

Consultee: Clare Lees

Event name: Purbeck Local Plan Supplementary Proposed Main Modifications

Consultee reference: 1189887

Consultation reference: SMMR01

Supplementary Proposed Main Modification: SMM88

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM1

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM86

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: No

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: SMM 86 is not legally compliant in that it is not prepared with diligence and impartiality. Dorset Council have relied upon inaccurate information given to it by the Environment Agency, Natural England and Wessex Water relating to nutrient pollution.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound:

- 1) Retain the word SEWAGE and if wanted rephrase the sentence as "wastewater including sewage"
 - 2) Replace the word NUTRIENT with "nitrate and phosphate pollution".
 - 3) Replace the phrase MOST OF THE NUTRIENT LOAD IN POOLE HARBOUR ARISES FROM AGRICULTURAL ACTIVITY, BUT A PROPORTION (APPROXIMATELY 15%) IS GENERATED BY WASTEWATER ARISING FROM URBAN AREAS with "the nutrient load in Poole Harbour arises from a variety of sources including, but not exclusively from, agriculture (both historic and current) and sewage and wastewater."
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Comments on addendum to Habitats Regulation Assessment (SMMCD2), addendum to Sustainability Appraisal (SMMCD3), 5-year housing land supply report (SMMCD4), local housing need update (SMMCD5), policies map paper (SMMCD6) or local plan policies maps (SMMCD7a to SMMCD7k) -

Section or paragraph: N/A

Comments: N/A

Consultee: Roger Starbuck

Event name: Purbeck Local Plan Supplementary Proposed Main Modifications

Consultee reference:

Consultation reference: SMMR02

Supplementary Proposed Main Modification: SMM88

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM25

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM47

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: N/A

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: Stop building second homes!! The need is for affordable housing for LOCAL people!

Supplementary Proposed Main Modification: SMM48

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: N/A

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: Local homes for local people, WITH covenants.

Supplementary Proposed Main Modification: SMM49

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: N/A

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: We mustn't let developers circumvent the needs of local people for profit.

Supplementary Proposed Main Modification: SMM52

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: N/A

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: Don't let developers use incorrect figures to 'prove' projects are not viable.

Supplementary Proposed Main Modification: SMM59

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: No

Does the respondent consider Supplementary Proposed Main Modification is sound: N/A

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: Travellers, by definition "travel", therefore they are able to use and pay for regular caravan parks in the same way that the non-travelling community have to. How else is discrimination avoided against the non-traveller part of the population who do not enjoy the same privileges.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Comments on addendum to Habitats Regulation Assessment (SMMCD2), addendum to Sustainability Appraisal (SMMCD3), 5-year housing land supply report (SMMCD4), local housing need update (SMMCD5), policies map paper (SMMCD6) or local plan policies maps (SMMCD7a to SMMCD7k) –

Section or paragraph: N/A

Comments: N/A

Consultee: Councillor Alex Brenton

Event name: Purbeck Local Plan Supplementary Proposed Main Modifications

Consultee reference:

Consultation reference: SMMR03

Supplementary Proposed Main Modification: SMM88

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: Logical change of text to show actual electoral situation

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM1

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: No comment necessary

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM3

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: No

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: The phrase does not include -removal of land from Green belt at Morden which is a separate and very

different Parish from Lytchett Matravers . This leads to confusion when later in the document Morden is mentioned.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: - Removal of land from Green Belt in the Parish of Morden for non-residential purposes only.

Supplementary Proposed Main Modification: SMM4

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM5

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: There is explanation of exceptions to residential areas for elderly and care homes. There is no clear definition of residential housing compared to holiday homes, or why they are acceptable in the Green Belt.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: - Holiday parks may be permitted as development if legally distinct from new residential homes.

Supplementary Proposed Main Modification: SMM6

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: No

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: This is misleading.

Removing land from Green belt around Lytchett Matravers will NOT improve access to green belt .

Holiday Park at Morden is NOT defined or described, and will lead to more buildings and development and Planning creep, outside any settlement boundary, and not for rural exception site.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: Need a definition of Holiday Park and how that is different from residential development. to prevent change of use to residential in the lifetime of the Plan.

Supplementary Proposed Main Modification: SMM8

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM14

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM15

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM16

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: The idea that SANGS will divert visitors from heathland is not sound if a large SANG is created immediately adjacent to protected heathland. Such as at Morden

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: SANGS should have a buffer area of at least 100 metres to prevent easy access to conservation areas nearby.

Supplementary Proposed Main Modification: SMM86

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM18

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM19

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM20

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM21

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM24

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM25

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: Sound but depressing.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM26

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM27

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM28

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: Definition is needed. Until the Green Belt boundary in Lytchett Matravers is moved housing being built on the land is not really legal. Delay is causing distress. Clarity is needed as to where the proposed new boundary will actually be, and for how long. If a Green Belt area can be moved once it can be moved again. How long will this plan last?

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM29

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: Not deliverable.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM30

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM31

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: Legally sound but not specific enough about carbon footprint , rainwater catchment and building materials

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM32

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM33

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM40

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: Sound but a chance lost in not including -connecting Lytchett Matravers with the secondary school at Lytchett Minster with cycle and footpath

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM41

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: The area designated was not sensible due to the flood plain. Now amended and feasible.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM42

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM43

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM45

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM46

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM47

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM48

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM49

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM52

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM53

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: Sound and sensible as rural businesses have a chance to show financial prospects.

Also no larger footprint than necessary.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM54

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM61

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM63

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM65

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM66

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: This needs More definition of what is a caravan park.

There is no mention of holiday park homes which can become permanent dwellings, a problem in the Green Belt. There needs a clear policy and definition of their role in the economy.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM68

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM69

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM71

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM72

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM76

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: This is a more defensible position for a Plan. The acceptance of a SANG as a suitable use of green Belt is logical , and separating the SANG from the proposed development allows them to be considered as stand alone proposals which prevents linkage and possible leverage. It increases the scrutiny of any holiday park proposals.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: It seems fine as is now proposed.

Supplementary Proposed Main Modification: SMM77

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: This modification gives an alternative strategy for achieving a SANG at Morden. It Separates the holiday park proposal from the need for a SANG and gives the Plan flexibility.

Nowhere else in the Purbeck Plan had a landowner or developer given such strong bargaining power. Council Plans should not be co-erced by a landowner over the needs of a strategic plan.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: Leave it as it is now.

Supplementary Proposed Main Modification: SMM87

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: Logical but seems slow to progress.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM78

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM81

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM84

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM85

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: This could soon be out of date, so must be reviewed regularly .

Morden Mill is expected to provide 2 new homes, based on existing footprint. There should not be a link to any enabling development.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Comments on addendum to Habitats Regulation Assessment (SMMCD2), addendum to Sustainability Appraisal (SMMCD3), 5-year housing land supply report (SMMCD4), local housing need update (SMMCD5), policies map paper (SMMCD6) or local plan policies maps (SMMCD7a to SMMCD7k) -

Section or paragraph: Inset map for Wareham (SMMCD7j).

Comments: Logical.

Consultee: Andrew Patrick on behalf of Swanage Railway Trust

Event name: Purbeck Local Plan Supplementary Proposed Main Modifications

Consultee reference: 1190289

Consultation reference: SMMR04

Supplementary Proposed Main Modification: SMM81

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: MM81 recognised that the words "where appropriate" and "or" must be added to Policy I 7 a (ii) to make it sound, because that change is necessary to enable the delivery of rail infrastructure in Purbeck, the identified need for which is based on the evidence we have submitted. There have been no changes in material circumstances since MM81 was published; those words have thus been correctly retained in SMM 81.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: SMM 81 is sound PROVIDED THAT the words "where appropriate" and "or" are retained in Policy I 7 a (ii).

Comments on addendum to Habitats Regulation Assessment (SMMCD2), addendum to Sustainability Appraisal (SMMCD3), 5-year housing land supply report (SMMCD4), local housing need update (SMMCD5), policies map paper (SMMCD6) or local plan policies maps (SMMCD7a to SMMCD7k) -

Section or paragraph: N/A

Comments: N/A

Consultee: Naomi Pickard

Event name: Purbeck Local Plan Supplementary Proposed Main Modifications

Consultee reference: 1190535

Consultation reference: SMMR05

Supplementary Proposed Main Modification: SMM88

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: I do not believe the previous consultations with the community have been taken into account regarding Lytchett Matravers. Multiple issues have been raised previously regarding the suitability of the sites proposed for development in Lytchett Matravers which were identified many years ago in a bizarrely archaic format and are not as stated above 'the least environmentally constrained' or 'the best connected to public transport'. Nor will they provide any additional infrastructure to the schools or health facilities which are already at maximum capacity. What is being proposed will only increase pollution and congestion from cars, put heavy pressure on existing village amenities, remove Green Belt land and negatively impact on village life.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: If other more suitable sites for development within the village of Lytchett Matravers cannot be identified, the housing allocation for this village should be reduced significantly so as to remove the proposed site adjacent to Wareham Road from the plan altogether. It cannot ever be justified to use existing plans that have been proposed by developers if they are so opposed by the local community and conflict with policies set out by Parliament regarding building on Green Belt land.

Supplementary Proposed Main Modification: SMM1

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: Not consistent with

National Planning Policy as not sufficient justification given to develop on Green Belt land.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM3

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: No

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: Unsound as Lytchett Matravers is neither a sustainable or accessible location.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: Find an alternative location for the housing allocation to Lytchett Matravers that does meet the brief! Housing closer to the conurbation of Poole with better public transport provision and on brownfield sites not precious Green Belt land.

Supplementary Proposed Main Modification: SMM4

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: Whilst Lytchett Matravers may have more services and facilities in the village, these have no spare capacity to accommodate such a large increase in population from these proposed housing developments.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: Find a more suitable site for the houses proposed at Lytchett Matravers.

Supplementary Proposed Main Modification: SMM5

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: No

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: I am repeating myself now. For reasons already stated, an allocation of 150 homes for Lytchett Matravers is unsound. It is not a suitable location for this size of development. There has already been significant housing development in Lytchett Matravers in the last 5 years (I believe over 100 homes) with no improvements to infrastructure made as a result. These developments have already put significant pressure on village amenities and made traffic congestion and pollution unbearable at peak times. Such an increase in homes would without doubt negatively impact on the community.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: Find more suitable sites than Lytchett Matravers.

Supplementary Proposed Main Modification: SMM6

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: Building on Green Belt land must and has to be always UNSOUND. It is surely common knowledge now how our wildlife is under threat. The RSPB alone has just released their latest figures for how bird numbers have declined. The Starling has declined 82%, the Blackbird 50% in the last 40 years. These are birds that frequent the gardens of residents in Glebe Road. Where will these birds go when their Green Belt land is taken away?

A SANG is not going to mitigate against the impact of removing Green Belt land. How can it? A SANG is not a re-wilding of Brownfield land. It is not making a new green space. It is not a new piece of green belt. It is an existing field.

What you are proposing is just taking away green land where wildlife is currently thriving, damaging the environment irrevocably and producing a whole load of pollution in the process.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: Build the houses on a site with less environmental constraints please. Green Belt land is precious. When it is gone, it is gone.

Supplementary Proposed Main Modification: SMM8

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: No

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: I do not at all feel that 'exceptional circumstances' for removing Green Belt land as defined in the National Planning Policy Framework, have been evidenced.

How come the numbers of housing needed for Wool and Moreton for example have been reduced so significantly, despite there being the ability to house more homes in those locations, without impacting on the environment and with all the infrastructural improvements provided?

Why is there a need to build on Green Belt when we know previously there were far more homes proposed for building elsewhere??? Why does the development need to be spread out across the district if larger scale developments in fewer locations would be far more 'suitable'??

This does not align with 'exceptional circumstances'.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: Allocate more homes to the larger scale developments proposed or find other more 'suitable' locations.

Supplementary Proposed Main Modification: SMM14

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM15

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: Such large scale developments will impact on the beautiful area we live in and want to protect.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: I feel more could be done to develop existing larger towns, repurposing commercial builds for example, and rejuvenating struggling town centres.

Supplementary Proposed Main Modification: SMM16

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: SANGs are as previously mentioned are already in existence, certainly regarding the SANG proposed at Lytchett Matravers. It is not a new green space or a re-wilding of a brownfield site. It will not take more harmful gases from the environment, or provide a new space for wildlife to thrive.

It is also 2km from the proposed development site on Wareham Road. People will only go there by car which obviously doubles the negative impact of removing Green belt land.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: Don't build on Green Belt land!

Supplementary Proposed Main Modification: SMM86

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: Such large scale developments will impact on the beautiful area we live in and want to protect.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: I feel more could be done to develop existing larger towns, repurposing commercial builds for example, and rejuvenating struggling town centres.

Supplementary Proposed Main Modification: SMM18

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: Such large scale developments will impact on the beautiful area we live in and want to protect.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: I feel more could be done to develop existing larger towns, repurposing commercial builds for example, and rejuvenating struggling town centres.

Supplementary Proposed Main Modification: SMM19

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: Such large scale developments will impact on the beautiful area we live in and want to protect.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: I feel more could be done to develop existing larger towns, repurposing commercial builds for example, and rejuvenating struggling town centres.

Supplementary Proposed Main Modification: SMM20

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: Such large scale developments will impact on the beautiful area we live in and want to protect.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: I feel more could be done to develop existing larger towns, repurposing commercial builds for example, and rejuvenating struggling town centres.

Supplementary Proposed Main Modification: SMM21

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: Such large scale developments will impact on the beautiful area we live in and want to protect.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: I feel more could be done to develop existing larger towns, repurposing commercial builds for example, and rejuvenating struggling town centres.

Supplementary Proposed Main Modification: SMM24

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM25

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM26

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM27

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM28

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM29

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM30

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: UNSOUND allocation of 95 homes at Lytchett Matravers east of Wareham Road. The site is not 'suitable' for development.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: Allocate these homes to a more suitable suit.

Supplementary Proposed Main Modification: SMM31

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM32

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM33

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM35

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: No

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: The SANG proposed for Lytchett Matravers is not big enough to mitigate the volume of houses proposed in Lytchett Matravers. It is too far from the largest development site as well.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: Don't build on the Green blue land and you won't need the SANG.

Supplementary Proposed Main Modification: SMM38

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM40

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: The SANG proposed for Lytchett Matravers is not big enough to mitigate the volume of houses proposed in Lytchett Matravers. It is too far from the largest development site as well.

I also wonder how affordable homes are going to work in Lytchett Matravers. House prices are very expensive to start with. And the elderly and young people tend to be more reliant on public transport of which there is precious little in Lytchett Matravers. The site at Wareham Road would require the new homeowners to be able to drive a private vehicle. This site is not suitable for affordable homes.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: Chose a more 'suitable' site.

Supplementary Proposed Main Modification: SMM41

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM42

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM43

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM45

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM46

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM47

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM48

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM49

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM52

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM53

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM54

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM59

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM60

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM61

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM63

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM64

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM65

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM66

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM68

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM69

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM71

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM72

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM76

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: The SANG proposed at Lytchett Matravers is unsuitable. It is situated too far from the largest development proposed in the village, therefore would not encourage residents to use it over, for example driving to Wareham Forest.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: Don't build on the Green Belt.

Supplementary Proposed Main Modification: SMM77

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM87

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM78

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM81

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM82

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM84

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM85

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Comments on addendum to Habitats Regulation Assessment (SMMCD2), addendum to Sustainability Appraisal (SMMCD3), 5-year housing land supply report (SMMCD4), local housing need update (SMMCD5), policies map paper (SMMCD6) or local plan policies maps (SMMCD7a to SMMCD7k) -

Section or paragraph: N/A

Comments: N/A

Consultee: Dr A C Warne

Event name: Purbeck Local Plan Supplementary Proposed Main Modifications

Consultee reference: 1190865

Consultation reference: SMMR06

Supplementary Proposed Main Modification: SMM88

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: No

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: SMM88 Foreword and SMM1 Introduction

1. I am sure that I have said this before but it needs repeating – that producing the plan and its modifications for public comment in the middle of summer or just before Christmas must be a deterrent to some people who might wish to comment. It has not been helped by the intermittent power cuts we have had in Frampton as a result of supply infrastructure being renewed. In consequence these responses to the modifications may not be as comprehensive as I would have liked. This response form does not include a section to comment on FMM and MM!

2. The current set of modifications is extremely difficult to follow and because it covers an area also covered in the Dorset Plan it is more than just confusing – it is deceptive. The Draft Dorset Plan is already published and contains a considerable expansion of the proposals in the Purbeck area and for Wool in particular by doubling the proposed allocation – yet this is not mentioned in the Purbeck Plan modifications. The modifications proposed for Morden etc subject to a separate consultation also contains a suggestion that even more housing might be directed to Wool and Morton if this cannot be accommodated in the area covered by this modification. This makes it all the more necessary to integrate the Purbeck Plan into the Dorset Plan to be much more transparent about what is really proposed and avoid the potential confusion that may occur over the lifetimes of these plans.

3. In paragraph 33 under application of the plan it states that Dorset Council have started work on preparing a local plan for the new council area – this is misleading because the plan is already in draft and has been subject of a first round of public consultation. This plan proposes additions to the Purbeck area that could and should be included in this consultation but would be much better dealt with by producing a single plan with Purbeck integrated into it – this would then be much less confusing for all.

4. The reopening of the debate into another National Park in England includes Dorset as one of its three options. Dorset has one of the most important areas for biodiversity in Britain, the Purbeck Plan if enacted will compromise this. The choice for Dorset Council is between whether it wants a National Park or the development proposals of the Purbeck and Dorset Plans – I do not visualise any compromise.

5. I believe that I have included in comments on previous modifications that Dorset Council take a very negative view of the environment suggesting it is an impediment to development, despite the requirement that councils pay due regard to biodiversity. The plan proposals affect many Internationally and Nationally designated sites yet proposals do not recognise the extent of potential damage which is considerable, yet mitigation is applied everywhere rather than avoidance. These sites are in a matrix of biodiverse countryside that supports them and their nationally important species by providing feeding areas. The plan also seeks to separate the international designations of SPA and SAC when it comes to damage to suit its ambitions for Corfe, this is not acceptable as they are all part of a National Network. If the Purbeck plan area was properly integrated into the Dorset Plan then there would be potential to avoid such sensitive sites in Purbeck.

6. Despite there being a requirement/obligation to protect Biodiversity the plan makes no recognition of the wider importance of Biodiversity in Purbeck something we are continuously learning about. See “Warne A.C. 2022 The conservation of biodiversity as exemplified by a beetle survey of Wool (Dorset Natural History and Archaeological Society Proceedings 2022 vol 143, p41)”. This paper analyses the habitats present in Wool Parish and concludes that the mosaic of habitats along with the organic management of land as being the most important elements leading to the exceptional richness of Wool. This type of mosaic may exist in some other parishes in the Frome corridor such as Morton but these will be few and Wool appears to be exceptional.

The confusion and ambiguities in the Purbeck Plan and between it and the Dorset Plan along with the negative view of the environment, that is one of the planks of sustainable development as described in NPPF23. The plan is therefore not sound nor a plan for sustainable growth.

Proposed Supplementary Main Modifications para 23 iv

Page 22 policies E7, E9, H3, H11 & I1

“provide a sound approach to nutrient neutrality” but the setting aside of farmland is unproven and includes a time lag when nutrients will continue to increase and damage will continue and increase in Poole Harbour (see comments on SMM 86. Methane as a green house gas is not mentioned as a consequence of the anaerobic conditions created by the nutrient enrichment.

Reading between the lines the Council only propose to do what they are “ obliged” to do and therefore the minimum. The word “Robust” is scattered around the policies proposed but in some cases such as nutrient neutrality policies are anything but “robust” and are based on an unproven hypothesis. “Robust” therefore becomes meaningless.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: Integrate the Purbeck Plan into the Dorset Plan. Delete Robust and other such words - these indicate the Council is prejudging its own plan.

Supplementary Proposed Main Modification: SMM1

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: No

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: See SMM 88

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: As SMM 88

It should also be recognised that like the numbers of houses required there is an increase in knowledge of the environment that will need to be incorporated if the council is to fulfill its obligations concerning biodiversity

Supplementary Proposed Main Modification: SMM3

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: No

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM4

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: No

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: SMM

This change from “up to” to “around” is repeated elsewhere such as SMM27

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: SMM

This change from “up to” to “around” is repeated elsewhere such as SMM27. A clear ceiling should be given

Supplementary Proposed Main Modification: SMM8

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: No

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: SMM8

“obliged” is rather a negative view again considering the Council’s responsibility for Natural Beauty which I hope includes the Natural Environment and its wildlife.

5 Policy V1 Spatial Strategy for Sustainable Communities

This policy contains the change from “up to” to “around”. In the case of Wool up to makes 470 the ceiling but around allows for 470 plus or minus so for example plus or minus 30 brings the potential total up to 500. Around is an imprecise term and leaves things open ended. This becomes less relevant with the proposals in the Dorset Plan that would mean up- to 1000 houses in Wool.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: The disparity between the Purbeck Plan and the Dorset plan makes integration of the two into a single plan essential

Supplementary Proposed Main Modification: SMM15

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: No

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: SMM15 Environment

This tends to contradict itself and is certainly very muddled. The original paragraph 83 identifies that there is sufficient pressure from development and Natural England appear to concur therefore the precautionary principle should be applied and AVOID these sites completely and not use universal mitigation.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: Changes needed included above

Supplementary Proposed Main Modification: SMM86

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: No

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: SMM86 Poole Harbour

It does not seem to be recognised just how critical conditions are in Poole Harbour. Areas not near to any development such as Brand's Bay on the south side are beginning to smell as strongly as other more obviously polluted areas such as Hole's Bay. The smell indicates anaerobic conditions under the algal mat that will not only restrict the growth, distribution and variety of food available to protected wading birds but will be killing it. It also produces Methane a serious greenhouse gas with all the well publicised implications of this.

Planning must get a better grip on agricultural development in particular indoor herds of milking cattle. The production of evermore quantities of slurry and the increasing spreading of this in the wider landscape, including the AONB and nitrate sensitive areas often in winter when nutrients will not be taken up by crops or grassland (below 4 degrees C) when it will percolate to the groundwater.

The statement that most of the nutrient load in Poole Harbour may be inaccurate as a result of the change from Nitrate to nutrient has been substituted to include Phosphate but do the same proportions apply to phosphate that is a component of domestic detergents?

The plan by being restricted to being a Housing Plan avoids the big picture that the council is also responsible for. The time lag between the beginning of taking land out of high fertiliser applications and the reduction in nutrients in the ground water and thence rivers and Poole Harbour means that for several years there will still be rises in nutrient levels continuing to threaten and damage the importance of the area for

wildlife. I have yet to see evidence that this land offset mitigation will produce the reduction hoped for.

The only proven way to reduce nutrients would be to upgrade all sewage works to the highest standards, including elimination of all untreated sewage discharges – as described as occurring in Holes Bay at the public hearings into the Purbeck Plan. The implications of expanding sewage works is not taken into account in the plan but its implications need to be included.

Under the section on Developer contributions to deliver Purbeck's infrastructure on page 169 the payments are for developments of 50 houses or more – appear to be the same as for developments of less than 50 houses this makes it confusing when I think you simply mean that payments will have to be made for all housing.

The issue of microplastics should be considered here although it could be included elsewhere such as drainage. Air quality is considered so why has microplastics been left out? Traffic increases will occur with the increase in houses and this will in turn increase the quantity of microplastics entering the environment and ending up in Poole Harbour and the sea. Tyre Rubber has been found in quantity around the Burton Cross roundabout and potentially can get into the Frome and thence Poole Harbour through drainage. Recently the Plymouth Marine Laboratory have publicised the danger of tyre rubber as a micro plastic and the threat this poses

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: Recognise the dire conditions of nutrient enrichment in Poole Harbour. Recognise the wider implications of nutrient enrichment. Recognise the contribution Methane makes to global warming. Recognise the potential increase in micro plastics in the environment and the threat these pose for Poole Harbour and the sea.

Other changes clear in comments above

Supplementary Proposed Main Modification: SMM18

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: No

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: SMM18 Environment

Tinkering with the boundaries of sites or their buffers that have been designated for one purpose so that they do not constrain another is a serious step. The Council are already moving along this in the case of the Green Belt that is only based on a

national designation. There is a very serious principle at stake here and another case where the NPPF advice to AVOID should be taken.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: Dangerous to tinker with designations. Green belt frowned upon by Mr Gove!

Supplementary Proposed Main Modification: SMM19

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: No

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: SMM 19 Environment

In important sites that will lead to planning applications being more difficult to resist if they this plan a prejudgement is being made about the effects on Nationally and Internationally are liable to cause damage. What is not recognised is that not only the surrounding 400m be recognises but there should be a better recognition that the wider surrounding countryside may be support areas for the designated sites. This is clearly demonstrated by the Nightjar where feeding sites are vulnerable (eg Coombe Wood and organic farmland) around Wool. It is no good protecting breeding sites without giving some protection to feeding sites as lack of food may seriously affect the “core” designated area. Mitigation might include better protection for feeding and other supporting areas for the species for which the site was designated.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: Changes needed included above

Supplementary Proposed Main Modification: SMM20

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: No

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: Comments relating to this SMM have been made throughout this response and these should also be considered here along with the changes needed.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: Comments relating to

this SMM have been made throughout this response and these should also be considered here along with the changes needed.

Supplementary Proposed Main Modification: SMM31

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: No

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: SMM 31 Chapter 4 Housing

Under the justification for this proposal there is the modification “ to ensure the plan is effective it should include an updated reference to the council area following the Local Government Reorganisation April 2019 – it does not do this fully and fails to mention that the draft Dorset Plan contains proposals that go far beyond what is proposed in this plan – this is deceptive and the plan should be integrated into the Dorset Plan to clearly say what is being proposed.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: Integrate Purbeck Plan into the Dorset Plan

Supplementary Proposed Main Modification: SMM32

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: No

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: SMM32 Chapter 4 Housing

The changes to this reflect what has already been proposed under earlier modifications.

The provisions for biodiversity in paragraph L do not reflect the councils responsibility for biodiversity in the Environment Act. Biodiversity is not something that can be simply turned on but requires considerable forward planning. The organic farmland at Wool for example has been managed as such for over 20 years which has allowed the enhancement of biodiversity that has taken place and has been found to be in the same region of 30% better than conventional farmland that is the average for organic sites in general. Simply setting aside areas for biodiversity will

only increase the number of individuals of colonist species not the number and variety of species. A considerable account of the exceptional biodiversity of Wool has been published. As they stand the housing proposals can only result in a decline in biodiversity, development is widely recognised as one of the reasons for the biodiversity crisis

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: You say you must comply with obligations throughout this plan but biodiversity consideration is extremely limited, a much more thorough consideration is needed to make this plan sound

Supplementary Proposed Main Modification: SMM38

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: No

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: SMM 38 Chapter 4 Policy H5 Wool

Throughout this response to the modifications Wool is cited both in specific terms and as an example of the way policies might act more widely. All these comments need to be taken into account here rather than repeat them again.

The known exceptional biodiversity and the importance of the organic farmland need to be fully recognised.

The lack of consideration for infrastructure to support these and other (Dorset Plan) proposals to virtually double the size of Wool need to be included as they have from the Purbeck Gate development because of inadequate planning. The increase in population will need an expansion of the existing sewage works but this is constrained by the surrounding SSSI implications for the whole plan. There is an existing sewage overflow problem resulting and the need for a new primary school as the present one is at full capacity, this will need more land to be allocated – an additional erosion of biodiversity of the area.

The provision of a SANG in Coombe Wood demonstrates the inadequate assessment of this proposal as it will threaten the feeding areas of Nightjar that breed on nearby protected heathland and a significant population of dormice – a protected species. The original designation of the Dorset Heaths did not fulfil the original objects of the Habitat and Species directive which actually required sites to provide the overall requirements of species, not just breeding areas but also the essential feeding areas.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: The bland assumption that there is plenty of land in Wool is not justified. The exceptional biodiversity of Wool should be properly assessed the implications of the proposals are for a considerable loss of biodiversity. The SANG and Coombe Wood in particular needs revision to exclude this.

Supplementary Proposed Main Modification: SMM42

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: No

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: SMM42 Chapter 4 Housing

Focussing on land with the least environmental and amenity value is proposed but what evidence have you that this is the case. Land at Wool is of exceptionally high environmental value as has been demonstrated in a published report.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: Do an unbiased assessment of Wool not just assume there is plenty of land.

Supplementary Proposed Main Modification: SMM63

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: No

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: SMM 63 Chapter 5 Economy

It is significant that avoidance of an adverse impact on Biodiversity is proposed here yet this explicit wording has not been used in regard to housing. The availability of employment sites has been used as a justification for increasing the area of housing in some areas yet for many years now the Dorset Innovation Park has been present under a variety of labels but has not attracted the amount of business planned for. If the site is not attractive for employment Wool simply becomes a commuter village for Dorchester and Poole this is not a sustainable proposition.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: What is the policy to avoid creating commuter dormitories for Poole and Dorchester? At what point does the Dorset Innovation Park become recognised as un sustainable?

Supplementary Proposed Main Modification: SMM68

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: No

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: SMM 68 Chapter 6 Infrastructures

This is confusing the justification for the change included deletion of the SPDs yet the new paragraph after 250 the SPDs are referred to.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: Needs more clarity

Supplementary Proposed Main Modification: SMM82

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: No

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: SMM82 Chapter 7 Implementation, Delivery and Monitoring

At the public hearings I challenged this section as being just a box ticking exercise which tells nothing about the effectiveness of a policy. If enhancing biodiversity is an objective that is taken seriously then improvements or otherwise need to be measured for several years and if gains are not being made proposals to remedy this should be made. My understanding of monitoring is to see if the objective of a policy is being achieved and if not to learn what constraints there are and remedy them.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: Your whole view of monitoring is meaningless and needs a proper policy to assess effectiveness

Comments on addendum to Habitats Regulation Assessment (SMMCD2), addendum to Sustainability Appraisal (SMMCD3), 5-year housing land supply

report (SMMCD4), local housing need update (SMMCD5), policies map paper (SMMCD6) or local plan policies maps (SMMCD7a to SMMCD7k) -

Section or paragraph: N/A

Comments: N/A

Attachment:

FMM & MM

The online response form only includes SMM comment options so the FMM and MM comments have to be included as an appendix as does the HRA comments.

This section further confuses the revisions to the plan and should have been integrated not appear to be afterthoughts.

MM9 Policy E1

The current AONB landscape is to a large extent dominated by Oilseed Rape and Maize and in no way compares with the outstanding natural beauty and wildlife value of the heaths that were left out for economic reasons when the original boundaries were drawn, this needs revision or the establishment of a National Park.

MM12 Renewable energy

The effect of wind turbines on bats and bird movement is well known and documented. Bats are all protected as are many birds and the effects and care needed to site wind turbines needs to be included. Protection of these species is overall not just on protected sites.

MM22

Dorset Ecological Network – the maps available on line are too small to examine what they might add or not cover. To some extent the drawing up of such maps takes away from the fact that the biodiversity of Dorset and the Purbeck area in particular is exceptional in national terms.

MM23

The paragraph below c) - it should be considered that feeding areas support these Annex 1 species and these are crucial to the success of these species. There are other species of mammals, amphibians, reptiles, fish and invertebrates that are also protected and need to be included under this section

Biodiversity appraisals are frequently only a snapshot of an area/site over one or two visits and often miss very important features – for example the appraisal of Coombe Wood fails to include the important population of Dormice (protected species) and the value of Coombe Wood as a feeding area for birds for which the heaths are protected.

MM36

In the identification of the sites around Wool there is no mention of the organic management of these areas. The NPPF might be interpreted to say that this is higher value farmland and should not be utilised for housing. The change of “up to “ with “around” has already been commented on elsewhere.

The SANG provision has already been considered but also the original justification that it would provide a way to revert the conifer area to broadleaved trees does not now hold as grants for this are now available from the Forestry Commission.

Appendix 1

This table only goes to emphasise the confusing nature of the numbering that has been adopted.

HRA

There is no justification for treating the SPA and SAC differently – damage and disturbance will still occur on Corfe Common. Originally SPA and SAC were part of a unified Natura 2000 site series to try to demonstrate that although the two designations were developed separately –The Birds Directive and The Habitats and Species Directive, they should be treated the same.

Table 2 Map does not include site 7 – Area to the North of Winfrith Heath.

The HRA still mentions “the established mitigation strategy” for nutrients in Poole Harbour despite the fact that:

1. It is an unproven technique
2. There is a time lag that allows nutrients to continue for a considerable period before the strategy might have an effect.
3. Although increases in indoor milk herds is subject to planning permission (for the buildings) none seem to have been refused although these facilities contribute nutrients by slurry spreading often in winter when the temperature when the vegetation does not take up the nutrients so that it percolated to the ground water and thence the river Frome.

There is still a considerable need to go way beyond the policies for nutrient neutral development and develop a more wide ranging nutrient reduction strategy – Poole Harbour is under threat now from nutrient enrichment.

Consultee: Mandy Backhouse

Event name: Purbeck Local Plan Supplementary Proposed Main Modifications

Consultee reference: 1191015

Consultation reference: SMMR07

Supplementary Proposed Main Modification: SMM88

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: No

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: This modification is unsound on the basis that one of the 'key service villages', Lytchett Matravers, has been identified for further development - it is not in a 'more accessible and sustainable location' and it certainly is not 'best connected to public transport and other existing and planned supporting infrastructure'.

Lytchett Matravers is largely dormitory settlement, with minimal local employment, remote from centres of employment, secondary education and only an infrequent and inconvenient bus service. Private motor cars are necessary to access most services.

It is not a sustainable location.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM3

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: No

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: The text is considered unsound on the basis that "delivery of the Purbecks housing needs in sustainable, accessible locations must involve the removal of some land from the green belt at Lytchett Matravers" is untrue. In arriving at this unsound conclusion, the council have not provided any sound evidence to show "exceptional circumstances are fully evidenced and justified." to review and alter green belt boundaries as required by

Para 145 of the NPPF (December 23) Further, as noted under our response to SMM88, Lytchett Matravers is demonstrably not a sustainable or accessible location.

The purposes of the green belt, now only a few miles wide between Lytchett Matravers and the BCP conurbation, enshrined in para 143 of the NPPF, remain valid since its inception in 1980. Nevertheless since then, Purbeck District Council have allowed a series of piecemeal subtractions. Para 145 of the NPPF requires that once established, green belt boundaries have "intended permanence in the long term, so that they can endure beyond the plan period.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM5

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: No

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: For the reason set out in Paras 142 - 148 incl of the NPPF, the spatial strategy is considered UNSOUND in its proposal to designate land taken from green belt around Lytchett Matravers to achieve around 150 miles.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM6

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: No

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: Text considered UNSOUND as listed para by para below:-

Para 45 – Exceptional Circumstances to ‘remove land from the green belt at Lytchett Matravers’ is not ‘fully evidenced or justified’ as required by Para 145 of the NPPF.

Para 46 – The selected sites adjoining Lytchett Matravers, in particular the land to the east of Wareham Road remote from the village centre facilities, are not ‘sustainable locations’ being remote from employment opportunities and demanding

reliance upon private motor vehicles. The reference to 'a strong demand for housing' is not justification for satisfying that demand in unsustainable locations. The reference to a new SANG is flawed, a) because it is a) remote from the principal site it is designed to serve, thus further exacerbating the need for more car travel; and b) it is substantially smaller in area than the recommendation for SANGs relative to homes served. The claim that the provision of a SANG improves green belt accessibility and helps to 'offset some of the impacts of removing land from the green belt' is doubtful.

Para 47 – Contrary to the claim that the Council has considered 'alternative strategies' and 'is satisfied that the proposals to remove land from green belt...to spread development more evenly across Purbeck are justified' is not evidenced. Also, given that Purbeck is now an integral part of the unitary authority of Dorset, there is no imperative to be constrained by what is now a redundant and irrelevant administrative boundary. The justifications which are then proffered by the Council are flawed as follows:-

- Any diminution of the already eroded and narrow green belt adjoining Lytchett Matravers will, by definition, '...irrevocably damage the strategic function of the green belt..' and further, the repeated claim that this is a 'most sustainable location in terms of access...' is untrue.
- Whilst it may be true that Purbeck has limited brownfield sites available, given that the great majority of present and future residents of Lytchett Matravers will look to Poole for work and most facilities, it should be noted that there are large tracts of redundant brownfield sites within Poole still remaining undeveloped after many years. It defies logic to erode the green belt designed to serve the Poole conurbation, whilst that conurbation has the opportunity to satisfy housing demand in highly sustainable locations.
- As noted above there is no actual need to achieve a spread of homes only across Purbeck. This is an historic and irrelevant anachronism.
- The proposal to site homes in an unsustainable dormitory village without any realistic public transport will actually impact considerably on the already congested nearby A35 and A350 routes into Poole. Junctions onto those main roads from Lytchett Matravers are now beyond capacity at peak morning and evening periods.
- 'effective use of land' and 'optimum density' are empty phrases in this context, neither relevant to non-sustainable locations nor justifying the 'exceptional circumstances' necessary to give up green belt land.
- The provision of a (undersized) SANG does not improve accessibility to essential facilities crucial to sustainable development.
- The reference to 'neighbouring Councils' may have been relevant when the Purbeck Local Plan was first mooted, but no longer given that the Plan area is now

part of a much larger authority which will seek to share assets and liabilities fairly across the whole County. With regard to BCP, there is certainly spare capacity, largely held back by developers only seeking to provide high value second home and holiday accommodation around a spectacular Harbour location. The numerous brownfield sites within Poole designated for residential development should be used to satisfy genuine local housing needs.

Para 48 – This Policy is ill founded, unjustified, contrary to Dorset’s declared Climate Emergency and counter to the requirements of the NPPF.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM16

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: No

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: Environment, para 85 – The proposal for a SANG at Flowers Drove with a capacity to mitigate for around 100 dwellings, is UNSOUND, given that the Council is proposing around 150 dwellings. Further, the site of the SANG at Flowers Drove is 2km from the largest of the developments it is intended to serve. It follows that many users will access the SANG by motor car thus exacerbating the unsustainable nature of the proposals for Lytchett Matravers.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM25

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: No

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: Housing paras 110 + 111 – The text is UNSOUND in its reference to the perceived non-cooperation of neighbouring councils. We repeat our comments under SMM 6, ie Given that Purbeck is now an integral part of the unitary authority of Dorset, there is no imperative to be constrained by what is now a redundant and irrelevant

administrative boundary. This is an historic and irrelevant anachronism. The reference to 'neighbouring Councils' may have been relevant when the Purbeck Local Plan was first mooted, but no longer given that the Plan area is now part of a much larger authority which will seek to share assets and liabilities fairly across the whole County. With regard to BCP, there is certainly spare capacity, largely held back by developers only seeking to provide high value second home and holiday accommodation around a spectacular Harbour location. The numerous brownfield sites within Poole designated for residential development should be used to satisfy genuine local housing needs.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM26

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: No

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: The reference to the Neighbourhood Plan prepared by Lytchett Matravers and adopted/'made' in 2017 is UNSOUND in that the text strongly implies that the NP '...does not seek to allocate housing sites, nor sets out any specific housing requirement beyond ...this Plan.' The truth behind this is that in preparing the NP we specifically sought to identify ways in which the village could grow with more housing, but balanced with new employment facilities and green cycling and walking routes, particularly to the secondary school in the adjoining village and for commuters to the conurbation. Instead, Purbeck District Council's planning officers absolutely forbade any proposals which might breach the green belt boundaries. The NP team were actively prepared to identify sustainable development proposals but were stopped from so doing. Instead, we now are faced with the largest of the proposed Lytchett Matravers housing sites being on the southern extremity of the village remote from village centre facilities, on a highly visible south facing slope, and this on the basis that it is the easiest and most convenient land to develop and already in the control of a major housebuilder. Instead, if new development is necessary, its location and a range of balancing and mitigatory proposals should be included in a revised Neighbourhood Plan.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM28

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: No

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: Housing paras 116+117 – The text is UNSOUND in the inclusion of Lytchett Matravers to provide 150 dwellings, for all the reasons set out in response to SMMs 88, 3, 5, 6, 16 and 25.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM30

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: No

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: The Policy is UNSOUND in the inclusion of Lytchett Matravers to provide 150 dwellings, for all the reasons set out in response to SMMs 88, 3, 5, 6, 16, 25 + 28.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM40

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: No

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: The Policy is UNSOUND in the inclusion of Lytchett Matravers to provide 150 dwellings, for all the reasons set out in response to SMMs 88, 3, 5, 6, 16, 25, 28 + 30. However, given that this Policy seeks to define obligations following from the designation of housing sites within Lytchett Matravers, we consider it imperative and crucial to the character, community cohesion and sustainability of our community, that the sites do not proceed simply on the basis of plans already drawn up and submitted as planning applications by the developer, but rather on the basis of development briefs prepared in an ongoing and iterative consultation process with the Parish Council and their Neighbourhood Plan

team, this being in accord with Para 40 of the NPPF which states that applicants should engage in pre-application services offered by the LPA and ‘....applicants who are not already required to do so by law (are) to engage with the local community and, where relevant, with statutory and non-statutory consultees, before submitting their applications.’ As an absolute minimum, any development in Lytchett Matravers must fund a sustainable green cycling and pedestrian route eastwards towards Poole.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM54

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: No

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: The Policy is UNSOUND in that it will undoubtedly be abused to allow non-rural workers to develop homes in unsustainable locations remote from settlements. Specifically, within the green belt around Lytchett Matravers, much of it elevated with views across to Poole Harbour, Corfe Castle and the Purbeck Hills, there have been numerous abuses of permitted development rights allowing the erection and subsequent conversion of spurious agricultural buildings into dwellings. Policy H13 increases that opportunity and likelihood of a continuing erosion of green belt. Whilst, we do not seek to constrain genuine agricultural and employment opportunities, we request as a minimum, that all development proposals within Purbeck’s green belt require specific planning permission to ensure full scrutiny and enable effective controlling planning conditions to be applied. This could be achieved by an Article 4 Direction if that is within the remit of a Local Plan.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Comments on addendum to Habitats Regulation Assessment (SMMCD2), addendum to Sustainability Appraisal (SMMCD3), 5-year housing land supply report (SMMCD4), local housing need update (SMMCD5), policies map paper (SMMCD6) or local plan policies maps (SMMCD7a to SMMCD7k) -

Section or paragraph: N/A

Comments: N/A

Consultee: Dr Andrew Langley

Event name: Purbeck Local Plan Supplementary Proposed Main Modifications

Consultee reference: 1191908

Consultation reference: SMMR08

Supplementary Proposed Main Modification: SMM15

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: No

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: SMM15 does not provide a clear statement on the impacts of new development in Purbeck in combination with plans and projects in other LPAs, and increased tourism (promoted both locally and nationally). To argue that local development is a very small increase on already significant visitor pressure is to admit that it requires mitigation along with all the other anticipated increases in visitor pressure.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: Assess the foreseeable impacts from all causes and propose a mitigation strategy.

Supplementary Proposed Main Modification: SMM16

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: What is the mitigation to be included in the Interim Air Quality mitigation strategy. Does an effective strategy exist?

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: Identify what mitigation is proposed.

Supplementary Proposed Main Modification: SMM86

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: N/A

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: SMM86 lacks clarity.

Conflating N & P into “nutrients” obscures the different sources, quantities and significance of these two different pollutants. The contributions from agriculture and development of N & P need to be isolated from each other so that the relative significance of each is clear.

The relative environmental significance of N vs P need to be quantified (what level of N pollution is equivalent to what level of P?).

What is the “nutrient pollution standard” and what evidence is there that this standard may be adequate to deal with Poole Harbour’s specific problems from development?

What evidence is there that WWTW improvements may remove the need to worry about P pollution from development (and when)? What is the threshold level of P pollution referred to? Currently, these improvements are just a possibility and lack the certainty required of mitigation.

Changes respondent considers are necessary to make the Supplementary

Proposed Main Modification legally compliant or sound: Address N & P separately. Identify the sources of these pollutants and quantify their magnitudes to show their relative importance. Quantify the current average rates of delivery of N & P to Poole Harbour SPA from existing development. Quantify how planned improvements to WWTW might compensate for the quantum of development envisaged within the catchment (and over what time period).

Supplementary Proposed Main Modification: SMM42

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: N/A

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: There is a typo, "in

cumulative", in the final paragraph. The text of this final paragraph about compliance with the habitats regulations is repeated almost verbatim in many other SMMs (e.g. 43, 49, 52, 53, 54, 59, 60, 63, 65, 66, 78, 81). Could this not be mostly handled by reference to E7 or an additional policy if necessary?

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM52

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: subsection g) "sites must primarily provide affordable housing" is unclear. The number of market homes to "facilitate" the delivery of affordable housing on rural exception sites should not be the only criterion in the balance, their market value in comparison with that of the affordable homes should also be considered. The aim is to provide a number of affordable houses. Any market housing should be at the smallest scale necessary to achieve that aim, which may not be just a restriction on the number of market units but also their sizes and values.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM81

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: No mention of development outside settlement boundaries being potentially in Green Belt.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: Add a condition about development in Green Belt.

Supplementary Proposed Main Modification: SMM82

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: Monitoring requirements for Poole Harbour nutrient pollution are very weak. Monitoring should include a

regular set of measurements of nutrient concentrations to demonstrate the success or failure of mitigation as part of the habitat assessment process. Periods when WWTW were not meeting their treatment targets ("overflows") should be collated and also progress on improvements to the relevant Works.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: Add an annual report on measured levels of nutrients, a summary of reported WWTW overflows in the catchment, and a summary of improvements to any of the WWTW in the catchment.

Comments on addendum to Habitats Regulation Assessment (SMMCD2), addendum to Sustainability Appraisal (SMMCD3), 5-year housing land supply report (SMMCD4), local housing need update (SMMCD5), policies map paper (SMMCD6) or local plan policies maps (SMMCD7a to SMMCD7k) -

Section or paragraph: N/A

Comments: N/A

Consultee: Wendy Riddle

Event name: Purbeck Local Plan Supplementary Proposed Main Modifications

Consultee reference: 1188362

Consultation reference: SMMR09

Supplementary Proposed Main Modification: SMM88

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: No

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound:

1. "The proposed Main Modification reflects local government re-organisation of Dorset councils in April 2019. The Purbeck Local Plan will relate to an area (defined by the former district council boundaries) within the recently formed Dorset Council administrative area"

But no relation to planning in other parts of Dorset Council is shown in the Main Modifications, so there is no way to judge that Purbeck is being treated fairly compared to other areas. Nor are any wildlife corridors connecting Purbeck to other areas able to be put in place.

2. " directing the majority of housing growth to less constrained areas, in particular Wool" &"As well as being the least environmentally constrained," are incorrect premises. Climate change generated rising sea levels, water table etc. have not been mentioned, let alone addressed for the Frome valley at Wool. Nor the R. Frome SSSI, nor NE "amber zone" for Great Crested newts . Nor a 21st century evaluation of soil quality in which organically farmed land has a sustainable structure and microbiome feeding the local biodiversity. How is this a less constrained area?

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound:

1. Make explicit the planning for the whole Dorset Council district showing even-handedness across the area and build in inter-connectiveness e.g. sustainable wildlife corridors with other parts of Dorset and other counties.

2. Bring the assessment processes into the current and growing understanding of climate change, biodiversity loss, destructive practices e.g. intensive farming,

Supplementary Proposed Main Modification: SMM1

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: No

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: It is necessary for planning in the Purbeck area to be assessed at the same time as the other areas in the Dorset plan.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: Include the plans for Purbeck for consultation at the same time as other areas under Dorset Council control

Supplementary Proposed Main Modification: SMM3

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: No

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound:

1. This reiterates the same incorrect assumption that less constraints affect the Wool area. See response to Q 8

2. Also a second error is that employment opportunities at the Dorset Technology Centre would be readily available for occupants of the proposed housing whereas only staff with topgrade technical knowledge or MOD connections will be sought.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound:

1. See previous rebuttal in Q 8

2. The occupants of the planned housing will be forced to commute for work to e.g Poole, Bournemouth etc or Dorchester, mostly by driving as the rail service is mainly once per hour, thereby increasing air and noise pollution, and contributing to climate change.

Supplementary Proposed Main Modification: SMM5

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: No

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: The use of the phrase "around "a certain number of homes cannot be "legally compliant or sound" as permits the developer to raise (or lower..but unlikely!) the number of houses as they wish. Doubtless without any further public consultation as happened in the building of Barratts Purbeck Gate development.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: State the number of permitted homes as a Maximum with fewer numbers, according to demand, being acceptable.

Supplementary Proposed Main Modification: SMM6

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: N/A

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: I do not know in detail the areas mentioned so it is inappropriate for me to comment

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM8

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: That "The Council is obliged to give great weight to conserving and enhancing the natural beauty, and outstanding value, of these designated landscapes." is a reasonable aim and attracts tourists generating bonus for the economy, but negatives in terms of footfall, pollution. But in the present era, to reduce CO2 emissions, to avoid a climate change tipping point, a more weighty obligation for the council is to safeguard areas that are contributing to biodiversity and absorbing CO2 such as scrub, hedgerows,

woodlands, flood plains, peat bogs etc. These serious considerations are totally omitted.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: Readjust considerations of what is to be valued. Landscape beauty yes, but ensure that it does not have a negative overall effect, AND equally supporting other biodiverse areas that in a less dramatic way make a far greater contribution to the battle to keep CO2 levels down and delay climate crises.

Supplementary Proposed Main Modification: SMM14

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM15

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM16

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: No

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound:

1. Plans for SANGs are not adequately monitored and rarely compensate the locals for what they have lost..they are further away..so how do locals access them? also they rarely match let alone exceed the area that has been lost, and thirdly the people moving into the new houses also will need recreational space that is not calculated into the plans
2. Housing developments e.g in Wool are not assigned any SANG.
3. If heaths are to thrive they need a protecting open space surrounding them, not encroachment by developments and their new occupants.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound:

SANGs are a too easy option for developers who make vast profits at the expense of those seeking a home. The council must insist that the compensation SANG area and facilities is far greater than what has been lost.

If the council's aim is to protect the heathland in accordance with legislation, this strategy is counterproductive.

Supplementary Proposed Main Modification: SMM86

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM18

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM19

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM20

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: No

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound:

1. The 400m protective ring should not permit exceptions such as a care home. That cannot comply with legislation due to the need for care staff doing shifts, visitors, hospital type waste sewage etc for disposal plus a secure boundary. Heavy machinery damaging the soil structure during construction. Definitely No

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound:

1. No exceptions unless the home of a Warden for the protected area
 2. The protective ring needs to be a green channel linking other biodiverse sites and preferably other parts of heath in order to avoid diminishing gene pools.
-

Supplementary Proposed Main Modification: SMM21

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM24

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: On reading modification I largely support it, but it needs to add an exclusion phrase where a development has been permitted recently, such as the Barratts Estate Purbeck Gate, that fails on most of the criteria listed, cannot be used as an argument for more of the same.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: Inappropriate previous developments cannot influence future planning design.

Supplementary Proposed Main Modification: SMM25

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM26

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: No

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: The Council has decided the the housing numbers, and the areas to accommodate these houses. The local plans are required to acquiesce to the council's decisions. These plans are only "local" in name and do not reflect the housing needs of the community. When a local

survey of Wool residents was undertaken a few years back the housing need in Wool was 20 or so. The need in Wool cannot have grown to 490!

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: Send a letter to every household in Wool and other areas listed to ascertain true housing need.

Supplementary Proposed Main Modification: SMM27

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: N/A

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: I cannot comment as I do not have detailed knowledge of areas mentioned

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM28

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: No

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: The allocation of housing reflects the Council's need to comply with Government desk top planning. It does not represent accurately local need, the availability of employment locally nor facilities needed for so many extra people

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: Survey households and build what actually is needed. Make the Government reassess its inappropriate strategy.

Supplementary Proposed Main Modification: SMM29

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: The peak building year according to the updated trajectory 2028 will make Purbeck noisy, polluted and unliveable and deter tourists from staying, damage the environment, further add to climate crisis with CO2 generated in concrete and steel production and not serve the needs of local people.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: Populations grow increasing year on year (not quite exponentially) therefore the greatest number of houses to be built in one year should be the last year shown i.e 2035-5

Supplementary Proposed Main Modification: SMM30

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: No

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: The phrase "unconsented numbers of homes" makes the table presented meaningless other than the council's aspirations

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: Only include what has consent.

Supplementary Proposed Main Modification: SMM31

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound:

1.Consideration the problems of reducing the ability to retain/absorb water due to the compacting of the ground during construction and the severely reduced area of ground not covered by concrete etc will result in flooding as happened when Purbeck Gate was built in Wool.

2. Also the foul drainage etc must not be joined onto existing structure built to take the waste from a far fewer buildings causing frequent sewage spills despite regular

maintenance by Wessex water, again as has resulted from the Purbeck Gate development

3. Mixed drainage is totally unacceptable in Wool as storm overflows enter the R Frome SSSI

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound:

1. No building on /near flood plains.
 2. New foul drainage sewers must be constructed for the complete route to the sewage processing station
 3. Mixed storm water/sewage arrangements should be banned.
-

Supplementary Proposed Main Modification: SMM32

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM33

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: N/A

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: Moreton residents should comment here not residents elsewhere

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM35

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: N/A

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: Moreton residents only should comment here

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM38

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: Despite the changes made, much that has been flagged up in previous consultations has been ignored.

1 Run off from development south of the A352 will increase flooding north of that road where 90 + 30 new houses are planned on a field that floods and is part of NE's amber great crested newt zone.

2. Increase traffic will make the hold-ups caused by the level crossing at Wool worse, increasing the frequency of accidents caused by impatient drivers. The stated traffic assessment will do nothing.

3. There is no mention of any strategies to prevent nutrient pollution of the R Frome SSSI.

4. There is no mention of protecting ancient hedgerows.

5. The SANG not mentioned in previous sections of this document of modifications is not a new space being enhanced to replace and improve on assets that will be destroyed by the proposed developments. It already has many features of an ancient woodland that being used as a SANG will destroy representing a double loss and damage to biodiversity in the area.

6. Without commuting new residents will fail to find jobs, and health facilities and schools will be overwhelmed.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: The size of the planned development may fit the Council's need to meet government requirements and also

fit Mr Weld's pocket, but it is grossly oversized and inappropriate for Wool. It needs to be reduced to meet local need not the council or Mr Weld.

Supplementary Proposed Main Modification: SMM41

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: N/A

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: I cannot comment on this area

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: I cannot comment on this area

Supplementary Proposed Main Modification: SMM42

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: N/A

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: I cannot comment on this section

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM43

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: N/A

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: I cannot comment on this section

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM45

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: N/A

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: I cannot comment on this section

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM46

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM47

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: N/A

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: I cannot comment on this section

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM48

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM49

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: N/A

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: I cannot comment on this section

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM52

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: N/A

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: I cannot comment on this section

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM53

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: N/A

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: I cannot comment on this section

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM54

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: N/A

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: I cannot comment on this section

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM59

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: N/A

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: I cannot comment on this section

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM60

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: N/A

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: I cannot comment on this section

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM61

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM63

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM64

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: N/A

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: i cannot comment

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM65

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: The proposed housing development in Wool is far in excess of the needs of the community, and similarly the proposed retail development. Existing local businesses that have served the community for decades will be threatened.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: Match the housing development and any additional retail outlets to the needs of the community

Supplementary Proposed Main Modification: SMM66

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: N/A

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: No comment

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM68

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM69

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM71

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM72

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM76

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: N/A

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: I cannot comment

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM77

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: N/A

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: I cannot comment

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM87

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: N/A

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: I cannot comment

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM78

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: N/A

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: I cannot comment

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM81

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: N/A

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: I cannot comment

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Comments on addendum to Habitats Regulation Assessment (SMMCD2), addendum to Sustainability Appraisal (SMMCD3), 5-year housing land supply report (SMMCD4), local housing need update (SMMCD5), policies map paper (SMMCD6) or local plan policies maps (SMMCD7a to SMMCD7k) -

Section or paragraph: N/A

Comments: N/A

Consultee: Philip Saunders on behalf of Wyatt Homes

Event name: Purbeck Local Plan Supplementary Proposed Main Modifications

Consultee reference:

Consultation reference: SMMR10

Supplementary Proposed Main Modification: SMM88

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM1

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM3

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM4

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM5

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: Wyatt Homes are committed to the delivery of much needed new homes on sites in our control at Upton, Bere Regis and Lytchett Matravers. We welcome the flexibility in policy wording with the addition of 'around' xx homes which is less prescriptive than previously and allows a degree of flexibility in the number of homes to be delivered on each site, whether that be more or less than allocated for, to allow for individual site constraints.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM6

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: Wyatt Homes are committed to the delivery of much needed new housing on allocated sites to be released from the green belt at Upton and at Lytchett Matravers. Wyatt Homes are committed to the delivery of these housing sites to assist the Council's housing land supply. Wyatt Homes recognise the need for improved access to recreational land to

offset the loss of the green belt in these locations and are committed to the delivery of SANGs at both Upton (Frenches Farm SANG extension - planning application submitted) and at Lytchett Matravers (Flowers Drove SANG). The SANG at Flowers Drove has planning permission and is capable of being implemented in the new year (2024) having had all necessary pre-commencement conditions discharged. A planning application for the SANG extension at Frenches Farm, Upton has recently been submitted and is awaiting determination.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM8

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM14

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM15

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM16

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: The Council has appropriately identified heathland infrastructure projects capable of delivery to offset potential impact on the Dorset Heathlands which could arise from the provision of new housing. Wyatt Homes are in control of and able to deliver the heathland infrastructure projects referenced within the policy modifications and set out below:

Extension to Frenches Farm SANG, Upton - to mitigate for c.150 homes (planning application for SANG extension submitted)

Securing excess mitigation from Flowers Drove SANG, Lytchett Matravers - to mitigate for c.100 homes. The Flowers Drove SANG benefits from planning permission (6/2019/0530) and the SANG is capable of being implemented in the new year (2024) with all necessary pre-commencement conditions already discharged.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM86

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: The proposed modifications reflect the latest position with regards to nutrients in the Poole Harbour catchment and provides flexibility to respond to changing circumstances as this issue continues to evolve and regulations are introduced to improve wastewater treatment.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM18

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM19

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM20

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM21

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM24

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM25

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: Wyatt Homes supports the Purbeck Local Plan seeking to deliver much needed housing in the interim period before the Dorset wide Local Plan is adopted. It is important to allocate sites and adopt the Purbeck Local Plan now to ensure housing delivery continues in a sensible and proportionate manner in the interim, prior to the Dorset Local Plan's adoption.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM26

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: Wyatt Homes supports the Purbeck Local Plan incorporating made Neighbourhood Plan housing allocations within the Purbeck Local Plan's housing delivery target. Coordination and collaboration between the Local Plan and Neighbourhood Plan should ensure a coordinated approach to Neighbourhood Plan allocations being determined at

planning application stage and ultimately delivered. Wyatt Homes are committed to the delivery of c. 67 homes in Bere Regis on the Back Lane and North Street sites as allocated by the Bere Regis Neighbourhood Plan.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM27

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM28

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: Wyatt Homes are committed to the delivery of new homes on allocated sites referenced within this policy on sites at Bere Regis, Upton and Lytchett Matravers. Planning applications have been submitted for many of these sites and are awaiting the Local Plan's adoption prior to their determination. Wyatt Homes support the wording amendments and recognise the need for a variety of small, medium and large sites to come forward for delivery to ensure a suitable delivery pipeline of new housing throughout the plan period.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM29

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM30

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: Wyatt Homes have submitted planning applications for the sites referenced at Upton (west of Watery lane) and Lytchett Matravers (Blaney's Corner and east of Wareham Road and Flowers Drove SANG). Wyatt Homes are committed to the delivery of these sites which contribute a significant number of houses (240 houses as allocated within the Local Plan plus 67 houses in Bere Regis as allocated by the made Bere Regis Neighbourhood Plan) to Purbeck's housing delivery target. Wyatt Homes welcome this policy which is supportive of delivery on sites sensibly distributed across the Purbeck housing market area.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM31

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM32

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM33

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM35

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM38

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM40

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: Wyatt Homes are supportive of this policy and are committed to the delivery of the three allocated sites in Lytchett Matravers and the associated SANG at Flowers Drove which benefits from planning permission (6/2019/2530). The allocated sites are sustainable and will contribute significantly to Purbecks housing land supply. Planning applications relating to Land at Blaney's Corner and East of Wareham Road have been submitted and are awaiting determination subject to the Local Plan's adoption. Wyatt Homes are also committed to delivery of land at Flowers Drove, with a planning application to be submitted dependent on the progress of this Local Plan examination. The SANG at Flowers Drove referenced by the policy is capable of implementation early in the new year (2024) having had all pre-commencement conditions discharged.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM41

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: Wyatt Homes are supportive of this policy and have submitted a planning application for the development of 90 homes on the allocated site (Policemans Lane phase 2, Upton) which is awaiting determination subject to the Purbeck Local Plan's adoption. Wyatt Homes are committed to the Site's delivery to aid Purbecks housing land supply. Wyatt Homes have also recently submitted a planning application for the extension of the adjacent Frenches Farm SANG, as required by policy.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM42

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: Wyatt Homes are in agreement with the small sites policy. Delivery of smaller sites can aid necessary growth of suitable towns and villages whilst also providing important windfall housing for the Council to help maintain an ongoing, sustainable housing land supply.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM43

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM45

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM46

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM47

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM48

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM49

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM52

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM53

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM54

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM59

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM60

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM61

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM63

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM64

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM65

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM66

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM68

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM69

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: The proposed modifications to Policy I1 re-enforce the need for Dorset Council to progress with the CIL Charging Schedule Review for the Purbeck area. An updated programme for the CIL Examination Hearing Sessions is awaited.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM71

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM72

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM76

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM77

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM87

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM78

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM81

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM82

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM84

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM85

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Comments on addendum to Habitats Regulation Assessment (SMMCD2), addendum to Sustainability Appraisal (SMMCD3), 5-year housing land supply report (SMMCD4), local housing need update (SMMCD5), policies map paper (SMMCD6) or local plan policies maps (SMMCD7a to SMMCD7k) -

Section or paragraph: SMMCD7c (Bere Regis local plan policies map)

Comments: Agree with the proposed changes. Wyatt Homes are committed to the delivery of homes on Back Lane and North Street as allocated by the Bere Regis Neighbourhood Plan and planning permissions are currently being prepared following a public consultation event held in summer 2023.

Consultee: Alf Bush on behalf of Lytchett Matravers Parish Council

Event name: Purbeck Local Plan Supplementary Proposed Main Modifications

Consultee reference: 1191250

Consultation reference: SMMR11

Supplementary Proposed Main Modification: SMM88

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: N/A

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: SMM 88 Foreword – Text considered UNSOUND on basis that one of the ‘Key Service Villages’, Lytchett Matravers, identified for further development is not in a ‘more accessible and sustainable location’ and nor is it ‘best connected to the public transport and other existing and planned supporting infrastructure’.

Rather, it is a largely dormitory settlement, with minimal local employment, remote from centres of employment, secondary education and only an infrequent and inconvenient bus service. Private motor cars are necessary to access most services. It is NOT a sustainable location.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: Delete references to Lytchett Matravers but note the PC's responses to other SMMs blow.

Supplementary Proposed Main Modification: SMM3

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: N/A

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: SMM 3 Vision and Objectives, Paras 43 + 44 – Text considered UNSOUND on basis that ‘delivery of ...Purbeck’s housing needs...in sustainable, accessible locations must involve the removal of some land from the green belt at Lytchett Matravers..’ is untrue. In arriving at this unsound conclusion, the Council have not provided any sound evidence to show ‘exceptional circumstances are fully evidenced and justified’ to review and alter Green Belt boundaries as required by Para 145 of the NPPF

(December 23). Further, as noted under our response to SMM88, Lytchett Matravers is demonstrably not a sustainable or accessible location.

The purposes of the Green Belt, now only a few miles wide between Lytchett Matravers and the BCP conurbation, enshrined in Para 143 of the NPPF, remain valid since its inception in 1980. Nevertheless, since then, Purbeck District Council have allowed a series of piecemeal subtractions. Para 145 of the NPPF requires that once established, Green Belt boundaries have '...intended permanence in the long term, so that they can endure beyond the plan period.'

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: References to removal of green belt land to facilitate development at Lytchett Matravers (and Upton) should be deleted.

Supplementary Proposed Main Modification: SMM4

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: N/A

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: No comment

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM5

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: N/A

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: SMM 5 – Visions and Objectives Policy V1 – For the reasons set out in Paras 142 – 148 incl of the NPPF, the Spatial Strategy is considered UNSOUND in its proposal to designate land taken from Green Belt around Lytchett Matravers to achieve around 150 homes.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: Delete references to Lytchett Matravers.

Supplementary Proposed Main Modification: SMM6

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: N/A

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: SMM 6 Visions and Objectives, paras 45-48 – Text considered UNSOUND as listed para by para below:-

Para 45 – Exceptional Circumstances to ‘remove land from the green belt at Lytchett Matravers’ is not ‘fully evidenced or justified’ as required by Para 145 of the NPPF.

Para 46 – The selected sites adjoining Lytchett Matravers, in particular the land to the east of Wareham Road remote from the village centre facilities, are not ‘sustainable locations’ being remote from employment opportunities and demanding reliance upon private motor vehicles. The reference to ‘a strong demand for housing’ is not justification for satisfying that demand in unsustainable locations. The reference to a new SANG is flawed, a) because it is a) remote from the principal site it is designed to serve, thus further exacerbating the need for more car travel; and b) it is substantially smaller in area than the recommendation for SANGs relative to homes served. The claim that the provision of a SANG improves green belt accessibility and helps to ‘offset some of the impacts of removing land from the green belt’ is doubtful.

Para 47 – Contrary to the claim that the Council has considered ‘alternative strategies’ and ‘is satisfied that the proposals to remove land from green belt...to spread development more evenly across Purbeck are justified’ is not evidenced. Also, given that Purbeck is now an integral part of the unitary authority of Dorset, there is no imperative to be constrained by what is now a redundant and irrelevant administrative boundary. The justifications which are then proffered by the Council are flawed as follows:-

- Any diminution of the already eroded and narrow green belt adjoining Lytchett Matravers will, by definition, ‘...irrevocably damage the strategic function of the green belt..’ and further, the repeated claim that this is a ‘most sustainable location in terms of access...’ is untrue.
- Whilst it may be true that Purbeck has limited brownfield sites available, given that the great majority of present and future residents of Lytchett Matravers will look to Poole for work and most facilities, it should be noted that there are large tracts of redundant brownfield sites within Poole still remaining undeveloped after many years. It defies logic to erode the green belt designed to serve the Poole conurbation, whilst that conurbation has the opportunity to satisfy housing demand in highly sustainable locations.

- As noted above there is no actual need to achieve a spread of homes only across Purbeck. This is an historic and irrelevant anachronism.
- The proposal to site homes in an unsustainable dormitory village without any realistic public transport will actually impact considerably on the already congested nearby A35 and A350 routes into Poole. Junctions onto those main roads from Lytchett Matravers are now beyond capacity at peak morning and evening periods.
- ‘effective use of land’ and ‘optimum density’ are empty phrases in this context, neither relevant to non-sustainable locations nor justifying the ‘exceptional circumstances’ necessary to give up green belt land.
- The provision of a (undersized) SANG does not improve accessibility to essential facilities crucial to sustainable development.
- The reference to ‘neighbouring Councils’ may have been relevant when the revision to the Purbeck Local Plan was first mooted (2012), but no longer given that the Plan area is now part of a much larger authority which will seek to share assets and liabilities fairly across the whole County. With regard to BCP, there is certainly spare capacity, largely held back by developers only seeking to provide high value second home and holiday accommodation around a spectacular Harbour location. The numerous brownfield sites within Poole designated for residential development should be used to satisfy genuine local housing needs.

Para 48 – This Policy is ill-founded, unjustified, contrary to Dorset’s declared Climate Emergency and counter to the requirements of the NPPF.

Notwithstanding the Council’s purported ‘justifications’ to demonstrate exceptional circumstances and claimed imperative to take land out of the green belt, only 3 days ago on 19th December 2023, on the day that the latest iteration of the NPPF was published, the Secretary of State for Levelling Up, Housing and Communities and Minister for Intergovernmental Relations, The Rt Hon Michael Gove MP gave a speech to the RIBA in which, inter alia, he announced that:-

“Those local authorities that have sought to vary the number in order to take account of the need to protect the Green Belt or other areas of environmental, heritage or aesthetic importance have found the Planning Inspectorate invincibly attached to the number first thought of, with only very few exceptions.

The new NPPF now, more clearly, upholds the spirit of the original intention. LOCAL AUTHORITIES HAVE THE COMFORT OF KNOWING THAT THEY NEED NOT RE-DRAW THE GREEN BELT OR SACRIFICE PROTECTED LANDSCAPES TO MEET HOUSING NUMBERS.”

It follows that the Council's contention that removal of land from green belt is not essential. Instead, this proposal should be taken out of the Purbeck Local Plan and be reconsidered in full consultation with the affected communities, ideally via the

Neighbourhood Plan process, as part of drawing up the forthcoming Dorset wide Local Plan.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: References to removal of land from green belt Instead should be taken out of the Purbeck Local Plan and be reconsidered in full consultation with the affected communities, ideally via the Neighbourhood Plan process, as part of drawing up the forthcoming Dorset wide Local Plan.

Supplementary Proposed Main Modification: SMM8

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: N/A

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: No comment

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM14

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: N/A

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: No comment

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM15

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: N/A

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: No comment

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM16

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: N/A

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: SMM 16 – Environment, para 85 – The proposal for a SANG at Flowers Drove with a capacity to mitigate for around 100 dwellings, is UNSOUND, given that the Council is proposing around 150 dwellings. Further, the site of the SANG at Flowers Drove is 2km from the largest of the developments it is intended to serve. It follows that many users will access the SANG by motor car thus exacerbating the unsustainable nature of the proposals for Lytchett Matravers.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: Delete references to the Lytchett Matravers/Flowers Drove SANG.

Supplementary Proposed Main Modification: SMM86

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: N/A

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: No comment.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM18

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: N/A

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: No comment.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM19

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: N/A

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: No comment.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM20

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: N/A

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: No comment.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM21

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: N/A

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: No comment.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM24

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: N/A

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: No comment.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM25

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: N/A

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: SMM 25 Housing paras 110 + 111 – The text is UNSOUND in its reference to the perceived non-cooperation of neighbouring councils. We repeat our comments under SMM 6, ie Given that Purbeck is now an integral part of the unitary authority of Dorset, there is no imperative to be constrained by what is now a redundant and irrelevant administrative boundary. This is an historic and irrelevant anachronism. The reference to ‘neighbouring Councils’ may have been relevant when the Purbeck Local Plan was first mooted, but no longer given that the Plan area is now part of a much larger authority which will seek to share assets and liabilities fairly across the whole County. With regard to BCP, there is certainly spare capacity, largely held back by developers only seeking to provide high value second home and holiday accommodation around a spectacular Harbour location. The numerous brownfield sites within Poole designated for residential development should be used to satisfy genuine local housing needs.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: This should be rewritten in its entirety to reflect that Purbeck is now part of a much wider Unitary Authority,

Supplementary Proposed Main Modification: SMM26

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: N/A

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: SMM 26 Housing Policy

H1 – The reference to the Neighbourhood Plan prepared by Lytchett Matravers and adopted/'made' in 2017 is UNSOUND in that the text strongly implies that the NP '...does not seek to allocate housing sites, nor sets out any specific housing requirement beyond ...this Plan.' The truth behind this is that in preparing the NP we specifically sought to identify ways in which the village could grow with more housing, but balanced with new employment facilities and green cycling and walking routes, particularly to the secondary school in the adjoining village and for commuters to the conurbation.

To evidence this we refer to the NP 2013-14 Questionnaire responses – very high totalling c500 replies . Of the respondents, whilst 56% were opposed to further development of the village, a remarkably high proportion of 40% supported the notion.

However, Purbeck District Council's planning officers absolutely forbade any proposals which might breach the green belt boundaries. This was frustrating given that our NP team were actively prepared to identify sustainable development proposals.

Instead, we now are faced with the largest of the proposed Lytchett Matravers housing sites being in the least sustainable location at the southern extremity of the village remote from village centre facilities, on a highly visible slope open to the surrounding landscape, simply on the basis that it is the easiest and most convenient land to develop and already in the control of a major housebuilder.

Instead, if new development is necessary, its location and a range of balancing and mitigatory proposals should be included in a revised Neighbourhood Plan with the potential to form part of the emerging Dorset wide Local Plan anticipated in 2016, only 2 years hence.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: Delete reference which imply that the Lytchett Matravers Neighbourhood Plan showed a negative reaction to growth. Instead suggest that a revised and updated NP will be taken account of in the emerging Dorset wide Local Plan.

Supplementary Proposed Main Modification: SMM28

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: N/A

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: SMM 28 Housing paras 116+117 – The text is UNSOUND in the inclusion of Lytchett Matravers to provide

150 dwellings, for all the reasons set out in the PC's responses to SMMs 88, 3, 5, 6, 16 and 25.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: Delete reference to Lytchett Matravers.

Supplementary Proposed Main Modification: SMM29

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: N/A

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: No comment.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM30

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: N/A

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: SMM 30 Housing Policy H2 – The Policy is UNSOUND in the inclusion of Lytchett Matravers to provide 150 dwellings, for all the reasons set out in the PC's responses to SMMs 88, 3, 5, 6, 16, 25 + 28.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: Delete reference to Lytchett Matravers.

Supplementary Proposed Main Modification: SMM31

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: N/A

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: No comment.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM32

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: N/A

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: No comment.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM33

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: N/A

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: No comment.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM35

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: N/A

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: No comment.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM38

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: N/A

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: No comment.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM40

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: N/A

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: SMM 40 – Housing Policy H6 - The Policy is UNSOUND in the inclusion of Lytchett Matravers to provide 150 dwellings, for all the reasons set out in response to SMMs 88, 3, 5, 6, 16, 25, 28 + 30. However, given that this Policy seeks to define obligations following from the designation of housing sites within Lytchett Matravers, we consider it imperative and crucial to the character, community cohesion and sustainability of our community, that the sites do not proceed simply on the basis of plans already drawn up and submitted as planning applications by the developer, but rather on the basis of development briefs prepared in an ongoing and iterative consultation process with the Parish Council and their Neighbourhood Plan team, this being in accord with Para 40 of the NPPF which states that applicants should engage in pre-application services offered by the LPA and ‘...applicants who are not already required to do so by law (are) to engage with the local community and, where relevant, with statutory and non-statutory consultees, before submitting their applications.’ As an absolute minimum, any development in Lytchett Matravers must fund a sustainable green cycling and pedestrian route eastwards towards Poole.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: The text should require that detailed development proposals and infrastructure changes arising therefrom, shall be prepared in consultation with the local community through the preparation of design briefs, and via the Neighbourhood Plan process where relevant.

Supplementary Proposed Main Modification: SMM42

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: N/A

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: No comment.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM43

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: N/A

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: No comment.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM45

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: N/A

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: No comment.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM47

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: N/A

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: No comment.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM48

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: N/A

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: No comment.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM49

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: N/A

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: No comment.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM52

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: N/A

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: No comment.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM53

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: N/A

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: No comment.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM54

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: N/A

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: SMM 54 Housing Policy H13 – The Policy is UNSOUND in that it will undoubtedly be abused to allow non-rural workers to develop homes in unsustainable locations remote from settlements. Specifically, within the green belt around Lytchett Matravers, much of it elevated with views across to Poole Harbour, Corfe Castle and the Purbeck Hills, there have been numerous abuses of permitted development rights allowing the erection and subsequent conversion of spurious agricultural buildings into dwellings. Policy H13 increases that opportunity and likelihood of a continuing erosion of green belt. Whilst, we do not seek to constrain genuine agricultural and employment opportunities, we request as a minimum, that all development proposals within Purbeck's green belt require specific planning permission to ensure full scrutiny and enable effective controlling planning conditions to be applied. This could be achieved by an Article 4 Direction if that is within the remit of a Local Plan.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: Self explanatory in details above.

Supplementary Proposed Main Modification: SMM59

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: N/A

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: No comment.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM60

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: N/A

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: No comment.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Comments on addendum to Habitats Regulation Assessment (SMMCD2), addendum to Sustainability Appraisal (SMMCD3), 5-year housing land supply report (SMMCD4), local housing need update (SMMCD5), policies map paper (SMMCD6) or local plan policies maps (SMMCD7a to SMMCD7k) -

Section or paragraph: N/A

Comments: N/A

Consultee: Barry Shephard

Event name: Purbeck Local Plan Supplementary Proposed Main Modifications

Consultee reference: 1188361

Consultation reference: SMMR12

Supplementary Proposed Main Modification: SMM88

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: No

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound:

1. "The proposed Main Modification reflects local government re-organisation of Dorset councils in April 2019. The Purbeck Local Plan will relate to an area (defined by the former district council boundaries) within the recently formed Dorset Council administrative area"

But as no relation to planning in other parts of Dorset Council is shown in the Main Modifications there is no way to judge that Purbeck is being treated fairly compared to other areas. Nor are any wildlife corridors connecting Purbeck to other areas able to be put in place.

2. In the Proposed supplementary Main Modification (SMM) 88: Foreword you state that "directing the majority of housing growth to less constrained areas, in particular Wool" and "As well as (Wool) being the least environmentally constrained". Both these statements make incorrect premises. Climate change generated rising sea levels, water table etc. have not been mentioned, let alone addressed for the Frome valley at Wool. Nor the R. Frome SSSI, nor NE "amber zone" for Great Crested newts. Nor a 21st century evaluation of soil quality in which organically farmed land has a sustainable structure and microbiome feeding the local biodiversity. How is this a less constrained area?

As areas other than Purbeck have yet to be evaluated it is impossible to state that Wool is a less constrained area. Less constrained than where?

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: Purbeck should not be evaluated, nor any decisions taken as to where development is to take place until it is possible to take a view and make comparison across the whole county. Surely this was a central purpose in the creation of a Unitary Authority as opposed to the piecemeal approach generated by the existence of District Authorities.

Supplementary Proposed Main Modification: SMM1

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: No

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: Again, for this process and evaluation to be efficient, fair and equitable the area under the administration of Dorset Council as a whole must be dealt with in its entirety, and not in a piecemeal manner determined by the boundaries of the former Purbeck District Council.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: The whole of Dorset Council administrative area must be evaluated for these purposes as an entity, and not as separate parcels.

Supplementary Proposed Main Modification: SMM3

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: No

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: Again there is an assumption that there are fewer constraints in the the Wool area, before evaluation has been made beyond the boundaries of the former district Council. This has not been properly tested

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: Coherrant evaluation of the Dorset Council area as a whole so that valid comparisons can be made.

Supplementary Proposed Main Modification: SMM5

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: No

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: The change from a specified number of houses deemed suitable for allocated sites eg Wool 470 houses

to arround 470 houses can be neither legally compliant nor sound. In this context what function does the change to 'arround' serve but to enable Council and Developers to manipulate numbers to their advantage at a later stage?

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: Restore the references to precise numbers of houses, using these stated numbers as a maximum, with the allowance for fewer should this be appropriate.

Supplementary Proposed Main Modification: SMM8

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: That "The Council is obliged to give great weight to conserving and enhancing the natural beauty, and outstanding value, of these designated landscapes." is a reasonable aim and attracts tourists generating bonus for the economy, but negatives in terms of footfall, pollution. But in the present era, to reduce CO2 emissions, to avoid a climate change tipping point, a more weighty obligation for the council is to safeguard areas that are contributing to biodiversity and absorbing CO2 such as scrub, hedgerows, woodlands, flood plains, peat bogs etc. These serious considerations are totally omitted. The over-concentration of effort on so called 'special areas' whilst others are disregarded, both isolates and endangers the biodiversity and resilience of wildlife within the areas so designated, but ignores the vital role played by wildlife corridors which support wildlife in locations outside the areas considered 'special'

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: Readjust considerations of what is to be valued. Landscape beauty yes, but ensure that it does not have a negative overall effect, AND equally supporting other biodiverse areas that in a less dramatic way make a far greater contribution to the battle to keep CO2 levels down and delay climate crises.

Supplementary Proposed Main Modification: SMM15

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM86

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM18

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM19

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM20

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: No

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: It cannot be that nursing homes as described for patients with advanced dementia or with physical needs could function without frequent traffic, from staff, service providers and visitors. As such this exception is entirely untenable.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: Remove the exception for nursing homes in its entirety

Supplementary Proposed Main Modification: SMM21

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM24

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM25

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM26

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: No

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: It is egregious to define 'local housing need' to include overspill from connerbations such as Poole and Bournemouth. Local need should be defined by truly local requirement.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: True local need should be ascertained by local survey.

Supplementary Proposed Main Modification: SMM28

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: No

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: The use of 'around' on this document renders it unfit for purpose. It only serves for Council and developers to manipulate numbers at a later stage to suit their advantage

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: Remove 'around' from the text and replace by specified maximum numbers eg Wool maiximum 470 houses

Supplementary Proposed Main Modification: SMM29

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: The amount of traffic and activity generated by this level of new build will render Wool as noisy, polluted and unattractive. It will also damage and pollute the environment and destroy the very aspects that attract visitors to Purbeck

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: Populations grow increase year on year, so that the peak housing need must be at the end of the time period under consideration, not at the end.

Adjust your conditions to accommodate this.

Supplementary Proposed Main Modification: SMM30

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: No

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: The phrase "unconsented numbers of homes" makes the table presented meaningless other than the council's aspirations

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: Only include what has consent

Supplementary Proposed Main Modification: SMM31

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound:

1.Consideration the problems of reducing the ability to retain/absorb water due to the compacting of the ground during construction and the severely reduced area of ground not covered by concrete etc will result in flooding as happened when Purbeck Gate was built in Wool.

2. Also the foul drainage etc must not be joined onto existing structure built to take the waste from a far fewer buildings causing frequent sewage spills despite regular maintenance by Wessex water, again as has resulted from the Purbeck Gate development

3. Mixed drainage is totally unacceptable in Wool as storm overflows enter the R Frome SSSI

3. Mixed storm water/sewage arrangements should

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound:

1. No building on /near flood plains.

2. New foul drainage sewers must be constructed for the complete route to the sewage processing station

Supplementary Proposed Main Modification: SMM38

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound:

Despite the changes made, much that has been flagged up in previous consultations has been ignored.

1 Run off from development south of the A352 will increase flooding north of that road where 90 + 30 new houses are planned on a field that floods and is part of NE's amber great crested newt zone.

2. Increased traffic will make the hold-ups caused by the level crossing at Wool worse, increasing the frequency of accidents caused by impatient drivers. The stated traffic assessment will do nothing.

3. There is no mention of any strategies to prevent nutrient pollution of the R Frome SSSI.

4. There is no mention of protecting ancient hedgerows.

5. The SANG not mentioned in previous sections of this document of modifications is not a new space being enhanced to replace and improve on assets that will be destroyed by the proposed developments. The woodland proposed as a SANG

already exists and displays features of an ancient woodland that being used as a SANG will destroy representing a double loss and damage to biodiversity in the area.

6. Without commuting new residents will fail to find jobs, and health facilities and schools will be overwhelmed.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: The size of the planned development is grossly oversized and inappropriate for Wool. It needs to be reduced to meet local need, and not the council's, its associates, or indeed the requirements of the present government.

Supplementary Proposed Main Modification: SMM46

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM48

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM49

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: Yes

Does the respondent consider Supplementary Proposed Main Modification is sound: Yes

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Comments on addendum to Habitats Regulation Assessment (SMMCD2), addendum to Sustainability Appraisal (SMMCD3), 5-year housing land supply report (SMMCD4), local housing need update (SMMCD5), policies map paper (SMMCD6) or local plan policies maps (SMMCD7a to SMMCD7k) -

Section or paragraph: N/A

Comments: N/A

Consultee: Amanda Marler

Event name: Purbeck Local Plan Supplementary Proposed Main Modifications

Consultee reference:

Consultation reference: SMMR13

Supplementary Proposed Main Modification: SMM88

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM38

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound:

Policy H5 amendment (Wool).

I do not think the policy is sound or in keeping with the NPPF in respect to Chapter 15 'Conserving and enhancing the natural environment.'

According to the NPPF

Planning policies and decisions should contribute to and enhance the natural and local environment: Plans should

- promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species: and identify and pursue opportunities for securing measurable net gains for biodiversity
- apply principles including 'development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons'

The provision of a SANG in a plantation on an ancient woodland site with areas of semi-natural woodland, a priority habitat, is not in keeping with these principles. The woodland includes ancient trees, old hazel coppice and, at least in parts, a rich woodland flora with a number of ancient woodland indicators. A SANG is necessary to relieve recreational pressure on the heaths but transferring this pressure to another habitat of high interest is neither conserving nor enhancing the natural environment.

The type of recreational pressures that are highlighted as threats to the heathland habitat are also likely to prove deleterious to the woodland habitat particularly disturbance by humans and/or dogs, given there may be over 470 new homes within easy reach of the woodland.

Enhancing the SANG to attract people away from the heathlands is likely to involve the removal of a shrub layer, a vital wildlife resource, creation of several accessible surfaced routes, parking areas and seating. At worst it will also result in BMX and scrambler bike activities that thoroughly destroy the ground layer.

This view is supported by the guidance to the creation of a SANG in Appendix D of the Dorset Heathlands Supplementary Planning Framework in which the following paragraphs state

'The identification of SANGs should seek to avoid sites of high nature conservation value which are likely to be damaged by increased visitor numbers. Such damage may arise, for example from increased disturbance, erosion, input of nutrients from dog faeces, and increased incidence of fires...Where sites of high nature conservation value are considered as SANGs, the impact on their nature conservation value should be assessed and considered along the relevant planning policy.'

'Paths should be routed so that they are perceived as safe by visitors, with some routes being through relatively open terrain (with no trees or scrub, or well-spaced mature trees, or wide rides with vegetation back from the path)'

'SANGs must be designed so that visitors are not deterred by safety concerns'

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: Locate the SANG in an area of low nature conservation value such as some of the many agriculturally improved fields in the area and look to enhance these areas. Do not locate it in a habitat of high conservation value such as a plantation on an ancient woodland site - for the reasons outlined above. Likewise avoid the organic arable fields in the area that support many notable arable weeds

Comments on addendum to Habitats Regulation Assessment (SMMCD2), addendum to Sustainability Appraisal (SMMCD3), 5-year housing land supply

report (SMMCD4), local housing need update (SMMCD5), policies map paper (SMMCD6) or local plan policies maps (SMMCD7a to SMMCD7k) -

Section or paragraph: N/A

Comments: N/A

Consultee: Gaynor Gallacher on behalf of National Highways

Event name: Purbeck Local Plan Supplementary Proposed Main Modifications

Consultee reference: 1191428

Consultation reference: SMMR14

Supplementary Proposed Main Modification: N/A

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: N/A

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Comments on addendum to Habitats Regulation Assessment (SMMCD2), addendum to Sustainability Appraisal (SMMCD3), 5-year housing land supply report (SMMCD4), local housing need update (SMMCD5), policies map paper (SMMCD6) or local plan policies maps (SMMCD7a to SMMCD7k) -

Section or paragraph: N/A

Comments: N/A

Attachment:

From: [REDACTED]
Sent: 27 November 2023 12:34
To: planningpolicyteamb
Subject: Purbeck Local Plan Further Supplementary Proposed Main Modifications Consultation - National Highways comments

Dear Planning Policy team

Thank you for providing National Highways with the opportunity to comment on further modifications to the Purbeck Local Plan following feedback from the examination process. We note that the current consultation is specifically with regards to the Supplementary Proposed Main Modification. National Highways is the strategic highway authority with responsibility for the A35 (west of Bere Regis) and A31 trunk roads, and operated as Highways England at the time of our earlier representations.

Of particular interest to us is the proposed uplift in housing numbers within the Plan with proposed growth of 2976 dwellings to be delivered over the plan period to 2034, up from 2688 dwellings. However, National Highways considers that the scale of increase is unlikely to materially alter the previous transport evidence submitted in support of the plan and we therefore have no comments on the further changes proposed, noting that we are continuing to work with Dorset Council on the transport evidence for the emerging Dorset Local Plan.

Kind regards
Gaynor

Gaynor Gallacher

[REDACTED]
[REDACTED]
Web: <http://www.nationalhighways.co.uk>

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National Highways Limited | **General enquiries: 0300 123 5000** | **National Traffic Operations Centre, 3 Ridgeway, Quinton Business Park, Birmingham B32 1AF** | <https://nationalhighways.co.uk> | info@nationalhighways.co.uk

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Consultee: Nick Squirrell on behalf of Natural England

Event name: Purbeck Local Plan Supplementary Proposed Main Modifications

Consultee reference: 1186743

Consultation reference: SMMR15

Supplementary Proposed Main Modification: N/A

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: N/A

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Comments on addendum to Habitats Regulation Assessment (SMMCD2), addendum to Sustainability Appraisal (SMMCD3), 5-year housing land supply report (SMMCD4), local housing need update (SMMCD5), policies map paper (SMMCD6) or local plan policies maps (SMMCD7a to SMMCD7k) -

Section or paragraph: N/A

Comments: N/A

Attachment:

Date: 21 December 2023
Our ref: [Click here to enter text.](#)
Your ref: [Click here to enter text.](#)



[Click here to enter text.](#)

BY EMAIL ONLY

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T 0300 060 3900

Dear Mrs Bellamy, Mr Boyt

Purbeck Local Plan Supplementary Proposed Main Modifications Consultation 10 November to 22 December 2023

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Thank you for consulting Natural England on the Purbeck Local Plan Supplementary Proposed Main Modifications.

Natural England agrees with the conclusions of the Habitats Regulations Assessment dated 17 October 2023 which are well evidenced and robust.

Natural England note that the term AONB is now no longer used.

Natural England has no further comments on the proposed modifications and supports the Plan as modified.

Yours sincerely

Nick Squirrell
Conservation and Planning Lead Advisor
Dorset Team

[Redacted signature block]

Consultee: Kim Miller on behalf of Historic England

Event name: Purbeck Local Plan Supplementary Proposed Main Modifications

Consultee reference:

Consultation reference: SMMR16

Supplementary Proposed Main Modification: N/A

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: N/A

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: N/A

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Comments on addendum to Habitats Regulation Assessment (SMMCD2), addendum to Sustainability Appraisal (SMMCD3), 5-year housing land supply report (SMMCD4), local housing need update (SMMCD5), policies map paper (SMMCD6) or local plan policies maps (SMMCD7a to SMMCD7k) -

Section or paragraph: N/A

Comments: N/A

Attachment:

planningpolicyteamb

From: [REDACTED]
Sent: 29 November 2023 16:31
To: planningpolicyteamb
Subject: Historic England response to Purbeck Local Plan supplementary proposed main modifications
Attachments: Historic England response Purbeck Local Plan SMM Nov 2023.pdf

Dear Strategic Planning Team,

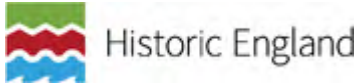
Please find attached a response from Historic England to this consultation.

I'd be grateful if you could replace [REDACTED] contact details on your Local Plan database with my own, which are below.

Many thanks,

Kim Miller, MRTPI IHBC
Historic Environment Planning Adviser
South West Region

[REDACTED]



Work with us to champion heritage and improve lives. Read our Future Strategy and get involved at historicengland.org.uk/strategy.

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From: planningpolicyteamb <planningpolicyteamb@dorsetcouncil.gov.uk>

Sent: 10 November 2023 08:06

Subject: Purbeck Local Plan supplementary proposed main modifications consultation 10 November to 22 December 2023

Dear Sir/Madam

Please find attached notification of the Purbeck Local Plan supplementary main modifications consultation. The letter and notification provide full details of when and how to respond, along with links to the consultation documents and online response form.

If you have any queries please don't hesitate to get in touch.

Yours faithfully

Strategic Planning Team
Economic Growth and Infrastructure

Dorset Council

planningpolicy@dorsetcouncil.gov.uk

dorsetcouncil.gov.uk



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Historic England

By email: Planning Policy
planningpolicy@dorsetcouncil.gov.uk



29 November 2023

Dear Sir/Madam,

Purbeck Local Plan Supplementary Proposed Main Modifications Consultation 10 November to 22 December 2023

Thank you for consulting Historic England on the proposed Supplementary Main Modifications to the Purbeck Local Plan. We have the following comments to make:

Supplementary Main Modification	Section/ Policy	Sound/ Unsound	Comment
SMM1	Chapter 1, Intro, Para 3	Unsound	<p>Historic England considers that Policy E2: Historic Environment should be identified as a strategic policy in the table inserted after paragraph 3.</p> <p>Paragraph 20 of the NPPF states that strategic policies should ... make sufficient provision for... d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation. [emphasis added]</p> <p>According to NPPF paragraph 21, strategic policies are those necessary to address the 'strategic priorities' of the area. We are of the strong view, and hope that the Council and Inspector will agree, that the heritage of the area including parts of the East Devon and Dorset World Heritage Site (the Jurassic Coast) should be a priority.</p> <p>Policy E2 is also central to the 'positive strategy for the conservation and enjoyment</p>



Historic England, 1st Floor Fermentation North, Finzels Reach, Hawkins Lane, Bristol, BS1 6JQ
0117 9751308 HistoricEngland.org.uk

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			of the historic environment' required by paragraph 190 of the NPPF.
SMM46	Chapter 4, Policy H10	Unclear/unsound	<p>We welcome the fact that special consideration may be given to heritage assets in considering whether it is appropriate to delivery the Council's 10% requirement for accessible and adaptable homes in the context of a neighbourhood plan policy.</p> <p>However, it is unclear why this should not also apply to any other unallocated site, whether or not included in a neighbourhood plan? We suggest that this part of the policy is revisited.</p>

Yours sincerely

Kim Miller MRTPI IHBC
Historic Environment Planning Adviser (South West)



Historic England, 1st Floor Fermentation North, Finzels Reach, Hawkins Lane, Bristol, BS1 6JQ
0117 9751308 HistoricEngland.org.uk
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Consultee: Rachel Palmer on behalf of Wool Flora & Fauna

Event name: Purbeck Local Plan Supplementary Proposed Main Modifications

Consultee reference: 1185234/1187112

Consultation reference: SMMR17

Supplementary Proposed Main Modification: SMM86

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: No

Does the respondent consider Supplementary Proposed Main Modification is sound: N/A

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: See attachment for full response.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM19

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: No

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: See attachment for full response

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM21

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: No

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: See attachment for full response

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM38

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: No

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: See attachment for full response

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM43

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: No

Does the respondent consider Supplementary Proposed Main Modification is sound: N/A

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: See attachment for full response.

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM82

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: No

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: See attachment for full response

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

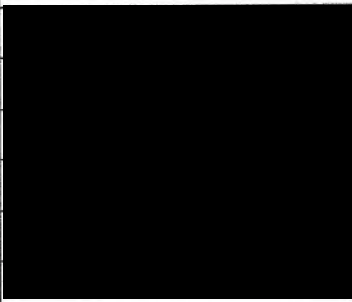

Comments on addendum to Habitats Regulation Assessment (SMMCD2), addendum to Sustainability Appraisal (SMMCD3), 5-year housing land supply report (SMMCD4), local housing need update (SMMCD5), policies map paper (SMMCD6) or local plan policies maps (SMMCD7a to SMMCD7k) -

Section or paragraph: N/A

Comments: N/A

Attachment:

PART A

	Your Contact Details	Agents Detail	
Name		Chairperson- Rachel Palmer	
Organisation	Wool Flora & Fauna		
Address :Line 1			
Address Line 2			
Town			
County			
Post Code			
E-mail address			

Group Representation

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.

5

COMMITTEE MEMBERS OF WOOL FLORA AND FAUNA GROUP

Rachel Palmer BSc (Hons) Botany Leicester – Chair	Botanist specialising in Woodland Flora including Lichens. Environmental education Wool.
Dr A.C. Warne BSc PhD FRES Notts.	Entomologist. Employed at National Level by English Nature. Independent Consultant Ecologist.
Mr I Duckworth BSc CBIol London	Specialist in Dragon Flies. Environmental Education
Mr A Branston BSc Environmental Science Plymouth	Professional Ornithologist Wool Resident
Emma Fulger BSc	Advisor for Farming Wildlife
Ms M Mahler MSc Imperial College, London	Professional Ecologist Landscape Design and Management
Mrs S Potticary	Secretary



20.12.23

SHEET B

THE SANG

SMM 43 HOUSING POLICY eight policies H9 and h11 NOT LEGALLY COMPLIANT

Why is This Included In Housing Not Environment??

REASON FOR CHANGE

Policy H8 here there is mention of risks of significant effect in EU national sites, but here suggests developers find mitigation or any assessment to show how damage will not occur. This is at variant with "will be adversely determined" MM40.

MODIFICATION.

REMOVE SEE AMENDMENT SMM 19

Amendment remove the SANG to ensure consistency with Habitats and Species Regulations and National Planning Policy.



18th Dec.
2023

P243 MM23 Policy E10 NOT LEGALLY COMPLIANT- UNSOUND

B

REASON FOR CHANGE

1. The amended policy does NOT ensure consistency with 175c National policy framework as allocating ancient woodland for mitigation to increasing population having a damage on EU international conservation site Dorset Heathland. It does not qualify as land of least environmental value. (in this case it also contains 10 priority species and 25+ aged veteran trees)

2. It should not delete reference to supplemental planning documents e.g 180 c 2023. (in fact it does quote this) in accordance with national planning policy development resulting in the loss of ancient woodland and veteran trees will be refused unless there are wholly exceptional circumstances and compensation strategy exists.

There are no exceptional circumstances.

The compensation strategy is ineffective and inaccurate regarding paws.

3. How can rerouting paths avoiding badger sets etc work as mitigation according to the Grampian Principle? Are parts to be blocked off by fences or just signs? Will either protected ground nesting birds e.g. Woodcock, birds in general, bats and dormice prevent them moving onto safe pathways?

N.b. P241 on dog walking- in decisions on Poole Harbour dog walking can disturb birds.

MM23 Policy 10 - -UN SOUND

- a) A better habitat will not be created by removing all conifers as for several years the woodland canopy will be removed. This could cause the loss of some species using Conifer Woods e.g. Willow Tits, Firecrest and Siskin. Also the change of layout will affect adversely Bats.

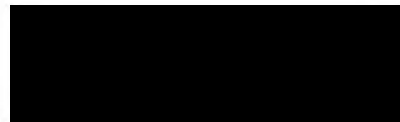
Annex1 bird species Nightjar and Woodlark do occur in Coombe Wood. Nightjars fly nightly from heathland breeding areas in the north of the parish and can be heard in Coombe Wood using it as a FUNCTIONALLY LINKED HABITAT for feeding on the plentiful moths in the wood, populations will be affected by removal of the feeding habitat as large areas 40% conifers are removed. The SANG is to draw people away from heathland to protect such birds BUT they exist in the wood they are to use for dog walking.

There is a removal of ancient woodland and veteran trees being development sites.

So this would be consistent with the following modification

SUGGESTED MODIFICATION

Removal of a SANG in Ancient Woodland no modification needed then



19.12.22

SMM 42 B

SMM 42 under housing!

Approve modification 48 "the council's strategy for addressing development needs focus strategic and larger scale allocations (e g Wool) on land with the least environmental and in the most sustainable locations - why do the planners not practice what they preach.

If they had they could of produced a sound strategic area plan instead of a list of allocated houses based on developers wishes with no justification.



18/72/32

APPENDIX B

THE SANG WOOL

PROPOSED MAIN MODIFICATION SMM 19 Policy E7 Conservation Of Protected Sites

REASON FOR CHANGE NOT LEGALLY COMPLIANT UNSOUND

a) It does not give adequate protection to the EU Internationally protected site of Dorset Heathland in the north of Wool parish to mitigate up to 470 (about!) houses ✓

b) as it still talks of development will only be permitted if it will not lead to adverse effect alone or with other plans (creation of a SANG for drawing people and dogs off an Ancient Woodland) and then goes on to say the council will determine adversely (surely not permitted) affect these sites i.e plans and projects (the SANG) in directly or internationally protected EU sites. Surely therefore at plan stage.

AMENDMENT

REMOVE THIS PLAN/PROJECT OF PUTTING A SANG IN ANCIENT WOODLAND.

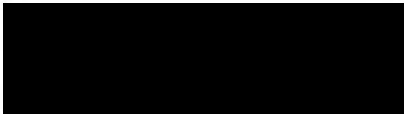
✓ To ensure the plan is legally compliant with the Habitat Regulations and with para 180 N.P.P.G C23 states planning permission should be refused (= determined adversely) resulting in the loss or deterioration of irreplaceable habitats EG aged or veteran trees and unless the need for and benefit of that development in THAT location clearly outweigh the loss (N.B. not OR) a compensation strategy exists.

Combe wood is Ancient Woodland 40% is coniferized but a PAWs still qualifies as an ancient wood and has full legal protection (see added reasons why this site is incompatible with a SANG. *

Amended suggestion

Policy E7

As use of Ancient Woodland and aged and veteran trees would cause damage therefore no mitigation for E.U internationally Heathland. The highest level of mitigation should be applied at planned stage – Avoid – Remove this site.



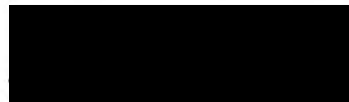
19.12.23

Proposed main modifications MM37
CH 4 Housing
REASONS NOT SOUND OR LEGALLY COMPLIANT

The SANG at Wool provides no benefits. The compensation is flawed P.A.W.s plantations on Ancient Woodland sites are classified as Ancient Woodland so replacing with deciduous woodland will not give more legal protection as PAWs have full legal protection. Only 40% is PAWs anyway. Canopy loss for many years with the felling of conifers will deprive birds and bats (which are particularly adversely effected when trying to forage in a changed lay out of woodland). Lack of protection from predators and loss of species which feed on and use conifers as habitat- fire crests, red poll, siskin etc. Depleted populations may never recover - from habitat loss and be a lost to the wood.

It is against National Planning Policy 180e of the Planning Policy Framework and the Habitats and Species Regulations as Mitigation involves a Fragile Habitat with Priority Species eg Hazel Dormouse and Great Crested Newt

THEREFORE REMOVE AND DELETE SANG PROVISION.



19th Dec. 2023

APPENDIX B

✓ Proposed Main Modification 38
Policy h5 Wool

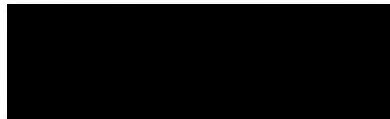
REASONS FOR CHANGE NOT LEGALLY COMPLIANT OR SOUND

1. Clarity is not achieved by changing for 470 new homes by around 470 new homes and around extra care units (all to add more homes) DELETE
2. They have pinned open space down to use the word SANG but even if it were to be effective it needs to be ready before houses are occupied not wait for phased implementation DELETE
3. Features of biodiversity occur throughout the wood- veteran trees, trees with bat roosts, occasional and a large badger set area. How will rerouting a path prevent Woodcock, priority species, Hazel dormouse priority species etc straying into routed areas. Will fencing be used- no protection against youngsters and straying dogs or a polite sign "path this way"!!
4. The SANG is therefore ineffective as mitigation for SAC Heathland birds and not only will it fail to prevent adverse effect on the species (loss of food to nightjars population decline possible) but is damaging a fragile and irreplaceable habitat Ancient Woodland.
It therefore is against National Planning Policy Framework para 180 c 2023 edit. It is also against Habitat and Species Regulations.

AMENDMENT MODIFICATION

Remove the SANG from Ancient Woodland at planned stage so no modifications are needed.

IN ALL USING THE ANCIENT WOODLAND AS A SANG CONFLICTS WITH NPPF 175C PLANS SHOULD IDENTIFY SITES WITH LOWEST ENVIRONMENTAL VALUE. AN ANCIENT WOOD? NO ✓



19th Dec. 2023

APPENDIX B

✓ Preface SMM 21 and SMM 86 – NOT LEGALLY COMPLIANT

The whole handling of nitrate neutrality to be in accord with the conservation of habitats and species by modification is a farce.

(SMM 86 NOT LEGALLY COMPLIANT. Purporting to be a response to this is not to be found in the consolidated modification schedule just found! No sequential arrangement.)

SMM 21 does address this issue but the modification policy E9 "Development will only be permitted where it would not lead to any adverse effects AND development proposals will need to demonstrate compliance with the H.S. regulations. BUT p199 NO development allowed that again leads to adverse impact on Poole Harbour. Appropriate mitigation is provided in S.P.D offered to the developer. Again the advice set out in S.P.D is removed from the amended policy SMM 21 and p 88 of SMM 86.

How can one make any sense of all this? How can a developer calculate possible impact and therefore adequate mitigation for around 470 houses P42 or 470+ p101 houses or unconsented total of 1,200 p87 and the catchment map leaves out Wool altogether!

The modification 21 P67 weakens the stance against further damage of Poole Harbour..

From: Development will NOT be permitted.
Delete Development will only be permitted.

The Solutions and mitigation ideas set out in the S.P.D are recommended for the developer p67 from nitrogen increase from tourism!

Presumably for clarity!! Are unsure where things stand.

There are 3 options for mitigation. To place the responsibility of mitigation on the developer (new technologies?) when the plan makers seem incapable of coming to a sound conclusion is UNACCEPTABLE. Talking here about the highest level of nature conservation (EU natura site) surely the responsibility rests on the plan makers. REMOVE the modification 21.

As there is no consistency in any mitigation use the one truly sound bit of mitigation in the S.P.D "in extreme circumstances the local Planning Authority may have to refuse planning applications for new houses and development until such time as adequate mitigation has been provided"

[REDACTED]

19th Dec 2023

CONCLUSION

1. This plan is not fit for purpose. Lacking a sound strategic base.
2. Conflicts with Habitats and Species, occur despite their mention sprinkled well throughout the document. In a letter from Beverley Doward she expressed concerns on this and the lack of an appropriate assessment in relation to these aspects of the plan where likely significant effects have been identified
3. It is therefore not legal
4. It is frequently contradictory.
5. It is not sustainable
6. It does not add clarity
7. It is poorly presented with different modification numbering dotted all around the place instead of being sequential.
8. The plan ducks out of addressing issues where allocated of land are questionable by leaving removal to the developer and disappointment as they are turned down. It is not deliverable.

The Inspector's Session in July 2019 was directed by various questions she raised. Question 3 does criteria of the policy comply with the requirements of the conservation of Habitat and Species regulations 217.

Question 5 Is policy E5 SUDS justified effective and consistent with National Policy ?
 Question 7 Are policies E7 conservation of Protected Species E8 (Dorset Heathlands) E9 (Poole Harbour) and E10 Biodiversity consistent with National Planning policy and where relevant compliant with the requirements of the Habitats Regulations.

Policy 8 E11(Development next to sewage treatment works and pumping stations) justified and effective?

All these environmental questions remain unsettled in our view by the MODIFICATIONS. Therefore leaving the Plan Environmentally unsound and undeliverable.

Perhaps this is why the plan was not signed off by Ms Beverle Doward. All these queries apply to Wool recipient of the highest number of houses 470 – mentioned in parts of the plan but 1,200 mentioned on p87 – consolidated schedule of main modifications Nov 2023.

The plan for Wool we believe was inherently unsound and is responsible for making the whole plan unsound – N.B. Ms Beverley Doward did not sign the plan off.

N.B. Most of these modifications do not actually remove the problem but simply defer them to be dealt with at application stage for development. This is dodging the issue and by putting things in the area plan it gives undue weight to the conclusion that they must be deliverable.

So why has Wool been picked for the 2nd highest allocation in Purbeck. It at the top of all parishes with land with environmental value. The plan conflicts with Habitats and Species all with two areas still unprotected at highest conservation levels. Not because of adequate infrastructure certainly not as a traffic hub. The A35 has constant flow of tractors the C6 need upgrading and the station just delivers regular traffic queues, suggest the plan allows for 40% more houses than needed (see C.R.P.E.) for local need. Remove Wool from plan. It was pre-selected by the publication by Weld the developer with his book a new vision for Wool two years before the plan and turned down outright by the Parish Council.

19th Dec. 2023

APPENDIX B.

P63 SMM19 p62 biodiversity
Policy E7- LEGALLY UNSOUND

✓
Amended policy states will only be permitted if no adverse effects, then the council will determine adversely applications affecting these sites. JUSTIFICATION these two statements are almost contradictory. There are several sites where species of the conservation of Habitats and Species occur;

Otter river Frome SSSI schedule 4,

Hazel dormouse- the SANG schedule 4,

Nightjar in the SANG- annex1,

Great Crested Newt. Actual site Functionally Linked Feeding Habitat- pond in householders garden schedule 4.

Salmon schedule 1,

Lamprey schedule1.

All will be adversely affected by disturbance by dog walkers and pollution reducing fish numbers and therefore feeding in the river Frome. These can only be mitigated to prevent damage at level 1 AVOID

Suggest as there will be affected habitat and species listed animals adversely affected and no mitigation is possible other than avoid. Remove such areas from plan (n b river Frome is an SSSI and National Planning Policy comes into play - as building sites occur 0.5km.

It is not surprising E10 has nothing to say on biodiversity. This plan in Wool has nothing to say on biodiversity so nothing to modify. It conflicts with para 175 2021 "plans should allocate land with the least environmental value". NOT LAND WITH MOST ENVIRONMENTAL VALUE!

N.P.P.F.174 B 2022 "to protect and enhance biodiversity plans should promote the protection of priority species"

Taking these as guidelines planners could have created a real plan- just not one for housing.


19th Dec. 2023

APPENDIX B

Proposed modification SMM82 UNSOUND ILLEGAL Policy 10

✓ This is listed as addressing biodiversity see p191. It does no such thing. It considers archaeological sites and should be amalgamated in SMM11 policy 2 under Historic Environment. Scant regard to biodiversity is given in comparison to the Historic Environment throughout the schedule of modifications. Purbeck in particular Wool is outstanding countryside for its biodiversity. Ignoring this in Wool has led to selection for the second highest level of housing allocation. This conflicts with and ignores NPPF 3.13 setting out principles as a basis of planning states "development land allocation should prefer land of lesser environmental value" Ancient Woodland, organic farmland, 17 out of 18 species of bat breed in Wool. All bats are priority species and schedule 4 on the H.R.A.. 30% higher biodiversity than traditional farmland 40 out of 44 species of mammals in the whole of Purbeck!

SUPPLEMENTARY TO POLICY MM 10

ENVIRONMENTAL CONSTRAINTS IN WOOL PARISH

- 50% of Wool's Parish is covered by environmental designations at all levels.
- 1 European Heathland site S.A.C. – International Designation
- 1 SSSI river Frome carrying pollution into the Poole Harbour S.P.A. site-International Designation
- River Frome is only 0.2 K from development site and runs all through centre of Village (against N.P.P.G. guidelines)
- 10 SNCI Sites of Conservation Interest
- 1 L.N.R Local Nature Reserve
- 13 Ancient Woodlands
- 2 areas under stewardship management - to protect wildlife - Organic Fields- river Frome Water Meadows.
- 1 Dorset wildlife managed verge (on the road to the proposed SANG)
- Dr A Warne's recent paper "Conservation of Biodiversity as provided by a beetle survey of Wool" States only 60% of records are restricted to statutory and non-statutory designated sites and only 9% of the rare and notable species.
50 priority species (15 on development sites) and species in the SANG.
10 of the 15 species of bats, two very rare, in the UK breed in Wool - all protected.
12 are recorded on development sites including the very rare Barbastelle Bat
30 Veteran Trees most in the SANG but not registered.
Miles of hedges (priority habitat) approximately 70% of all hedges on development sites are "species-rich" and the one around the Dorset plan site of 400 new houses is a remnant of one of the oldest hedges in parish approx. 14th century.
- Mammals - the whole of Purbeck has 44 species of these found in the UK - only four more than those in Wool – otters, water voles, harvest mice, water shrew, brown hare and dormice. (Healthy populations over several of the DERC bats in Coombe Wood - SANG.)


19th Dec. 2023

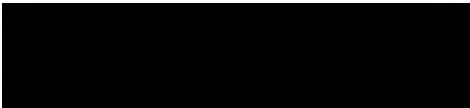
APPENDIX B

Main Modification 13 p237

✓ SUDS Sustainable Drainage Systems Justification for Change - UNSOUND

It gives no ideas for how to deliver SUDS on land with a high water table. This is the case on areas proposed for development in Wool where flooding risk occurs at different levels up to 4 because of high water table levels. This therefore does not reflect N.P.P.F. para 175d. The SUDS gives no allowance for climate change. We have had 5 tropical storms this winter and the development land is flooded at present, as high rainfall events combine with land with a high water table and flooding of the river Frome.

SUGGEST if no appropriate SUD is possible and no opportunities for biodiversity benefit, there should be no permission for development on such sites.



14th Dec. 2023

APPENDIX B

Modification SMM86 - NOT LEGALLY COMPLIANT.

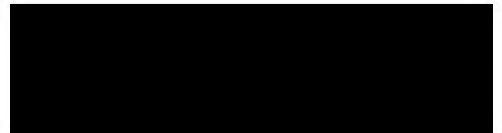
✓

The levels of phosphorus and nitrates are said by Natural England to contribute to damage in Poole Harbour. Particularly associated with waste water from urbanisation. So increase in housing will particularly affect these levels.

JUSTIFICATION - no positive solutions to this throughout the catchment area as for EG Wool has no capacity for increasing and upgrading waste water standards unlike other sites along the catchment and there is still uncertainty Natural England are revising S.P.D - mitigation advice so uncertainty exists. Mitigation depends on certainty GRAMPAN PRINCIPLE so all in all the modification does not ensure the plan is legally compliant or effective so remove the main modification 88, and follow up.

Wool having the greatest level of insecurity in mitigation - remove this - the second greatest level of housing increase from the plan. Removing the need for modifications 21 and 86.

As there is such confusion and lack of clarity in preparing this Purbeck plan suggest it is not ready nor fit for purpose and consider the whole issue to be decided with the county plan (as suggested by Ms Doward, last inspector.



19th Dec. 2023

Consultee: Deirdre Flegg

Event name: Purbeck Local Plan Supplementary Proposed Main Modifications

Consultee reference:

Consultation reference: SMMR18

Supplementary Proposed Main Modification: SMM25

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: No

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: See attachment for full response

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM40

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: See attachment for full response

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM77

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: See attachment for full response

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Comments on addendum to Habitats Regulation Assessment (SMMCD2), addendum to Sustainability Appraisal (SMMCD3), 5-year housing land supply report (SMMCD4), local housing need update (SMMCD5), policies map paper (SMMCD6) or local plan policies maps (SMMCD7a to SMMCD7k):

Section or paragraph: N/A

Comments: N/A

Attachment:



Response form for: Purbeck Local Plan Supplementary Proposed Main Modifications consultation

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

The council has opened a consultation into Supplementary Proposed Main Modifications (SMM) published as part of the Consolidated schedule of Main Modifications (SMMCD1) to the Purbeck Local Plan. The council is only accepting comments on the novel supplementary modification and not any earlier modifications which have already been presented as Main Modifications or Further Proposed Main Modifications. 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 that have previously been raised and discussed at hearing sessions or in earlier responses.

Alongside SMM, there is also an opportunity to comment on updated policies maps, the Habitats Regulation Assessment Addendum and Sustainability Appraisal Addendum. The council has also published supporting evidence relating to the SMM, comprising a five-year housing land supply report and an assessment of local housing need.

These documents can be found on-line at www.dorsetcouncil.gov.uk/plpmainmods .

Once the consultation is closed at 11:45pm on 22 December 2022, 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 Inspectors for their consideration. The Inspectors will then make a recommendation around the next stages of the local plan's examination taking account of the issues raised in the representations.

PART A

	Your contact details	Agent's Details (if applicable)
Name	Deirdre Flegg	
Organisation / Group (if applicable)		
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 **10 November 2023** and will last for 6 weeks until 11.45pm on **22 December 2023**.
- Only representations made in this period will be referred to the Planning Inspectors for consideration.
- Responses must be made using this form (sent in the post or attached to an e-mail).
- Respondents must complete Part A of this response form and separate Part B forms for each Supplementary 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 supplementary proposed main modifications, the updated policies map, the Habitats Regulation Assessment Addendum and Sustainability Appraisal Addendum, are available to view on the Council's website at www.dorsetcouncil.gov.uk/plpmainmods. Paper copies of the supplementary proposed main modifications, the updated policies map, the Habitats Regulation Assessment Addendum and Sustainability Appraisal Addendum are available to consult at libraries in Dorchester, Corfe Castle, Lytchett Matravers, Swanage, Upton, Wareham, Wool and Poole.
- If you have questions relating to the consultation, or the process for making a response, please contact the Planning Policy team on 01305 838334 or planningpolicy@dorsetcouncil.gov.uk.
- Response forms returned in the post should reference the **Purbeck Local Plan, Supplementary Proposed Main Modifications Consultation, and be sent to Spatial Planning Team, County Hall, Colliton Park, Dorchester, DT1 1XJ**. Forms can be returned by email, referencing Purbeck Local Plan Supplementary Proposed Main Modifications Consultation, to the email above.
- Please tick the box if you would like to be notified of the following:

Adoption of the Local Plan.

PART B

1. Which Supplementary Proposed Main Modification does your representation relate to?

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

Supplementary Proposed Main Modifications reference number	SMM40
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2. Do you consider that the Supplementary Proposed Main Modification is:

Legally compliant	Yes		No	
Sound	Yes		No	No

To be considered legally compliant the Supplementary Proposed Main Modifications must:

- comply with the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019; 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 Supplementary Proposed Main Modification[s] that you are seeking to make a representation on.

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

In relation to the SANG at Flowers' Drove, I have commented before, during the DC Draft Local Plan consultation, and during the application for the SANG.

1. This site already has a public ROW running through it, which was extensively used as an 'informal' SANG before the applicant fenced off the main field, thus now restricting the ability of dogs [and people] to run about.
2. It never met the criteria for the size of a SANG, unless activity was in circles.
3. Its location at the far end of the village obviates any use by people living at the southern end of the village [both currently, and in the proposed new housing off Wareham Road], who are much more likely to use nearby heathland if they want a good walk, a car journey therefore required for the majority.
4. The access proposes a small car park on Flowers Drove, thus turning this quiet lane, well used by pedestrians and horse riders, into an unwelcome source of additional traffic.

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 Supplementary Proposed Main Modification legally compliant or sound. You will need to say why this change will make the Supplementary 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)

Take it out of the plan. Take out the proposed housing which depends on it for viability. See comments on green belt.

Please continue on a separate sheet if necessary.

PART B

1. Which Supplementary 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.

Supplementary Proposed Main Modifications reference number	77
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2. Do you consider that the Supplementary Proposed Main Modification is:

Legally compliant	Yes		No	
Sound	Yes		No	No

To be considered legally compliant the Supplementary Proposed Main Modifications must:

- comply with the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019; 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 Supplementary Proposed Main Modification[s] that you are seeking to make a representation on.

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

I am not familiar with the detail of how the proposed Morden Park SANG might be accessed, but given the address, I make the following observation: this is an area already troubled by car accidents on the A 35 [at least three in the past few weeks], often leading to road closures and diversions. It is also prone to flooding; please see also the comments from experts re flood risk in the extant Planning Application P/FUL/2023/02064 re Morden Mill.

It does not seem wise to load the area with yet more cars trying to get off or on the roads in the area.

4. Having regard to your comments in question 3, please set out what change(s) you consider necessary to make the Supplementary Proposed Main Modification legally compliant or sound. You will need to say why this change will make the Supplementary 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)

PART B

1. Which Supplementary Proposed Main Modification does your representation relate to?

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

Supplementary Proposed Main Modifications reference number	SMM 25
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2. Do you consider that the Supplementary Proposed Main Modification is:

Legally compliant	Yes		No	No
Sound	Yes		No	No

To be considered legally compliant the Supplementary Proposed Main Modification must:

- comply with the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019; 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 Supplementary Proposed Main Modification[s] that you are seeking to make a representation on.

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

The Purbeck Local Plan has been overtaken by the changes to the administrative structures of Dorset. Purbeck no longer exists as a District, and it is thus invidious to base assessments of housing need on previous boundaries.

The HN assessment takes no account of the implications for the removal of the green belt around parts of Lytchett Matravers, particularly as a sea change in attitudes towards erosion of the green belt is happening at Central Government level. Mr. M. Gove, in a speech to RIBA, on 19.12.23 'Falling back in love with the future' remarked: ***'Those local authorities that have sought to vary the number in order to take account of the need to protect the Green Belt or other areas of environmental, heritage or aesthetic importance have found the Planning Inspectorate invincibly attached to the number first thought of, with only very few exceptions. The new NPPF now, more clearly, upholds the spirit of the original intention. Local authorities have the comfort of knowing that they need not re-draw the green belt or sacrifice protected landscapes to meet housing numbers.'***

Paragraphs 145-154 of the new NPPF refer. In particular:

Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport.

No persuasive exceptional circumstances have been noted to justify the release of green belt around Lytchett Matravers. It also does not reflect the recent information from BCP that they will not be expecting to ask other LAs to help with their own housing need, effectively intending to 'consume their own smoke'.

There is insufficient exploration of the balance required between market housing, which is inevitably attracting inward migration, and the provision of substantially sized market homes, and the desperate need for housing for local people which is affordable to buy and/or rent.

There is a persistent assumption that Lytchett Matravers is a sustainable location for large numbers of new houses. It is not. We have no effective public transport, other than an intermittent bus service, which means that all journeys to employment outside the village would be by car [or possibly by cycle for the exceptionally confident riders along narrow roads with fast moving traffic]. We have limited retail services, and in fact have lost one local shop in recent years. Employment within the village is limited. The three sites identified for development in Lytchett Matravers are all on green belt which is pristine; this together with the abysmal lack of public transport makes any new development unsustainable, and at odds with the new guidance in the NPPF.

4. Having regard to your comments in question 3, please set out what change(s) you consider necessary to make the Supplementary Proposed Main Modification legally compliant or sound. You will need to say why this change will make the Supplementary 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)

PART C

1. Comments on updated policies map, SA or HRA.

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:	
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Please continue on a separate sheet if necessary.

Please sign and date this form:	
Signature: 	Date: 20.12.23