council Response

115. The council has sought to respond to the matters / issues raised in responses by drawing the Inspector's attention to published evidence and national policy and guidance. Where appropriate it has also indicated where it considers it might be appropriate to consider revision to a proposed Main Modification.

- a) The council notes comments.
- b) The council does not consider that this comment relates to a proposed Main Modification or supporting documents.
- c) While not subject to proposed Main Modification, the council would not raise objections to the following revisions to proposed Main Modification 38: '~~provide details of improvements~~ **financial contributions toward improvements** to the travel interchange at Wool Railway Station to include additional car parking, secure cycle storage, and electric vehicle charging points;'
- d) The council notes the comments and would not raise objection to the further suggested revisions.
- e) This matter was discussed during the hearing sessions (reference Matter E: Housing, Issue 1: Housing Allocations (Policy H4, Policy H5, Policy H6 and Policy H7), Q18 (b)). The council does not propose any Main Modifications relating to the SANG which will serve planned housing development in Wool.
- f) The council has prepared a revised Habitats Regulation Assessment (HRA) which considers the effects of the local plan on habitat sites (MMCD 3: [purbeck-lp-main-modifications-hra-231020-final.pdf](https://www.dorsetcouncil.gov.uk/media/231020-final.pdf) ([dorsetcouncil.gov.uk](https://www.dorsetcouncil.gov.uk))).
- g) The council notes the response. The changes to the references to housing numbers in the proposed Main Modification are necessary to make the local plan sound (more specifically consistent with the parts of the National Planning Policy Framework relating to the effective use of land).
- h) The council notes the response and will work with Wessex Water and the owners / site developer prior to submission of a planning application to ensure that where deemed necessary, preparations can be made around building capacity into the sewage network.

- i) SD115 'Planning the Care Provision for the Purbeck Area in response to actions 33, 34 and 47 arising from the Purbeck Local Plan 2019 – 2034 examination in public' ([sd115-councils-response-to-actions-33-34-and-47-03-10-2019.pdf \(dorsetcouncil.gov.uk\)](#)) summarises the evidence and justification for the extra care accommodation sought through Policies H4: Moreton Station/Redbridge Pit and H5: Wool. The council's assessment of housing need is consistent with government methodology (see SD85: Housing Need in Purbeck - [sd85-housing-need-12-08-2019.pdf \(dorsetcouncil.gov.uk\)](#)).
- j) The council has specified and justified the infrastructure needed to support the homes identified in this policy allocation in its updated Infrastructure Delivery Plan (MMCD6: [infrastructure-development-plan-with-cover.pdf \(dorsetcouncil.gov.uk\)](#)).
- k) Government has encouraged councils to continue preparing their local plans despite their consultation on long term plans for change to the planning system presented in 'Planning for the Future' ([Planning newsletter - October 2020 \(publishing.service.gov.uk\)](#)). The council has presented evidence around the deliverability of new homes in Wool in its revised five year housing land supply report (MMCD5: [purbeck-5-yhls-2020-final-redacted.pdf \(dorsetcouncil.gov.uk\)](#)). The council has presented evidence in respect to the need and types of care accommodation required in Purbeck (SD115: [sd115-councils-response-to-actions-33-34-and-47-03-10-2019.pdf \(dorsetcouncil.gov.uk\)](#)). The council expects to receive further details on the management of the proposed SANG at Coombe Wood at the point planning applications are submitted for consideration. The council considers that the distribution of homes at the sites allocated in the local plan is sustainable (SD85: [sd85-housing-need-12-08-2019.pdf \(dorsetcouncil.gov.uk\)](#)).

Proposed Main Modification 39: Chapter 4, Housing, paragraph 134

Summary of matters / issues raised in responses

116. The council received a response relating to this proposed Main Modification raising the following matters / issues:

- a) Council should precisely define housing numbers in allocations policy. (West Lulworth Parish Council).

Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound

117. Respondents have suggested the following changes:

- a) N/A.

Council Response

118. The council has sought to respond to the matters / issues raised in responses by drawing the Inspector's attention to published evidence and national policy and guidance. Where appropriate it has also indicated where it considers it might be appropriate to consider revision to a proposed Main Modification.

- a) The changes to the references to housing numbers in the proposed Main Modification are necessary to make the local plan sound (more specifically to ensure the local plan is consistent with the parts of the National Planning Policy Framework relating to the effective use of land).

Proposed Main Modification 40: Chapter 4, Housing, Policy H6

Summary of matters / issues raised in responses

119. The council received responses relating to this proposed Main Modification raising the following matters / issues:

- a) Reference to SANGs avoiding adverse impact from development. SANGs mitigate adverse impacts and cannot address all likely significant effects. (Dr A Langley).
- b) Wessex Water is carrying out an investigation after frequent overflows from Bulbury Lane sewage pumping station (the likely cause is ground water inundating sewers). Additional foul flows from proposed allocations will have minimal impact on the existing overflows. Wessex Water do not consider that it is necessary to delay development in response to the overflows from Bulbury Lane pumping station. Wessex Water is investigating solutions to the issues here. (Wessex Water).
- c) Changes around housing numbers for sites means policy is now unclear and ambiguous. (Mr A Bagley).
- d) Proposed SANG at Lytchett Matravers will not be effective because of its position relative to sites for new homes (specifically proposed homes on the southern side of the village). (Mr A Bagley).

Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound

120. Respondents have suggested the following changes:

- a) 'partially to mitigate the adverse effects from the new homes on European sites.' (Dr A Langley). Or 'to demonstrate that the mitigation provided is effective over the lifetime of the development' (Dr A Langley).
- b) N/A.
- c) N/A.
- d) N/A.

Council Response

121. The council has sought to respond to the matters / issues raised in responses by drawing the Inspector's attention to published evidence and national policy and guidance. Where appropriate it has also indicated where it considers it might be appropriate to consider revision to a proposed Main Modification.

- a) The council notes the response.
- b) The council notes Wessex Water's response on this matter.

- c) The changes to the references to housing numbers in the proposed Main Modification are necessary to make the local plan sound (more specifically to ensure the local plan is consistent with the parts of the National Planning Policy Framework relating to the effective use of land).
- d) The effectiveness of the proposed SANG at Flowers Drove was discussed during the hearing sessions relating to Matter E: Housing. The council's proposed Main Modifications do not affect the position or size of the proposed SANG at Lytchett Matravers.

Proposed Main Modification 41: Chapter 4, Housing, Policy H7

Summary of matters / issues raised in responses

122. The council received responses relating to this proposed Main Modification raising the following matters / issues:

- a) Reference to SANGs avoiding adverse impact from development. SANGs mitigate adverse impacts and cannot address all likely significant effects. (Dr A Langley).
- b) Drainage and water supply strategies have been realised to accommodate development. (Wessex Water).

Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound

123. Respondents have suggested the following changes:

- a) 'partially to mitigate the adverse effects from the new homes on European sites.' Or 'to demonstrate that the mitigation provided is effective over the lifetime of the development' (Dr A Langley).
- b) N/A.

Council Response

124. The council has sought to respond to the matters / issues raised in responses by drawing the Inspector's attention to published evidence and national policy and guidance. Where appropriate it has also indicated where it considers it might be appropriate to consider revision to a proposed Main Modification.

- a) The council notes the response.
- b) The council notes Wessex Water's response on this matter.

Proposed Main Modification 42: Chapter 4, Housing, Paragraphs 148 and 149 (insertions and deletions)

Summary of matters / issues raised in responses

125. The council received responses relating to this proposed Main Modification raising the following matters / issues:

- a) The wording of this MM essentially repeats the requirement to comply with policy E7 and does not quite match the usual requirements for in-combination effects and avoiding / mitigating effects. (Dr A Langley).
- b) Comment on text in paragraph 148 which is not subject to proposed Main Modification ('...which respects its surroundings, can have an important role in enhancing and maintaining the vitality of rural communities.'). (West Lulworth Parish Council).
- c) The council has not sought to limit the numbers of small housing sites adjoining ranked settlements in its hierarchy. (West Lulworth Parish Council).

Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound

126. Respondents have suggested the following changes:

- a) 'The effects of small housing sites on European sites will need to be carefully considered on a case by case basis. The Council will screen proposed development for likely significant effects on European sites alone, or in combination with other **plans and projects**. Where development is found to have likely significant effects on European site(s) an appropriate assessment will be required. Applicants should provide full details of any mitigation measures needed to avoid **or mitigate** adverse impacts on European sites with their planning application, and demonstrate that mitigation can be delivered and maintained over the life time of development.' Or 'The effects of small housing sites on European sites will need to be carefully considered on a case by case basis **and must comply with Policy E7, and Policies E8 & E9 if applicable**. Applicants should provide full details of any mitigation measures needed to avoid **or mitigate** adverse impacts on European sites with their planning application, and demonstrate that mitigation can be delivered and maintained over the lifetime of development.' (Dr A Langley).
- b) N/A.
- c) N/A.

Council Response

127. The council has sought to respond to the matters / issues raised in responses by drawing the Inspector's attention to published evidence and national policy and guidance. Where appropriate it has also indicated where it considers it might be appropriate to consider revision to a proposed Main Modification.

- a) The council notes the response and would not object to the insertion of the words 'or mitigate'. In respect to the need and justification for this part of the proposed Main Modification, paragraph A9 of the Inspector's Post Hearing Note states: *'In addition to the proposed modifications to the environment policies referred to above, the Council has drafted modifications to the small sites policy (policy H8), the rural exception sites policy (policy H12) and the supporting vibrant and attractive tourism policy (policy EE4) to reflect the Habitats Regulations in relation to the protected environment. Similar modifications should be included to other policies relating to unallocated residential development (policies H13 and H15), employment development (policies EE2 and EE3) and the Wareham integrated health and social care hub (policy I6). It will also be necessary to ensure that the effects of development intended through Neighbourhood Plan allocations are addressed.'* ([post-hearings-note-20-03-2020.pdf \(dorsetcouncil.gov.uk\)](https://www.dorsetcouncil.gov.uk/media/20-03-2020/post-hearings-note-20-03-2020.pdf)).
- b) The council notes the comment but is not seeking to vary the text in paragraph 148 which is subject to comment from West Lulworth Parish Council.
- c) The proposed Main Modification to paragraph 149 expressly clarifies that the council has not sought to limit the number of small sites that may be permitted adjoining ranked settlements (as defined in the local plan) through Policy H8. The proposed Main Modification clarifies that it expects the cumulative effects of small sites to be considered during decision making on planning applications.

Proposed Main Modification 43: Chapter 4, Housing, Policy H8

Summary of matters / issues raised in responses

128. The council received responses relating to this proposed Main Modification raising the following matters / issues:

- a) Repetition of requirement in Policy E7, consider deleting paragraph or re-draft as suggested. (Dr A Langley).
- b) Cap on numbers of homes permitted on small sites not consistent with the aim of achieving sustainable patterns of growth and could lead to inefficient use of land. Cap on numbers appears arbitrary. (Origin 3 on behalf of Halsall Homes).
- c) Criterion b. 'individually and cumulatively, the size, appearance and layout of proposed homes does not harm the character and value of any landscape or settlements potentially affected by the proposals' not consistent with national planning policy as it skews planning balance in decision making. (Origin 3 on behalf of Halsall Homes).
- d) Query why the proposed Main Modification includes a re-drafting to part of the policy substituting 'does' for 'must' when assessing the impact of development on the character / value of landscapes / settlements. (West Lulworth Parish Council).
- e) Proposed Main Modifications address some of earlier concerns by limiting scale of development that may be permitted to reflect the ranking of the settlement in the council's hierarchy. Respondent still has reservations about the cumulative impacts of new homes on small sites and how these impacts might be managed. (Mr R Brown on behalf of the Dorset Area of Outstanding Natural Beauty Team).
- f) Council failed to identify small and medium sized sites in its local plan in accordance with paragraph 68 of the National Planning Policy Framework. Suggests that Policy H8 should be subject to greater limitations, as currently drafted the policy provides 'free reign for development proposals (outside the Green Belt) which adjoin villages...'. (Mr G Tulley).

Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound

129. Respondents have suggested the following changes:

- a) 'the impact of proposed development on European sites, alone or in combination with other **plans and projects**, will be screened for likely significant effects under the Conservation of Habitats and Species Regulations (amended) (EU exit), 2019. Where this is found to be the case an appropriate assessment (to include any necessary mitigation) will be required (taking into account the lifetime of the development) to

show how the development will avoid **or mitigate** adverse impact on the integrity of the relevant European site(s).' (Dr A Langley).

- b) 'a. the scale of proposed development is proportionate to the size and character of the existing settlement, ~~up to a maximum of~~ **around**:' (Origin 3 on behalf of Halsall Homes).
- c) 'Individually and cumulatively, the size, appearance and layout of proposed homes **conserves and protects the** character and value of any landscape or settlements potentially affected by the proposals'. (Origin 3 on behalf of Halsall Homes).
- d) N/A.
- e) N/A.
- f) Sites identified as potentially suitable small sites to help meet housing requirements should be part of the Development Plan - an appendix as the Inspector has proposed (to H2 and or H8) and in accord with Para 68 of the Framework. (Mr G Tulley).

Council Response

130. The council has sought to respond to the matters / issues raised in responses by drawing the Inspector's attention to published evidence and national policy and guidance. Where appropriate it has also indicated where it considers it might be appropriate to consider revision to a proposed Main Modification.

- a) The council notes the response.
- b) The council has justified the reason for the proposed Main Modification in MMCD1. SD86: 'Review of sources of housing supply', at paragraphs 11.1 to 11.6, provides further justification for the proposed Main Modification ([sd86-review-of-sources-of-housing-supply-12-08-2019.pdf](https://www.dorsetcouncil.gov.uk/media/12082019/sd86-review-of-sources-of-housing-supply-12-08-2019.pdf) ([dorsetcouncil.gov.uk](https://www.dorsetcouncil.gov.uk))).
- c) Council notes suggested revision to proposed Main Modification but is satisfied that the drafting in the proposed Main Modification is justified, effective and consistent with national planning policy.
- d) The council does not consider that the proposed Main Modification to criterion b. of Policy H8 has substantive impact on the policy's meaning.
- e) Council notes response and that the cumulative impact of development on small sites has been raised in earlier representation and discussed during the examination hearing sessions.
- f) The council has sought to identify small and medium sized sites in 'Appendix 2' (proposed Main Modification 85) of the local plan. It considers that the proposed Main Modification satisfies the requirement of paragraph 68 a) of the National Planning Policy Framework. The council considers that the policy criteria in Policy H8 will provide a

framework for achieving high quality sustainable development that is consistent with national planning policy.

Proposed Main Modification 45: Chapter 4, Housing, Policy H9

Summary of matters / issues raised in responses

131. The council received a response relating to this proposed Main Modification raising the following matters / issues:

- a) Proposed housing mix is unclear and lacks justification. (Mr S Smith on behalf of Wool Parish Council) (Mr A Wilson).

Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound

132. Respondents have suggested the following changes:

- a) N/A.

Council Response

133. The council has sought to respond to the matters / issues raised in responses by drawing the Inspector's attention to published evidence and national policy and guidance. Where appropriate it has also indicated where it considers it might be appropriate to consider revision to a proposed Main Modification.

- a) The council is satisfied that, with proposed Main Modifications, Policy H9 is clear and unambiguous. The housing mix is justified by the 2015 Strategic Housing Market Assessment (SD21: [Microsoft Word - Eastern Dorset SHMA Final Report \(14.10.2015\).docx \(dorsetcouncil.gov.uk\)](#)) and its 2018 (SD20: [sd20-shma-update-for-purbeck-jan-19.pdf \(dorsetcouncil.gov.uk\)](#)) update. The proposed Main Modification also clarifies that the final housing mix will be determined through discussions between the applicant and the council taking account of any other recent evidence on this issue.

Proposed Main Modification 49: Chapter 4, Housing, Paragraphs 171 and 172, Alterations / Insertions / Deletions

Summary of matters / issues raised in responses

134. The council received a response relating to this proposed Main Modification raising the following matters / issues:

- a) Repetition of requirement in Policy E7, consider deleting paragraph or re-draft as suggested. (Dr A Langley).

Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound

135. Respondents have suggested the following changes:

- a) 'the impact of proposed development on European sites, alone or in combination with other **plans and projects**, will be screened for likely significant effects under the Conservation of Habitats and Species Regulations (amended) (EU exit), 2019. Where this is found to be the case an appropriate assessment (to include any necessary mitigation) will be required (taking into account the lifetime of the development) to show how the development will avoid **or mitigate** adverse impact on the integrity of the relevant European site(s).' (Dr A Langley).

Council Response

136. The council has sought to respond to the matters / issues raised in responses by drawing the Inspector's attention to published evidence and national policy and guidance. Where appropriate it has also indicated where it considers it might be appropriate to consider revision to a proposed Main Modification.

- a) The council notes the response and would not object to the insertion of the words 'or mitigate'. In respect to the need and justification for this part of the proposed Main Modification paragraph A9 of the Inspector's Post Hearing Note states: '*In addition to the proposed modifications to the environment policies referred to above, the Council has drafted modifications to the small sites policy (policy H8), the rural exception sites policy (policy H12) and the supporting vibrant and attractive tourism policy (policy EE4) to reflect the Habitats Regulations in relation to the protected environment. Similar modifications should be included to other policies relating to unallocated residential development (policies H13 and H15), employment development (policies EE2 and EE3) and the Wareham integrated health and social care hub (policy I6). It will also be necessary to ensure that the effects of development intended through Neighbourhood Plan allocations are addressed.*' ([post-hearings-note-20-03-2020.pdf \(dorsetcouncil.gov.uk\)](https://www.dorsetcouncil.gov.uk/media/20-03-2020.pdf)).

Proposed Main Modification 50: Chapter 4, Housing, paragraph 176 and 177

Summary of matters / issues raised in responses

137. The council received a response relating to this proposed Main Modification raising the following matters / issues:

- a) The respondent has concerns that deleting supporting text could lead to fewer affordable homes on rural exception sites. (West Lulworth Parish Council).

Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound

138. Respondents have suggested the following changes:

- a) N/A.

Council Response

139. The council has sought to respond to the matters / issues raised in responses by drawing the Inspector's attention to published evidence and national policy and guidance. Where appropriate it has also indicated where it considers it might be appropriate to consider revision to a proposed Main Modification.

- a) The council notes the response.

Proposed Main Modification 52: Chapter 4, Housing, Policy H12

Summary of matters / issues raised in responses

140. The council received responses relating to this proposed Main Modification raising the following matters / issues:

- a) Repetition of requirement in Policy E7, consider deleting paragraph or re-draft as suggested. (Dr A Langley).
- b) Langton Matravers Parish Council requests the reinsertion of the final deleted paragraph to ensure that the vast majority of rural exception site housing would be affordable. (Dr M Sparks on behalf of Langton Matravers Parish Council).

Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound

141. Respondents have suggested the following changes:

- a) 'the impact of proposed development on European sites, alone or in combination with other **plans and projects**, will be screened for likely significant effects under the Conservation of Habitats and Species Regulations (amended) (EU exit), 2019. Where this is found to be the case an appropriate assessment (to include any necessary mitigation) will be required (taking into account the lifetime of the development) to show how the development will avoid **or mitigate** adverse impact on the integrity of the relevant European site(s).' (Dr A Langley).
- b) Remedy: N/A.

Council Response

142. The council has sought to respond to the matters / issues raised in responses by drawing the Inspector's attention to published evidence and national policy and guidance. Where appropriate it has also indicated where it considers it might be appropriate to consider revision to a proposed Main Modification.

- a) The council notes the response a) and would not raise objection to the insertion of the words 'or mitigate'. In respect to the need and justification for this part of the proposed Main Modification paragraph A9 of the Inspector's Post Hearing Note states: '*In addition to the proposed modifications to the environment policies referred to above, the Council has drafted modifications to the small sites policy (policy H8), the rural exception sites policy (policy H12) and the supporting vibrant and attractive tourism policy (policy EE4) to reflect the Habitats Regulations in relation to the protected environment. Similar modifications should be included to other policies relating to unallocated residential development (policies H13 and H15), employment development (policies EE2 and EE3) and the Wareham integrated health and social care hub (policy 16). It will also be necessary to ensure that the effects of development*

intended through Neighbourhood Plan allocations are addressed.' ([post-hearings-note-20-03-2020.pdf \(dorsetcouncil.gov.uk\)](#)).

- b) The council notes the response. The inclusion and implications of the deleted final paragraph of Policy H12 were raised as matters in earlier representation and discussed during the examination hearing sessions. The Inspector notes in her Post Hearing Note that '*The final paragraph of the rural exceptions sites policy (Policy H12) in the submitted Plan would appear to have been superseded by the inclusion of criterion f in the proposed modification (MM58). Accordingly, it should be indicated as deleted in the revised schedule.*' (Paragraph A12: [post-hearings-note-20-03-2020.pdf \(dorsetcouncil.gov.uk\)](#)).

Proposed Main Modification 53: Chapter 4, Housing, Insert New Paragraph (after 181)

Summary of matters / issues raised in responses

143. The council received a response relating to this proposed Main Modification raising the following matters / issues:

- a) Repetition of requirement in Policy E7, consider deleting paragraph or re-draft as suggested. (Dr A Langley).

Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound

144. Respondents have suggested the following changes:

- a) 'the impact of proposed development on European sites, alone or in combination with other **plans and projects**, will be screened for likely significant effects under the Conservation of Habitats and Species Regulations (amended) (EU exit), 2019. Where this is found to be the case an appropriate assessment (to include any necessary mitigation) will be required (taking into account the lifetime of the development) to show how the development will avoid **or mitigate** adverse impact on the integrity of the relevant European site(s).' (Dr A Langley).

Council Response

145. The council has sought to respond to the matters / issues raised in responses by drawing the Inspector's attention to published evidence and national policy and guidance. Where appropriate it has also indicated where it considers it might be appropriate to consider revision to a proposed Main Modification.

- a) The council notes the comments and would not raise objection to the words 'or mitigate'. In respect to the need and justification for this part of the proposed Main Modification paragraph A9 of the Inspector's Post Hearing Note states: '*In addition to the proposed modifications to the environment policies referred to above, the Council has drafted modifications to the small sites policy (policy H8), the rural exception sites policy (policy H12) and the supporting vibrant and attractive tourism policy (policy EE4) to reflect the Habitats Regulations in relation to the protected environment. Similar modifications should be included to other policies relating to unallocated residential development (policies H13 and H15), employment development (policies EE2 and EE3) and the Wareham integrated health and social care hub (policy I6). It will also be necessary to ensure that the effects of development intended through Neighbourhood Plan allocations are addressed.*' ([post-hearings-note-20-03-2020.pdf \(dorsetcouncil.gov.uk\)](https://www.dorsetcouncil.gov.uk/post-hearings-note-20-03-2020.pdf)).

Proposed Main Modification 54: Chapter 4, Housing, Policy H13

Summary of matters / issues raised in responses

146. The council received a response relating to this proposed Main Modification raising the following matters / issues:

- a) Repetition of requirement in Policy E7, consider deleting paragraph or re-draft as suggested. (Dr A Langley).

Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound

147. Respondents have suggested the following changes:

- a) 'the impact of proposed development on European sites, alone or in combination with other **plans and projects**, will be screened for likely significant effects under the Conservation of Habitats and Species Regulations (amended) (EU exit), 2019. Where this is found to be the case an appropriate assessment (to include any necessary mitigation) will be required (taking into account the lifetime of the development) to show how the development will avoid **or mitigate** adverse impact on the integrity of the relevant European site(s).' (Dr A Langley).

Council Response

148. The council has sought to respond to the matters / issues raised in responses by drawing the Inspector's attention to published evidence and national policy and guidance. Where appropriate it has also indicated where it considers it might be appropriate to consider revision to a proposed Main Modification.

- a) The council notes comments and would not raise objection to the words 'or mitigate'. In respect to the need and justification for this part of the proposed Main Modification paragraph A9 of the Inspector's Post Hearing Note states: '*In addition to the proposed modifications to the environment policies referred to above, the Council has drafted modifications to the small sites policy (policy H8), the rural exception sites policy (policy H12) and the supporting vibrant and attractive tourism policy (policy EE4) to reflect the Habitats Regulations in relation to the protected environment. Similar modifications should be included to other policies relating to unallocated residential development (policies H13 and H15), employment development (policies EE2 and EE3) and the Wareham integrated health and social care hub (policy I6). It will also be necessary to ensure that the effects of development intended through Neighbourhood Plan allocations are addressed.*' ([post-hearings-note-20-03-2020.pdf \(dorsetcouncil.gov.uk\)](https://www.dorsetcouncil.gov.uk/post-hearings-note-20-03-2020.pdf)).

Proposed Main Modification 57: Chapter 4, Housing, Policy H14

Summary of matters / issues raised in responses

149. The council received responses relating to this proposed Main Modification raising the following matters / issues:

- a) Scope of the second homes policy should be extended across the whole of Purbeck. (West Lulworth Parish Council).
- b) Langton Matravers Parish Council requests the insertion at the end of the 2nd paragraph, "*in the event that such a planning condition/obligation is not complied with or the permission/obligation is withdrawn then the property in question will, in perpetuity, be subject to the principal residence restriction which would have applied if the commercial holiday let planning permission had not been granted*". (Dr M Sparks on behalf of Langton Matravers Parish Council).

Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound

150. Respondents have suggested the following changes:

- a) N/A.
- b) N/A.

Council Response

151. The council has sought to respond to the matters / issues raised in responses by drawing the Inspector's attention to published evidence and national policy and guidance. Where appropriate it has also indicated where it considers it might be appropriate to consider revision to a proposed Main Modification.

- a) The proposed Main Modification does not affect the scope of Policy H14. The council has presented evidence on this matter as part of the submission Purbeck Local Plan and the Planning Inspector raised a question for discussion on this issue through the examination hearing sessions (Matter E: Housing, Issue 4: Other housing policies, Q10 (a)).
- b) Planning law does not give the council discretion to impose further planning conditions following the grant of planning permission. Section 70 (1) (a) of the Town and Country Planning Act 1990 states that councils '*may grant planning permission, either unconditionally or subject to such conditions as they think fit*'. It does not give the council power to impose further conditions in the event of breach / withdrawal of other planning conditions or a planning obligation.

Proposed Main Modification 59: Chapter 4, Housing, Paragraphs 191 and 192

Summary of matters / issues raised in responses

152. The council received a response relating to this proposed Main Modification raising the following matters / issues:

- a) Repetition of requirement in Policy E7, consider deleting paragraph or re-draft as suggested. (Dr A Langley).

Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound

153. Respondents have suggested the following changes:

- a) 'the impact of proposed development on European sites, alone or in combination with other **plans and projects**, will be screened for likely significant effects under the Conservation of Habitats and Species Regulations (amended) (EU exit), 2019. Where this is found to be the case an appropriate assessment (to include any necessary mitigation) will be required (taking into account the lifetime of the development) to show how the development will avoid **or mitigate** adverse impact on the integrity of the relevant European site(s).' (Dr A Langley).

Council Response

154. The council has sought to respond to the matters / issues raised in responses by drawing the Inspector's attention to published evidence and national policy and guidance. Where appropriate it has also indicated where it considers it might be appropriate to consider revision to a proposed Main Modification.

- a) The council notes comments and would not raise objection to the words 'or mitigate'. In respect to the need and justification for this part of the proposed Main Modification paragraph A9 of the Inspector's Post Hearing Note states: '*In addition to the proposed modifications to the environment policies referred to above, the Council has drafted modifications to the small sites policy (policy H8), the rural exception sites policy (policy H12) and the supporting vibrant and attractive tourism policy (policy EE4) to reflect the Habitats Regulations in relation to the protected environment. Similar modifications should be included to other policies relating to unallocated residential development (policies H13 and H15), employment development (policies EE2 and EE3) and the Wareham integrated health and social care hub (policy I6). It will also be necessary to ensure that the effects of development intended through Neighbourhood Plan allocations are addressed.*' ([post-hearings-note-20-03-2020.pdf \(dorsetcouncil.gov.uk\)](https://www.dorsetcouncil.gov.uk/post-hearings-note-20-03-2020.pdf)).

Proposed Main Modification 60: Chapter 4, Housing, Policy H15

Summary of matters / issues raised in responses

155. The council received a response relating to this proposed Main Modification raising the following matters / issues:

- a) Repetition of requirement in Policy E7, consider deleting paragraph or re-draft as suggested. (Dr A Langley).

Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound

156. Respondents have suggested the following changes:

- a) 'the impact of proposed development on European sites, alone or in combination with other **plans and projects**, will be screened for likely significant effects under the Conservation of Habitats and Species Regulations (amended) (EU exit), 2019. Where this is found to be the case an appropriate assessment (to include any necessary mitigation) will be required (taking into account the lifetime of the development) to show how the development will avoid **or mitigate** adverse impact on the integrity of the relevant European site(s).' (Dr A Langley).

Council Response

157. The council has sought to respond to the matters / issues raised in responses by drawing the Inspector's attention to published evidence and national policy and guidance. Where appropriate it has also indicated where it considers it might be appropriate to consider revision to a proposed Main Modification.

- a) The council notes comments and would not raise objection to the words 'or mitigate'. In respect to the need and justification for this part of the proposed Main Modification paragraph A9 of the Inspector's Post Hearing Note states: '*In addition to the proposed modifications to the environment policies referred to above, the Council has drafted modifications to the small sites policy (policy H8), the rural exception sites policy (policy H12) and the supporting vibrant and attractive tourism policy (policy EE4) to reflect the Habitats Regulations in relation to the protected environment. Similar modifications should be included to other policies relating to unallocated residential development (policies H13 and H15), employment development (policies EE2 and EE3) and the Wareham integrated health and social care hub (policy I6). It will also be necessary to ensure that the effects of development intended through Neighbourhood Plan allocations are addressed.*' ([post-hearings-note-20-03-2020.pdf \(dorsetcouncil.gov.uk\)](https://www.dorsetcouncil.gov.uk/post-hearings-note-20-03-2020.pdf)).

Proposed Main Modification 61: Chapter 5, Economy, Policy EE1

Summary of matters / issues raised in responses

158. The council received responses relating to this proposed Main Modification raising the following matters / issues:

- a) Object to suggested safeguarding of employment land at Westminster Road and Johns Road industrial estates, on the basis that the remaining safeguarded land is non-strategic scale, that these sites are likely to be suitable for homes in the long term and that release and re-use would be consistent with national planning policy. The council has informally suggested that this policy is also required to limit the number of new homes north of the railway line because of potential impacts on habitat sites. Further clarification on justification for the proposed Main Modification is needed if this is the case. Alternatively, this issue can be dealt with at planning application stage. (Wareham Town Council) (Dr D Evans on behalf of the Wareham Neighbourhood Plan Steering Group).
- b) Lack of justification for not defining land adjacent (7.6 hectares) to Dorset Innovation Park as 'employment land' and safeguarding this land through policy EE1. (East Stoke Parish Council).
- c) Reintroduce reference to B8 uses in respect to policy EE1 for consistency with policy EE2. (Chapman Lily Planning on behalf of Birchmere Ltd).
- d) The policy should re-consider allocating land adjacent to Holton Heath Industrial Estate for employment purposes. (Chapman Lily Planning on behalf of Birchmere Ltd).
- e) The policy should re-consider allocating Admiralty Park for employment purposes. (Chapman Lily Planning on behalf of Birchmere Ltd).
- f) Safeguarding of employment land in Wareham should be dictated by strategic local plan policies as opposed to non-strategic policies in neighbourhood plans. (Carter Jonas on behalf of Welbeck Land).
- g) Revision to safeguarding of employment land in Wareham could introduce incompatible uses with one-another. (Carter Jonas on behalf of Welbeck Land).

Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound

159. Respondents have suggested the following changes:

- a) Release safeguarding of remaining employment land at Westminster Road Industrial Estate and Johns Road Industrial Estate Wareham. The issues relating to this matter can be dealt with at planning application stage. (Wareham Town Council) (Dr D Evans on behalf of the Wareham Neighbourhood Plan Steering Group).

- b) N/A.
- c) Policy EE1 should be amended to refer to B8 as an acceptable use and make it consistent with Policy EE2. This would make the policy NPPF compliant (NPPG paragraph 16d). (Chapman Lily Planning on behalf of Birchmere Ltd).
- d) White land at Holton Gate and Admiralty Park should be included as part of the strategic employment site allocation. This would make the plan NPPF compliant in terms of being flexible (paragraphs 11a and 81d) and positive (paragraphs 16b and 81a). (Chapman Lily Planning on behalf of Birchmere Ltd).
- e) The above changes would make the plan sound in terms of being positively prepared, justified and consistent with national policy. (Chapman Lily Planning on behalf of Birchmere Ltd).
- f) N/A.
- g) N/A.

Council Response

160. The council has sought to respond to the matters / issues raised in responses by drawing the Inspector's attention to published evidence and national policy and guidance. Where appropriate it has also indicated where it considers it might be appropriate to consider revision to a proposed Main Modification.

- a) The council has presented evidence on the matters raised in this comment during the examination hearing sessions. Paragraph 9.1 of SD86 ([sd86-review-of-sources-of-housing-supply-12-08-2019.pdf](https://www.dorsetcouncil.gov.uk/~/media/2019/08/SD86-review-of-sources-of-housing-supply-12-08-2019.pdf) ([dorsetcouncil.gov.uk](https://www.dorsetcouncil.gov.uk))) clarifies that at the point the document was prepared *'The Neighbourhood Plan is no longer intending to give consideration to the allocation of land west of Westminster Road (for 60 dwellings), as it is no longer required.'* The Dorset Heathland Supplementary Planning Document states at paragraph 5.5 that *'For large sites of approximately 50 or more dwellings provision of SANGs should form part of the overall infrastructure provision of that site, particularly where urban extensions or development on greenfield sites are proposed.'* (SD79: [Dorset-Heathlands-SPD-Oct-2015](https://www.dorsetcouncil.gov.uk/~/media/2015/10/Dorset-Heathlands-SPD-Oct-2015.pdf) ([dorsetcouncil.gov.uk](https://www.dorsetcouncil.gov.uk))). Natural England have advised through correspondence that: *'...that the approach favoured is one which will deliver the necessary SANG capacity for the proposed development (55 units) but which additionally demonstrates that the allocation set out in the neighbourhood plan at Westminster Industrial Estate can be commenced in a material way with minimal restrictions due to heathland mitigation requirements. The agreement about Areas 4 and 5 provides the option of enabling the full indicative Westminster Estate allocation should this come forward or alternatively providing capacity for other developments coming forward in Wareham. Should the Westminster Industrial Estate site not secure SANG at the Neighbourhood Plan stage it is likely that the release of Green Belt land*

would become more difficult as other locations in the District are reviewed as alternatives.’ (SD64: [sd64-natural-england-letter-231018.pdf \(dorsetcouncil.gov.uk\)](https://www.dorsetcouncil.gov.uk/documents/default.aspx?d=sd64-natural-england-letter-231018.pdf)). Releasing the safeguarding on further land at Westminster Road Industrial Estate would need to be supported by specific habitat site mitigation projects. (Paragraph 3.4.5 of the emerging Wareham Neighbourhood Plan also refers to this matter: [22.10.20-wareham-np-reduced-twice-part-1.pdf \(dorsetcouncil.gov.uk\)](https://www.dorsetcouncil.gov.uk/documents/default.aspx?d=22.10.20-wareham-np-reduced-twice-part-1.pdf)).

- b) The council notes comments but does not accept that the proposed Main Modification lacks justification having regard to representations made by Natural England on the pre-submission draft Purbeck Local Plan (see letter dated 3rd December 2018, pages 1558 to 1562 of representations: [working-responses-document-m-q-redacted-v2.pdf \(dorsetcouncil.gov.uk\)](https://www.dorsetcouncil.gov.uk/documents/default.aspx?d=working-responses-document-m-q-redacted-v2.pdf)).
- c) The council notes comments and that proposed Main Modification 61 continues to refer to Class B8 as ‘employment uses’ for the purposes of the local plan.
- d) The council notes comments. The need for employment land and the employment land supply presented in the local plan have been raised as issues in earlier representation and were subject to the Inspector’s Matters Issues and Questions (Matter G: Economy, COR10-2019-10: [cor10-2019-05-10-matters-issues-and-questions-final.pdf \(dorsetcouncil.gov.uk\)](https://www.dorsetcouncil.gov.uk/documents/default.aspx?d=cor10-2019-05-10-matters-issues-and-questions-final.pdf)). The council and other parties have previously made representation on this matter.
- e) The council notes comments. See its response at paragraph 15 d) above.
- f) The council notes comments. See its response at paragraph 15 d) above.
- g) The council notes comments. The allocation of the site for homes would be made through the emerging Wareham Neighbourhood Plan (Policy H5. Westminster Road: [22.10.20-wareham-np-reduced-twice-part-1.pdf \(dorsetcouncil.gov.uk\)](https://www.dorsetcouncil.gov.uk/documents/default.aspx?d=22.10.20-wareham-np-reduced-twice-part-1.pdf)) which is currently subject to examination.

Proposed Main Modification 63: Chapter 5, Economy, Policy EE2

Summary of matters / issues raised in responses

161. The council received a response relating to this proposed Main Modification raising the following matters / issues:

- a) Repetition of requirement in Policy E7, consider deleting paragraph or re-draft as suggested. (Dr A Langley).

Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound

162. Respondents have suggested the following changes:

- a) 'the impact of proposed development on European sites, alone or in combination with other **plans and projects**, will be screened for likely significant effects under the Conservation of Habitats and Species Regulations (amended) (EU exit), 2019. Where this is found to be the case an appropriate assessment (to include any necessary mitigation) will be required (taking into account the lifetime of the development) to show how the development will avoid **or mitigate** adverse impact on the integrity of the relevant European site(s).' (Dr A Langley).

Council Response

163. The council has sought to respond to the matters / issues raised in responses by drawing the Inspector's attention to published evidence and national policy and guidance. Where appropriate it has also indicated where it considers it might be appropriate to consider revision to a proposed Main Modification.

- a) The council notes comments and would not raise objection to the insertion of the words 'or mitigate'. In respect to the need and justification for this part of the proposed Main Modification paragraph A9 of the Inspector's Post Hearing Note states: '*In addition to the proposed modifications to the environment policies referred to above, the Council has drafted modifications to the small sites policy (policy H8), the rural exception sites policy (policy H12) and the supporting vibrant and attractive tourism policy (policy EE4) to reflect the Habitats Regulations in relation to the protected environment. Similar modifications should be included to other policies relating to unallocated residential development (policies H13 and H15), employment development (policies EE2 and EE3) and the Wareham integrated health and social care hub (policy I6). It will also be necessary to ensure that the effects of development intended through Neighbourhood Plan allocations are addressed.*' ([post-hearings-note-20-03-2020.pdf \(dorsetcouncil.gov.uk\)](https://www.dorsetcouncil.gov.uk/media/20-03-2020.pdf)).

Proposed Main Modification 65: Chapter 5, Economy Policy EE3

Summary of matters / issues raised in responses

164. The council received responses relating to this proposed Main Modification raising the following matters / issues:

- a) Repetition of requirement in Policy E7, consider deleting paragraph or re-draft as suggested. (Dr A Langley).
- b) Retail requirement at allocated sites in Wool and Moreton over prescriptive and precise. Greater flexibility required to take account of master planning process on these sites, unforeseen circumstances and the requirements of commercial operators. (Mr Martin Miller, Terence O'Rourke, on behalf of the Moreton Estate).

Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound

165. Respondents have suggested the following changes:

- a) 'the impact of proposed development on European sites, alone or in combination with other **plans and projects**, will be screened for likely significant effects under the Conservation of Habitats and Species Regulations (amended) (EU exit), 2019. Where this is found to be the case an appropriate assessment (to include any necessary mitigation) will be required (taking into account the lifetime of the development) to show how the development will avoid **or mitigate** adverse impact on the integrity of the relevant European site(s).' (Dr A Langley).
- b) To be consistent with other changes proposed in the modifications and to provide sufficient flexibility to maximise the chances of a commercially viable retail offer coming forward, we request that the word 'around' precedes '350sqm convenience retail floorspace'. (Mr Martin Miller Terrence O'Rourke on behalf of the Moreton Estate).

Council Response

166. The council has sought to respond to the matters / issues raised in responses by drawing the Inspector's attention to published evidence and national policy and guidance. Where appropriate it has also indicated where it considers it might be appropriate to consider revision to a proposed Main Modification.

- a) Council notes comments and would not raise objection to the insertion of the words 'or mitigate'. In respect to the need and justification for this part of the proposed Main Modification paragraph A9 of the Inspector's Post Hearing Note states: *'In addition to the proposed modifications to the environment policies referred to above, the Council has drafted modifications to the small sites policy (policy H8), the rural exception sites policy (policy H12) and the supporting vibrant and attractive tourism policy (policy EE4) to reflect the Habitats Regulations in relation to the protected environment. Similar modifications should be*

included to other policies relating to unallocated residential development (policies H13 and H15), employment development (policies EE2 and EE3) and the Wareham integrated health and social care hub (policy I6). It will also be necessary to ensure that the effects of development intended through Neighbourhood Plan allocations are addressed.' ([post-hearings-note-20-03-2020.pdf](https://www.dorsetcouncil.gov.uk/media/20-03-2020/post-hearings-note-20-03-2020.pdf) ([dorsetcouncil.gov.uk](https://www.dorsetcouncil.gov.uk))).

- b) The council notes comments and does not object to the further change suggested in comments.

Proposed Main Modification 66: Chapter 5 Economy, Policy EE4

Summary of matters / issues raised in responses

168. The council received responses relating to this proposed Main Modification raising the following matters / issues:

- a) Repetition of requirement in Policy E7, consider deleting paragraph or re-draft as suggested. (Dr A Langley).
- b) Object to the part of the Main Modifications text in Policy EE4 relating to the holiday park and SANG at Morden, for the reasons provided in relation to MM77 above (in respect to Policy I5) by the same respondent. (Freeths on behalf of P Bowyer (representing CPRE) and Dr A Langley).
- c) Requirement relating to existing holiday accommodation unreasonable. (The respondent gives an example of holiday accommodation which is also the owners residence). (West Lulworth Parish Council).

Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound

169. Respondents have suggested the following changes:

- a) 'the impact of proposed development on European sites, alone or in combination with other **plans and projects**, will be screened for likely significant effects under the Conservation of Habitats and Species Regulations (amended) (EU exit), 2019. Where this is found to be the case an appropriate assessment (to include any necessary mitigation) will be required (taking into account the lifetime of the development) to show how the development will avoid **or mitigate** adverse impact on the integrity of the relevant European site(s).' (Dr A Langley).
- b) Delete the following text: '~~The proposals for the holiday park at Morden Park should be assessed against the criteria in Policy I5: Morden Park strategic suitable alternative natural green space (SANG) and holiday park~~'. (Freeths on behalf of P Bowyer (representing CPRE) and Dr A Langley).
- c) N/A.

Council Response

170. The council has sought to respond to the matters / issues raised in responses by drawing the Inspector's attention to published evidence and national policy and guidance. Where appropriate it has also indicated where it considers it might be appropriate to consider revision to a proposed Main Modification.

- a) Council notes comments and would not object to the insertion of the words 'or mitigate'. In respect to the need and justification for this part of the proposed Main Modification paragraph A9 of the Inspector's Post

Hearing Note states: *'In addition to the proposed modifications to the environment policies referred to above, the Council has drafted modifications to the small sites policy (policy H8), the rural exception sites policy (policy H12) and the supporting vibrant and attractive tourism policy (policy EE4) to reflect the Habitats Regulations in relation to the protected environment. Similar modifications should be included to other policies relating to unallocated residential development (policies H13 and H15), employment development (policies EE2 and EE3) and the Wareham integrated health and social care hub (policy I6). It will also be necessary to ensure that the effects of development intended through Neighbourhood Plan allocations are addressed.'* ([post-hearings-note-20-03-2020.pdf \(dorsetcouncil.gov.uk\)](#)).

- b) After considering the matters and issues raised in the representation made by Freeths around the council's examination of alternative strategic SANG in accordance with national planning policy it is persuaded of the need for a further revision to the proposed Main Modification. This revision would involve deleting the text identified in paragraph 167 b) from Policy EE4.
- c) The council notes comments and considers that the policy's requirements are sound and legally compliant. The proposed Main Modification relates to the insertion of criterion h. The remaining parts of this part of the policy have been subject to earlier representation and consideration through the examination process.

Proposed Main Modification 69: Chapter 6, Infrastructure, Policy I1

Summary of matters / issues raised in responses

171. The council received a response relating to this proposed Main Modification raising the following matters / issues:

- a) Revise drafting relating to Policy H8 'Not *all* habitats mitigation will be secured through CIL for small sites (sub para b. ii)' (Dr A Langley).

Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound

172. Respondents have suggested the following changes:

- a) **'for small sites and windfall developments of less than 50 dwellings, habitats mitigation for urban effects on designated heathlands, increased nitrogen discharges and recreation impacts on the Poole Harbour SPA will be secured through CIL as applicable;'** (Dr A Langley).

Council Response

173. The council has sought to respond to the matters / issues raised in responses by drawing the Inspector's attention to published evidence and national policy and guidance. Where appropriate it has also indicated where it considers it might be appropriate to consider revision to a proposed Main Modification.

- a) The council notes the comments but considers that in this instance the policy covers all eventualities.

Proposed Main Modification 72: Chapter 6, Infrastructure, paragraph 249

Summary of matters / issues raised in responses

174. The council received a response relating to this proposed Main Modification raising the following matters / issues:

- a) The matters in this paragraph should be dealt with an environmental policy rather than infrastructure. (Dr A C Warne)

Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound

175. Respondents have suggested the following changes:

- a) N/A.

Council Response

176. The council has sought to respond to the matters / issues raised in responses by drawing the Inspector's attention to published evidence and national policy and guidance. Where appropriate it has also indicated where it considers it might be appropriate to consider revision to a proposed Main Modification.

- a) The council notes the comments. The proposed Main Modification links neighbourhood plan provision directly to the requirements set out in policy I3. The council considers that it is appropriate to refer to these matters in this part of the local plan.

Proposed Main Modification 73: Chapter 6, Infrastructure, Policy I3

Summary of matters / issues raised in responses

177. The council received responses relating to this proposed Main Modification raising the following matters / issues:

- a) Matters in this policy should be dealt with an environmental policies rather than infrastructure. (Dr A C Warne).
- b) Development at Wool likely to lead to a loss in biodiversity. (Dr A C Warne).

Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound

178. Respondents have suggested the following changes:

- a) N/A.
- b) N/A.

Council Response

179. The council has sought to respond to the matters / issues raised in responses by drawing the Inspector's attention to published evidence and national policy and guidance. Where appropriate it has also indicated where it considers it might be appropriate to consider revision to a proposed Main Modification.

- a) The council notes comments. 'Policy I3: Green infrastructure, trees and hedgerows' is concerned with the provision of green infrastructure. The council considers that it is appropriate to refer to these matters in this part of the local plan.
- b) The council notes comments which are not related to the proposed Main Modification. Representation has previously been made on the suitability of the proposed housing allocation around Wool (Policy H5), in the Inspector's Matters, Issues and Questions and in the course of the examination hearing sessions.

Proposed Main Modification 77: Chapter 6, Infrastructure, Policy 15

Summary of matters / issues raised in responses

180. The council received responses relating to this proposed Main Modification raising the following matters / issues:

- a) Criterion (l) (relating to clearance of Rhododendron) is not effective as the requirement is not deliverable over the plan period. (Pro Vision Planning and Design on behalf of Charborough Estate).
- b) Criterion (m) should be revised to clarify when details of funding for strategic SANG need be presented for consideration. (Pro Vision Planning and Design on behalf of Charborough Estate).
- c) Natural England support the policy as worded. It is aware of reservations about the use of the word *eradication* (in respect to Rhododendron) however this issue is best addressed at the application and pre-application stages to resolve a pragmatic approach. (Natural England).
- d) Dr Langley's previous representations that the allocation (Policy 15) is both unsound and not legally compliant, have not been overcome. Respondent considers that the SANG is unlikely to be effective, and to the contrary is likely to give rise to likely significant effects on Morden Bog / Wareham Forest habitat sites. (Freeths on behalf of P Bowyer (representing CPRE) and Dr A Langley).
- e) Quantity of land released from the Green Belt for holiday homes is not proportionate with the size of the strategic SANG. (Freeths on behalf of P Bowyer (representing CPRE) and Dr A Langley).
- f) Inadequate screening for likely significant effects on Special Protection Area, Special Area of Conservation and Ramsar not robust. (Freeths on behalf of P Bowyer (representing CPRE) and Dr A Langley).
- g) Tourist accommodation / SANG / other uses are positioned within 400 metres of Dorset heath and therefore inconsistent with other policies in the local plan (Policy E8). (Freeths on behalf of P Bowyer (representing CPRE) and Dr A Langley).
- h) The council has not considered alternative ways of funding SANG and not evidenced / justified the joint approach to funding the SANG. (Freeths on behalf of P Bowyer (representing CPRE) and Dr A Langley).

Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound

181. Respondents have suggested the following changes:

- a) Revise criterion (l): '**Phased rhododendron clearance; and**' (Pro Vision Planning and Design on behalf of Charborough Estate).

- b) Revised criterion (m): 'The promoter of the holiday park will need to demonstrate through the requisite planning application that the holiday park can, with other available sources of funding, support the strategic SANG provision in perpetuity.' (Pro Vision Planning and Design on behalf of Charborough Estate).
- c) N/A.
- d) Take out reference to the proposed holiday park from the policy. Clarify that, the SANG will be located at Morden Park or an alternative suitable site in the north of Purbeck and, in either case, a site selection assessment must be submitted with the planning application to fully examine and take into account the reasonable alternatives. And the SANG will be developed subject to agreement between the relevant land owner(s), the Council and Natural England or the Council using compulsory purchase powers where necessary. And the promoter will need to demonstrate financial support for the SANG provision in perpetuity whether using S106 contributions and/or the Community Infrastructure Levy and/or otherwise.' (Freeths on behalf of P Bowyer (representing CPRE) and Dr A Langley).
- e) See above (d). (Freeths on behalf of P Bowyer (representing CPRE) and Dr A Langley).
- f) See above (d). (Freeths on behalf of P Bowyer (representing CPRE) and Dr A Langley).
- g) N/A.
- h) N/A.

Council Response

182. The council has sought to respond to the matters / issues raised in responses by drawing the Inspector's attention to published evidence and national policy and guidance. Where appropriate it has also indicated where it considers it might be appropriate to consider revision to a proposed Main Modification.

- a) See council's response to the matters raised in paragraph 182 e) (below) by Freeths.
- b) See council's response to the matters raised in paragraph 182 e) (below) by Freeths.
- c) See council's response to the matters raised in paragraph 182 e) (below) by Freeths.
- d) The council notes comments. The council has prepared a Habitats Regulation Assessment (HRA) which considers the effectiveness of the proposed strategic Suitable Alternative Greenspace at Morden (MMCD3: [purbeck-lp-main-modifications-hra-231020-final.pdf](https://www.dorsetcouncil.gov.uk/media/231020-final.pdf) ([dorsetcouncil.gov.uk](https://www.dorsetcouncil.gov.uk))).

- e) The council notes comments and has assessed whether there are exceptional circumstances in its Green Belt Study (SD56: [sd56-2018-10-08-green-belt-study.pdf \(dorsetcouncil.gov.uk\)](https://www.dorsetcouncil.gov.uk/media/10-08-green-belt-study.pdf)). After considering other matters and issues raised in the representation made by Freeths around the council's examination of possible alternative strategic SANG in accordance with national planning policy (paragraph 137 of the National Planning Policy Framework) the council is persuaded of the need for further revisions to the proposed Main Modification to Policy I5. These revisions would comprise deleting any references to the proposed holiday park.
- f) The council notes comments. The council has prepared a Habitats Regulation Assessment (HRA) which it considers adequately screens for likely significant effects and includes appropriate assessments. After considering other matters and issues raised in the representation made by Freeths around the council's examination of possible alternative strategic SANG in accordance with national planning policy (paragraph 137 of the National Planning Policy Framework) the council is persuaded of the need for a further proposed Main Modification to Policy I5, taking out any references to the proposed holiday park.
- g) The council notes comments. The council has prepared a Habitats Regulation Assessment (HRA) which it considers adequately screens for likely significant effects and includes appropriate assessments. After considering other matters and issues raised in the representation made by Freeths around the council's examination of possible alternative strategic SANG in accordance with national planning policy (paragraph 137 of the National Planning Policy Framework) the council is persuaded of the need for a further proposed Main Modification to Policy I5,taking out any references to the proposed holiday park.
- h) The council notes comments.

Proposed Main Modification 78: Chapter 6, Infrastructure, Policy 16

Summary of matters / issues raised in responses

183. The council received a response relating to this proposed Main Modification raising the following matters / issues:

- a) Repetition of requirement in Policy E7, consider deleting paragraph or re-draft as suggested. (Dr A Langley).

Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound

184. Respondents have suggested the following changes:

- a) 'the impact of proposed development on European sites, alone or in combination with other **plans and projects**, will be screened for likely significant effects under the Conservation of Habitats and Species Regulations (amended) (EU exit), 2019. Where this is found to be the case an appropriate assessment (to include any necessary mitigation) will be required (taking into account the lifetime of the development) to show how the development will avoid **or mitigate** adverse impact on the integrity of the relevant European site(s).' (Dr A Langley).

Council Response

185. The council has sought to respond to the matters / issues raised in responses by drawing the Inspector's attention to published evidence and national policy and guidance. Where appropriate it has also indicated where it considers it might be appropriate to consider revision to a proposed Main Modification.

- a) The council notes comments and would not raise objection to the insertion of the words 'or mitigate'. In respect to the need and justification for this part of the proposed Main Modification paragraph A9 of the Inspector's Post Hearing Note states: '*In addition to the proposed modifications to the environment policies referred to above, the Council has drafted modifications to the small sites policy (policy H8), the rural exception sites policy (policy H12) and the supporting vibrant and attractive tourism policy (policy EE4) to reflect the Habitats Regulations in relation to the protected environment. Similar modifications should be included to other policies relating to unallocated residential development (policies H13 and H15), employment development (policies EE2 and EE3) and the Wareham integrated health and social care hub (policy I6). It will also be necessary to ensure that the effects of development intended through Neighbourhood Plan allocations are addressed.*' ([post-hearings-note-20-03-2020.pdf \(dorsetcouncil.gov.uk\)](https://www.dorsetcouncil.gov.uk/post-hearings-note-20-03-2020.pdf)).

Proposed Main Modification 81: Chapter 6, Infrastructure, Policy 17

Summary of matters / issues raised in responses

186. The council received a response relating to this proposed Main Modification raising the following matters / issues:

- a) Revise drafting relating to Policy 17 so that it includes references to requirements in Policies E7 to E9. (Dr A Langley).

Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound

187. Respondents have suggested the following changes:

- a) Suggest including a specific reference to HRA requirements in Policy 17.

Council Response

188. The council has sought to respond to the matters / issues raised in responses by drawing the Inspector's attention to published evidence and national policy and guidance. Where appropriate it has also indicated where it considers it might be appropriate to consider revision to a proposed Main Modification.

- a) The council notes comments but does not consider that revision to Policy 17 is necessary. In respect to the need and justification for this part of the proposed Main Modification paragraph A9 of the Inspector's Post Hearing Note states: *'In addition to the proposed modifications to the environment policies referred to above, the Council has drafted modifications to the small sites policy (policy H8), the rural exception sites policy (policy H12) and the supporting vibrant and attractive tourism policy (policy EE4) to reflect the Habitats Regulations in relation to the protected environment. Similar modifications should be included to other policies relating to unallocated residential development (policies H13 and H15), employment development (policies EE2 and EE3) and the Wareham integrated health and social care hub (policy I6). It will also be necessary to ensure that the effects of development intended through Neighbourhood Plan allocations are addressed.'* ([post-hearings-note-20-03-2020.pdf \(dorsetcouncil.gov.uk\)](https://www.dorsetcouncil.gov.uk/media/20-03-2020/post-hearings-note-20-03-2020.pdf)).

Proposed Main Modification 82: Chapter 7, Implementation delivery and monitoring framework, monitoring framework

Summary of matters / issues raised in responses

189. The council received responses relating to this proposed Main Modification raising the following matters / issues:

- a) Monitoring and report requirements relating to delivery of mitigation measures weak. (Dr A Langley).
- b) Approach to monitoring inadequate. (Dr A C Warne).
- c) Policy E9 should refer to SPA and Ramsar – not SAC. (Natural England).

Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound

190. Respondents have suggested the following changes:

- a) The monitoring framework should include regular, periodic monitoring of the effectiveness of mitigation on European sites and reporting of results. This relates specifically to Policies E7, E8 and E9 but as E8 and E9 are not comprehensive, all mitigation needs to be monitored for effectiveness. (Dr A Langley).
- b) N/A.
- c) N/A.

Council Response

191. The council has sought to respond to the matters / issues raised in responses by drawing the Inspector's attention to published evidence and national policy and guidance. Where appropriate it has also indicated where it considers it might be appropriate to consider revision to a proposed Main Modification.

- a) The council notes the comments. The issue of monitoring was discussed in depth at the examination hearings, which led to the changes in the monitoring section. Monitoring reports were published as Appendices to document SD93. The Council has commissioned a review of heathland mitigation and its approach to delivery of mitigation projects alongside the Dorset Council Local Plan.
- b) The council is satisfied that the approach to monitoring is legally compliant and sound.
- c) The council notes the comments and agree with Natural England that monitoring of E9 should not refer to SAC. The council would not object to the deletion of 'SAC'.

Proposed Main Modification 84: Insert Appendix 1

Summary of matters / issues raised in responses

192. The council received a response relating to this proposed Main Modification raising the following matters / issues:

- a) Include reference to the townscape character appraisals (which are adopted Supplementary Planning Documents) in Appendix 1 of the local plan. (Savills on behalf of The Lulworth Estate, Redwood Partnership and Mr Andrew Jackson).

Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound

193. Respondents have suggested the following changes:

- a) Insert the following text into Appendix 1: **'Townscape character appraisal SPDs for Swanage, Wareham, North Wareham, Upton, Bere Regis, Bovington, Corfe Castle, Lytchett Matravers and Wool (2012). (referred to at: paragraph 104 in respect to Policy E12: Design).'** (Savills on behalf of The Lulworth Estate, Redwood Partnership and Mr Andrew Jackson).

Council Response

194. The council has sought to respond to the matters / issues raised in responses by drawing the Inspector's attention to published evidence and national policy and guidance. Where appropriate it has also indicated where it considers it might be appropriate to consider revision to a proposed Main Modification.

- a) The council notes comments and would not raise objection to inserting the following text into proposed Main Modification 84: **'Townscape character appraisals (Supplementary Planning Documents) for: Bere Regis, Bovington, Corfe Castle, Lytchett Matravers, Swanage, Upton, Wareham North, Wareham and Wool. (Referred to at: paragraph 104 in respect to Policy E12: Design).'**

Proposed Main Modification 85: Insert Appendix 2

Summary of matters / issues raised in responses

195. The council received a response relating to this proposed Main Modification raising the following matters / issues:

- a) Small and medium sized sites identified in West Lulworth not suitable for development. (F M Redman).

Changes which the respondent considers are necessary to make the proposed Main Modification legally compliant or sound

196. Respondents have suggested the following changes:

- a) Take out references to small and medium sized sites in West Lulworth. (F M Redman).

Council Response

197. The council has sought to respond to the matters / issues raised in responses by drawing the Inspector's attention to published evidence and national policy and guidance. Where appropriate it has also indicated where it considers it might be appropriate to consider revision to a proposed Main Modification.

- a) The council notes the response. The title in the table for the appendix makes it clear the listed sites are 'potentially suitable'. Development on these sites is subject to planning permission being given by the council following assessment against the development plan and any other relevant planning considerations.

Council summary of matters / issues raised through consultation relating to accompanying documents

Accompanying document: Habitats Regulation Assessment (HRA) [MMCD3]

Summary of matters / issues raised in responses

198. The council received a number of responses relating to the HRA, raising the following matters / issues:

- a) HRA fails to satisfactorily consider in combination effects from other plans and projects – specifically Bournemouth, Christchurch and Poole local plan. (Dr A Langley).
- b) Paras 6.7, 6.8 and 6.9 – Conclusions around the significance of effects from planned development on Atlantic Salmon from the River Avon SAC not properly justified. (Dr A Langley).
- c) The HRA is unlawful and does not meet the requirements of the Conservation of Habitats and Species Regulations 2017 and related Habitats Directive. Assessments in the HRA are not sufficient/adequate in respect to the impacts of holiday park activities at Morden (Policy I5) on SPA/SAC and directly adjoining the Ramsar (specifically the HRA assessment failed to consider direct and in-direct effects). There is a lack of clarity around potential mitigation measures for the proposed holiday park (Policy I5). The HRA failed to consider significance of effects from holiday park/SANG (Policy I5) on functionally related land (used by qualifying species) around habitat sites. Paragraph 5.61 of the HRA presents design considerations which will act as mitigation – these have been listed prematurely before detailed assessment undertaken. Analysis supporting conclusions relating to the effects on air quality unclear and not sufficiently justified. HRA fails to consider water quality as a potential likely significant effect from proposed development. Not clear that the strategic SANG will be effective – will there be excess capacity in SANG to address the impacts from windfall development. Will strategic SANG be effective having regard to its location the location of windfall development. (Freeths on behalf of P Bowyer (representing CPRE) and Dr A Langley).
- d) Potentially significant impacts from development habitats functionally related to habitat sites. (Dr A C Warne).
- e) Air pollution part of the HRA needs to consider the impact from slurry pits. (Dr A C Warne).
- f) Disagree that impacts from nitrates on habitat sites can be mitigated in the short term as there is a lag between the time when development will be completed and the changes in land management take effect. (Dr A C Warne).

- g) Plan fails to demonstrate that mitigation for habitat sites will be effective. (Ms R Palmer on behalf of Wool Flora and Fauna).
- h) Re-emphasised comments made in examination statement around Morden SANG and Holiday Park (Andrew Elliott, Terence O'Rourke)

Changes which the respondent considers are necessary to make the Purbeck Local Plan legally compliant

199. Respondents have suggested the following changes:

- a) N/A.
- b) There is a large body of scientific research and expertise on Salmon in the Frome/Piddle catchment and it would be reassuring to see it used to assess risks from development, such as the overall quantum of housing in the catchment, or particular types of project that may require screening for likely significant effects on Salmon. Suggests further research on chalk stream Salmon populations to understand the supporting role that rivers not currently designated as SACs for Salmon may be providing to rivers like the Avon would be helpful. (Dr A Langley).
- c) N/A.
- d) N/A.
- e) N/A.
- f) N/A.
- g) N/A.
- h) N/A

Council Response

200. The council has sought to respond to the matters / issues raised in responses by drawing the Inspector's attention to published evidence and national policy and guidance. Where appropriate it has also indicated where it considers it might be appropriate to consider revision to a proposed Main Modification. In respect to this matter the council has provided a more detailed response to the matters raised in representation summarised in paragraph 196 a) to h).

201. The council works closely with Bournemouth, Christchurch and Poole Council, as evidenced by 3 supplementary planning documents addressing Habitats Regulations requirements and a further joint Interim Strategy which is about to be adopted.

202. Salmon and the River Avon SAC

- In light of comments received relating to the submission version of the Plan, further consideration of Salmon was included in the HRA accompanying the Main Modifications. Further representations at Main Modifications challenge the conclusion in the HRA that adverse effects for the River Avon SAC can be ruled out alone or in combination.
- The issue relates to studies that have shown Salmon from the River Avon have been recorded in Purbeck. Any issues that therefore might affect Salmon in the River Frome or Piddle, could undermine the conservation objectives for the River Avon SAC (for which Salmon are a qualifying feature). The latest representations suggest greater reference should have been made in the HRA to the research work undertaken on Salmon on the Frome (there has been a long-running freshwater research station at East Stoke) and also suggest that the evidence for mixing is recent and therefore would not have been picked up in the supplementary conservation advice.
- In fact, the HRA does refer to the body of work undertaken on Salmon in the Frome and draws on a study from the 1980s (Solomon 1991) that demonstrated the level of mixing between the different rivers. In undertaking the HRA work, checks were made with both the Environment Agency and Natural England with respect to their concerns with Salmon and the risks to the River Avon SAC. The risks are not credible. As the HRA highlights, there is limited public access along the Frome and Piddle and therefore no risks of any spawning sites being affected by people or dogs splashing in the water. There are no elements of the Plan that relate to structural changes to the Frome or Piddle such that fish movements might be affected. There is no evidence of a need for further abstraction that might affect the flow of the Frome or the Piddle. Furthermore, the level of mixing is so small (drawing on the Solomon study, 6.5% of Salmon from the Avon were estimated to go to other rivers, and this would be spread across a range of rivers that included the Test and the Itchen, as well as the Frome and the Piddle).
- The council does not consider that the HRA needs redrafting as suggested.

203. HRA legal compliance

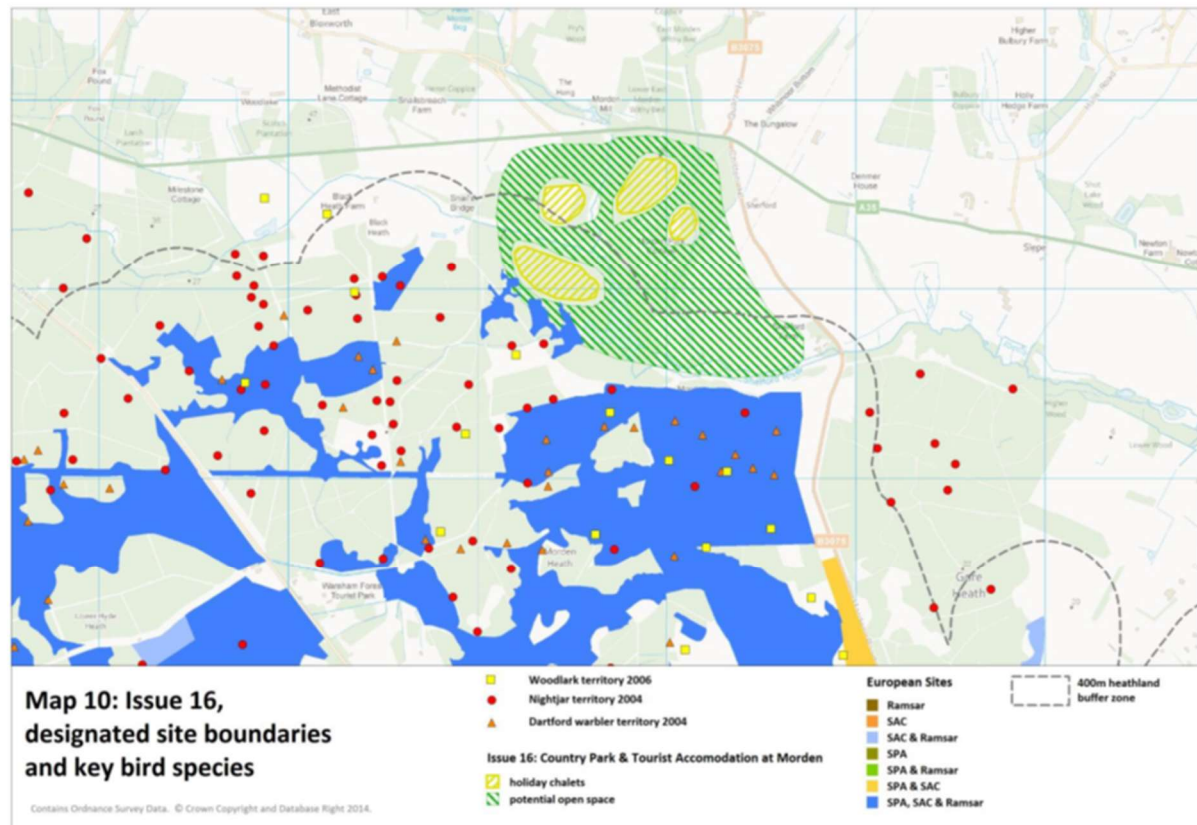
204. The council, as competent authority, considers the HRA to be legally compliant and sound, being based upon the appropriate level of information for a plan at this level. At application stage all 'projects' will be assessed in much more detail. It is ultimately the council's decision to determine the level of evidence that is appropriate to the allocations in the plan, which includes taking the advice of Natural England and other specialists in the field.

205. Risks from the holiday park in relation to the Dorset Heaths (holiday park site includes and abuts SPA/SAC/Ramsar)

- The HRA at main modifications (MMCD3) is criticised for not highlighting the issue of the boundary for the green belt extension (as shown on the policies map), including part of the Dorset Heaths SAC/Dorset Heathlands SPA/Ramsar and criticisms also suggest that some issues have been missed.
- The HRA screening for likely significant effects did not identify issues of fragmentation or mobile species (i.e. in relation to Nightjar, Woodlark or other SPA species) as a result of policy I5. This is because development comprised of 80-100 chalets is not sufficient to trigger risks from this pathway. The appropriate assessment section on fragmentation and mobile species (para 6.11 of MMCD3) draws on studies of Nightjar (the main species of concern) that radio-tracked birds and showed that they were leaving forest clearings (most of the tracking was conducted in conifer plantations) to feed in deciduous woodland, orchards, village gardens and they also used wetland sites such as streams, small ponds and water meadows. The appropriate assessment then goes on to highlight that “significant urban growth” may therefore impact on Nightjar (para 6.13), with the risk of loss of foraging habitat and flight paths becoming blocked. Scattered chalets in a woodland setting would not count as significant urban growth and would not pose a risk in terms of loss of Nightjar foraging habitat or disruption of flight paths. The area where the chalets are proposed is dense Rhododendron and the creation of clearings and more open habitat is likely to be beneficial.
- The SANG would not be an issue in terms of functionally-linked land as it is not suitable habitat for Woodlark (either foraging or breeding) and there will be no impact for Nightjar foraging (which is during darkness).
- The HRA does refer to functionally-linked land when discussing the Morden holiday park (MMCD3, para 5.60) in the appropriate assessment section on urban effects and recreation, but this text is highlighting the general sensitivity of Wareham Forest for the SPA species. Reference to the map in the Issues and Options HRA (SD73, Map 10 on page 58) helps to clarify the issues and is reproduced below. The map shows that Nightjar and Woodlark are widespread in Wareham Forest (at least based on the data from the last national surveys) and occur widely outside the dark blue shaded area that is the Dorset Heathlands SPA. As such, Wareham Forest is of considerable importance for the species. Therefore, issues such as disturbance and recreation impacts will relate to the areas in Wareham Forest that are not part of the SPA. There are no records for the species holding territory in the area where the chalets are proposed or in the SANG.

- In light of the comments received in relation to the SANG and Morden Park, it is important to stress that the SANG and the woodland around the lake (where the chalets are proposed) are not suitable habitat for woodlark and highly unlikely to support regular Nightjar territories.

Map reproduced from SD73 to show designated site boundaries and key bird species:



206. Note that the yellow shaded areas in the map above show the areas initially identified for the chalets and considered in the Issues and Options HRA. Following the HRA work, the chalets are now identified as being set back and focussed beyond 400m from the European site boundary, as shown in the more recent maps (e.g. the MOU between Dorset Council, Charborough Estate and Natural England). The HRA is criticised for not considering the impacts of chalets directly on the European site, with the criticisms suggesting that there is development proposed within the European site boundary. As the MOU makes clear, the areas that are within the European site and a wide area adjacent to it are identified to be established within the grazing unit with management that will benefit the nature conservation interest.

- For the holiday park (and indeed all the growth within the plan), the HRA rules out water availability as a potential impact pathway for all elements of the plan. This is because Wessex Water's Resources Management Plan (WRMP) provides assurance that there is

sufficient water supplies for a 25-year period that extends beyond the Purbeck Local Plan. The WRMP was subject to separate HRA and the modelling takes account of population growth, building, water use behaviour, industrial needs and leakage. It forecasts likely water supplies to include an assessment of the impacts of climate change, the likely availability of our water sources and any abstraction licence changes necessary. It deals with uncertainty by ensuring headroom and predicts a surplus in water that increases over time.

- Water quality issues are identified in the HRA through the screening and subsequent appropriate assessment. The issues with water quality will relate to Poole Harbour SPA/Ramsar and are addressed through the strategic mitigation approach that ensures cumulative effects are addressed – the MOU between Dorset Council, Charborough Estate and Natural England confirms that the change of land use within the SANG, taking land out of arable production will mitigate the level of additional Nitrogen. There are no risks for the Dorset Heaths SAC or Dorset Heathlands SPA/Ramsar in relation to water quality as wastewater from the chalets will be addressed at the treatment works rather than through septic tanks.
- With the chalets set back north and east of the lake, and beyond 400m from the European site boundary, adverse effects on integrity relating to urban effects, including noise, light, fire risk etc. can be ruled out.

207. Extent of mitigation that SANG might provide

- The comments relating to the Morden holiday park and SANGs challenge the SANG capacity that the site might deliver and question the overall effectiveness of the SANG. These concerns are unfounded and in fact the site has the potential to work very effectively as a SANG and is in many ways ideal.
- The HRA at main modifications does suggest (in para 5.64) that the capacity of the SANG may in part be absorbed by the new chalets, but that this will be dependent on the design of the chalet area. The detailed design of the area around the chalets could include significant green infrastructure and opportunities for recreation. For example, there is scope for paths around the lake, access to the water and lengthy routes through and around the site for walking and dog walking. There is scope for dedicated areas for dogs to be exercised to be created (with the lake and fencing creating suitable barriers to the European site and the grazing unit to 'contain' the access. The connectivity to the SANG and the extent to which the area around the chalets will be opened to access will be important details to confirm the extent to which the SANG will provide any mitigation for the chalets, but the scale of the chalets and amount of space available, plus the quality of the location of the chalets should mean that the SANG all the SANG capacity could be available as

strategic SANG. The details can be set out within the masterplan which policy I5 ensures will be submitted with the planning application.

- In terms of the quality of the location and its potential effectiveness as a SANG, the location is in many ways ideal and has the potential to work very well. Footprint Ecology staff have visited the proposed SANG, are very familiar with the whole area and have undertaken a range of visitor surveys and other work in and around the Wareham Forest area. This gives a good understanding of the potential and key points include:
 - The SANG would be at the north-east corner of the Wareham Forest block – making it easily accessible to those travelling from the east on the A35 and in fact the first part of the Forest that could be accessed by anyone travelling in that direction;
 - There are limited parking opportunities along the B3075 and visitors often park on the verges or lay-bys. There is a map showing parking locations in the general area within the Issues and Options HRA (SD73, Map 6). The formal parking locations are small and in particular the parking at the bend at Sherford Bridge is awkward and potentially difficult if trying to get a dog out of the car safely due to the proximity of the road. Creating a new ‘destination’ car park along this road is likely to work very well and this could be signposted from the A35 to direct visitors;
 - There is scope to reduce and limit parking along the B3075 at locations away from the SANG, providing scope to further focus recreation use at the SANG;
 - The location is such that it will be possible to create a sense of visiting Wareham Forest and a ‘recreation’ destination that is within the Wareham Forest landscape while separated from the areas that are sensitive to recreation impacts;
 - The SANG is clearly separated from the European site by the stream and wet woodland that runs along the southern edge of the area proposed for the SANG, this will allow an effective barrier to anyone wanting to enter the European site;
 - Further buffering to the European site will be established with the grazing unit and the chalets;
 - At 37ha the SANG will be a large area. The initial draft SANG layout (see MOU between Dorset Council, Charborough Estate and Natural England) illustrates a circular route of around 2.3km which provides a reasonable route length.
 - The proposed SANG area includes higher ground with good views, attractive streamside woodland and access to water for dogs, all features that will work well to draw visitors.

- Mitigation for recreation on heathlands is likely to be best served by a range of different approaches and this has been the approach of the local authorities through the Dorset Heathlands Planning Framework SPD. Ultimately a diverse network of SANG sites, providing a range of greenspace opportunities and facilities for recreation will provide the most robust mitigation and work best. Strategic SANG play a role in this and providing a strategic SANG in close proximity to Wareham Forest will work well.

208. The advice from Natural England is that the strategic SANG will have sufficient capacity to both divert existing visitors and absorb windfall development from new pressures and the council has no evidence to the contrary.

209. Role of Natural England and weight given to their advice

- Criticism is made of the HRA referring to advice from Natural England, in particular in reference to the potential design of the SANG at Morden and in relation to the appropriate assessment of air quality impacts.
- The cross-reference to Natural England is made in the HRA to reflect that the assessment has been made in light of discussions with Natural England and their advice sought. This does not bypass the role of Dorset Council as competent authority and it is not suggested that the statutory body should undertake the assessment or gather and analyse the necessary evidence.
- Nonetheless the advice of Natural England is important and highly relevant. For the purposes of the appropriate assessment, the competent authority must consult the statutory nature conservation body and have regard to any representations made by that body. The guidance in the Habitats Regulations Handbook is clear, stating that “The competent authority must accord considerable weight to the advice of the statutory nature conservation body, and case law is to the effect that there must be cogent and compelling reasons for departing from it.” . The Handbook also states that “the statutory nature conservation body will be involved in the Habitats Regulations Assessment at most stages.... It will hold much of the existing information on the European sites, which the competent authority is likely to need in order to make the necessary judgements.” Furthermore “The statutory nature conservation body will also be best placed to advise where ecological information is lacking and what the priorities may be for further investigation or analysis in order to inform an appropriate assessment”.
- The cross-references to Natural England’s advice and input within the HRA therefore helps to ensure that necessary checks have been made and that the HRA findings are robust.

210. Need and role of project-level HRA for the holiday park

- With respect to the holiday park, the HRA identifies a suite of detailed mitigation measures and design elements that would be necessary to allow a conclusion of no adverse effects at project-level HRA. This approach is criticised in representations through the suggestion that the proposal in the PLP is specific and therefore should be subject to detailed assessment and the conclusions should not rely on measures secured at a later (more detailed) design stage.
- The approach taken in the HRA is not a way of deferring or delaying the assessment process, but a way of securing mitigation measures where they cannot be secured in detail in the higher-level plan. It entirely accords with guidance in the Habitats Regulations Assessment Handbook which states that "it may be possible and appropriate for the higher level plan to outline some aspects of mitigation measures, which must be provided at the later stage or lower level plan in order to rule out adverse effects on site integrity."
- The holiday chalets will require planning permission and therefore must be subject to project-level HRA. It is at the project level that it will be possible to identify more precisely the nature and scale of the development and its potential effects and crucially at that stage there will be flexibility in the detail/design to ensure that adverse effects on integrity can be avoided.
- The number of chalets and their precise location will be a key factor in the project level HRA. There are specific details with respect to the location that will allow the project design to address the concerns raised in the HRA. With the chalets located beyond 400m from the European site, to the north and east and separated from the Dorset Heaths SAC/Dorset Heathlands SPA/Ramsar by the lake, there is clear scope to ensure no risks to the European site from urban effects (such as light, noise, increased predators such as rats) and the fire risk (e.g. from barbeques) will be addressed due to the chalets being separated from the heath by the lake. The area proposed for the chalets is largely dense Rhododendron and secondary woodland and therefore unlikely to be used by Woodlark and Nightjar.
- As already highlighted, recreation issues, arising from the use of the chalets, could be addressed through the provision of cycle routes and pathways within the area allocated for the chalets, providing opportunities for dog walking, jogging and other activities. The presence of the large, attractive lake will be a key feature to draw people. The lake and layout of the site can also be used so as to restrict access directly onto the sensitive part of Morden Bog NNR, where there is open heathland and breeding birds. The presence of the stream and lake already creates a natural barrier. Provision of extensive greenspace around the chalets and for the exclusive use of the residents will resolve any issues with the SANG capacity being absorbed as mitigation for the chalets.

- As such– at project level – there is clear scope to ensure adverse effects on integrity to the European site can be ruled out and to provide enhancements for biodiversity. For the HRA to rely on these details to be finalised at project level is entirely in keeping with guidance and best practice.

211. In-combination assessment for the impacts of coastal recreation

- The HRA concluded adverse effects on integrity for coastal sites (Isle of Portland to Studland Cliffs SAC, St. Albans to Durlston Head SAC) from recreation are ruled out, alone or in-combination given the scale and distribution of growth, the relevant site interest, monitoring results and the existing infrastructure in-place at the coastal sites. This has subsequently been challenged in relation to the in-combination conclusion.
- Guidance on Habitats Regulations Assessment highlights that the underlying intention of the in-combination provision is to take account of cumulative effects. An appropriate assessment need not be extended further than is necessary to fulfil the key purpose – to ensure that a plan or project is authorised only to the extent that it will not, either alone or in combination with other plans or projects, adversely affect the integrity of the European site.
- In the case of coastal recreation, the European sites are part of a World Heritage Site with a National Trail that runs the length of the coastline. Sites such as Studland and Durlston have the necessary infrastructure and staffing in place to manage the large number of visitors. Impacts relate to SAC habitats and any issues associated with local housing growth are likely to be undetectable given the levels of use and the infrastructure in place to manage recreation and the numbers of tourists.
- While it might have been possible to present more detailed information within the HRA, this would have had little benefit apart from simply highlighting population growth and housing growth across a broad swathe of southern England and general trends in tourism. Ultimately the same conclusion would have been reached. The HRA is not extended further than is necessary to reach a conclusion that is evidence-based and proportionate.
- The HRA rules out adverse effects alone and in combination. A ‘watching brief’ is also recommended, just as an additional back-up. Furthermore, the HRA states that any small sites that come forward close to the coast will need to address recreation issues as part of the project level HRA, for example through the provision of dog bins, contribution to wardening or path infrastructure.

212. Where appropriate the HRA considers functionally linked habitats (Warne)

213. Air quality – reliance on interim strategy to rule out adverse effects on integrity

- The HRA is challenged in relation to a reliance on an interim air quality strategy. This strategy is joint with Bournemouth, Christchurch and Poole Council (BCP), as are all of our strategies to consider and deliver mitigation resulting from Habitats Regulations requirements. BCP has recently adopted the strategy and Dorset Council is considering it in early March.
- The HRA is clear that the level of growth in the Purbeck Local Plan – at 180 dwellings per annum – is small enough and distributed such that adverse effects on integrity from the PLP on its own can be ruled out.
- In-combination effects are more challenging: as traffic models were not available at the time the HRA was produced, there is therefore uncertainty. The interim air quality strategy provides a means to address in-combination effects and deal with the uncertainty. The strategy highlights that emissions from traffic account for around 8% of the local Nitrogen deposition. The strategy also highlights that there are 11,290 homes forecast to come forward in the BCP area 2020-2025 and 3,716 in the Dorset Council area over the same period, within 5km of the Dorset Heaths.
- Modifications (MM16) ensure that the air quality strategy is referenced in the plan. In addition, Policy E8 ensures that there is protection for the heaths by ensuring that development will only be permitted where it would not lead to an adverse effect on integrity, alone or in-combination. The air quality strategy recognises (see para 5.3) that there is a policy vacuum for any new planning permissions until such time as the new Dorset Local Plan is in place. Any applicants seeking planning permission for trip generating uses will need to consider the impacts of air quality arising from the proposed development and where the proposal encourages modal shift, facilitates the use of zero emission vehicles and/or contributes CIL towards mitigation measures it will be possible for the Council to conclude that air quality impacts from the proposed development will not have an adverse effect on the integrity of the Dorset Heathlands, alone or in combination.
- Mitigation is secured through CIL funding and the air quality strategy lists a range of projects that will be implemented in the period 2020-2025, referred in the strategy as Phase 2.
- This provides a rigorous approach and is in line with the recent case law. The interim strategy therefore addresses issues around uncertainty and ensures mitigation is secured, informed by modelling, to address impacts associated with the in-combination growth.
- The HRA is only required to consider the impact of the proposals under consideration in the plan it is assessing. There are no

proposals in the Purbeck Local Plan for diary farms or slurry pits (Warne).

214. Reliance on Footprint Ecology to undertake the HRA (comments suggest Footprint Ecology is not an appropriate body)
215. It is common practice for plan-making bodies to turn to a specialist, external, experienced professional advisor who can undertake an assessment with impartiality and produce a document that the competent authority may adopt as its own appropriate assessment. The Habitats Regulations Assessment Handbook recognises this as an acceptable way of proceeding and cites relevant case law in support of the approach,
216. Dr Warne's comment about nitrogen mitigation is not related to modifications or updates to the HRA and therefore not duly made.
217. Mrs Palmer comment about no evidence to show mitigation will be effective is not related to a modification or an update in the HRA and therefore not duly made. The council has been delivering new homes and mitigation, especially for heathlands for several years without an adverse effect on the interest features of the SPA.
218. The council notes Andrew Elliott's comments.

Accompanying document: Sustainability Appraisal (SA) [MMCD4]

Summary of matters / issues raised in responses

220. The council received a response relating to the SA raising the following matters / issues:

- a) Assessments on environmental impacts unsound. (Dr A C Warne).

Changes which the respondent considers are necessary to make the Purbeck Local Plan legally compliant

221. Respondents have suggested the following changes:

- a) N/A.

Council response

222. The council has sought to respond to the matters / issues raised in responses by drawing the Inspector's attention to published evidence and national policy and guidance. Where appropriate it has also indicated where it considers it might be appropriate to consider revision to a proposed Main Modification.

- a) The council notes comments but is satisfied that its Sustainability Appraisal (SA) is robust. The SA has been subject to earlier representation and consideration through the examination hearing sessions.

Accompanying document: SD93

Summary of matters / issues raised in responses

223. The council received a response relating to the policies maps raising the following matters / issues:

- a) Continued objection to Green Belt strategy and approach. (Terence O'Rourke on behalf of Bloor Homes).

Changes which the respondent considers are necessary to make the Purbeck Local Plan effective

224. Respondents have suggested the following changes:

- a) N/A.

Council Response

225. The council has sought to respond to the matters / issues raised in responses by drawing the Inspector's attention to published evidence and national policy and guidance. Where appropriate it has also indicated where it considers it might be appropriate to consider revision to a proposed Main Modification.

- a) Council notes response. After considering other matters and issues raised in the representation made by Freeths around the council's examination of possible alternative strategic SANG in accordance with national planning policy (paragraph 137 of the National Planning Policy Framework) the council agrees that Policy I5 should not include any references to the proposed holiday park. Subject to direction from the Planning Inspector the council will present further evidence in respect to an interim strategy, pending adoption of the Dorset Council Plan in 2023 ([Key stages of the plan - Dorset Council](#)), for mitigating the impacts of residential development on habitat sites in the Purbeck area

Accompanying document: Local Plan Policies Map

Summary of matters / issues raised in responses

226. The council received responses relating to the policies maps raising the following matters / issues:

- a) Revise policies maps for Wareham. Object on the basis that the policies map does not show local green spaces proposed in the emerging Wareham Neighbourhood Plan. (Wareham Town Council) (Mr D Evans on behalf of the Wareham Neighbourhood Plan Steering Group).
- b) Revise policies maps relating to Morden. (Freeths on behalf of P Bowyer (representing CPRE) and Dr A Langley).

Changes which the respondent considers are necessary to make the Purbeck Local Plan effective

227. Respondents have suggested the following changes:

- a) Amend local plan policies map to show proposed Local Green Spaces in the emerging Wareham Neighbourhood Plan. (Wareham Town Council). (Dr D Evans on behalf of the Wareham Neighbourhood Plan Steering Group).
- b) Delete the modifications to the Proposals Map as follows: Delete the release of Green Belt at Morden Park shaded yellow from the Proposals Map – See the reasons set out in relation to MM7 (policy V2). And Delete the identification of the extent of policy I5 (holiday park and SANG at Morden Park) edged blue from the Proposals Map – See the reasons set out in relation to MM77 (policy I5) and MM7 (policy V2). Delete the SANG at Morden Park edged red from the Proposals Map because the modifications have not overcome Dr Langley's previous objections – See the reasons set out in relation to MM77 (policy I5). If the Inspector does not accept deletion of the SANG, the Inspector is still requested to recommend deletion of the modifications mentioned in paragraph 1 above. If the Inspector does not accept deletion of the modifications mentioned in paragraph 1 above, 76ha of Green Belt release for built development and a total 157ha for the holiday park overall is hugely excessive and should be reduced to the reasonable and proportionate amount for the proposed 100 holiday units. (Freeths on behalf of P Bowyer (representing CPRE) and Dr A Langley).

Council Response

228. The council has sought to respond to the matters / issues raised in responses by drawing the Inspector's attention to published evidence and national policy and guidance. Where appropriate it has also indicated where it considers it might be appropriate to consider revision to a proposed Main Modification.

- a) National planning policy (paragraph 99 of the National Planning Policy Framework) gives discretion for Local Green Space to be designated

through local and neighbourhood plan. The council has not presented evidence (as required by paragraph 100) in respect to the possible areas of Local Green Space identified in the emerging Wareham Neighbourhood Plan. The neighbourhood plan has not yet been examined and found to meet the basic conditions. The council does not consider that it would be sound to refer to the areas of proposed Local Green Space in the emerging Wareham Neighbourhood Plan.

- b) Council notes the representation. After considering other matters and issues raised in the representation made by Freeths around the council's examination of possible alternative strategic SANG in accordance with national planning policy (paragraph 137 of the National Planning Policy Framework) the council has called for further revisions to the proposed Main Modification for Policy I5 to delete references to the proposed holiday park. It therefore would not object to deletion of the area identified for release from the Green Belt at Morden or the extent of the holiday park.

Appendix 1 – Consultation response form



Response form for: Purbeck Local Plan proposed Main Modifications consultation

This form is for making representations on the proposed Main Modifications to the Purbeck Local Plan (2018-2034)

The Purbeck Local Plan was submitted for examination, by a Planning Inspectorate appointed by the Secretary of State, in January 2019. Public examination hearing sessions were held in July, August and October 2019. The Inspector examining the local plan issued a [Post Hearing Note](#) in March 2020. The council has prepared a schedule of proposed Main Modifications to the pre-submission draft of the local plan as part of its examination. These proposed Main Modifications are considered necessary to ensure that the local plan is legally compliant and/or sound. Proposed Main Modifications have been suggested by the Inspector, respondents (including those participants at the hearing sessions) and by the council.

The council has also prepared an updated version of the proposed Purbeck Local Plan (2018-2034) policies map(s) and updated versions of appraisals and supplementary evidence including:

- Habitats Regulations Assessment (HRA);
- Sustainability Appraisal (SA);
- 5 Year Housing Land Supply;
- Infrastructure Delivery Plan; and
- Purbeck Local Plan Examination (2018-2034), Dorset Council response to The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.

The Council published a series of papers and supporting evidence, in response to representations, over the course of the local plan hearing sessions. It has also re-published a selection of these papers and evidence which relates to the proposed Main Modifications including:

- Review of capacity from small sites [SD88];
- Proposed amendments to HRA [SD89];
- Appropriate assessment statement [SD96];
- Addendum to SA re settlement hierarchy [SD92];
- Strategy for mitigating effects on European sites, and Green Belt changes at Morden [SD93];

- Summary of viability issues raised by respondents and Council / Dixon Seale response to those concerns [SD97];
- Examination stage – viability update Purbeck Local Plan [SD117];
- Memorandum of understanding between Dorset Council and Savills on viability related issues for housing sites around Wool October 2019;
- Memorandum of understanding between Dorset Council and Wyatt Homes on viability related issues for Lytchett Matravers and Upton October 2019;
- Memorandum of understanding between Dorset Council and the Moreton Estate on viability related issues for Moreton Station/Redbridge Pit October 2019;
- Proposed changes to care provision [SD95]; and
- Planning the care provision in Purbeck [SD115]

The consultation is focused on the proposed Main Modifications, changes to the local plan policies map(s), updated appraisals and supplementary evidence, including the HRA, SA and Purbeck Local Plan Examination (2018-2034), Dorset Council response to The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020. This is not an opportunity to raise matters relating to other parts of the Plan that have already been considered by the Inspector during the examination. Weight will not be given to representations that repeat matters raised and discussed at the hearing sessions or in earlier responses.

Once the consultation is closed, the council will prepare a summary of the issues raised in representations to the consultation and provide its response. The council's summary, and full copies of the representations, will then be sent to the Planning Inspector for her consideration. If the Inspector's final report indicates that the local plan is sound and legally compliant with the proposed Main Modifications, the council will then take a decision about whether to adopt the local plan subject to Main Modifications.

PART A

| | Your contact details | Agent's Details (if applicable) |
|--|----------------------|---------------------------------|
| Name | | |
| Organisation / Group <small>(if applicable)</small> | | |
| Address line 1 | | |
| Address line 2 | | |
| Town / City | | |
| County | | |
| Post Code | | |
| E-mail address | | |

Group Representations

If your representation is on behalf of a group, ensure the lead representative completes the contact details box above. Also, please state here how many people supports the representation.

Please note:

- The consultation period starts on **Friday 13 November 2020** and will last for 8 weeks until 11.45pm on **Friday 15 January 2021**.
- Only representations made in this period will be referred to the Planning Inspector for consideration.
- Responses must be made using this form (sent in the post or attached to an e-mail) or online at this link www.dorsetcouncil.gov.uk/plp-main-modifications.
- Respondents must complete Part A of this response form and separate Part B forms for each proposed Main Modification that they might wish to comment on.
- All respondents must provide their name and address and/or email address.
- All forms must be signed and dated.
- Responses cannot be treated as confidential. By making a response you agree to your name and comments being made available for public viewing.
- Information on the council's privacy policy is available on our website at: <https://www.dorsetcouncil.gov.uk/your-council/about-your-council/data-protection/dorset-council-general-privacy-notice.aspx>.
- The council will not accept any responsibility for the contents of comments submitted. We reserve the right to remove any comments containing defamatory, abusive or malicious allegations.
- If you are part of a group that shares a common view, please include a list of the contact details of each person (including names, addresses, emails, telephone numbers and signatures) along with a completed form providing details of the named lead representative.

- The proposed Main Modifications to the Purbeck Local Plan, proposed Purbeck Local Plan (2018-2034) policies map and the relevant background and evidence documents, are available to view on the Council's website at www.dorsetcouncil.gov.uk/plp-main-modifications.
- Hard copies of the consultation documents are available to loan from libraries in Dorchester, Lytchett Matravers, Swanage, Upton, Wareham and Wool. Please contact the libraries separately to ascertain their opening times, availability of documents to loan and for full details of their procedures to restrict the spread of COVID-19. You must follow any procedures relating to the COVID-19 in the libraries.
- If you have questions relating to the consultation, or the process for making a response, please contact the Planning Policy team on 01929556561 or planningpolicy@dorsetcouncil.gov.uk.
- Response forms returned in the post should reference the Purbeck Local Plan Proposed Main Modifications Consultation, Dorset Council, Spatial Planning Team and be sent to South Walks House, South Walks Road, Dorchester, DT1 1UZ.
- Please tick the box if you would like to be notified of the following:

Adoption of the Local Plan.

PART B

1. Which proposed Main Modification does your representation relate to?

Separate Part B forms must be completed for each separate proposed Main Modification you wish to comment on.

| | |
|---|--|
| Proposed Main Modifications reference number | |
|---|--|

2. Do you consider that the proposed Main Modification is:

- Legally compliant Yes No
- Sound Yes No

To be considered legally compliant the proposed Main Modifications must:

- comply with The Conservation of Habitats and Species Regulation 2017; and
- be appraised for their sustainability.

To be considered sound the local plan as a whole must be:

- positively prepared - **providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs;**
- justified - **an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;**
- effective - **deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and**
- consistent with national policy - **enabling the delivery of sustainable development in accordance with the policies in the Government's National Planning Policy Framework.**

Some or all of these considerations of soundness may be relevant to the proposed Main Modification[s] that you are seeking to make a representation on.

3. Please give details of why you consider the proposed Main Modification is / is not legally compliant or sound. (Please be as precise as possible).

Please continue on a separate sheet if necessary.

4. Having regard to your comments in question 3, please set out what change(s) you consider necessary to make the proposed Main Modification legally compliant or sound. You will need to say why this change will make the **proposed** Main Modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording and where appropriate provide evidence necessary to support/justify the representation. (Please be as precise as possible)

Please continue on a separate sheet if necessary

PART B

1. Which proposed Main Modification does your representation relate to?

Separate Part B forms must be completed for each separate proposed Main Modification you wish to comment on.

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|---|--|
| Proposed Main Modifications reference number | |
|---|--|

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- Sound Yes No

To be considered legally compliant the proposed Main Modifications must:

- comply with The Conservation of Habitats and Species Regulation 2017; and
- be appraised for their sustainability.

To be considered sound the local plan as a whole must be:

- positively prepared - **providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs;**
- justified - **an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;**
- effective - **deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and**
- consistent with national policy - **enabling the delivery of sustainable development in accordance with the policies in the Government's National Planning Policy Framework.**

Some or all of these considerations of soundness may be relevant to the proposed Main Modification[s] that you are seeking to make a representation on.

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Please continue on a separate sheet if necessary

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Separate Part B forms must be completed for each separate proposed Main Modification you wish to comment on.

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|---|--|
| Proposed Main Modifications reference number | |
|---|--|

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- Sound Yes No

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Please continue on a separate sheet if necessary.

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Please continue on a separate sheet if necessary

PART C

1. Comments on updated policy maps, appraisals or evidence.

Separate Part C forms must be completed for each appraisal or evidence document commented upon, making clear the section or paragraph you're referring to

| | |
|------------------|--|
| Document: | |
|------------------|--|

Please continue on a separate sheet if necessary

| | |
|--|-------|
| Please sign and date this form: | |
| Signature: | Date: |

Appendix 2 - Notification letter for consultation on proposed Main Modifications



Spatial Planning

South Walks House, South Walks Road, Dorchester,
DT1 1UZ

📞 01929 556561

🌐 www.dorsetcouncil.gov.uk

Date: 13 November 2020

Ref:

Officer:

📞

✉ planningpolicy@dorsetcouncil.gov.uk

Dear Sir/Madam

Purbeck Local Plan proposed Main Modifications Consultation 13 Nov 2020 – 8 Jan 2021

This letter relates to the examination of the Purbeck Local Plan (2018-2034). Following hearing sessions last year, and a Post Hearing Note prepared by the Planning Inspector, the council has prepared a schedule of proposed Main Modifications to the local plan which are considered to be necessary to ensure that the plan is legally compliant and/or sound.

The council has also prepared an updated version of the proposed adopted policies map(s) and updated versions of appraisals and supplementary evidence including:

- Habitats Regulations Assessment (HRA);
- Sustainability Appraisal (SA);
- 5 Year Housing Land Supply;
- Infrastructure Development Plan; and
- Purbeck Local Plan Examination (2018-2034), Dorset Council response to The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.

The Council published a series of papers and supporting evidence in response to representations over the course of the local plan hearing sessions. It has also re-published a selection of these papers and evidence which relates to the proposed Main Modifications including:

- Review of capacity from small sites [SD88];
- Addendum to SA re settlement hierarchy [SD92];
- Strategy for mitigating effects on European sites, and Green Belt changes at Morden [SD93];
- Summary of viability issues raised by respondents and Council / Dixon Seale response to those concerns [SD97] ;
- Examination stage – viability update Purbeck Local Plan [SD117];
- Memorandum of understanding between Dorset Council and Savills on viability related issues for housing sites around Wool October 2019;
- Memorandum of understanding between Dorset Council and Wyatt Homes on viability related issues for Lytchett Matravers and Upton October 2019;
- Memorandum of understanding between Dorset Council and the Moreton Estate on viability related issues for Moreton Station/Redbridge Pit October 2019;
- Proposed changes to care provision [SD95]; and
- Planning the care provision in Purbeck [SD115].

All documents are available online at: www.dorsetcouncil.gov.uk/plpmainmods.

The consultation is focussed on the proposed Main Modifications, changes to the local plan policies map(s), updated appraisals and supplementary evidence, including the HRA, SA and Purbeck Local Plan Examination (2018-2034), Dorset Council response to The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020. This is not an opportunity to raise matters relating to other parts of the Plan that have already been considered by the Inspector during the examination. Weight will not be given to representations that repeat matters raised and discussed at the hearing sessions or in earlier responses. Responses on the proposed Main Modifications consultation must:

- be made in writing;
- using the council's response form;
- include the respondents name and address.

Responses to proposed Main Modifications to the Purbeck Local Plan (2018-2034)

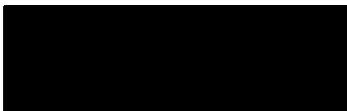
The Council is unable to accept anonymous responses. In accordance with government laws, and policies, relating to the Covid-19 pandemic the council encourages people and organisations who are interested in the consultation to view digital copies of the consultation documents through its website and to make any responses digitally using:

- the online response form; or
- an e-mail (attaching a digital copy of the response form) addressed to planningpolicy@dorsetcouncil.gov.uk .

The council has also published a schedule of Additional Modifications which it does not consider have any substantive effect on policies and text within the local plan. Responses should be made by **11.45pm on 8th January 2021**.

If you have any queries please don't hesitate to get in touch by telephone on 01929 556561, or email planningpolicy@dorsetcouncil.gov.uk using 'Purbeck Local Plan' in the subject bar.

Yours faithfully



Hilary Jordan

Service Manager for Spatial Planning