



# Responses: proposed Main Modifications to the Purbeck Local Plan

Consultation references: 1 to 21

# Responses raised through the council's online form

**Consultee:** [REDACTED]

**Event Name:** Purbeck Local Plan proposed Main Modifications

**Consultee reference:** 1190127

**Consultation reference:** 01

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**Proposed Main Modification:** Not specified.

**Does respondent consider plan is legally compliant:** No

**Does respondent consider that the plan is sound:** No

**Details of the reasons why the respondent considers the proposed Main Modification is / is not legally compliant or sound:** previously submitted.

**Changes respondent considers are necessary to make proposed Main Modification legally compliant and sound:** previously submitted.

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**Consultee:** [REDACTED]

**Event Name:** Purbeck Local Plan proposed Main Modifications

**Consultee reference:** 1189740

**Consultation reference:** 02

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**Proposed Main Modification:** MM21

**Does respondent consider plan is legally compliant:**

**Does respondent consider that the plan is sound:** No

**Details of the reasons why the respondent considers the proposed Main Modification is / is not legally compliant or sound:** The text within revised Policy E9 refers specifically to sewage draining to Poole Harbour. The explanatory text for MM21 in document MMCD2 initially refers to " drainage catchment" and then later on refers to " catchment areas for sewage treatment works that discharge into the harbour" . The intention appears to be to represent the sewage catchment on the Policies map (shown with a light green line) however there is confusion between sewage catchments and natural catchments. Since 1945 small sewage pumping stations have been used to allow settlements to expand beyond the physical limit of a hill or ridge line and the sewage is pumped a short distance uphill before joining the gravity flow sewage network. On the Lytchett Matravers Inset map, the houses along and to the north of Lime Kiln Road are shown as being outside of the Poole Harbour sewage catchment (and therefore treated sewage flows eventually to Christchurch Harbour). However these properties and possibly others gravity drain to sewage pumping stations, such as the one at the north end of Flowers Drove and the treated sewage flows to Poole Harbour. The light green line on the revised Polices Map does not show the sewage catchment as was intended but currently shows the natural catchment for rainwater and surface water.

**Changes respondent considers are necessary to make proposed Main Modification legally compliant and sound:** Consult Wessex Water who will be able to provide an accurate sewage catchment. Remove the reference to "drainage catchment" and replace with "sewage catchment" as drainage catchment can be taken to mean the sewage catchment or the natural catchment which are not the same.

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**Consultee:** [REDACTED]

**Event Name:** Purbeck Local Plan proposed Main Modifications

**Consultee reference:** 1187733

**Consultation reference:** 03

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**Proposed Main Modification:** Policy H12

**Does respondent consider plan is legally compliant:** Yes

**Does respondent consider that the plan is sound:** No

**Details of the reasons why the respondent considers the proposed Main Modification is / is not legally compliant or sound:** Policy H12. Policy H12: the Council requests the reinsertion of the final deleted paragraph so as to ensure that the vast majority of rural exception site housing would be affordable. DC's suggested amendment drives a horse and cart through the whole raison d'etre for RESs.

**Changes respondent considers are necessary to make proposed Main Modification legally compliant and sound:** As above.

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**Proposed Main Modification:** Policy H14

**Does respondent consider plan is legally compliant:** Yes

**Does respondent consider that the plan is sound:** No

**Details of the reasons why the respondent considers the proposed Main Modification is / is not legally compliant or sound:** Issues Raised: Policy H14. Policy H14. The Council requests the insertion at the end of the 2nd paragraph, " in the event that such a planning condition/obligation is not complied with or the permission/obligation is withdrawn then the property in question will, in perpetuity, be subject to the principal residence restriction which would have applied if the commercial holiday let planning permission had not been granted").

**Changes respondent considers are necessary to make proposed Main Modification legally compliant and sound:** As above.

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**Consultee:** [REDACTED]

**Event Name:** Purbeck Local Plan proposed Main Modifications

**Consultee reference:** 996269

**Consultation reference:** 04

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**Proposed Main Modification:** 251

**Does respondent consider plan is legally compliant:** Yes

**Does respondent consider that the plan is sound:** Yes

**Details of the reasons why the respondent considers the proposed Main Modification is / is not legally compliant or sound:** Dorset Council now has a robust Playing Pitch Strategy was was completed and therefore is able to identify the quality, quantity of playing pitches with the council's administrative boundaries.

**Changes respondent considers are necessary to make proposed Main Modification legally compliant and sound:** N/A.

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**Consultee:** [REDACTED]

**Event Name:** Purbeck Local Plan proposed Main Modifications

**Consultee reference:** 1189783

**Consultation reference:** 05

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**Proposed Main Modification:** All.

**Does respondent consider plan is legally compliant:** No

**Does respondent consider that the plan is sound:** No

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

- 1.** As a general comment, it is noted that the Main Modifications to the Local Plan as they apply to Wool largely reflect the input from would-be developers (as represented in the Memorandum of Understanding) and therefore signally fail to embody the representations made by members of Wool's community at the Inspector's Hearings, and also the wishes of the community as implicitly stated in the two consultations. It seems to have escaped the notice of Dorset Council that Wool Parish Council, and a significant percentage of the community who responded (almost 80% of the responses submitted) rejected the proposal for even 470 houses.
- 2.** It is noted that the Main Modifications refer to: Wool – around 470 new homes. We take issue with such loose definition of numbers which we feel will be open to potential manipulation by developers, especially in the light of the proposal to include in the proposed development in Wool the inclusion in the Main Modifications of the statement that Purbeck's ageing population will be catered for by the provision of around 65 units of extra care facilities at Wool. It was noted in a previous response, and in representations made at the Hearings that there had been no mention of this additional build in the original consultation. It should be noted that this extra build will in fact make a total of 535 unit/houses, which is already significantly more than the agreed 470. In addition, we would wish to point out that there is no evidence – as far as we are aware – that 65 units of extra care facilities are required by the local community.
- 3.** Referring to paragraph 128 Land to the west of Chalk Pit Lane and Oakdene Road – it is noted that this is the largest of the four sites (positioned to the west of Chalk Pit Lane and Oakdene Road) and is currently used as agricultural land. Whilst it accurately reports that ground levels fall from the southern side of the site toward its north eastern corner and proposes that the Council considers that this site is suitable for up to around 320 homes, no mention is made of the real fears of added flood risk to those areas of Wool lying to the north of this natural drainage slope. It is the case that there is on-going enquiry instituted as a result of over 5 reports of flooding having been made following recent flash-flooding events. It is the opinion of the Parish Council that this proposed development area should be downgraded to provisional only pending the outcome and recommendations of the flooding enquiries. It appears that the Planning Department has no up to date local knowledge of actual ground conditions or flood risk.
- 4.** The Parish Council is concerned that the dramatic increase in housing will bring with it potentially a huge increase in children of school age. We note that paragraph 133 makes the comment that the sites fall inside the catchment

areas for Wool CE VA Primary School. No mention is made of the actual size and capacity of this school, other than to reflect that financial contributions will be needed for extension to the school, betraying a complete lack of local knowledge or sensitivity to the wishes and requirements of the community. Yet again, this statement – whilst doubtless in keeping with the application of Policies H3 and I1 – shows scant regard for the actual physical and geographical location of Wool CE VA Primary School which simply has no room for the significant expansion, regardless of the possibility of funding, that could be required by the excessive number of proposed new houses – a point that has been raised frequently throughout the consultation process and which has been tacitly ignored by the Planning Authority. **5.** Wool Parish Council also wishes to question the inclusion of the claims made for the benefits of the provision of a SANG. Whilst it is acknowledged that a case could be made that the development of the proposed SANG presents a significant opportunity to implement management to enhance the biodiversity value of Coombe Wood, e.g. through the restoration of existing plantation coniferous woodland to native broadleaved woodland towards meeting Ancient Woodland criteria, and creation of a series of rides and glades along proposed walking routes it seems that no notice whatever has been taken of the various submissions made by local Flora and Fauna interest groups, with submissions being made by experts in their various fields of science, that far from enhancing biodiversity (and then only in one small, privately owned area) the impact on biodiversity in the wider development area, including the proposed removal of hedgerow habitat, the blocking off of migration routes and threats to protected and endangered species, has been completely ignored in the Main Modifications, adding weight to the previously expressed opinion that the document reflects only the wishes and aspirations of the developer whilst completely ignoring the representations of the local community. It is further noted that although the human recreational aspect of a SANG could be satisfied by the PLP proposal, it is difficult to see how the conversion of an already biodiverse and ancient woodland into an accessible public space could be argued to maintain, let alone enhance biodiversity. Policy E10 (Amended) p76 states that In accordance with national policy development resulting in the loss or deterioration of Ancient Woodland, and veteran trees will be refused unless there are wholly exceptional circumstances and a compensation strategy exists. It is the understanding of WPC that integral to the concept of a SANG was that it would be formed from a 'biodepleted', formerly (intensively) cultivated or brownfield site, and that its conversion to green space, wooded or otherwise, would therefore increase the biodiversity factor of the locality. It would seem that neither the protection of Ancient Woodland and veteran trees as spelt out in Policy E10 (Amended), nor the general principles relating to the enhanced biodiversity resulting from SANG creation are supported in the Purbeck Local Plan proposed Main Modifications, but have been trampled over in the pursuit of expediency and profit. **6.** Wool Parish Council believes that statements made in the Main Modifications document under Policy H5 are formulaic, at best disingenuous, and do not reflect the reality of the geography of the village. It repeats the assertion that Land at Wool as shown on the policies map will help to meet the District's development needs by providing a total of around 470 new homes and around 65 extra care units facility, community facilities and supporting infrastructure. No evidence has ever been produced that confirms the need for such a large

number of houses locally – other than of course to fulfil a completely irrelevant and now discredited government-imposed quota which takes no account of genuine local need or community aspiration. Indeed, it was shown in the production of statistics from the then Purbeck District Council that the Housing Needs Register would justify the building of perhaps 24 affordable houses (Gold and Silver Band requirements), and according to the rather misleading statement in the 2018 Consultation that the Council would “encourage 40% affordable housing” as a required proportion of any development, this would allow for a housing build number of perhaps up to 100 additional market-value houses – a tiny proportion of the “around 470” now being proposed. The local community’s response to the various consultations has always agreed that some houses need to be built, but it would appear that the numbers being proposed are out of all proportion to those that are actually needed, leading to the conclusion, previously voiced on numerous occasions, that this development is based on Greed and not on Need – not least on the part of the Dorset Council which presumably seeks to profit from new build grant payments from central government.

7. The Main Modifications contain – with relation to Wool – reference to a variety of Section 106 provisions. It is noted that at no time did Wool Parish Council, or the local community that it represents, request any of the S106 statements. In addition, several of them again demonstrate a complete lack of awareness of actual geography, and actual (as opposed to conveniently aspirational) need. For example, Wool is already served by adequate local shops – the provision of 350sqm of convenience retail space would only be required if there was any proven need for the number of houses being proposed – which is clearly not the case anyway. In addition, there is no guarantee that even if such retail space could/should be provided that occupancy could be assured. There is, it should be noted, no timetable included in the Main Modifications for any of these S106 contributions to be built – under the Parish Plan, which preceded the various consultations, and in responses to the previous consultations, it was consistently noted that identified infrastructure provision must be completed before housing development (especially on the scale envisaged) could be started, not least because of Dorset Council’s parlous record on enforcement of infrastructure provision. It is also noted that there is a non-specific statement regarding the provision of contributions towards improvements at the D’Urberville Hall community facility. This has never been requested by the Parish Council, and there has never been any discussion as to the sort of S106 provision that the community either wants or needs. Additionally, it is our understanding that the legal position is that if we do not reject this Main Modification, we are implicitly accepting the building development on which it is contingent. Part of our wish to reject this modification stems also from the decision to remove the easily calculated and transparent CIL payments from any large development (over 200 houses) and instead apply non-specific, developer led, and non-enforceable S106 statements which could easily turn out to be specious. Additionally, reference is made to a vague intention to explore opportunities to provide a community hub. Wool already has a community hub, and even were another to be provided, it would have the effect of creating two communities, not one unified village (or small town...). Sections (d) and (e) in this section of the Main Modifications also betray a complete lack of awareness of local needs and geographical restrictions. Paragraph (d) refers to improving accessibility between the sites and nearby services (including Wool

Railway Station and Dorset Innovation Park) and facilities by forming or improving defined walking and cycling routes. Two factors should be registered here: firstly, there is no current requirement for improved accessibility between the DIP and Wool Station, not least because the DIP is and will in all probability remain – a ‘white elephant’. Secondly, other than the East Burton Road (already very narrow and congested and with no possibility for sufficient widening) there is nowhere for improved walking and cycling routes, making this ‘commitment’ completely pointless. Paragraph (e) refers to providing details of improvements to the travel interchange at Wool Railway Station to include additional car parking, secure cycle storage, and electric vehicle charging points which again demonstrates ignorance of the actual site. There is simply no room for additional car parking (WPC has previously been involved in discussion with Network Rail in terms of utilising the land beyond the old Goods Shed – it is simply not available, making any such ‘commitment’ mere pie-in-the-sky. We would also wish to point out that the document fails totally to provide any details of any of these improvements, without which it would be ill-advised to accept any of these provisions. **8.** Policy H9 refers to Housing mix, and states that In order to achieve mixed and balanced communities, the Council will expect new market housing to support delivery of the housing mix identified through the Strategic Housing Market Assessment 2015, its update in 2018 or other recent evidence. We would wish to point out that the SHMA has already been amended and questioned, and we remain concerned that the final housing mix proposed will be agreed between the applicant and the Council – in other words, will not necessarily reflect the expressed wishes of the local community, nor even represent the genuine requirement for housing based on Need rather than Greed, which is why Wool Parish Council require that far greater definition of this area of the document is required before we could or indeed, should, accept it. We further note that a statement is made that Where an applicant considers there are significant economic viability constraints that would prevent a mix of housing in accordance with the policy, they will be required to provide full justification of the exceptional circumstances to the Council’s satisfaction – but we would posit the point that surely as stakeholders, the satisfaction of the Parish Council and of the community is just as important – but the document fails to acknowledge this, as the Council has failed to do throughout this process. **9.** Wool is in the process of developing a Local Plan. We fear greatly that if we are seen to be accepting the Main Modifications – many of which run contrary to the views that have been expressed locally in the process of compiling the outline so far reached of a local plan – it will become a complete irrelevance, and yet again, the stated wishes and aspirations of our community will be ignored. **10.** Wool Parish Council is concerned that a wide swathe of our demographic will have been unable to respond personally to this Consultation on the Main Modifications. There has been a lack of analogue publicity for the Consultation, and many members of our community had no idea of the existence of the Main Modifications, nor the ability to respond to the Consultation, leaning heavily as it does towards digital and on-line responses. Whilst we acknowledge that the Covid-19 Pandemic has meant that there have been unprecedented difficulties, this should – in our opinion – have been sufficient grounds for putting this process on hold until such time as public meetings could be held in order to inform and engage our community, and to allow paper documentation to be utilised. As it is, there are

reasonable grounds for suggesting that this Consultation has been disenfranchising and discriminatory. We need hardly remind you that there were over 1,000 paper responses to the 2018 Consultation; it is our fear that there will be significantly fewer responses to this consultation, and we would not wish the assumption to be made (as it was, on the record, in 2018/19) that non-response was deemed to be and was regarded as acceptance. **11.** As a final comment, it is the understanding of Wool Parish Council that the Dorset Local Plan, due to be consulted on in early 2021, will render the Purbeck Local Plan, with all its flaws and inconsistencies, completely irrelevant. In this response, reference has been made frequently to the way that the stated democratic wishes of the community, and the representations of the Parish Council, have been consistently ignored in drawing up the Main Modifications, certainly in comparison to the inclusion of many of the wishes of the would-be developers. To give one example of how the Dorset Plan renders the Purbeck Local Plan (and therefore, by inference, the Main Modifications) completely irrelevant, is the outline proposal for 800+ houses in Wool, making the 470 (to which we have stringently objected) a mere bagatelle. We would therefore urge that the Purbeck Local Plan, and the Main Modifications and all other ancillary documentation should be immediately abandoned, and any further decisions, planning applications or proposals be considered on the basis of, and following, the 2021 Dorset Local Plan Consultation. To proceed with the Purbeck Local Plan (and the Main Modifications) is – in our opinion - not merely flawed and in the process, ignoring of stated local wishes and opinions, but it would in fact be pointless.

**Changes respondent considers are necessary to make proposed Main Modification legally compliant and sound: N/A**

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**Consultee:** [REDACTED]

**Event Name:** Purbeck Local Plan proposed Main Modifications

**Consultee reference:** 1188577

**Consultation reference:** 06

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**Proposed Main Modification:** Policy H8

**Does respondent consider plan is legally compliant:** Yes

**Does respondent consider that the plan is sound:** Yes

**Details of the reasons why the respondent considers the proposed Main Modification is / is not legally compliant or sound:** Concerning the small sites policy (H8), the AONB Team has consistently raised concerns about the implications of this policy. I note that the modifications alleviate these, to some degree, by reducing the thresholds of maximum dwellings in relation to settlement hierarchy. Whilst this is considered a positive step, there residual risks in the implementation of this policy. Effectively managing incremental change is a challenging subject and, whilst the Plan recognises that cumulative effects will be considered, there is nonetheless a risk that a series of small site applications could result in adverse effects on the character and appearance of a settlement and its landscape context. Given that the Plan relies on housing numbers from small sites to satisfied assessed need, it is difficult to see how this risk can be addressed at this stage. Furthermore, it is also recognised that the small site policy, at least in part, is the outcome of resistance to allocating larger sites within the AONB.

**Changes respondent considers are necessary to make proposed Main Modification legally compliant and sound:** N/A.

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**Consultee:** [REDACTED]

**Event Name:** Purbeck Local Plan proposed Main Modifications

**Consultee reference:** 1190993

**Consultation reference:** 07

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**Proposed Main Modification:** MM5

**Does respondent consider plan is legally compliant:** Yes

**Does respondent consider that the plan is sound:** Yes

**Details of the reasons why the respondent considers the proposed Main Modification is / is not legally compliant or sound:** The insertion of the word "around" prior to the quantum of units within this policy is welcomed as it provides flexibility for future developers to be able to respond appropriately to unforeseen circumstances or any issues that arise during the masterplanning and planning application processes. Such flexibility will aid the deliverability of each site.

**Changes respondent considers are necessary to make proposed Main Modification legally compliant and sound:** N/A

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**Proposed Main Modification:** MM35

**Does respondent consider plan is legally compliant:** Yes

**Does respondent consider that the plan is sound:** No

**Details of the reasons why the respondent considers the proposed Main Modification is / is not legally compliant or sound:** The policy is inconsistent, vague and inflexible in a number of places, and is no longer clear and thereby effective. Criteria (ai) fails to have the word "Around" preceding the 65 extra care units and so is at odds with other parts of the policy. Criteria (aii) contains reference to "its overall housing requirements" which is not defined and could either mean 10% of "Around 490 new homes" (i.e. around 49 units) or "Around 490 homes plus around 65 extra care units" (i.e. around 55 units). Given that this site is already due to provide around 65 extra care units, the use of which is likely to be for older people over the age of 55, we are assuming that the 10% relates to the "around 490 new homes" figure, but we would welcome clarification as the overall quantum will inevitably affect the site's viability. Criterion (c) of the policy requires the site to provide 350 square metres of convenience retail floorspace, making it very inflexible. To be consistent with other proposed changes to this policy and in order to provide some flexibility, the word "around" should precede this quantum of provision.

**Changes respondent considers are necessary to make proposed Main Modification legally compliant and sound:** The word "around" should precede "65 extra care units" so as to be compatible with other parts of the policy. The policy needs to clarify whether the 10% relates to the 490 new homes or the 490 new homes plus 65 extra care units. The word "around" should precede "350 square metres of convenience retail floorspace" to be consistent with other proposed

changes to this policy and to provide some element of flexibility to meet the requirements of commercial operators.

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**Proposed Main Modification:** MM43

**Does respondent consider plan is legally compliant:** Yes

**Does respondent consider that the plan is sound:** Yes

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

**Changes respondent considers are necessary to make proposed Main Modification legally compliant and sound:** No changes are required.

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**Proposed Main Modification:** MM65

**Does respondent consider plan is legally compliant:** Yes

**Does respondent consider that the plan is sound:** No

**Details of the reasons why the respondent considers the proposed Main Modification is / is not legally compliant or sound:** The requirement to provide 350sqm of convenience retail floorspace stems from the decision at the examination to split the 700sqm requirement from the whole of the former Purbeck district and apply it to the sites at Moreton and Wool. Whilst it is appropriate that both developments have some form of retail offer available within them, convenience retail floorspace already exists near to both sites in Wool and at Crossways and so further analysis of the requirement will be required as part the masterplanning process and as part of a planning application. The requirement to provide 350sqm of floorspace rather than "around 350 sqm" of floorspace makes the policy very precise (when the basis behind the identification of 350sqm was very imprecise) and inflexible to take account of unforeseen circumstances or the requirements of commercial operators. As a result it could render the policy ineffective.

**Changes respondent considers are necessary to make proposed Main Modification legally compliant and sound:** To be consistent with other changes proposed in the modifications and in order to provide sufficient flexibility to maximise the chances of a commercially viable retail offer coming forward, we request that the word "around" precedes "350sqm convenience retail floorspace".

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**Consultee:** [REDACTED]

**Event Name:** Purbeck Local Plan proposed Main Modifications

**Consultee reference:** 1191014

**Consultation reference:** 08

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**Proposed Main Modification:** MM43

**Does respondent consider plan is legally compliant:** Yes

**Does respondent consider that the plan is sound:** Yes

**Details of the reasons why the respondent considers the proposed Main Modification is / is not legally compliant or sound:** The requirements of amended policy H8 (small sites) are very clear, they are justified in terms of national policy and will be effective in delivering development at sustainable locations across the former Purbeck district.

**Changes respondent considers are necessary to make proposed Main Modification legally compliant and sound:** N/A

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**Proposed Main Modification:** MM85

**Does respondent consider plan is legally compliant:** Yes

**Does respondent consider that the plan is sound:** Yes

**Details of the reasons why the respondent considers the proposed Main Modification is / is not legally compliant or sound:** Whilst the list of small and medium sized sites identified in Appendix 2 is not an exhaustive list and the council's estimated capacity of each is indicative and requires testing, the appendix is effective and justified as part of the council's commitment to demonstrating how it intends to implement the national policy requirement for 10% of the plan's housing requirement to be provided on small sites.

**Changes respondent considers are necessary to make proposed Main Modification legally compliant and sound:** N/A

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**Consultee:** [REDACTED]

**Event Name:** Purbeck Local Plan proposed Main Modifications

**Consultee reference:** 1189887

**Consultation reference:** 09

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**Proposed Main Modification:** MM7

**Does respondent consider plan is legally compliant:**

**Does respondent consider that the plan is sound:** No

**Details of the reasons why the respondent considers the proposed Main Modification is / is not legally compliant or sound:** MM7 and the supporting revised document SD93 fail to meet the key requirements of plan preparation in that they are not based on robust and credible evidence. There is inadequate research and fact-finding to back up the choices made in the plan and there is no rigorous appraisal of the reasonable alternatives in the updated SD93. There is no audit trail to evidence research of alternatives to justify any decisions made in relation to strategic SANG in the north of Purbeck. In SD93 para 36, the Council states: "the Council has identified three alternatives for a potential strategic SANG in the north of the area: Morden Park/Wareham Forest (as identified on the policies map of the Purbeck Local Plan) and those SANGs associated with the Bere Farm and Lytchett Minster housing options sites." In SD93 para 37 the Council continues: "As presented in the 2016 options consultation, Natural England have advised that a 34 hectare SANG for around 1,000 homes at Bere Farm would not have excess capacity to act as a strategic SANG, or be in an appropriate location relative to the European sites at Morden Bog. The SANG at Morden would have strategic capacity to address the effects from between 250 and 300 homes (in addition to the holiday) and the proposed SANG at Lytchett Minster would have capacity to address the effects from a further 350 homes at the settlement. Map 8 shows approximate size and locations of the SANGs." In 2016 The South Lytchett Estate were asked by Purbeck District Council to submit a plan for a garden village and associated SANG land at Bere Farm. Two Purbeck District Councillors first suggested this scheme as an alternative to development in Lytchett Matravers and Lytchett Minster. The suggestion was made late in the planning process and as it was a last minute community led scheme, the plans were of necessity quite simplistic and it was clearly understood by us and by Purbeck District Council that plans were fluid. A more elaborate submission was made on May 16th 2018 and is attached below. In the covering letter, Andrew Elliott of Terence O' Rourke says: "Do note, as previously discussed with officers, that a variety of different development concepts / proposals could come forward on part of this overall land area, including residential development, SANGs, public open space etc." This is a clear invitation to Purbeck District Council to explore the potential of our land, with SANG land specifically referenced. This covering letter also makes clear there is no limitation on the scope of any discussion, including for SANG land and for the avoidance of any doubt the covering letter includes: "a plan showing the entire area of interest." SD93 para 37 is incorrect in stating Bere Farm does 'not having excess capacity' to act as a strategic SANG.

Instead Bere Farm has uncalculated capacity. The South Lytchett Estate owns land to the east and west of Bere Farm, either closer to or further away from the land Natural England seek to protect and at a suitable point to intercept visitors from Bournemouth Poole and Christchurch as identified in SD93 para 39b. The opportunity to explore capacity has been available since 2016 when plans were first submitted and had this been explored there would be an evidence trail to demonstrate this. In SD93, table 5 the spare capacity of 40 ha of SANG offered at Lytchett Minster alongside a 28.9ha release of green belt land for housing was calculated at 350 houses. The Lytchett Minster proposal could therefore build 650 houses and supply SANG for 1000 houses. By contrast for a release of 76ha of green belt land at Morden, no houses are built and SANG is provided for c 250-300 houses. In SD93 para 39a the Council states: "the characteristics of the possible SANG site at Morden/Wareham Forest mean that it will perform more effectively than either of the alternatives at Bere Farm and Lytchett Minster (the possible SANG sites at Bere Farm and Lytchett Minster would take longer to establish before they functioned as effectively and are designed for use by adjacent residential occupants);" The farmland around Lytchett Minster is predominately permanent grassland and has extensive woodlands. It is ready and suitable to become SANG land. The land at Bere and Newton Farms are in arable production and like the land at Morden, will require time and work to become attractive SANGs land. All the sites offered by the South Lytchett Estate have the potential to offer access to extensive woodlands. Putting aside the fact that the South Lytchett Estate were never invited to discuss the possibility of strategic SANGs, there is no fact based audit trail to justify the decisions which were eventually made. There is no objective set of criteria with which to compare the three sites researched. There is no objective list of their characteristics, their potential, their strengths or their weaknesses. There is no research report on these sites. The updated SD93 fails to offer new information to inform decisions taken and as such undermines the soundness of the revised plan. As a result the evidence base to justify green belt release, which in turn allows for the delivery of a strategic SANGs and then further facilitates the building of c250-300 houses in the north of the district, is flawed. Dear Frances Please find below a response on behalf of Bloor Homes in respect of its land interest at Lytchett Minster and Bere Farm. This land lies within the 'Lees Estate'. I attach a plan showing the entire area of interest. Do note, as previously discussed with officers, that a variety of different development concepts / proposals could come forward on part of this overall land area, including residential development, SANGs, public open space etc. Please ensure that the text in blue above is added to any SHLAA entry / entries associated with this land. I'm happy to answer any queries on this. Kind regards

**Changes respondent considers are necessary to make proposed Main Modification legally compliant and sound: N/A**

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**Consultee:** [REDACTED]

**Event Name:** Purbeck Local Plan proposed Main Modifications

**Consultee reference:** 1188328

**Consultation reference:** 10

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**Proposed Main Modification:** Policies Map

**Does respondent consider plan is legally compliant:** Yes

**Does respondent consider that the plan is sound:** No

**Details of the reasons why the respondent considers the proposed Main Modification is / is not legally compliant or sound:** Policies Map – Protection of Local Green Space. The modified policies map for Wareham does not include some significant local Green Spaces identified in the Neighbourhood Plan, for example the former middle School Playing fields or the allotments at Bestwall and Northmoor park. There is therefore a danger of confusion for the public and for decision takers about which Local Green Spaces are protected. It is therefore recommended that this aspect of the Local Plan Policies Map for Wareham be objected to and that the Local Plan shows all the Local Green Spaces identified in the Wareham Neighbourhood Plan.

**Changes respondent considers are necessary to make proposed Main Modification legally compliant and sound:** the Local Plan should show all the Local Green Spaces identified in the Wareham Neighbourhood Plan.

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**Proposed Main Modification:** Employment Land (Policy EE)

**Does respondent consider plan is legally compliant:** No

**Does respondent consider that the plan is sound:** No

**Details of the reasons why the respondent considers the proposed Main Modification is / is not legally compliant or sound:** Employment Land (Policy EE). The Submitted Plan identified Strategic Employment Sites (Dorset Innovation Park and Holton Heath Trading Park) and other identified employment sites (at Wareham only the Sandford lane Estate). The main modification to this policy adds in the northern part of Westminster Road (2.5Ha) and the southern part of Johns Road (0.5Ha). The justification for this change given in the text is to “safeguarded employment land at Wareham and Bere Regis reflecting local policies in emerging and made local policies in neighbourhood plans in these areas (also having regard to the respective land supplies and needs for new homes and employment land)”. These are relatively modest areas of land, particularly at Johns Road and it is unclear exactly why this modification has been proposed. The numbers employed on these sites are relatively small and they are rundown with many buildings no longer fit for purpose. In the longer term they may well be the most suitable land for additional housing beyond the Plan period, and if owners wish to change the use of this land it is hard to see what harm would be caused. NPPF para. 117 requires local

planning authorities to “promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained” as it is at Wareham by AONB, Green Belt nature conservation and flooding designations. An officer has subsequently suggested that this policy is aimed at restricting the number of new dwellings at Wareham north of the railway line to 50 or less, beyond which a SANG would be required. If this is the case then the policy should address this issue rather than protect rundown and underused employment land when the Council has agreed there is an oversupply of employment land in the area. Alternatively this issue can be dealt with at planning application stage.

**Changes respondent considers are necessary to make proposed Main Modification legally compliant and sound:** Delete the modification. This issue can be dealt with at planning application stage.

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**Proposed Main Modification:** Policy V1, H1 and H2.

**Does respondent consider plan is legally compliant:** Yes

**Does respondent consider that the plan is sound:** Yes

**Details of the reasons why the respondent considers the proposed Main Modification is / is not legally compliant or sound:** Housing Requirement for Wareham. (Policy V1, H1 and H2). The submitted plan proposed 300 new homes for the Wareham Neighbourhood Plan area including windfall. The modifications now proposed 207 new homes for Wareham on allocated sites. This reflects updated evidence on sources of housing land supply in Wareham (as referenced in the emerging Wareham Neighbourhood Plan). Windfall development (on unallocated sites in the Neighbourhood Plan are not included in this housing requirement. This is fully in accord with the submitted neighbourhood Plan currently awaiting its Regulation 16 consultation and Examination and these modifications are therefore supported.

**Changes respondent considers are necessary to make proposed Main Modification legally compliant and sound:** No change – supported

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**Proposed Main Modification:** Green Belt (Policy V2).

**Does respondent consider plan is legally compliant:** Yes

**Does respondent consider that the plan is sound:** Yes

**Details of the reasons why the respondent considers the proposed Main Modification is / is not legally compliant or sound:** Green Belt. (Policy V2) This Policy no longer proposes removing land from the Green Belt at Wareham as shown in the submitted Plan. This reflects the recognition that it is now possible to accommodate the housing requirement for Wareham within the existing settlement boundary, largely due to higher housing numbers being proposed for the middle School and Bonnets Lane housing sites. The Policies map is also amended by deleting the reference to removing land from the Green Belt west of Westminster Road. These modifications are supported.

**Changes respondent considers are necessary to make proposed Main Modification legally compliant and sound:** No change - supported

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**Proposed Main Modification:** Area of Outstanding Natural Beauty (Policy E1).

**Does respondent consider plan is legally compliant:** Yes

**Does respondent consider that the plan is sound:** Yes

**Details of the reasons why the respondent considers the proposed Main Modification is / is not legally compliant or sound:** Area of Outstanding Natural Beauty (Policy E1). The submitted Plan did not fully comply with national policy for protected landscapes and the modification now proposes that “the Council attaches great weight to conserving and enhancing landscape and scenic beauty in the Area of Outstanding Natural Beauty (AONB). The scale and extent of any development within these designated areas will be limited. Development, other than major development (where the NPPF provides guidance), will only be permitted in the Area of Outstanding Natural Beauty (Dorset AONB) where proposals would conserve or and enhance the natural beauty of the area...”. This is a significant strengthening of the Local Plan policy and it is supported.

**Changes respondent considers are necessary to make proposed Main Modification legally compliant and sound:** No change - supported

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**Consultee:** [REDACTED]

**Event Name:** Purbeck Local Plan proposed Main Modifications

**Consultee reference:** 1188328

**Consultation reference:** 11

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**Proposed Main Modification:** Small sites policy (H8).

**Does respondent consider plan is legally compliant:** Yes

**Does respondent consider that the plan is sound:** Yes

**Details of the reasons why the respondent considers the proposed Main Modification is / is not legally compliant or sound:** Small sites policy (H8). This policy as submitted would have allowed small developments of up to 30 dwellings adjoining settlements on unallocated sites. This policy proved to be very contentious and is now proposed to be amended to a hierarchy subject to criteria: i) 30 homes on any single small site adjoining a town; ii) 20 homes on any single small site adjoining a key service village; iii) 15 homes on any single small site adjoining a local service village; iv) 5 homes on any single small site adjoining other villages with a settlement boundary. In addition, this policy is now not to apply within the Green belt or within a Neighbourhood Plan area where small sites have been allocated to meet identified housing needs in a made neighbourhood plan (as at Wareham). This modification be supported.

**Changes respondent considers are necessary to make proposed Main Modification legally compliant and sound:** No change - supported

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**Proposed Main Modification:** Improving accessibility and transport (Policy I2).

**Does respondent consider plan is legally compliant:** Yes

**Does respondent consider that the plan is sound:** Yes

**Details of the reasons why the respondent considers the proposed Main Modification is / is not legally compliant or sound:** Improving accessibility and transport (Policy I2). A main modification adds to this policy states the following: "Local vehicle parking provision Local planning policies in neighbourhood plans relating to the provision of vehicle parking should support the general principles around delivering adequate parking in accordance with this policy and be consistent with national planning policy. Where justified with robust local evidence, local policies in made neighbourhood plans may specify distinct local requirements for vehicle parking." This policy change provides discretion for neighbourhood plans to introduce, where justified, local requirements for vehicle parking. In the Wareham Neighbourhood Plan it is proposed that within the Conservation Area a stricter approach is taken to parking provision for new residential development. This modification be supported.

**Changes respondent considers are necessary to make proposed Main Modification legally compliant and sound:** No change - supported

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**Proposed Main Modification:** Wareham integrated health and social care (Policy I6).

**Does respondent consider plan is legally compliant:** Yes

**Does respondent consider that the plan is sound:** Yes

**Details of the reasons why the respondent considers the proposed Main Modification is / is not legally compliant or sound:** Wareham integrated health and social care (Policy I6). This policy is proposed to be modified to reflect the need for appropriate mitigation to be secured to avoid adverse effects on habitat sites. This modification be supported.

**Changes respondent considers are necessary to make proposed Main Modification legally compliant and sound:** No change - supported

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**Consultee:** [REDACTED]

**Event Name:** Purbeck Local Plan proposed Main Modifications

**Consultee reference:** 1188362

**Consultation reference:** 12

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**Proposed Main Modification:** H5

**Does respondent consider plan is legally compliant:** No

**Does respondent consider that the plan is sound:** No

**Details of the reasons why the respondent considers the proposed Main Modification is / is not legally compliant or sound:** A response from [REDACTED] to the "Main modifications to the Purbeck Local Plan" General overwhelming matters

1. The starting point for the development of the policies and their application in the Purbeck Local Plan would have been in 2016/17 and would have been responding to the then government guidelines/legislation. It is now 2021, and in the intervening period, the state of the planet in terms of climate change and the state of the human population due to COVID-19, have both catastrophically worsened.
2. COVID-19 has taken centre stage over 2020 yet there is little indication so far, that despite the efforts of governments around the world, that the virus is under control, let alone eradicated. As coronaviruses SARS in 2003 and MERS in 2012 caused lesser pandemics, the arrival of COVID-19 should have been anticipated. Future pandemics are to be expected if the recent societal model consisting of: high density populations; daily and global travel; and the destruction of ecosystems and wildlife; continue. These factors allow zoonoses to jump species and spread globally.
3. Efforts to control the spread of COVID-19 in GB have had serious economic consequences for a great proportion of the population, as despite the furlough scheme, businesses have failed or shrunk, resulting in job losses or reduction of hours especially in retail, hospitality, sport/exercise, and the arts. Now Brexit border delays caused by new and extra paperwork threatens the livelihoods of those exporting fresh food to Europe. Those who have fallen behind in rent or mortgage payments are currently protected from eviction by the government's ruling which is about to end. The extent of the economic damage will then become apparent.
4. Efforts to counteract climate change, have been allowed to slip despite disastrous fires, floods, storms around the world including here in GB. This year, 2021, the UN Climate Change Conference (COP26) meets and will assess the progress to meet the Paris Agreement and the UN Framework Convention on Climate Change. Even the simplest agreed strategy of planting more trees and protecting all the trees/hedges/scrub that we have, has not been actioned. The government promised to fund and plant 11 million trees between 2017 and 2022 but is unlikely to achieve this.
5. In view of the matters and events explained above the Westminster government urgently needs to reassess existing policies. Mr George Eustice, Secretary of State for Environment, Food, and Rural Affairs has begun the review, promoting more traditional farming over the intensive factory farming as factory farming is a potential source of zoonoses and is destructive of ecosystems especially the soil. The prime Minister is in discussion with Wildlife Trusts on the concept of a

“Wildbelt” around/through every community to enhance biodiversity and green corridors, provide opportunities for exercise and wellbeing, and counteract climate change by absorbing carbon dioxide and reduce flooding. (Wildbelt, Sept 2020, Wildlife Trusts.) In summary It would be a futile waste of public money for Dorset Council to enact now the plans and policies in the Purbeck Local plan and the main modifications, that were developed in good faith to meet the then government policies and the then state of the planet and human population. Please wait until you can adopt the ideas and policies that are in development now, which aim to rectify previous mistakes and to safeguard people and the planet for the future. Specific examples of policies and plans in the Main Modifications to the Purbeck Local Plan which fail to meet the challenges in 2021 and the future. Policy H5, 470 houses at Wool plus 65 extra care facilities and a SANG a) Around 24 affordable homes, were identified as needed by the PDC Housing needs register. After the economic consequences of 2020/2021, that number may be reduced. What evidence do you have that there are sufficient would-be home- owners who have not lost their savings for the necessary deposit over the last year and are still able to buy 446 properties and would choose to live in Wool? b) Dorset Echo, 14/10/20 article “Care needs change” states that “at one point in the summer there were around 500 vacant care home beds across the county.” After the appalling neglect of provision of PPE for care homes residents and staff, by the government at the start of the pandemic, with shocking loss of life, care homes are no longer readily chosen for one’s elderly relatives. Therefore, a further 65 care beds, (which Wool population were not given the opportunity to comment on), are clearly not needed and a complete waste of land and money. c) The “agricultural fields” (greenfield sites) offered by Mr Weld and Savills have been used by a tenant farmer for raising organic sheep or their fodder over the last 2 decades, with organic records being submitted annually. They therefore support a rich biodiversity and a good soil ecosystem, unlike the rest of the Weld/Lulworth Estates intensively farmed fields and livestock raising. The farming model of the tenant farmer meets Mr G Eustice’s requirements and is profitable and sustainable, whilst the Lulworth Estate’s model fails on both counts. The acceptance of these fields for housing development by the Council cannot be justified by any ethical or environmental argument. Furthermore, resulting from the economic damage caused by “lockdown”, empty office blocks and retail premises have been identified as suitable brownfield sites that could be converted into housing, according to several articles in the national press. As the benefits of “shopping on- line” and office workers working from home are saving travel time and avoiding infection, the pre- COVID-19 situation is unlikely to return. Therefore, until these recently available brownfield sites have been converted into housing there can be no justification to destroy the biodiversity and soil ecosystems of the organic fields identified in H5. In addition, such centrally located homes would avoid the daily need for a car and contribute to a reduction in emissions. d) Fields to the south of the A352 slope towards this main road and towards the present properties to the north of the A352. This year as the Climate crisis is escalating an unusually heavy rainstorm caused muddy flood water to pour off the field identified for “around 320 houses” and flow along the A352, and into the Baileys Drove / Frome Avenue area of Wool. At least one of the affected properties is still uninhabitable. Covering that field with houses and roads, removing the present herbage and roots, and compacting the soil during

construction will cause even normal amounts of rain to generate further floods. I spoke on matters of the slope, water retention and possible flooding at the planning meeting for the Purbeck Gate development. My contribution was ignored, resulting in some properties there experiencing floods and an open grassy area became a deep mud pit!

e) A sustainable use for the fields to the south of the A352 identified for housing would be to create a Wildbelt, planted with native species of trees. This would (i) contribute to tackling the Climate Emergency, (ii) enhance biodiversity creating a green corridor linking existing isolated trees/hedges/woods, (iii) reduce greatly any chance of flooding, (iv) provide public green space of adequate size for the population of Wool and “on their doorstep” i.e. no transport needed, (v) that would increase the chance of gaining National Park status. f) The specification and description of the proposed SANG contains errors and the location selected offers little benefit to residents of the western end of Wool, north of the A352 who will have suffered noise pollution, poor air quality, biodiversity loss due to the construction of the proposed housing. The selected SANG site is a considerable distance further than the new housing and approached by a narrow road with no footway, after crossing the A352. Errors noted are as follows:- (i) On the Inset Map -Wool, the wooded area marked as the SANG is North Wood not Combe Wood. (ii) You state it has an area of 13.75 hectares, but around 2 hectares of this is Wessex Water’s fenced off Maggot Hill Reservoir, pumping station, sulphur dioxide store and access tracks for their vehicles. So, the area of North Wood offered is around 11.75 hectares. (iii) It takes no more than 15 minutes to walk from the road to the southern boundary of the proposed North Wood part of the SANG. This is a totally inadequate size for a public green space unless it is connected by safe pathways to a series of other spaces, such as has been done by the boroughs of Greenwich, Lewisham, Bexley, Bromley in creating the Green Chain. (iv) Whether the proposed replacement of elderly conifers in North Wood with native deciduous trees will in any way counteract the negative effects of this disturbance, and of increased footfall on the ground flora and wildlife, is doubtful. Any such detrimental effects negate the core aim of a SANG. (v) No details of management of the 17 hectares agricultural land with the ancient monuments are given, other than protecting the latter from tillage. A SANG must enhance biodiversity and provide a public space for leisure, and well-being. If this area is a SANG, what are the plans? How does this area fulfil the criteria for a SANG? g) References to reduction in emissions, or tackling the climate crisis, or sustainable principles in the development plans for Wool are minimal. Each of the proposed sites for new housing in Wool, is as far as it could be from (i) the rail station/transport hub (ii) the 2 primary schools, (iii) the Wellbridge practice (iv) the Kids of Wool Youth Club. How many car journeys (electric or petrol) will be necessitated by this plan? Is it fit for 2021 and the future?

**Changes respondent considers are necessary to make proposed Main Modification legally compliant and sound:** Please see the changes I consider necessary to make the proposed Main Modifications legally compliant and sound, which I have set out above within my comments answering question 3.

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**Consultee:** [REDACTED]

**Event Name:** Purbeck Local Plan proposed Main Modifications

**Consultee reference:** 1191258

**Consultation reference:** 13

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**Proposed Main Modification:** Proposed Main Modification (MM) 43: Chapter 4, Housing, Policy H8.

**Does respondent consider plan is legally compliant:**

**Does respondent consider that the plan is sound:** No

**Details of the reasons why the respondent considers the proposed Main Modification is / is not legally compliant or sound:** In respect of draft Policy H8 the Inspectors "Post Hearings" note (18 March 2020) notes at para 45 that... " The Framework indicates that small and medium sized sites .... local planning authorities should identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare". At Para 46 the inspector notes that the ...."Purbeck Local Plan does not specifically allocate small and medium sized sites. However, it does include a policy (Policy H8) which supports the provision of homes on small sites next to existing settlements, providing that certain criteria are met. At Para 47 the inspector notes..."However, in the interests of clarity and in order to ensure that the Plan is justified an explanation of this should be provided as a modification to the supporting text of policy H2 and details of the sites should be included in an Appendix to the Plan in order to demonstrate compliance with the national policy requirement." I note the LPA has prepared supporting evidence SD88 "Review of capacity from small sites", however this does not form part of the Development Plan. Turning to the amended draft Policy H8 in MM43, the amendment does not refer to an appendix to the Development Plan identifying the small sites concerned. Nor is there a reference in the amended supporting text. Indeed quite the reverse, the amended text states..."The small sites policy does not impose a limit on the total number of separate small sites that may be permitted around any one of the eligible settlements in the hierarchy, but it does require the cumulative effects of development on small sites to be taken into consideration" As such the draft Policy H8 (and the amended supporting text) continues to fail the NPPF test set out at para 68 of the Framework which requires that local authorities to identify such sites "through the development plan and brownfield registers". A policy construction as proposed at H8, would give free rein for development proposals (outside the green Belt) which adjoin villages (subject to the other criteria set out in the policy). For these reasons the policy is not consistent with national policy and cannot therefore be considered sound.

**Changes respondent considers are necessary to make proposed Main Modification legally compliant and sound:** Sites identified as potentially suitable small sites to help meet housing requirements should be part of the Development Plan - an appendix as the Inspector has proposed ( to H2 and or H8) and in accord with Para 68 of the Framework.

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**Consultee:** [REDACTED]

**Event Name:** Purbeck Local Plan proposed Main Modifications

**Consultee reference:** 1186981

**Consultation reference:** 14

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**Proposed Main Modification:** MM 24.

**Does respondent consider plan is legally compliant:** Yes

**Does respondent consider that the plan is sound:** No

**Details of the reasons why the respondent considers the proposed Main Modification is / is not legally compliant or sound:** It is not sound to include renewable energy only "where possible".

**Changes respondent considers are necessary to make proposed Main Modification legally compliant and sound:** All new homes must be built powered by renewable energy only. The installation of, for example, ground source heat pumps is much cheaper and efficient when they are installed when a development of multiple homes is being constructed. a) In light of Government policy, having signed up to the 1915 Paris agreement; and b) its passing into law a requirement for the United Kingdom to reduce greenhouse gas emissions to net zero by 2050, as advised by its Climate Change Committee; and c) having regard to the overwhelming weight of global scientific opinion that the increase in global temperatures must not exceed 1.5 degrees C; d) having regard to the evident Government policy in the build up to COP 26 and the weight of business and commercial opinion and intent supporting it; it would now fly in the face of this policy and the accepted wisdom to build new homes which are not carbon neutral, i.e. whose carbon emissions are greater than net zero, from the outset. Government plans to retrofit all the existing housing stock so that it becomes carbon neutral by 2050 and it would be ridiculous to build new homes which are not carbon neutral from the outset.

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**Proposed Main Modification:** MM32

**Does respondent consider plan is legally compliant:** Yes

**Does respondent consider that the plan is sound:** No

**Details of the reasons why the respondent considers the proposed Main Modification is / is not legally compliant or sound:** The term "affordable" housing, homes or developments as used throughout the "Further Modifications" consultation documents does not meet the requirements of people living and working in the Purbeck area who are on the average wage of less than £20,000 per annum. "Affordable homes" as a term in Planning presently means 80 per cent of market value, or market rate in the case of rentals.

**Changes respondent considers are necessary to make proposed Main Modification legally compliant and sound:** Wherever the term "affordable" is used in connection with the purchase price or the rentals of homes, it should be replaced

by "homes, the cost or rent of which is based on the income of people living and working in the Purbeck area".

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Consultee: F [REDACTED]

Event Name: Purbeck Local Plan proposed Main Modifications

Consultee reference:

Consultation reference: 15

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Proposed Main Modification: MM 85 Appendix 2.

Does respondent consider plan is legally compliant:

Does respondent consider that the plan is sound: No

Details of the reasons why the respondent considers the proposed Main Modification is / is not legally compliant or sound: I do not consider the sites identified in Appendix 2 for new houses in West Lulworth to be appropriate for this location. (SHLAA/0113 Land adjacent to 1 Church Road) (SHLAA/0067 " " the Hall, Church Road) (SHLAA/0066 Opposite Witton Cottage) Millions of tourists visit this village, not only for its famous cove and coastline but also the historic sense of place and feeling of stepping back in time. The village already suffers enormously from traffic congestion, undesirable loss of green space and habitat, and ever-increasing commercialisation. Church Road is an especially vulnerable pinch point and essential route for tourists and rescue services for Durdle Door. It is often gridlocked and the addition of 8 new houses here would further exacerbate pressures, suburbanise the setting and adversely affect atmosphere. In particular, the development of the ancient, enclosed field at the beginning of Church Road (SHLAA/0113) would be a tragic and irretrievable loss of villager heritage and local character (and very sad for the barn owls whose domain this has been for many generations).

Changes respondent considers are necessary to make proposed Main Modification legally compliant and sound: The aforementioned small sites allocated for future development in West Lulworth should be withdrawn from Appendix 2 (MM85). Housing Policy H1 (MM26) states there is "no specific housing requirement" for West Lulworth. World-renowned Lulworth should be afforded exceptional status and protection from impactful new development, as evidenced by its special designations (Area of Outstanding Natural Beauty, Conservation Area, World Heritage Coast etc).

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Responses raised through the post /  
e-mail

**Consultee:** [REDACTED]

**Event Name:** Purbeck Local Plan proposed Main Modifications

**Consultee reference:** 1190858

**Consultation reference:** 16

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## Response form for Purbeck Local Plan proposed Main Modifications consultation

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

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

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

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

*continued overleaf*




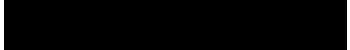

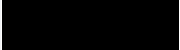
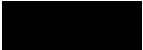


The Council published a series of papers and supporting evidence, in response to representations, over the course of the local plan hearing sessions. It has also re-published a selection of these papers and evidence which relates to the proposed Main Modifications including:

- Review of capacity from small sites [SD88];
- Proposed amendments to HRA [SD89];
- Appropriate assessment statement [SD96];
- Addendum to SA re settlement hierarchy [SD92];
- Strategy for mitigating effects on European sites, and Green Belt changes at Morden [SD93];
- Summary of viability issues raised by respondents and Council / Dixon Seale response to those concerns [SD97];
- Examination stage – viability update Purbeck Local Plan [SD117];
- Memorandum of understanding between Dorset Council and Savills on viability related issues for housing sites around Wool October 2019;
- Memorandum of understanding between Dorset Council and Wyatt Homes on viability related issues for Lytchett Matravers and Upton October 2019;
- Memorandum of understanding between Dorset Council and the Moreton Estate on viability related issues for Moreton Station/Redbridge Pit October 2019;
- Proposed changes to care provision [SD95]; and
- Planning the care provision in Purbeck [SD115]

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

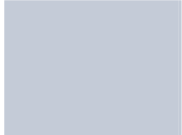
Once the consultation is closed, the council will prepare a summary of the issues raised in representations to the consultation and provide its response. The council's summary, and full copies of the representations, will then be sent to the Planning Inspector for her consideration. If the Inspector's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

## PART A






	Your contact details	Agent's Details (if applicable)
Name		
Organisation / Group (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 support the representation



**Please note:**

- The consultation period starts on **Friday 13 November 2020** and will last for 9 weeks until 11.45pm on **Friday 15 January 2021**.
- Only representations made in this period will be referred to the Planning Inspector for consideration.
- Responses must be made using this form (sent in the post or attached to an e-mail) or online at this link  [www.dorsetcouncil.gov.uk/plp-main-modifications](http://www.dorsetcouncil.gov.uk/plp-main-modifications) .
- Respondents must complete Part A of this response form and separate Part B forms for each proposed Main Modification that they might wish to comment on.
- All respondents must provide their name and address and/or email address.
- All forms must be signed and dated.
- Responses cannot be treated as confidential. By making a response you agree to your name and comments being made available for public viewing.
- Information on the council's privacy policy is available on our website at:  
 [www.dorsetcouncil.gov.uk/your-council/about-your-council/data-protection/dorset-council-general-privacy-notice.aspx](http://www.dorsetcouncil.gov.uk/your-council/about-your-council/data-protection/dorset-council-general-privacy-notice.aspx) .
- The council will not accept any responsibility for the contents of comments submitted. We reserve the right to remove any comments containing defamatory, abusive or malicious allegations.
- If you are part of a group that shares a common view, please include a list of the contact details of each person (including names, addresses, emails, telephone numbers and signatures) along with a completed form providing details of the named lead representative.
- The proposed Main Modifications to the Purbeck Local Plan, proposed Purbeck Local Plan (2018-2034) policies map and the relevant background and evidence documents, are available to view on the Council's website at  [www.dorsetcouncil.gov.uk/plp-main-modifications](http://www.dorsetcouncil.gov.uk/plp-main-modifications) .
- Hard copies of the consultation documents are available to loan from libraries in Dorchester, Lytchett Matravers, Swanage, Upton, Wareham and Wool. Please contact the libraries separately to ascertain their opening times, availability of documents to loan and for full details of their procedures to restrict the spread of COVID-19. You must follow any procedures relating to the COVID-19 in the libraries.
- If you have questions relating to the consultation, or the process for making a response, please contact the Planning Policy team on  **01929556561** or  [planningpolicy@dorsetcouncil.gov.uk](mailto:planningpolicy@dorsetcouncil.gov.uk).
- Response forms returned in the post should reference the Purbeck Local Plan Proposed Main Modifications Consultation, Dorset Council, Spatial Planning Team and be sent to South Walks House, South Walks Road, Dorchester, DT1 1UZ.
- Please tick the box if you would like to be notified of the following:

Adoption of the Local Plan.

## PART B

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

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

<b>Proposed Main Modifications reference number</b>	61
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### 2. Do you consider that the proposed Main Modification is:

- Legally compliant      Yes       No
- Sound                      Yes       No

### To be considered legally compliant the proposed Main Modifications must:

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

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

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

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



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

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**Please continue on a separate sheet if necessary.**

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

Policy EE1 should be amended to refer to B8 as an acceptable use and make it consistent with Policy EE2. This would make the policy NPPF compliant (NPPF paragraph 16d).

'White land' at Holton Gate and Admiralty Park should both be included as part of the strategic employment site allocation. This would make the plan NPPF compliant in terms of being flexible (paragraphs 11a and 81d) and positive (paragraphs 16b and 81a).

The above changes would make the plan sound in terms of being positively prepared, justified and consistent with national policy.

**Please continue on a separate sheet if necessary.**

## PART B

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

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

<b>Proposed Main Modifications reference number</b>	
---	--

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

- Legally compliant    Yes     No
- Sound    Yes     No

#### To be considered legally compliant the proposed Main Modifications must:

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

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

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

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

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

**Please continue on a separate sheet if necessary.**

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

**Please continue on a separate sheet if necessary.**

## PART B

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

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

<b>Proposed Main Modifications reference number</b>	
---	--

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

- Legally compliant      Yes       No
- Sound                      Yes       No

### To be considered legally compliant the proposed Main Modifications must:

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

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

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

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

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

**Please continue on a separate sheet if necessary.**

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

**Please continue on a separate sheet if necessary.**



## PART C

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

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

<b>Document</b>	
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**Please continue on a separate sheet if necessary.**

<b>Please sign and date this form:</b>	
Signature: Brett Spiller	Date: 11/01/2021

**Consultee:**



**Event Name:** Purbeck Local Plan proposed Main Modifications

**Consultee reference:** 1190022

**Consultation reference:** 17

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## Response form for: Purbeck Local Plan proposed Main Modifications consultation

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

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

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

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

*continued overleaf*

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

- Review of capacity from small sites [SD88];
- Proposed amendments to HRA [SD89];
- Appropriate assessment statement [SD96];
- Addendum to SA re settlement hierarchy [SD92];
- Strategy for mitigating effects on European sites, and Green Belt changes at Morden [SD93];
- Summary of viability issues raised by respondents and Council / Dixon Seale response to those concerns [SD97];
- Examination stage – viability update Purbeck Local Plan [SD117];
- Memorandum of understanding between Dorset Council and Savills on viability related issues for housing sites around Wool October 2019;
- Memorandum of understanding between Dorset Council and Wyatt Homes on viability related issues for Lytchett Matravers and Upton October 2019;
- Memorandum of understanding between Dorset Council and the Moreton Estate on viability related issues for Moreton Station/Redbridge Pit October 2019;
- Proposed changes to care provision [SD95]; and
- Planning the care provision in Purbeck [SD115]

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

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






**PART A**

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

**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 support the representation

**Please note:**

- The consultation period starts on **Friday 13 November 2020** and will last for 8 weeks until 11.45pm on **Friday 8 January 2021**.
- Only representations made in this period will be referred to the Planning Inspector for consideration.
- Responses must be made using this form (sent in the post or attached to an e-mail) or online at this link  [www.dorsetcouncil.gov.uk/plp-main-modifications](http://www.dorsetcouncil.gov.uk/plp-main-modifications) .
- Respondents must complete Part A of this response form and separate Part B forms for each proposed Main Modification that they might wish to comment on.
- All respondents must provide their name and address and/or email address.
- All forms must be signed and dated.
- Responses cannot be treated as confidential. By making a response you agree to your name and comments being made available for public viewing.
- Information on the council's privacy policy is available on our website at:  
 [www.dorsetcouncil.gov.uk/your-council/about-your-council/data-protection/dorset-council-general-privacy-notice.aspx](http://www.dorsetcouncil.gov.uk/your-council/about-your-council/data-protection/dorset-council-general-privacy-notice.aspx) .
- The council will not accept any responsibility for the contents of comments submitted. We reserve the right to remove any comments containing defamatory, abusive or malicious allegations.
- If you are part of a group that shares a common view, please include a list of the contact details of each person (including names, addresses, emails, telephone numbers and signatures) along with a completed form providing details of the named lead representative.
- The proposed Main Modifications to the Purbeck Local Plan, proposed Purbeck Local Plan (2018-2034) policies map and the relevant background and evidence documents, are available to view on the Council's website at  [www.dorsetcouncil.gov.uk/plp-main-modifications](http://www.dorsetcouncil.gov.uk/plp-main-modifications) .
- Hard copies of the consultation documents are available to loan from libraries in Dorchester, Lytchett Matravers, Swanage, Upton, Wareham and Wool. Please contact the libraries separately to ascertain their opening times, availability of documents to loan and for full details of their procedures to restrict the spread of COVID-19. You must follow any procedures relating to the COVID-19 in the libraries.
- If you have questions relating to the consultation, or the process for making a response, please contact the Planning Policy team on  **01929556561** or  [planningpolicy@dorsetcouncil.gov.uk](mailto:planningpolicy@dorsetcouncil.gov.uk).
- Response forms returned in the post should reference the Purbeck Local Plan Proposed Main Modifications Consultation, Dorset Council, Spatial Planning Team and be sent to South Walks House, South Walks Road, Dorchester, DT1 1UZ.
- Please tick the box if you would like to be notified of the following:

Adoption of the Local Plan.

## PART B

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

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

<b>Proposed Main Modifications reference number</b>	MM26
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### 2. Do you consider that the proposed Main Modification is:

- Legally compliant      Yes       No
- Sound      Yes       No

### To be considered legally compliant the proposed Main Modifications must:

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

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

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

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

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

MM26 proposes text changes to Policy H1: Local housing requirement, including adding a table at the end identifying housing requirements for designated neighbourhood areas, where relevant. However, the text in the table for Lytchett Matravers and Wool gives the impression that no new homes are required at each of these locations, which is not consistent with other parts of the local plan. It should be revised by referring to the strategic allocations made by the local plan.

**Please continue on a separate sheet if necessary.**



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

The text in the right-hand column of the table proposed to be added to Policy H1: Local housing requirement should be changed as follows:

"Lytchett Matravers	Made neighbourhood plan does not seek to allocate housing sites, no specific housing requirement in accordance with the Council's housing strategy <b><u>beyond the 150 homes allocated by this plan (Policy H6)</u></b> "
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An equivalent change should also be made to the text covering the Wool emerging neighbourhood plan area.

**Please continue on a separate sheet if necessary.**

## PART B

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

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

<b>Proposed Main Modifications reference number</b>	MM28
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### 2. Do you consider that the proposed Main Modification is:

- Legally compliant    Yes     No
- Sound    Yes     No

### To be considered legally compliant the proposed Main Modifications must:

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

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

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

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

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

MM28 seeks to revise the text of Chapter 4 (Housing) paragraphs 116 and 118. In paragraph 116, some further changes are required to be consistent with other parts of the Local Plan and to carry out the Inspector's recommended Main Modifications. Changes are also required to avoid the Local Plan pre-determining the appropriate housing mix at the allocated sites in Lytchett Matravers and Upton, by requiring 'houses' rather than 'homes' or 'dwellings'.

**Please continue on a separate sheet if necessary.**

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

To address the above concerns, the third sentence of paragraph 116 should be revised as follows:

“These amendments will allow approximately 240 homes to be built at extensions to these settlements (**around** 90 ~~houses~~ **homes** at Upton and **around** 150 **homes** ~~houses~~ at Lytchett Matravers), which will contribute towards providing a balanced spread of housing development across the District.”

**Please continue on a separate sheet if necessary.**

**Consultee:**



**Event Name:** Purbeck Local Plan proposed Main Modifications

**Consultee reference:** 1188470

**Consultation reference:** 18

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MM1 – M N Hill

## Response form for: Purbeck Local Plan proposed Main Modifications consultation

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

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

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

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

*continued overleaf*

## PART A

	Your contact details	Agent's Details (if applicable)
Name	[REDACTED]	
Organisation / Group (if applicable)	[REDACTED]	
Address line 1	[REDACTED] [REDACTED]	
Address line 2	[REDACTED]	
Town / City	[REDACTED]	
County	[REDACTED]	
Post Code	[REDACTED]	
E-mail address	chrisnigelhill@aol.com	

### 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 support the representation

Moreton PC : 5*
Moreton : 218**
Crossways : 1650**

\* = Moreton Parish Council  
\*\*= based on household surveys of Moreton and Crossways

- Please tick the box if you would like to be notified of the following:

Adoption of the Local Plan.

## PART B

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

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

Proposed Main Modifications reference number	MM 1
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### 2. Do you consider that the proposed Main Modification is:

- Legally compliant    Yes     No
- Sound    Yes     No

### To be considered legally compliant the proposed Main Modifications must:

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

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

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

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



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

Sound:

- positively prepared ..... X
- justified ..... X
- effective .....
- consistent with national policy... X

MM1 is not sound.

**The table of Strategic or Non-strategic policies contains inconsistencies.**

1. Policies E1 and E2. It is wrong for Policy E1 to be considered as strategic and Policy E2 to be non-strategic since they are both key components of Purbeck's main industry: tourism. The NPPF on page 9 in sub-paragraph 20.d) includes *the historic environment*.
2. Policy E3. Adapting to climate change is one of the NPPF's 3 objectives on page 5 of the NPPF (Feb 2019). Integral to adaption is the use of renewable energy. Policy E3 should be a strategic policy.
3. Policy E11. The Purbeck Local Plan on page 17 refers to *improving the quality of life for the local community*. As anyone who has passed close to the sewage works in Dorchester or outside Winfrith will know, the smell can be very unpleasant. Policy E11 implements the Local Plan's vision quoted above and should be strategic.
4. Policies EE2,EE3,EE4. It seems strange to have a policy EE2 as Strategic on planning for employment and then to rank Policies EE3 and EE4 as non strategic. Policies EE3 and EE4 are concerned with the 2 dominant employment sectors in Purbeck and should be considered as strategic. EE3 and EE4 affect people's livelihoods and are in fact more important than EE2 which is more in the realms of philosophy.
5. The NPPF has a specific chapter (7) on *Ensuring the vitality of town centres*. Given this weight of evidence, the Policy EE3 should be a strategic policy.
6. The NPPF has a specific chapter (6) on *Building a strong, competitive economy*. Tourism is the principle economic activity in Purbeck and indeed in Dorset. Following the NPPF's lead, Policy EE4 should be a strategic policy.
7. Policy I5. The Moreden Park SANG and holiday park are commercial enterprises. No other SANG has a strategic policy. The Purbeck Local Plan should not have a commercial enterprise as a strategic policy. Policy I5 does not fit the criterial for strategic policies in the NPPF on page 9 in paragraph 21.
8. Policy I6. Policy 6 is a strategic policy but health and social care in Wareham will be delivered and prioritised by the Clinical Commissioning Group, the NHS, and the

private sector. Policy I6 should be a non-strategic policy

New paragraph: ***Application of the Plan*** (page 20)

9. This is an entirely new paragraph. There is no reference to any part of the Purbeck Local Plan or any document presented to the Examination inquiry in 2019.
10. The paragraph contains no references to any Dorset Council documentation.
11. The paragraph contains the sentence:  
  
***The preparation and adoption of the Dorset Council Local Plan provides a mechanism for ensuring that housing need above the capped figure defined in this local plan is provided as soon as possible.***
12. The start date of the Purbeck Local Plan is 2018 and the 5 year review point according to the NPPF is 2023. The West Dorset Local Plan was adopted in 2015 and its review had been progressed significantly until it was stopped by the creation of Dorset Council. The Dorset Council Local Plan will presumably use household projections based upon ONS sub-national population projections for the Dorset Council sub-areas.
13. The use of the word capped is erroneous and wrong. The Purbeck Housing need was not capped but based upon ONS sub-national population predictions.
14. Thus the housing need across the Purbeck is already being considered as part of the construction of the Dorset Local Plan.
15. In effect the Purbeck Local Plan housing allocations have already been superseded by the work on the Dorset Council Local Plan.
16. The sentence above in bold italics is, therefore, misleading and has been overtaken by work on the Dorset Council Local Plan.
17. It should, therefore, be deleted.

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

### **The table of Strategic and Non-Strategic Policies**

1. The Purbeck Local Plan has 63 mentions of the word Strategic. The word strategic is also used in the Main Modifications. But neither document describes what it means by the term strategic,

2. The University of Cambridge Dictionary (online) defines strategic as:

*Helping to achieve a plan, for example in business or politics*

3. The Table of Strategic or Non-strategic therefore contains policies that help to achieve the plan: strategic policies; and policies that don't help to achieve the plan: non-strategic.

4. This means that in effect the non-strategic policies are subordinate to the strategic policies', and that the plan primarily relies on the strategic policies. Thus instead of the rather grandiose but fairly meaningless titles Strategic and Non-Strategic, it would be far more helpful to title the columns *Help to achieve the plan* and *Subordinate policies*. This accords with the NPPF criterion on page 9.

5. The following policies should be changed from Non-Strategic to Strategic because they directly help to achieve the plan:

Policy E2, E3  
Policy E11  
Policy EE3, EE4.

6. The following policies should be changed from strategic to non-strategic:

I5. I6.

#### **New paragraph: *Application of the plan***

7. Delete the sentence:

***The preparation and adoption of the Dorset Council Local Plan provides a mechanism for ensuring that housing need above the capped figure defined in this local plan is provided as soon as possible.***

8. I suggest the sentence is replaced by:

'The Dorset Council Local Plan is in the course of production and will presumably use ONS sub-national population predictions to assess household need in each of its constituent areas, including the area covered by the Purbeck Local Plan.'



MM2 – M N Hill

## Response form for: Purbeck Local Plan proposed Main Modifications consultation

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

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

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

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

*continued overleaf*

# PART A

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

### 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 support the representation

Moreton PC : 5*
Moreton : 218**
Crossways : 1650**

\* = Moreton Parish Council  
\*\*= based on household surveys of Moreton and Crossways

- Please tick the box if you would like to be notified of the following:

Adoption of the Local Plan.

## PART B

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

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

Proposed Main Modifications reference number	MM 2
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### 2. Do you consider that the proposed Main Modification is:

- Legally compliant    Yes     No
- Sound    Yes     No

### To be considered legally compliant the proposed Main Modifications must:

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

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

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

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

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

Sound

- positively prepared .....
- justified ..... X
- effective ..... X
- consistent with national policy... X

1. The second bullet is very difficult to understand. What does the sentence

*interpret these policies (through an objective consideration of the language used in the policy, read in its proper context);*

mean?

2. The MHCLG document *Planning for the future* states on page 26 on the right hand side, that Local Plans should:

- *communicate key information clearly and visually so that plans are accessible and easily understandable,*

3. The proposed sentence in paragraph 1 above fails *the Planning for the future* condition of communicating clearly.

4. The paragraph on page 22 refers to an annex which contains 29 document titles. The paragraph states that *The list of documents is not exclusive or exhaustive. Other documents may be relevant.....*

5. The MHCLG document *Planning for the future* states on page 26, left hand side, last paragraph, that:

*Layers of assessment, guidance and policy have broadened the scope of Local Plans, requiring a disproportionate burden of evidence to support them.*

6. The reference to over 29 documents in MM2 fits exactly what the *Planning for the future* quote is referring to, layers upon layers of ..*assessment, guidance and policy ...*

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

7. The second bullet point should say:

- The Local Plan policies have been written so as to be clear and unambiguous. The policies say what they mean and mean what they say.

8. The text on page 22 should be replaced by the following:

**The documents listed in the appendix do not form part of the development plan, but provide guidance to applicants. The list of documents is not exclusive or exhaustive. Other documents may be relevant to applicants. The Council will advise applicants which documents it considers relevant to the proposed application.**





MM3 – M N Hill

## Response form for: Purbeck Local Plan proposed Main Modifications consultation

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

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

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

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

*continued overleaf*

## PART A

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

### 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 support the representation

Moreton PC : 5*
Moreton : 218**
Crossways : 1650**

\* = Moreton Parish Council  
\*\*= based on household surveys  
of Moreton and Crossways

- Please tick the box if you would like to be notified of the following:

Adoption of the Local Plan.

## PART B

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

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

Proposed Main Modifications reference number	MM 3
--	------

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

- Legally compliant    Yes     No
- Sound    Yes     No

### To be considered legally compliant the proposed Main Modifications must:

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

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

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

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

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

Sound

- positively prepared .....
- justified ..... x
- effective ..... x
- consistent with national policy... x

1. The proposed deletion of Wareham in paragraph 43 is not agreed. Wareham has ample scope to remove land from the green belt.

2. The proposed additional sentence in paragraph 43 states:

***...the relative accessibility of some of the other settlements, notably ... Moreton Station/Redbridge Pit.***

3. This is wrong.

4. Moreton Station/Redbridge Pit can only be accessed on single carriageway roads from all directions. The train service is totally insufficient as indicated by the less than 2% of the population which uses the train service, the lowest percentage and actual number of people who use the train in Purbeck. There is no bus service in Moreton Station/Redbridge Pit.

5. Crossways (not in Purbeck) has an insufficient bus service used by only 2% of the population of Crossways.

6. There is no employment in Moreton Station/Redbridge Pit and virtually no employment in Crossways.

7. By comparison Wareham is outstandingly more accessible than Moreton Station/Redbridge Pit.

8. Swanage is also far more accessible and sustainable than Moreton Station/Redbridge Pit. Wool is more accessible than Moreton Station/Redbridge Pit.

9. In paragraph 44 the addition of the statement **within the context of the settlement hierarchy** is entirely wrong and should be deleted. Swanage is at the top of the settlement hierarchy and has no allocation in the Purbeck Local Plan, Moreton Station is amongst the smallest settlements in Purbeck (90 houses).

10. The Settlement Hierarchy has been wrongly constructed – see my comments in MM4 on the Settlement Hierarchy.

11. The deleted section on Paragraph 44 should be reinserted, especially in the wake of Covid-19 and its impact on shops in town centres.

---

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

9. Reinsert Wareham in paragraph 43.

10. The original sentence should be reinstated in paragraph 43 and the proposed new sentence starting ***It also needs*** ... should be deleted..

11. Moreton Station/Redbridge Pit is not more sustainable than Wareham, Swanage, Upton, Wool or Bere Regis. It is patently untrue to say otherwise and no evidence has been supplied to support this statement.

12 Moreton Station/Redbridge Pit is not as accessible as Wareham, Swanage, Upton, Wool and Bere Regis. It is patently untrue to say otherwise and no evidence has been supplied to support this statement,

13. In paragraph 44 the proposed statement,....***within the context of the settlement hierarchy.*** should be deleted as it is not true.

14. The proposed deletion in paragraph 44: *and town and local centres (EE3)*, should be retained in paragraph 44.



MM5 – M N Hill

## Response form for: Purbeck Local Plan proposed Main Modifications consultation

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

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

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

*continued overleaf*



## PART A

	Your contact details	Agent's Details (if applicable)
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### 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 support the representation

Moreton PC : 5*
Moreton : 218**
Crossways : 1650**

\* = Moreton Parish Council  
\*\*= based on household surveys of Moreton and Crossways

- Please tick the box if you would like to be notified of the following:

Adoption of the Local Plan.

## PART B

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

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

Proposed Main Modifications reference number	MM 5
--	------

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

- Legally compliant    Yes     No
- Sound    Yes     No

### To be considered legally compliant the proposed Main Modifications must:

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

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

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

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



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

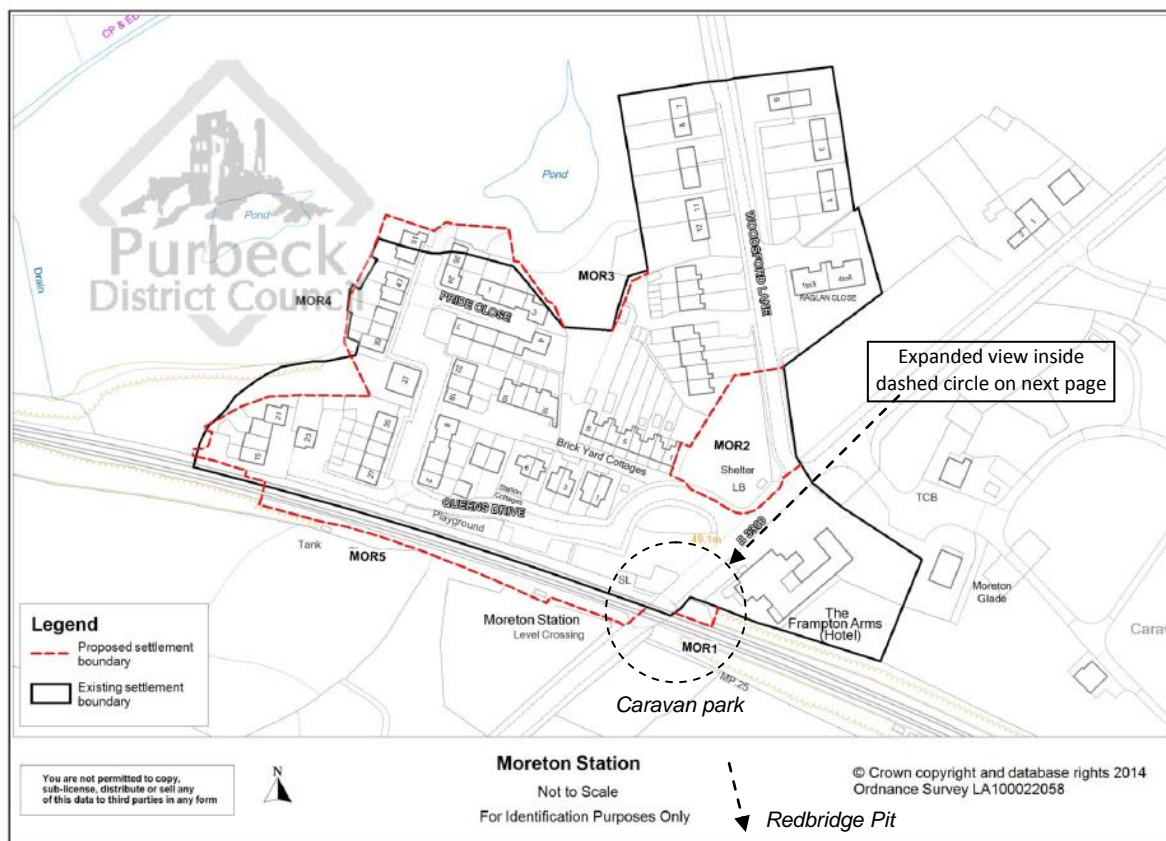
**Sound**

- positively prepared ..... X
- justified ..... X
- effective ..... X
- consistent with national policy... X

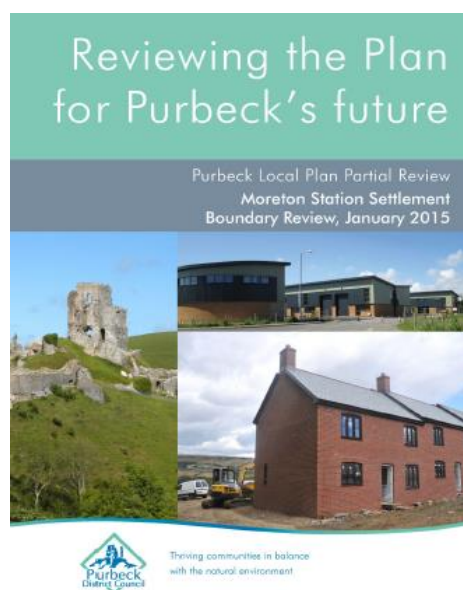
**Moreton Station settlement boundary and Redbridge Pit**

**Moreton Settlement Boundary Review Background Paper – January 2015**

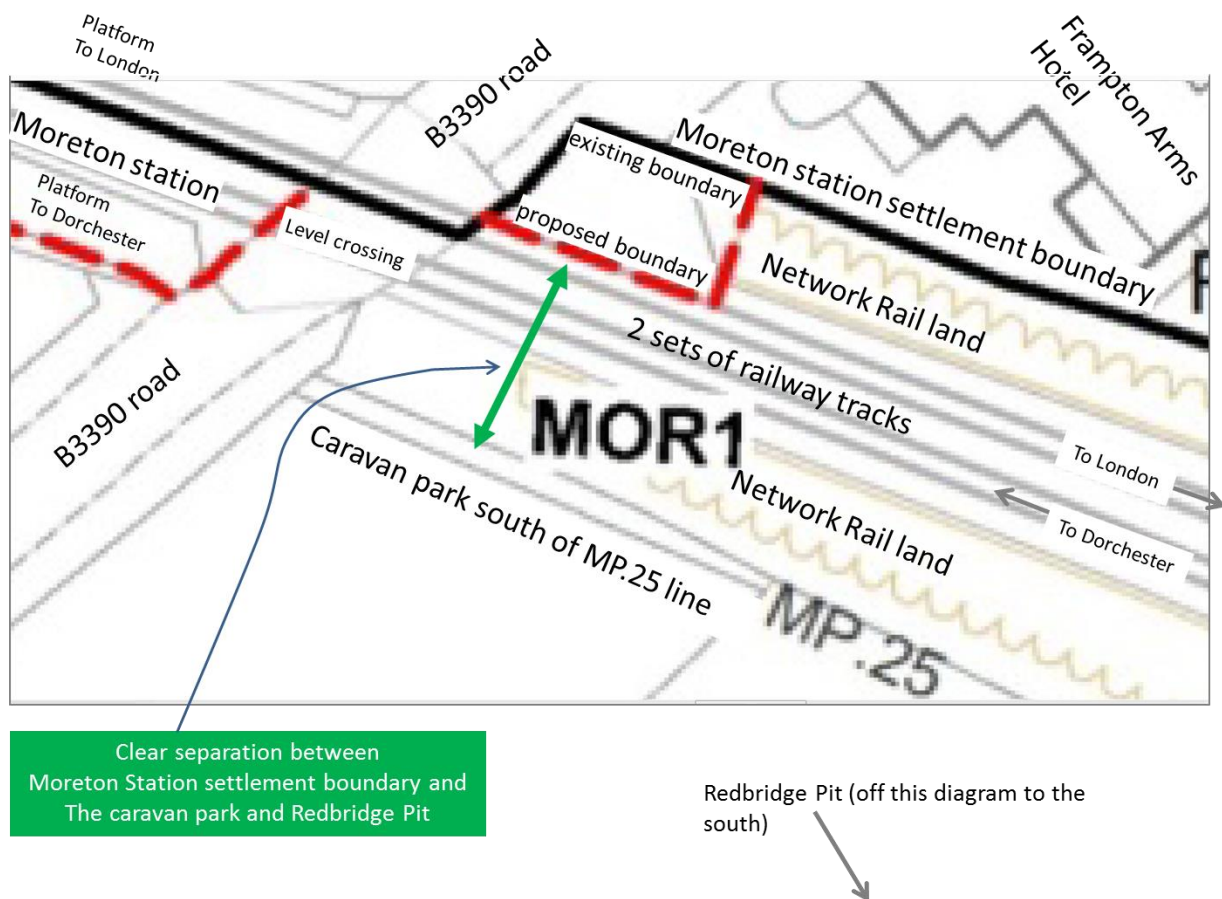
**Map of the existing and proposed settlement boundary**



1. The above diagram has been copied from the Purbeck District Council document *Reviewing the Plan for Purbeck's future, Moreton Station Settlement Boundary Review, January 2015*. A copy of the document cover is given below.



2. I have added the words *Caravan park* and *Redbridge Pit* and the dashed arrow pointing to Redbridge Pit which is off the bottom right hand side of the diagram
3. The *Purbeck District Council* document clearly shows that both the *Existing settlement boundary* (solid black line) and *Proposed settlement boundary* (dashed red line) are north of the double track railway land at their nearest point to *caravan park*.
4. The diagram below shows the area inside the dashed circle on the diagram above and shows the closest proximity of Moreton Station settlement boundary to the boundary of the caravan park.
5. Redbridge Pit is at least a hundred metres south of the line MP.25.
6. The diagram has been obtained by selecting 800% on the *Reviewing the Plan for Purbeck's future* pdf display

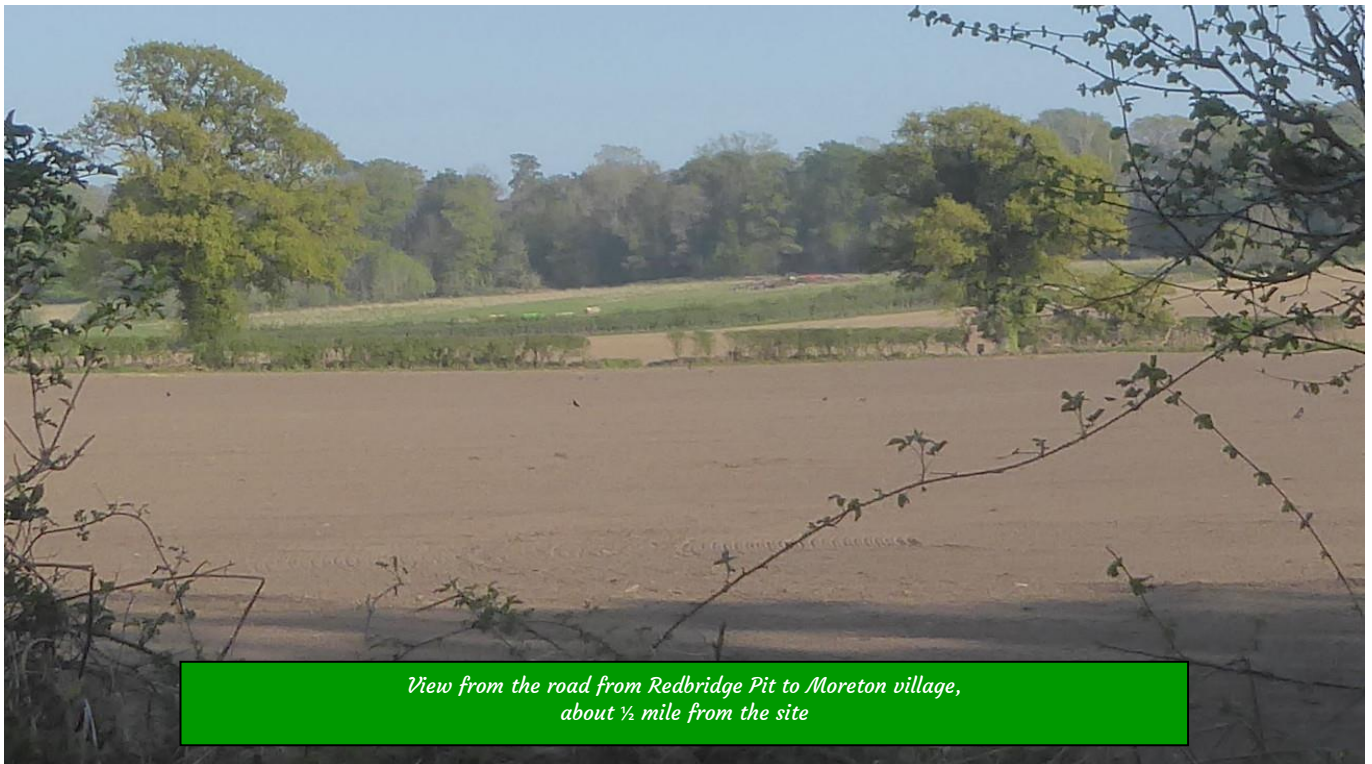


7. The Purbeck District Council diagram clearly and irrefutably shows that the caravan park and Redbridge Pit which is south of the caravan park, and even further away from the Moreton Station settlement boundary, are not within or adjoining either the existing or proposed Moreton Station settlement boundaries.
8. The Cambridge University English Dictionary online defines adjoin as *..with nothing in between or touching*. Clearly the caravan site is not adjoining Moreton Station Settlement and Redbridge Pit is even further away.

### Redbridge Fields – a greenfield site

9. For planning purposes all quarries are designated as green fields. Therefore Redbridge Pit is to be considered as a green field for planning purposes.
10. It is far more appropriate for the Purbeck Local Plan to refer to Redbridge Fields since that is what the site should be considered as now and will be in less than 2 years time.
11. The one building on Redbridge Pit is to be demolished as part of the site restoration before 2022.
12. Thus in 2023 Redbridge Pit will be a green field with no buildings on it, in open countryside, and not in, or adjoining Moreton Station settlement boundary.

13. The photo below shows how in planning terms the Redbridge Pit site should be considered now and approximately how it will look at the end of 2022 when it has been restored.



14. As illustrated above Redbridge Fields are definitely not now and will not be a brownfield site once restored.
15. The Purbeck Local Plan is committed to the restoration of Redbridge Pit which is already underway.
16. The caravan park contains toilets and site buildings concerned with the running of the site, otherwise it is a green field in open countryside and is not in Moreton Station settlement boundary or adjoining it.

### **Redbridge Fields in the parish of Moreton**

17. It is wrong to associate Redbridge Pit with Moreton Station as in MM5 **Amended Policy** paragraph 2 on page 30: ...Moreton Station/Redbridge Pit.. because Redbridge Pit is not in or adjoining Moreton Station Settlement Boundary as the Purbeck District Council diagram above clearly shows
18. It is more accurate to simply link Redbridge Pit with the parish of Moreton as in Redbridge Pit/Moreton.



## Redbridge Fields and the NPPF

19. The NPPF on page 22, paragraph 79 states:

*Planning policies and decisions should avoid the development of isolated homes in the countryside unless one or more of the following circumstances apply:*

20. None of the exceptions in the NPPF paragraph 79 have been quoted for allowing housing development on Redbridge Fields.

21. The NPPF in Chapter 11, which the Main Modifications quotes on page 29 at the first ●, also prohibits development in the open countryside in rural areas. Redbridge Fields (Redbridge Pit) is a green field in open countryside in a rural area.

22. Both the Purbeck Local Plan Submission Draft Policy 8 (page 66/Adobe 68) and the Main Modification (MM) 43 **Amended Policy** (pages 135-136) prohibit development on land which does not adjoin a settlement boundary. Redbridge Fields (Redbridge Pit) does not adjoin Moreton Station settlement boundary and is a green field in open countryside.

23. Therefore, MM4 and MM35 cannot proceed.

24. In summary, development of **around** 490 houses and **around** 65 **extra care units** on Redbridge Fields (Redbridge Pit) is not permitted by both the NPPF and by the Purbeck Local Plan Submission and the Main Modifications documents.

### Amended policy, paragraph 5

25. The **Amended policy** paragraph 5 of MM5 on page 30 states that:

**5. High quality small scale development on unallocated sites within the boundaries of settlements listed in the hierarchy or on small sites, outside the Green Belt, adjoining existing settlement boundaries of towns, key service villages, local service villages and other villages with a settlement boundary will be supported where:**

**● the scale of development is proportionate to the size and character of the existing settlement;**

**● development does not harm the character and value of any landscape or settlement either individually or cumulatively through the size, appearance and layout of proposed homes;**

**● development contributes to a mix of different types and sizes of homes (as specified in relevant policies); and**

**● development would not have an adverse effect on the integrity of European sites.**

26. Redbridge Pit:

a. Is not ....**within the boundaries of settlements listed in the hierarchy or on small sites** – it is not within Moreton Station settlement boundary.

b. Is not .... **adjoining existing settlement boundaries of towns, key service villages, local service villages and other villages with a settlement boundary**

c. .... **scale of development is** NOT **proportionate to the size and character of the existing settlement;** in Moreton. Moreton Station settlement has 90 houses, the proposed development has **around 490 houses** (page 29) and **around 65 units of extra care facilities** (page 30). The proposed scale of development is clearly disproportionate to the size and character of the rural parish of Moreton and the nearest settlement of Moreton Station.

d. ... **development** DOES **harm the character and value of any landscape or settlement either individually or cumulatively through the size, appearance and layout of proposed homes;** by virtue of the fact that Moreton is a rural parish in which much of the population is dispersed around the parish. Moreton Station settlement has 90 houses, the proposed development has **around 490 houses** (page 29) and **around 65 units of extra care facilities** (page 30). The dominant landscape character consists of fields with mature trees on their boundary. As shown in the photo above Redbridge Pit will be restored to fields and trees in less than 2 years to blend in with the landscape of the rest of Moreton Parish. Moreton Parish has great historical links to both Lawrence of Arabia and the birth of the trade union movement, a level of historical significance that few other parishes in Purbeck or Dorset can match.

e... **development would** HAVE **an adverse effect on the integrity of European sites** – the proposed site is very close to Egdon Heath and the proposed very large increase in Moreton's population due to the proposed development of **around 490 new homes** and **around 65 extra care facilities** will promote its degradation.

## **MM5 is not sound**

### **The Local Plan is not positively prepared**

27. Main Modification 5 is not positively prepared because it does not provide a strategy to meet the area's assessed housing need.
28. The Moreton Parish (Moreton Station plus Moreton Village) housing need was assessed by Purbeck District Council in 2015 as 1.
29. There is, therefore, no housing requirement for 489 houses and 65 care units on Redbridge Pit.
30. Crossways housing need is amply satisfied by the housing proposals in the *Joint Local Plan Review for West Dorset and Weymouth & Portland, Preferred Options Consultation, August 2018*.

### **The Local Plan is not justified**

31. The proposed policy is not based on proportionate evidence. Purbeck District Council has assessed Moreton's housing need is 1 not 490.
32. D92 states on page 22 in paragraph 90 that:

*90. Moreton Station has one of the highest populations of under 65s in Purbeck.*
33. D92 states on page 17 in paragraph 60 that:

60. Swanage also has the highest percentage of over 65s,
34. The **around 65 units of extra care units** are needed in Swanage not in Moreton parish. Swanage is about 20 miles away from Redbridge Fields. The Purbeck Local Plan and Main Modifications contain no extra care units for Swanage.

### **The Local Plan is not effective**

35. The Purbeck Local Plan contains absolutely no evidence of joint working on cross-boundary strategic matters.
36. The Local Plan contains no statement of common ground with West Dorset District Council or with Dorset Council.
37. The Local Plan completely ignores the proposals in the *Joint Local Plan Review for West Dorset and Weymouth & Portland, Preferred Options Consultation, August 2018*.
38. The Local Plan refers a shop on Redbridge Pit without any reference to any cross-border consultation with Crossways, West Dorset District Council or Dorset Council.

39. The water, sewerage and electricity providers to Crossways have formally stated that they do not have the capacity to supply the proposed development
40. Broadband supply is already barely capable of coping with demand. For example when Zoom Parish Council meetings are held in Moreton involving about 6 separate people at least 2 only have audio but no video provision. Crossways Parish Council suffers a similar broad band shortfall.
41. There is nothing definite in the Local Plan about health service provision unlike the provision for Wareham in strategic policy *16 Wareham integrated health and social care*.

**The Local Plan is not consistent with national policy**

42. The Main Modification 5 proposals for Redbridge Fields (Redbridge Pit) are not in accordance with the NPPF as indicated above.
43. The Local Plan will not enable the delivery of sustainable development because there no provision in the Local Plan for employment in Moreton for the economically active inhabitants of the proposed around 490 new homes.
44. The proposed development will not be sustainable quite simply because there is nothing to sustain it – no infrastructure, no services, no employment, no evidence of cross-boundary working, no water, no electricity and no sewerage. Nothing.
45. The proposal would be sporadic development in rural countryside.



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

#### **Redbridge Fields (Redbridge Pit) – proposed developments**

1. The proposed ***around 490 new homes*** and ***around 65 extra care facilities*** on Redbridge Fields(Redbridge Pit) and the caravan park should be deleted from the Purbeck Local Plan and the Main Modifications.
2. Purbeck District Council documentation clearly shows that Redbridge Fields(Redbridge Pit) and the caravan park do not adjoin Moreton Station Settlement.
3. Hence the proposed development of ***around 490 new homes*** and ***around 65 extra care facilities*** on Redbridge Fields(Redbridge Pit) and the caravan park are explicitly not permitted by the Purbeck Local Plan Submission and the Main Modifications, including Policy H8 *Small sites next to existing settlements* and the NPPF.

#### **Redbridge Fields (Redbridge Pit) – a green field site**

4. Redbridge Pit as a quarry is classified in planning terms as a green field. The site restoration plan to which the Purbeck Local Plan Submission, Main Modifications and NPPF are committed will result in the site being restored to a collection of fields and trees very similar to the photo above.
5. It is thus far more appropriate to refer to the site in the Purbeck Local Plan final version as Redbridge Fields (Redbridge Pit) since this title reflects the site's planning, and within 2 years, actual status.
6. The site should be referred to throughout the Purbeck Local Plan and Main Modifications simply as Redbridge Fields (Redbridge Pit)Pit and not associated with Moreton Station because the site is not within or adjoining Moreton Station settlement boundary. Redbridge Fields are simply a collection of fields in open countryside in the rural parish of Moreton.
7. Any development on Redbridge Fields (Redbridge Pit) would classify in planning terms as 'sporadic development in the countryside' and as such is against the guidance in the NPPF as discussed above.



MM6 – M N Hill

## Response form for: Purbeck Local Plan proposed Main Modifications consultation

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- Habitats Regulations Assessment (HRA);
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*continued overleaf*

## PART A

	Your contact details	Agent's Details (if applicable)
Name	[REDACTED]	
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Address line 1	[REDACTED] [REDACTED]	
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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 support the representation

Moreton PC : 5*
Moreton : 218**
Crossways : 1650**

\* = Moreton Parish Council  
 \*\* = based on household surveys of Moreton and Crossways

- Please tick the box if you would like to be notified of the following:

Adoption of the Local Plan.

## PART B

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

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

Proposed Main Modifications reference number	MM 6
--	------

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

- Legally compliant    Yes     No
- Sound    Yes     No

### To be considered legally compliant the proposed Main Modifications must:

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

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

- positively prepared - providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs;
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**3. Please give details of why you consider the proposed Main Modification is / is not legally compliant or sound.** (Please be as precise as possible).

**Sound**

- positively prepared .....
- justified ..... X
- effective ..... X
- consistent with national policy... X

**Paragraph 46 – town and key service village**

1. This paragraph is far too vague to be acceptable.
2. The amended paragraph 46 states that:

*Removing land from the green belt will allow new homes to be delivered in sustainable locations around ~~two~~ **one** of the District's **Purbeck's** towns and one of its larger **key service** villages, where there is a strong demand for housing.*

3. Which **town** and **key service** village are being referred to in this paragraph?
4. Without this information it is impossible to make sense of paragraph 46.
5. This paragraph needs to name the town and key service village.

**Paragraph 46 – Green Belt**

6. Paragraph 46 state in the last sentence:

*....(SANGs) at Lytchett Matravers and Wareham **Morden Park** will improve levels of accessibility into the green belt and help to offset some of the impacts of removing land **from the Green Belt.***

7. There is no indication how the **Morden Park** SANG will offset some of the impacts of removing land **from the Green Belt.**
8. A study of the NPPF (February 2019) Chapter 13 starting on page 40 would appear to indicate that the Purbeck Planners have misunderstood the reason for the Green Belt.
9. It is very difficult to see any justification for this action in the NPPF Chapter 13.
10. Main Modification 6, paragraph 46 needs to be redrafted and then circulated for consideration.

## Paragraph 47 – opening paragraph

11. The opening paragraph includes the proposed amendment ...and facilities delivery of SANG.....
12. What does this mean? I have no idea and there is no explanation.
13. The SANG is to be achieved by removing land from the Green Belt (paragraph 46).
14. Again it strongly indicates a lack of awareness of the role of the green belt in the NPPF Chapter 13.
15. This proposed amendment needs an explanation of how the removal of the Green Belt is compatible with unexplained facilities delivery.

## Paragraph 47 – 8<sup>th</sup> • (numbering is far more helpful than a succession of •s)

16. This states:

**•releasing land from the green belt at Morden Park will act as enabling development for delivery of a strategic SANG, which will in turn mitigate the effects of new homes on protected heathland in the north of Purbeck;**

17. A misunderstanding of the role of the Green Belt as stated in the NPPF Chapter 13.
18. There is nothing in NPPF Chapter 13 about releasing land to mitigate the effect of new homes on protected heathland.
19. The Green Belt and Heathland are two entirely separate designation and releasing Green Belt land cannot be used as a mitigation for the effects of new homes on protected heathland.
20. The submission draft text does not mention the word heathland let alone the effects of new homes on protected heathland?
21. MM4 and MM5 provide no indication that some of the proposed houses will have effects on protected heathland.
22. Paragraph 47 8<sup>th</sup> • needs to be redrafted to reflect the role of the Green Belt and acknowledge that nowhere in the NPPF chapter on Green Belts is the word 'mitigate' used let alone the removal of Green Belt land to mitigate for another designation.

## **Not Sound**

23. **Justified.** No alternatives have been presented to the release of Green Belt land.
24. **Effective** This policy is not effective because no evidence has been presented to show that removing land from the Green Belt will achieve the outcomes described.
25. **Consistent with national Policy.** This Main Modification is not consistent with the NPPF Chapter 13.

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

26. Paragraph 46 needs to name the town and key service village.
27. Paragraph 47 – opening paragraph. The proposed amendment needs to explain how the removal of land from the Green Belt is compatible with the delivery of unexplained facilities.
28. Paragraph 47 – 8<sup>th</sup> ●. – Needs to be redrafted to reflect the role of the Green Belt and explain how, in spite of the NPPF Chapter 13 on the Green Belt not mentioning the word mitigate, the removal of Green Belt land can mitigate effects on heathland.



MM25 – M N Hill

## Response form for: Purbeck Local Plan proposed Main Modifications consultation

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

*continued overleaf*



# PART A

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

### 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 support the representation

Moreton PC : 5*
Moreton : 218**
Crossways : 1650**

\* = Moreton Parish Council  
\*\*= based on household surveys of Moreton and Crossways

- Please tick the box if you would like to be notified of the following:

Adoption of the Local Plan.

## PART B

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

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

Proposed Main Modifications reference number	MM 25
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### 2. Do you consider that the proposed Main Modification is:

- Legally compliant    Yes     No
- Sound    Yes     No

### To be considered legally compliant the proposed Main Modifications must:

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

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

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

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

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

Sound

- positively prepared .....
- justified .....
- effective .....
- consistent with national policy... X

**Calculation of the number of houses per year**

1 The amended text in paragraph 110 states:

**Using the standard methodology for calculating local housing need, and after applying the necessary cap, the Council has calculated an annual need for 180 new homes per year.**

2 How the number of 180 new homes per year has been derived is explained by the text which is proposed to be deleted:

~~The 2018 SHMA update indicates a local housing need of 168 homes per year.  
and~~

~~The ratio between median house prices and workplace earnings in Purbeck in 2017 stood at 11.1. To take into account this overall challenge to affordability in Purbeck, in accordance with the government's standard methodology, the local housing need assessment incorporates a 42% uplift to take into consideration the need for affordable housing.~~

3 Without this text in paragraph 2 above it will be impossible for future planners to understand how the proposed wording in paragraph 1 above has been derived:

**.....an annual need for 180 new homes per year the words**

**Capped and Around**

4 Paragraph 110 also includes the proposed wording:

**...any housing need above the capped level...**

5 MM5 (page 29) proposes the wording ...**around...** in conjunction with the number of proposed houses in each allocation.

6 The word **capped** in MM25 is incompatible with **around** in MM5

## Reviewing and updating

7 The proposed wording to be added to paragraph 110 states:

**The Council is committed to reviewing and considering an update, to the strategic policies in this local plan**

8 This is disingenuous. Purbeck Council was and Dorset Council is required by the NPPF to review and update their Local Plan.

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

### **Soundness**

- 9 **Consistent with national policy.** The proposals above clearly indicate that MM25 is not consistent with national policy.
- 10 The proposed deletion of the calculation of housing need, the capping of housing allocations and the lack of any reference to the NPPF in reference to reviewing the Local Plan are not consistent with national policy.

### **Paragraph 110.**

- 11 The proposed deletions should be retained in paragraph 110.
- 12 The word **capped** in the proposed new wording for paragraph 110 should be replaced by the word *around*.
- 13 The proposed wording at the end of paragraph 110 should indicate that the review and update are processes mandated by the NPPF.



MM26 – M N Hill

## Response form for: Purbeck Local Plan proposed Main Modifications consultation

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

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

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

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

*continued overleaf*

## PART A

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### 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 support the representation

Moreton PC : 5*
Moreton : 218**
Crossways : 1650**

\* = Moreton Parish Council  
\*\*= based on household surveys of Moreton and Crossways

- Please tick the box if you would like to be notified of the following:

Adoption of the Local Plan.

## PART B

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

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

<b>Proposed Main Modifications reference number</b>	MM 26
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### 2. Do you consider that the proposed Main Modification is:

- Legally compliant      Yes       No
- Sound                      Yes       No

#### To be considered legally compliant the proposed Main Modifications must:

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

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

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

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



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

Sound

- positively prepared .....
- justified ..... x
- effective ..... x
- consistent with national policy... X

**Purbeck Local Plan conformity with the NPPF**

- 1 The NPPF states on page 7 in paragraph 13 that:

*Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies.*

- 2 The NPPF states on page 10 in paragraph 2

*Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies<sup>16</sup>.*

*16 Neighbourhood plans must be in general conformity with the strategic policies contained in any development plan that covers their area.*

- 3 These 2 quotes from the NPPF show that the Local Plan has primacy over the Neighbourhood plan.

- 4 The amendment to Policy H1 in MM26, (page 85) states

**The table below identifies a housing requirement for designated neighbourhood areas where a made, or emerging, neighbourhood plan allocates land for new homes in support of the Council's strategy for meeting Purbeck's housing needs**

- 5 Note that there is no indication of the Council's strategy for housing in the 6 neighbourhood areas, that is there are no explicit Purbeck Plan housing proposals, only Neighbourhood Plan proposals.
- 6 MM5 (pages 29+30) states that it is the Neighbourhood Plan housing proposals that are used in Bere Regis (105 homes) and Wareham (207 homes). There is no indication of a Purbeck housing requirement in these locations. The table in MM26, page 85 makes no mention of strategic housing requirements for Bere Regis and Wareham.

- 7 Thus from the table in MM5 and the table in MM26, housing allocations for Lytchett Matravers and Wool are part of the strategic allocated list of sites and Bere Regis and Wareham are housing totals based upon Neighbourhood Plans.
- 8 But according to the quote above from the NPPF on page 7, paragraph 13 states that Purbeck should have its own strategic allocations for all the named sites in MM5.
- 9 The situation is made even worse by the fact that the Wareham Neighbourhood Plan is only **an emerging neighbourhood plan**. It is entirely conceivable that an Inspector may consider that more housing can be obtained in Wareham through densification (MHCLG's *Planning for the future*, August 2020).

### **Not Sound**

- 10 **Not Justified**. – This strategy does not take into account all reasonable alternatives. It simply accepts the housing totals in Neighbourhood Plans without any challenge as indicated in the tables in MM30 and MM5.
- 11 **Not Effective** – There is no evidence of joint working, especially with West Dorset Council when it was in existence.
- 12 **Not Consistent with National Policy** - MM26 is not consistent with National Policy. Instead of quoting Strategic housing requirements for Bere Regis and Wareham it simply accepts the housing requirement in the Neighbourhood Plan

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

- 13 The Major Modifications should state the strategic housing totals for all the sites chosen for housing.
- 14 If the individual strategic housing totals are exactly the same as the corresponding individual Neighbourhood Plan housing totals then it something is wrong. Individual strategic totals will invariably be larger than Neighbourhood Plan totals because the priority of the two organisations are inherently different.
- 15 Neighbourhood Plans invariably indicate the lowest number of houses a community will tolerate.
- 16 Strategic individual settlement housing totals represent the maximum number of houses a Planning Authority considers it can allocate in an individual location in order to achieve an overall housing total which it has been given by the ONS.
- 17 Thus objective of a settlement neighbourhood plan and the objective of a planning authority are markedly different.
- 18 The Main Modifications should state its strategic settlement totals and an apology to individual settlements that it has not been possible to allocate a lower total consistent with the totals in the individual Neighbourhood Plans.
- 19 MM26 should be redrafted to be consistent with National Policy and not consistent with the wishes of individual settlements.



MM27 – M N Hill

## Response form for: Purbeck Local Plan proposed Main Modifications consultation

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

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

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

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

*continued overleaf*

## PART A

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### 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 support the representation

Moreton PC : 5*
Moreton : 218**
Crossways : 1650**

\* = Moreton Parish Council  
\*\*= based on household surveys of Moreton and Crossways

- Please tick the box if you would like to be notified of the following:

Adoption of the Local Plan.

## PART B

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

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

<b>Proposed Main Modifications reference number</b>	MM 27
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### 2. Do you consider that the proposed Main Modification is:

- Legally compliant      Yes       No
- Sound                      Yes       No

#### To be considered legally compliant the proposed Main Modifications must:

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

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

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

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

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

Sound

- positively prepared ..... X
- justified ..... X
- effective ..... X
- consistent with national policy... X

**Purbeck Local Plan conformity with the NPPF**

- 1 The NPPF states on page 7 in paragraph 13 that:

*Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies.*

- 2 The NPPF states on page10 in paragraph 2

*Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies<sup>16</sup>.*

*16 Neighbourhood plans must be in general conformity with the strategic policies contained in any development plan that covers their area.*

- 3 The quotes show that the Purbeck Local Plan has primacy over Neighbourhood Plans and the Swanage Local Plan. But that is not what is indicated in MM27.

**The Swanage Local Plan**

- 4 The Amended text for the Swanage deletes 150 and inserts 40 homes. There is no explanation for this change, the numbers quoted are inexplicable in the context of the Swanage Local Plan and the Purbeck Local Plan.
- 5 There is no explanation with the ~~150~~ **40** numbers what happens to Swanage between the end of its Local Plan in 2027 and the end of the Purbeck Local Plan 7 years later in 2034?

**The Wareham Neighbourhood Plan**

- 6 The amended text states the Wareham Neighbourhood Plan will be adopted (note not Made which is the formal acceptance of a Neighbourhood Plan – NPPF) in **2021** .
- 7 It is entirely conceivable that the Wareham Neighbourhood Plan will be adopted after

the Purbeck Local Plan. Hence a key part of the Purbeck Local Plan plan is based upon a Neighbourhood Plan that has not been made prior to the adoption of the Purbeck Local Plan.

8 This is exceptionally poor planning, even for a Local Plan which will have taken about 10 years to be adopted and even then may well be overtaken by the consultation on the Dorset Local Plan.

9 The proposed addition to the 4<sup>th</sup> • states:

**.....on 6 sites plus 100 homes as a result of predicted windfall development. However this plan and its 5YHLS report makes provision for 207 homes at Wareham which is slightly different to that noted in the Wareham Neighbourhood Plan. This is because the windfall for Wareham is incorporated into the windfall for the whole Purbeck area and because 207 homes are expected to be delivered when taking into account the Health hub proposal and adjustments necessary to take account of the care provision.**

10 This is an appalling convoluted statement.

11 For example what is the **5YHLS** report and what does it say? Has it been circulated for Purbeck citizens to read?

12 Why is the **windfall for Wareham ..incorporated into the windfall for the whole of Purbeck area?** Not explained.

13 What does the statement **because 207 homes are expected to be delivered when taking into account the Health hub proposal and adjustments necessary to take account of the care provision.** mean?

14 Again after about 10 years in gestation we are presented with an entirely new statement that is not in the Submission draft text on page 86 and without any explanation of what it means.

15 It involves a Neighbourhood Plan which has not yet been Made and which conceivably may be Made after the adoption of the Purbeck Local Plan which itself may well be overtaken by the consultation on the Dorset Local Plan, which may be overtaken by HMCLG's 30 months to produce a Local Plan announced in HMCLG's *Planning for the future* (August 2020) consultation.

16 The Purbeck Local Plan was meant to have been adopted by 2017, 5 years after the adoption of the 2012 Purbeck Local Plan.



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

### **Not Sound**

- 17 Not Positively Prepared – The amended text presents number to be change in the text without explanation for their derivations. The text cannot be said to support the area’s objectively assessed needs.
- 18 Not Justified. – The text does not support an appropriate strategy because the additions and subtractions present a convoluted and impossible to understand situation.
- 19 Not Effective – The text cannot be said to be deliverable because the Swanage Local Plan is left in limbo for 7 years and the Wareham Neighbourhood Plan may not be Made until after the Purbeck Local Plan is adopted and its numbers of houses appears to be extremely difficult to understand.
- 20 Not Consistent with National Policy - The proposed text indicates that there is doubt about when the Wareham Neighbourhood Plan may be made (the text says it is already 3 years late) and about the number of houses it will deliver. This in turn has contributed to the delay of the completion of the Purbeck Local Plan which according to the NPPF should have been completed in 2017, 4 years ag.
- 21 The proposed texts in MM27 are convoluted and I have indicated in section 3 that there are a number of explanations required be added to MM27 for it to be acceptable as an amendment to the Purbeck Local Plan.



MM29 – M N Hill

## Response form for: Purbeck Local Plan proposed Main Modifications consultation

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

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

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- Habitats Regulations Assessment (HRA);
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- Infrastructure Delivery Plan; and
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*continued overleaf*

## PART A

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### 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 support the representation

Moreton PC : 5*
Moreton : 218**
Crossways : 1650**

\* = Moreton Parish Council  
\*\*= based on household surveys of Moreton and Crossways

- Please tick the box if you would like to be notified of the following:

Adoption of the Local Plan.

## PART B

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

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

Proposed Main Modifications reference number	MM 29
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### 2. Do you consider that the proposed Main Modification is:

- Legally compliant      Yes  No
- Sound                      Yes  No

#### To be considered legally compliant the proposed Main Modifications must:

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

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

- positively prepared - providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs;
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- consistent with national policy - enabling the delivery of sustainable development in accordance with the policies in the Government's National Planning Policy Framework.

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

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

Sound

- positively prepared ..... x
- justified ..... x
- effective ..... x
- consistent with national policy... X

**Amended text – New Housing Trajectory**

**Standard methods of producing charts**

- 1 A fundamental international discipline of chart production is that the chart has a name and that the axes are named and the scale used is shown.
- 2 The Amended text chart has no name, the axes have no names and the scale used on each axes is not shown.
- 3 There is no indication whether the columns for each year indicate completions, starts or development in progress.
- 4 Amended text chart has a dominant horizontal line but no title indicating its purpose.

**Colours used**

- 5 The new housing trajectory is extremely difficult to interpret.
- 6 The Rural Exception Sites, Allocations and Small sites all appear to be indicated by almost the same colour dark blue.
- 7 There are 5 categories indicated by shades of blue.
- 8 Even the target line has two distinct colours, blue and black, whereas the code at the bottom of the graph has only one colour: light blue.
- 9 The trajectory definitely needs more distinguishing colours to indicate the 7 different types of housing development. Using close shade of blue to indicate 5 of the 7 categories is extremely unimaginative.

**Sources of data**

- 10 The original trajectory had 3 housing categories. The **Amended text** has 7 categories.

11 But there is no explanation where the total and numerical profiles for each category can be found.

### **Differences between the Submission draft text trajectory and**

12 There are significant differences between the total number of houses per year in the **Submission draft text** and the **Amended text**.

13 For example the **Submission** chart in 2021/22 had a height of approximately 180 houses. In the **Amended text** it is about 155 houses.

14 The **Submission** chart in 2023/24 had a height of approximately 260 houses. In the **Amended text** it is about 335 houses. The **Submission** chart in 2033/34 had a height of approximately 145 houses. In the **Amended text** it is about 110 houses.

15 There also isn't a very good correlation between the type of houses per year. In the **Submission** chart in 2023/24 Local Plan site allocations accounted for approximately 155 houses. In the **Amended text** chart Local Plan site allocations account for about 195 of the houses.

### **Cumulative number of houses**

16 The **Submission** chart has a line indicating the approximate growth in the cumulative number of house building to a total in 2034 of about 2900.

17 The **Amended text** chart has no line indicating the approximate cumulative number of houses and the right hand axes has no cumulative annotation. This is despite the fact that the data could easily be used to produce the yearly cumulative housing total.

### **Summary**

18 The Amended text chart is not fit for purpose and definitely should be replaced.

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

### **Not Sound**

- 19 Not Positively Prepared – The Amended text chart does not indicate the cumulative housing total and, therefore, cannot be said to indicate that the selected strategy meets the area’s objectively assessed needs.
- 20 Not Justified – The Amended text chart is so poor that it cannot be said to show whether any alternatives is appropriate.
- 21 Not Effective – The Amended text chart does not show the cumulative total of houses and, therefore, cannot be used to assess whether the strategy is deliverable over the plan period.
- 22 Not consistent with National Policy – The Amended text chart is not even consistent with international conventions on the production of a chart let alone enabling the delivery of a sustainable development.
- 23 The Amended Text chart is of a very poor standard and need to be replaced with a chart which:
- Has a title.
  - Has a left hand axes titled Number of house.
  - Has a right hand axes titled Cumulative Number of Houses.
  - The axes need scales.
  - Seven very different and distinct colours should used to show the 7 different categories of development.
  - The Amended text chart should have links to data showing the 2018-34 yearly values for each category of development.
  - The chart should have a cumulative housing line to show the growth profile of development houses.



MM30 – M N Hill

## Response form for: Purbeck Local Plan proposed Main Modifications consultation

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

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

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- Infrastructure Delivery Plan; and
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*continued overleaf*



## PART A

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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 support the representation

Moreton PC : 5*
Moreton : 218**
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\* = Moreton Parish Council  
\*\*= based on household surveys  
of Moreton and Crossways

- Please tick the box if you would like to be notified of the following:

Adoption of the Local Plan.

## PART B

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

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

<b>Proposed Main Modifications reference number</b>	MM 30
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### 2. Do you consider that the proposed Main Modification is:

- Legally compliant      Yes  No
- Sound                      Yes  No

### To be considered legally compliant the proposed Main Modifications must:

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

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

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

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

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

Sound

- positively prepared ..... x
- justified ..... x
- effective ..... x
- consistent with national policy... X

**Policy H2: The Housing Land Supply**

- 1 The table on page 95 contains a large number of houses which cannot be explained by MM5 or Appendix 2. The houses are shown in the copy of the table on page 95 of the Main Modifications below. The table has been split into 4 parts to aid analysis of its content.

	Source of housing supply Location	Number of homes
A	Completions April 2018 to March 2019	73
	Completion April 2019 to March 2020	148
	Extant Planning permission at 1 April 2020	476
	<b>Unconsented Purbeck Local Plan allocations</b>	
B	- Lytchett Matravers: Blaney's Corner	25
	- Lytchett Matravers – East of Flower's Drove	30
	- Lytchett Matravers: East of Wareham Road	95
	- Moreton Station: Redbridge Pit/Caravan Site	490 (+65 extra care units)
	- Upton: West of Watery Lane	90
	- Wool: West of Chalk Pit Lane and Oakdene Road	320 (+65 extra care units)
	- Wool: North East of Burton Cross Roundabout	90
	- Wool: North West of Burton Cross Roundabout	30
	- Wool: North of the Railway Line	30
	Unconsented Swanage Local Plan allocations	
Total unconsented allocations		1,240
<b>Neighbourhood plan allocations and sites</b>		
C	- Bere Regis	105
	- Wareham	207
	Total neighbourhood plan allocations	312
Windfall	827	
D	Small sites policy sites	123
	Total	3,199 + 130 extra care units

Section A

- 2 **Appendix 2** contains **153 small and medium sized sites with planning permission at 31<sup>st</sup> March 2020.**
- 3 Section A of the chart above states that **476** houses have **Extant Planning permission at 1 April 2020.** If 153 of these are accounted for in **Appendix 2** what

are the 323 (476-153) other houses?

- 4 Why are these 323 **Extant Planning permission at 1 April 2020** not also in **Appendix 2?**
- 5 There is no verification of these 323 houses in the Main Modifications, yet they represent 11% of the 2,880 required houses in MM27
- 6 Section A also contains **Completions April 2018 to March 2019 73** and **Completions April 2019 to March 2020 148**
- 7 The total number of houses in Section A is 697 or 24% of the required 2,880 houses required in MM27. Of these only 153 are in MM85 **Appendix 2.**
- 8 There is no verification for the remaining 544 houses or 19% of the total 2,880 houses required in MM27.

#### Section B

- 9 The sections of the table separated at B above are taken from MM5 on page 29.
- 10 As described below, Wareham should be deleted because it is not a Made neighbourhood plan.

#### Section C - Neighbourhood Plans

- 11 This states that the **Total neighbourhood plan allocations** is **312.**
- 12 MM26, Policy H1, page 85, states that *Across Purbeck, six neighbourhood plan areas have been designated.*
- 13 The six are: **Arne**, **Beer Regis**, **Lytchett Matravers**, **Wareham**, **West Lulworth**, and **Wool.**
- 14 Since Purbeck District Council ceased to exist in 2019, it cannot create any more.
- 15 MM1, **Amended text**, page 18, states that:

*This Purbeck Local Plan, together with the Swanage Local Plan (adopted in 2017), Minerals and Waste Local Plans jointly produced for Dorset and any adopted neighbourhood plans, collectively forms the development plan for **Purbeck** ~~the District~~.*

- 16 Thus only **adopted neighbourhood plans** can form part of the development plan for Purbeck District. MM1 specifically does not include emerging Neighbourhood Plan or any Neighbourhood Plans that have not yet been Made.

- 17 MM26, Policy H1, states that only Beer Regis and Lytchett Matravers are **made neighbourhood plans** and therefore the only neighbourhood plans that form part of *the development plan for **Purbeck***.
- 18 Consequently Arne, Wareham, West Lulworth and Wool Neighbourhood Plans do not form part of *the development plan for **Purbeck***.
- 19 MM26, Policy H1 Arne, Lytchett Matravers, and Wool neighbourhood plans each state:  
...**does not seek to allocate housing sites**,
- 20 West Lulworth states  
**Currently no intention to prepare neighbourhood plan, no specific housing requirement in accordance with the Council's housing strategy.**
- 21 Wool states:  
**Emerging neighbourhood plan does not seek to allocate housing sites, no specific housing requirement in accordance with the Council's housing strategy.**
- 22 Thus of the six **Designated Neighbourhood Areas** only two, Wool and Wareham ..**allocate land for new homes..** (second paragraph of the ***Amended Policy***).
- 23 But Wareham is stated in the MM1 designated **strategic policy H2** (page 20) to only be an **emerging neighbourhood plan** and not a **made... neighbourhood plan**
- 24 Since the **Lytchett Matravers** neighbourhood plan .....**does not seek to allocate housing sites**, then according to the ***MM1, Amended text*** on page 18 only one of the six **Designated Neighbourhood Areas** qualifies as part of the ...*development plan for **Purbeck***.
- 25 There is nothing in the Main Modifications which states that the Wareham neighbourhood plan will be made before the Purbeck Local Plan is adopted.
- 26 Thus in the ***MM30, Policy H2: The Housing land supply, Amended Policy*** table on page 95 all references to Wareham should be deleted.
- 27 The **Neighbourhood plan allocations and sites** section should have **Wareham** and **207** deleted.
- 28 The **Total neighbourhood plan allocations** should be changed from **312** reduced to **105** (the Wool neighbourhood plan).

29 The Total should be reduced from 3,199 + 130 care units to 2, 992 + 130 care units.

Section C - Windfall

30 The Submission Local Plan had a section in its Policy H2 section:

*Small sites next to existing settlements and windfall* 933  
*within existing settlements (excluding Wareham).*

31 Section D now contains a Small Site policy sites with a total of 123. Subtracting 123 from 933 gives 810 which presumably is the size of the windfall

32 Spread over the Plan Period this is equivalent to 51 houses per year. There is no way of knowing whether the windfall allowance is realistic without a past history of Purbeck windfall. Which has not been provided.

Section D

33 The small sites policy in section D is contained in MM85, Appendix 2 on page 259.

**Changes to Allocations**

34 The Submission Purbeck Local Plan Policy H2 had

Swanage Local Plan allocation .....150  
Wareham Neighbourhood Plan (including site allocations....300  
and windfall)

35 The **Amended policy** has:

**Unconsented Swanage allocations.....40**  
**Wareham.....207**

36 There is no explanation for the changes in these numbers.

37 The Amended Policy has the new section A but there is no explanation why it wasn't included in the Submission Purbeck Local Plan, what it means and why it has after 6/7 years suddenly appeared in the Minor Modifications.

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

### **Not Sound**

38 Not Positively Prepared – MM30 needs considerable amendment to ensure the strategy will meet the

39 Not Justified – The

40 Not Effective – The

41 Not consistent with National Policy – The

### **The Amended Policy**

42 Section 3 contains a number of questions and recommendations and these need to be actioned to make the MM worthwhile.

43 The Amended Policy chart contains a number of items which need explanation.

44 It is amazing that after 10years in production MM30 should introduce so many line completely new line items.



MM31 – M N Hill

## Response form for: Purbeck Local Plan proposed Main Modifications consultation

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

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

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

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

*continued overleaf*



## PART A

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

### 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 support the representation

Moreton PC : 5*
Moreton : 218**
Crossways : 1650**

\* = Moreton Parish Council  
\*\*= based on household surveys  
of Moreton and Crossways

- Please tick the box if you would like to be notified of the following:

Adoption of the Local Plan.

## PART B

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

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

Proposed Main Modifications reference number	MM 31
--	-------

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

- Legally compliant      Yes  No
- Sound                      Yes  No

### To be considered legally compliant the proposed Main Modifications must:

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

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

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

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

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

Sound

- positively prepared ..... x
- justified ..... x
- effective ..... x
- consistent with national policy... X

**Chapter 4, Housing, Paragraph 118**

- 1 The Amended text is not an improvement on the Submission draft text.
- 2 The Amended text is verbose and adds very little if anything of value to the Submission draft text.
- 3 The Submission draft text is merely a joining piece text and adds very little to the Purbeck Local Plan.
- 4 The Amended text is, like many of the Main Modifications, is not easy to read and appears to be convoluted for the sake of being convoluted.
- 5 The Purbeck Local Plan is realistically only likely to last a matter of months before it is overtaken by the emerging Dorset Council Draft Local Plan.

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

6 Retain the original Submission draft text.



MM32 – M N Hill

## Response form for: Purbeck Local Plan proposed Main Modifications consultation

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

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

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

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

*continued overleaf*

## PART A

	Your contact details	Agent's Details (if applicable)
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Moreton : 218**
Crossways : 1650**

\* = Moreton Parish Council  
\*\*= based on household surveys  
of Moreton and Crossways

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Adoption of the Local Plan.

## PART B

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

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

<b>Proposed Main Modifications reference number</b>	MM 32
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### 2. Do you consider that the proposed Main Modification is:

- Legally compliant      Yes  No
- Sound                      Yes  No

#### To be considered legally compliant the proposed Main Modifications must:

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

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

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

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

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

Sound

- positively prepared ..... x
- justified ..... x
- effective ..... x
- consistent with national policy... X

**Policy H3: New housing development requirements**

- 1 The opportunity should have been taken to separate sub-paragraph g into two separate sub-paragraphs.
- 2 Electric vehicles and broadband will be dominant features of life in new homes and these technologies are supported by different companies.
- 3 It would therefore be better to have a sub-paragraph for broadband and a separate sub-paragraph for electric vehicle charging.
- 4 Neither the Submission draft policy or the Amended policy contain any reference to a contribution to a nearby general practise. This vitally important and the opportunity should be taken to include this requirement.
- 5 Both the Submission draft policy and the Amended policy contain references to sustainable modes of transport. An electric car charged using home solar panels or mains electricity could be far more sustainable than many other forms of transport and hence the Submission draft policy should not be worded as though this option is subordinate to any other form of possibly less sustainable form of transport such as an electric train or electric bus.



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

- 6 Separate sub-paragraph g into two separate sub-paragraphs. One for electric vehicle charging and one for broadband supply.
- 7 A new sub-paragraph should be added requiring developers to contribute to new GP facilities at the nearest GP building.
- 8 Sub-paragraph m should reflect that electric cars charge using domestic solar panels or mains electricity may be as or more sustainable than electric buses or electric trains.



MM35 – M N Hill

## Response form for: Purbeck Local Plan proposed Main Modifications consultation

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

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

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

*continued overleaf*



## PART A

	Your contact details	Agent's Details (if applicable)
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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 support the representation

Moreton PC : 5*
Moreton : 218**
Crossways : 1650**

\* = Moreton Parish Council  
 \*\*= based on household surveys of Moreton and Crossways

- Please tick the box if you would like to be notified of the following:

Adoption of the Local Plan.

## PART B

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

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

Proposed Main Modifications reference number	MM 35
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### 2. Do you consider that the proposed Main Modification is:

- Legally compliant    Yes  No
- Sound    Yes  No

### To be considered legally compliant the proposed Main Modifications must:

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

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

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

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

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

**Soundness**

- positively prepared ..... X
- justified ..... X
- effective ..... X
- consistent with national policy... X

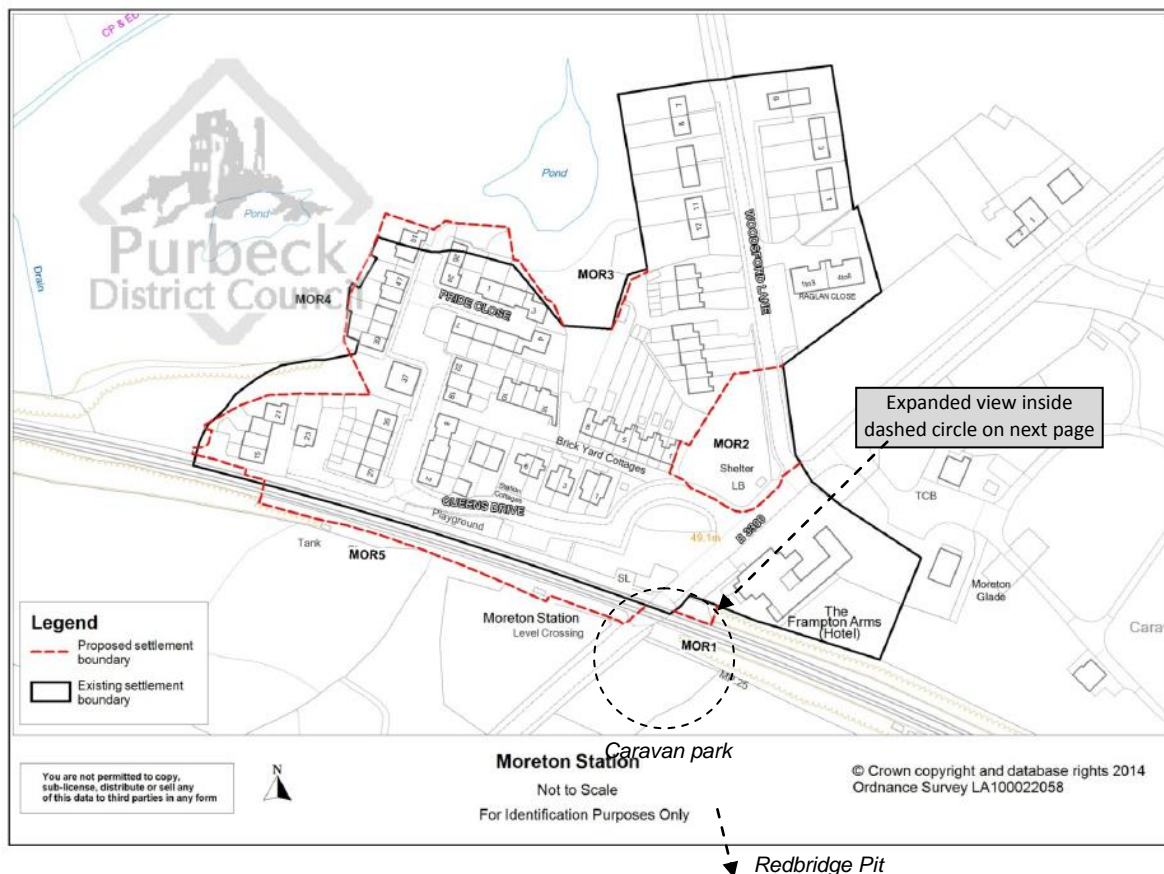
**MM4, MM5 and MM43 (Policy H8)**

- 1 I have started my response to MM35 with a repeat of some of my comments in my MM4 and MM5 responses. This is because there are facts in my MM4 and MM5 responses which are relevant to comment on MM35.
- 2 The proposed housing on Redbridge Pit fails the Policy V1 MM5 **Amended policy**(page 30) and the Policy H8 **Submission draft policy** (page 134) and **Amended policy** (page 135).

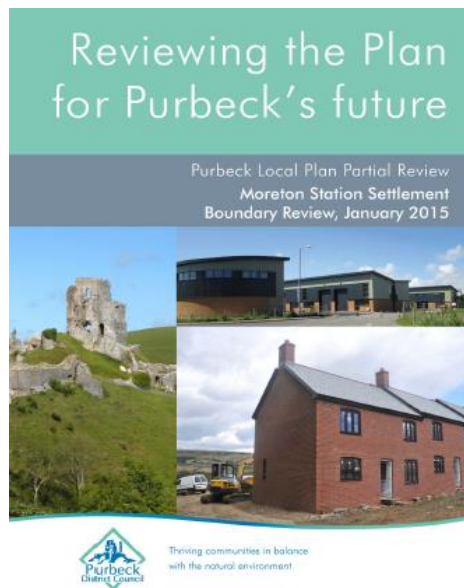
**Moreton Station Settlement Boundary and Redbridge Pit**

Moreton Settlement Boundary Review Background Paper – January 2015

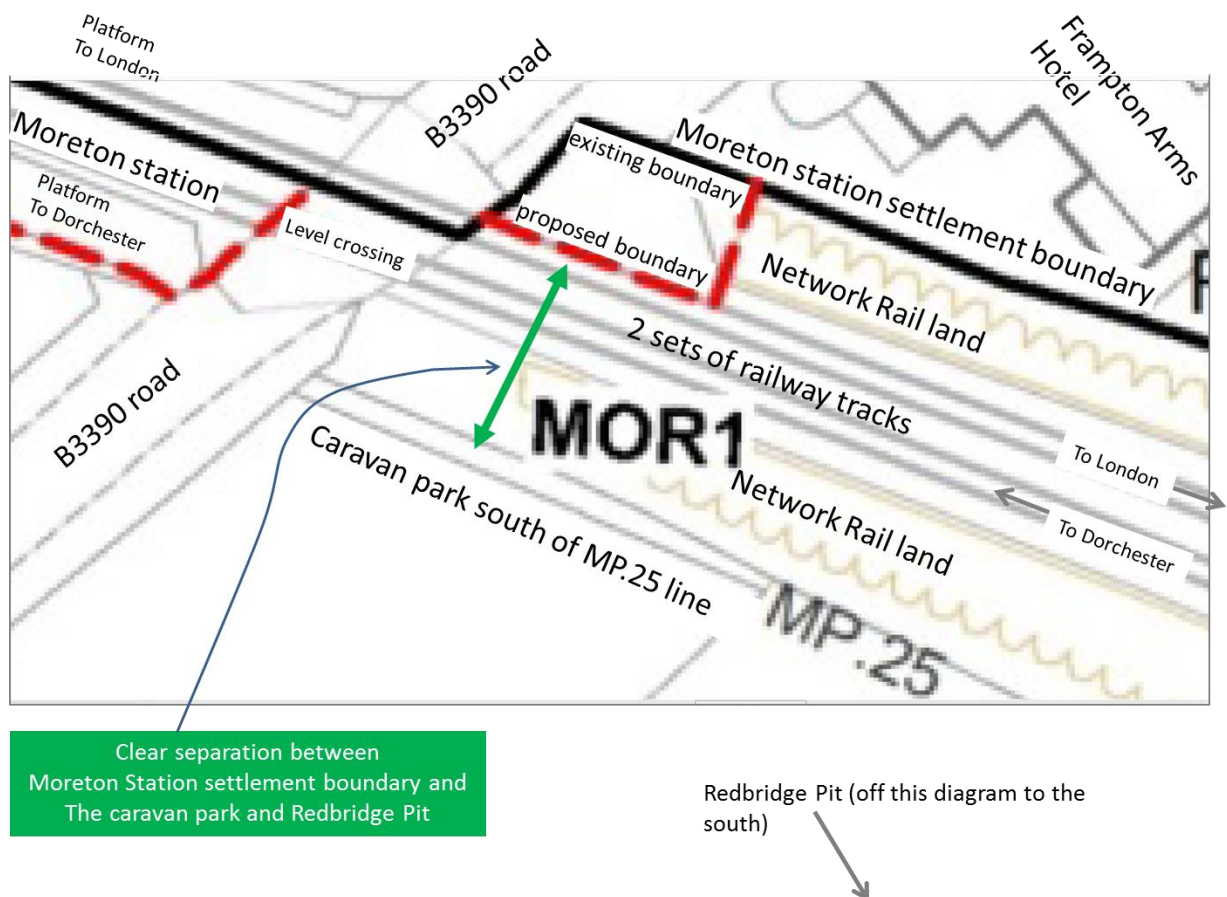
**Map of the existing and proposed settlement boundary**



- 3 The above diagram has been copied from the Purbeck District Council document *Reviewing the Plan for Purbeck's future, Moreton Station Settlement Boundary Review, January 2015*. A copy of the document cover is given below.



- 4 I have added the words *Caravan park* and *Redbridge Pit* and the dashed arrow pointing to Redbridge Pit which is off the bottom right hand side of the diagram
- 5 The *Purbeck District Council* document clearly shows that both the *Existing settlement boundary* (solid black line) and the *Proposed settlement boundary* (dashed red line) are north of the double track railway land at their nearest point to *caravan park*.
- 6 The diagram below shows the area of closest proximity of the Moreton Station settlement boundary to the Caravan Park and Redbridge Pit beyond. It shows the area inside the dashed circle on the diagram above.
- 7 The diagram was obtained by selecting 800% on the *Reviewing the Plan for Purbeck's future* pdf display.



- 8 The Purbeck District Council diagram clearly and irrefutably shows that the caravan park and Redbridge Pit which is south of the caravan park and even further away from the Moreton Station settlement boundary, are not within or adjoining either the existing or proposed Moreton Station settlement boundaries.
- 9 For planning purposes all quarries are designated as green fields. Therefore Redbridge Pit is a green field.
- 10 The one building on Redbridge Pit is to be demolished as part of the site restoration before 2022.
- 11 In 2023 Redbridge Pit will be a green field with no buildings on it, in open countryside, not in or adjoining Moreton Station settlement boundary.
- 12 The caravan park contains toilets and site buildings concerned with the running of the Caravan Park, otherwise the park is a green field in open countryside and is not within Moreton Station settlement boundary or adjoining it.
- 13 It is, therefore, wrong to associate Redbridge Pit with Moreton Station as in Redbridge Pit/Moreton Station because they are not within the same settlement boundary and are not connected. Redbridge Pit is not within Moreton Station settlement boundary. This has been done erroneously in MM4 (page 25) **Amended text, Key Service villages** .... **Redbridge Pit/Moreton Station** and in MM5 (page 30) **Amended policy** paragraph 2 Moreton **Station/Redbridge Pit**.



14 It is more accurate to simply use the separate terms Redbridge Pit and Moreton rather than Redbridge Pit/Moreton Station since they are not connected.

15 The **Amended policy** paragraph **5** of MM5 states that:

**High quality small scale development on unallocated sites within the boundaries of settlements listed in the hierarchy or on small sites, outside the Green Belt, adjoining existing settlement boundaries of towns, key service villages, local service villages and other villages with a settlement boundary will be supported where:**

16 Moreton Pit is not within the boundary of Moreton Station settlement boundary.

17 Moreton Pit is not adjoining the settlement boundary of Moreton Station.

18 Thus all development allocated to Redbridge Pit should be deleted because according to the above **Amended policy** paragraph **5** of MM5, Redbridge Pit is a green field in open countryside not in or adjoining the settlement boundary of Moreton Station.

19 With regard to MM43, Policy H, Small Sites, development of Redbridge Pit is not ... **adjoining the settlement boundaries of ....other villages** (Moreton Station) **with a settlement boundary...**

20 Development of Redbridge Pit is, therefore, also not permitted under MM43.

### **MM35 Amended Policy**

21 Redbridge Pit is in planning terms a green field and has no housing. As shown above Redbridge Pit is not within, and does not adjoining the Moreton Station settlement boundary.

22 The sections below have been reviewed simply because they erroneously refer to the green field of Redbridge Pit.

23 As the amended text in MM5 has proven, they do not apply to Redbridge Pit because Redbridge Pit is neither in nor adjoining the settlement boundary of Moreton Station.



## The MM35 **Amended policy** states

24 The opening paragraph of the **Amended policy** refers to:

**around** 65 bed unit **extra care units** *facility, home*

25 This dramatic amendment was announced by Purbeck planners at gone 6pm during the 2<sup>nd</sup> week of the Examination at the Springfield Country Hotel near Stoborough (ie after the examination should have ended for the day). Apart from myself hearing this news for the first time, no one in Moreton or Crossways would have heard about it or been consulted on the change from one building to 65 separate care units and probably more buildings associated with the 65 care units.

26 This was 7 years after the initiation of the Purbeck Local Plan Review and 2 years after it should have completed according to the NPPF.

27 The NPPF states on page 11, in paragraph 33 that:

*Reviews should be completed no later than five years from the adoption date of a plan,*

28 The change from a home to 65 care units is a major change involving considerable infrastructure, facilities, people, vehicles and medical provision. None of this was explained at the Examination and there is nothing in the Purbeck Local Plan.

29 By comparison there is a strategic Policy, I6, for Wareham integrated health and social care. This will provide integrated social care and health services including GP surgery and ambulance station using existing buildings.

30 Wareham is 33 times larger than Moreton Station but will receive only 207 houses versus Redbridge Pit's 490 plus 65 care units, at least 555 new buildings in total.

31 Sub-paragraph a on pages 108 and 109 of the **Amended policy** states:

**a. provide care accommodation designed in consultation with local health and social care providers to meet the changing needs of older and disabled people in Purbeck. The scheme should aim to provide:**

**i. 65 extra care units; and**

**ii. 10% of its overall housing requirement as supported housing for the elderly or age specific housing;**

**b. provide 20% of its overall housing requirement in accordance with M4(2) building control optional standards to meet the needs of the elderly and/or disabled people;**

- 32 It is very important to note that the above policy specifically refers to .. **in Purbeck**, .... ie not across the border, not in Crossways or Dorchester or anywhere else.
- 33 The requirement to provide **10% of its overall housing requirement as supported housing for the elderly or age specific housing;** - around 49 houses,  
and  
**20% of its overall housing requirement in accordance with M4(2) building control optional standards to meet the needs of the elderly and/or disabled people;** around 98 houses,
- are both entirely new requirements, not in the Submission Purbeck Local Plan and therefore not seen by the people of Moreton and Crossways even though it would directly affect their own medical services and the likely number of cars on the local road.
- 34 These proposals were not even raised or discussed at the Inspector's Examination in 2019.
- 35 Of the 555 houses to be built on Redbridge Pit 163 or around 30% (98+65) are for elderly, disabled people, or age specific people.
- 36 This is on the assumption that the 20% requirement in b incorporates the 10% in a ii. If the 20% and 10% are separate then the total number of houses to be built for elderly, disabled or age specific people will be 212 houses or around 38% of the total number of houses on the Redbridge Pit.
- 37 Wool has the same requirements except that Wool has 26 times more houses already than Moreton Station and over 2000 times more houses than Redbridge Pit. The impact of the smaller allocation in Wool will thus be significantly diluted because Wool is so much bigger than Redbridge Pit.
- 38 The Purbeck Local Plan Review was started in 2012 at the instigation of the Inspector examining the extant Purbeck District Council Local Plan 2012. Purbeck District Council and its planning staff have had about 6~7 years (though the Local Plan should have been completed in 5 years, NPPF, to consult the public on the proposed amendment in this ***Amended policy***.
- 39 The problems of an ageing population were apparent in 2012, but MM35 is literally the first occasion Purbeck have attempted to incorporate them into their Local Plan.
- 40 Furthermore the provisions in MM35 reproduced above are 10 to 25 miles away from where they are needed **in Purbeck**.
- 41 The ONS 2011 Census results indicate that in 2011 the average age of people in some Swanage wards was in the 60s whereas the average age of people in

Moreton and Crossways was in the 40s.

42 The Swanage Local Plan states on page 19 in paragraph 62 that:

*Swanage has a higher proportion of older people than both the Dorset and the UK average with almost 31.5% of the population aged 65 and over compared to 26% for Dorset and 17% for the UK.*

43 The Dorchester Council geowessex.com statistical website shows that the percentage of Moreton's population over 65 is 22%, whereas the average for Dorset is 26% ([https:// apps.geowessex.com/insights/](https://apps.geowessex.com/insights/)).

44 Thus the percentage of Moreton's population over 65 is almost 9.5% lower than Swanage's and is 4% lower than the Dorset average. Moreton is clearly not a location in need of elderly care.

45 But the proposed modifications given on pages 108 and 109 in sub-paragraphs a. and b. of the **Amended Policy** are needed in Swanage, over 20 miles away from Moreton Station settlement in the east of the district, and not on Purbeck's western boundary.

46 Because Purbeck District Council have shown that the total affordable housing need in Moreton (including Moreton Station) is only 1 house, and the average age is in the mid-40s (Dorset Council: <https://apps.geowessex.com>), elderly residents in Swanage, Upton, Wareham, Lytchett Matravers etc will have to move between 10 and 25 miles west to avail themselves of the proposed facilities in sub-paragraphs a. and b. on Redbridge Pit.

47 Hence, the Main Modifications referred to above in MM35 should not be put on a field effectively in Crossways in West Dorset but in the towns in the east of the district.

48 Redbridge Pit and the caravan site do not even qualify for minor development under Policy H8 Small sites next to existing settlements because they do not adjoin Moreton Station settlement boundary.

49 Any development on Redbridge Pit would be classed as sporadic development in open country and be against Purbeck Local Plan Submission, the Main Modifications and the guidance in NPPF.

## Retail provision

### MM35

50 MM35 **Amended policy** states in sub-paragraph c:

c. **provide 350sqm of convenience retail floor space**

- 51 The bare statement above on retail provision is not made with any reference to any other retail provision in Crossways or plans for retail in Crossways.
- 52 MM35 makes no reference to any masterplan for Moreton Station settlement, the Redbridge Pit site and Crossways.
- 53 The only mentions of a masterplan in the Main Modifications are in MM76 with respect to *Morden Holiday Park infrastructure* on page 219 and in MM77 with reference the *Morden Park SANG* on page 221.
- 54 There is no mention of the word masterplanning in the Main Modifications.
- 55 The Purbeck Local Plan Submission January 2019 makes only one reference to a masterplan when it refers to the *Dorset Innovation Park concept masterplan* on page 104, paragraph 254.

The NPPF

- 56 The NPPF on page 66 refers to a *masterplan* as a *design vision* akin to a *design and development framework for a site or area*.

Joint Local Plan Review for West Dorset and Weymouth & Portland Preferred Options Consultation August 2018

- 57 The *Joint Local Plan Review for West Dorset and Weymouth & Portland Preferred Options Consultation August 2018* was produced jointly by West Dorset District Council and Weymouth and Portland Borough Council planners and has been subsumed by Dorset Council into the work to produce a Dorset Council Local Plan.
- 58 The West Dorset document covers the development of 1,114 house in Crossways which currently has about 1,000 houses.
- 59 The *Joint Local Plan Review for West Dorset and Weymouth & Portland*, Chapter 12, page LPR 246 has a Policy CRS1, titled *Masterplanning for the wider Crossways area*. This policy states:

*West Dorset District Council will work with Purbeck District Council and Dorset County Council on masterplanning to address both the strategic cross-boundary and local issues for the wider Crossways area. Masterplanning will aim to co-ordinate the provision of housing, employment and associated infrastructure to ensure that over the long term, the most appropriate solutions are provided.*

60 On page LPR 247, in paragraph 12.4.3, the *West Dorset Joint Local Plan Review for West Dorset and Weymouth & Portland* states:

*The provision of a local centre to meet the future retail needs of Crossways is a matter to be addressed through masterplanning work to be jointly undertaken with Purbeck District Council and Dorset County Council.*

61 Also on page LPR 247, in paragraph 12.5.5 the *Joint Local Plan Review for West Dorset and Weymouth & Portland* states:

*These strategic and more local issues, as outlined in the policy below, should be addressed through masterplanning and any on and off-site provision and contributions to community infrastructure will be sought in line with Policy COM1 and secured through a legal agreement.*

62 Thus the *Joint Local Plan Review for West Dorset and Weymouth & Portland Preferred Options Consultation August 2018* takes the provision of additional retail very seriously and considers it should be part of a .....*masterplan for Crossways to address both the strategic cross-boundary and local issues for the wider Crossways area* (Policy CRS1 page LPR 246)

63 In stark contrast Purbeck District's Local Plan makes no mention of masterplanning, discussions with West Dorset Council, Dorset Council, Crossways Parish Council or Moreton Parish Council and illogically simply places a shop on Redbridge Pit.

64 This is in spite of one of the conditions for the Local Plan to be *Sound* is that it is effective, as stated on page 3 of this review of MM35:

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

- *effective - ..... 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;*

65 West Dorset is only mentioned twice in the Main Modifications, and then only in MM33, on page 103 in the ***Submission text*** and repeated exactly in the ***Amended text*** that:

*Redbridge Pit is located in the west of the District close to the boundary with West Dorset District Council.*

66 West Dorset adopted their Local Plan in 2015 and the document I have quoted from above was produced in 2018, about 3 years later.

67 By comparison Purbeck adopted their Local Plan in 2012 and the first time their Local Plan has specifically mentioned retail provision on Redbridge Pit was in MM35 ***Amended policy*** in November 2020.

68 Where West Dorset have comprehensive statements and a dedicated policy for cross-boundary strategic matters including retail provision after less than 3 years.

69 Purbeck have 8 words after 10 years

## Moreton Station

e. make a financial contribution toward ~~provide~~ improvements to the station / travel interchange.....

- 70 There is no bus service at Moreton Station.
- 71 Hence the rather grandly titled travel interchange means for most train passengers a long and very dispiriting walk from the station to Crossways.
- 72 It is dispiriting because many vehicles including quarry lorries travel very close to the Crossways – Moreton Station pavement (within less than 2 metres of pedestrians) at speeds in excess of 50~60 miles per hour. The noise, wind and proximity of the vehicles are very, very unpleasant. If it is raining pedestrians are splashed by the vehicles. If it is dark the road is not well lit. I have undertaken this walk on a number of occasions in each of the above conditions.
- 73 The more affluent people who live north of Moreton depart the station promptly in warm and comfortable cars. A significant proportion of the people who use the station travel to and from the station in a northerly direction beyond Moreton
- 74 Only about 2% of Moreton and Crossways population catch the train (ONS 2011 Census results). Even the family who lived closest to the station in Moreton Station settlement never caught the train because they said it was too expensive.
- 75 Thus the financial contribution will benefit almost as many people who live north of the station and are unaffected by the proposed housing and quarrying in Crossways and Moreton, as live south of the station and have to walk to and from the station, putting up with increased traffic on the road due to a very significant increase in housing and quarrying.
- 76 For the people who live south of the station the financial contribution will not make any difference to the disadvantages of travel by train: the walk to and from the station; the totally inadequate service for local travel; and the expense of train travel.
- 77 At the moment parking at the station is free. However there is a proposal to build a car park on the former caravan site north of Redbridge Pit. If as has been anticipated there will be a fee for parking this will hardly qualify as an improvement. The MOU map indicates that the car park will be very small and access will be hazardous due to the slope of the B3390 road and the speed of the traffic which is frequently at least 40~50 mph.
- 78 The financial contribution would benefit far more people if it was added to the contribution to the health centre which is used by almost everyone rather than the station which is only used by about 2% of the population.

- 79 The very low number of people who use the train is due to the fact that the service is only hourly for all but the first 1~2 hours on week days, the train is expensive and onward journeys from local destination stations is very time consuming and expensive.
- 80 An example of the inadequacy of the service is that a car journey from Crossways to Dorchester will only take about 12 minutes in both directions. It takes longer than 12 minutes to walk to the station and if a passenger misses the return train it will mean a 1 hour wait for the next train.
- 81 Train travel from Moreton Station is really only worthwhile for long journeys to Southampton or London.

### Local health infrastructure

*h. provide financial contributions for local health infrastructure and education (as required by Policy I1), **other than for extra care units where an applicant is able to demonstrate that it would be unnecessary and unreasonable to seek contributions;***

- 82 It is totally unacceptable for applicants to even try to **demonstrate that it would be unnecessary and unreasonable to seek contributions;** for **extra care units** for local healthcare infrastructure.
- 83 If the applicant seeks to not *provide financial contributions for local health infrastructure* the cost and impact of no financial contribution would primarily fall on the populations of Moreton and Crossways.
- 84 Thus whilst the applicant enjoys a profit on building and selling the care units the local people will suffer the penalties of an overburdened and weakened local health service under this sub-paragraph.
- 85 If the applicant doesn't wish to pay for the local healthcare infrastructure associated with the care units then they should not be awarded any contracts.

### **...on site SANG and off-site Heathland Support Area...**

- 86 This paragraph and the detail involved were not included in any of the preceding consultations over the last 10 years, or in the ***Submission draft policy.***
- 87 Whilst the Morden SANG has a dedicated strategic policy I5, and has been consulted upon extensively over the years, the Moreton SANG's first appearance is in the MM35 ***Amended policy.*** It wasn't even mentioned in the ***Submission draft policy.***

88 Paragraph h, part of which is reproduced above raises a number of concerns.

89 However since building houses on Redbridge Pit is not allowed by MM5 and the NPPF there is little point in raising question other than to highlight the difference between two Local Councils.

## **MM35 is not sound**

### **The Local Plan is not positively prepared**

90 The proposed housing on Redbridge Pit fails the Policy V1 MM5 **Amended policy**(page 30) and the Policy H8 **Submission draft policy** (page 134) and **Amended policy** (page 135) and the NPPF on page 22 paragraph 79.

91 Main Modification 35 is not positively prepared because it does not provide a strategy to meet the area's assessed housing need. The proposed 490 housing allocation on a green field represents sporadic development in the countryside and fails the MM5 **Amended policy** and MM43 Policy H8 Small Sites **Amended Policy**.

92 The Moreton Parish (Moreton Station plus Moreton Village) housing need as assessed by Purbeck District Council in 2015 is 1. There is, therefore, no housing requirement for 489 houses and 65 care units on Redbridge Pit.

93 There is nothing positive about providing 489 houses and Purbeck's largest single allocation of affordable housing for people who live 10 to 25 miles to the east or have nothing to do with Purbeck in the west.

94 Crossways housing need is amply satisfied by the housing proposals in the *Joint Local Plan Review for West Dorset and Weymouth & Portland, Preferred Options Consultation, August 2018*.

### **The Local Plan is not justified**

95 The proposed housing on Redbridge Pit fails the Policy V1 MM5 **Amended policy**(page 30) and the Policy H8 **Submission draft policy** (page 134) and **Amended policy** (page 135) and the NPPF on page 22 paragraph 79.

96 No evidence, let alone proportionate, has been proposed to support the Purbeck Local Plan's proposal to locate its largest market and affordable housing in effect in a completely different housing market area. Purbeck is in the Eastern Housing Market Area and which Poole, Bournemouth and Christchurch. Crossways is in the Western Housing Market Area which includes Bridport and Lyme Regis.



- 97 The plan is not justified because there is ample room for housing around Swanage, Beer Regis, Lytchett Minster and Lytchett Matravers for the 490 houses plus 65 care units as indicated in the SHLAA.
- 98 Approximately 80% of Purbeck's population lives at least 10 miles away east of the Worgret railway bridge. Swanage for example is Purbeck's largest town and is over 20 miles east of Crossways. Only 40 houses are allocated to Swanage in the Purbeck Local Plan Submission and Main Modifications.
- 99 Purbeck's largest elderly population is based in Swanage (ONS 2011 Census results and Swanage Local Plan page 19). But the Local Plan does not propose locating any care units in Swanage, instead it locates its largest allocation 25 miles away in Moreton, without any rational and realistic justification. SD 92 states on page 22, paragraph 90 that:
- Moreton Station has one of the highest populations of under 65s in Purbeck*
- 100 Whereas SD92 states on page 17, paragraph 60 that:
- Swanage also has the highest percentage of over 65s,*
- 101 This logic is not explained, possibly because there is no rational explanation.

### **The Local Plan is not effective**

- 102 The proposed housing on Redbridge Pit fails the Policy V1 MM5 **Amended policy**(page 30) and the Policy H8 **Submission draft policy** (page 134) and **Amended policy** (page 135) and the NPPF on page 22 paragraph 79.
- 103 The Purbeck Local Plan contains absolutely no evidence of joint working on cross-boundary strategic matters.
- 104 The Local Plan contains a statement of common ground with West Dorset District Council which does not mention Crossways, Moreton Station as a key service village or Crossways role in enabling this designation.
- 105 The Local Plan completely ignores the proposals in the *Joint Local Plan Review for West Dorset and Weymouth & Portland, Preferred Options Consultation, August 2018* for masterplanning.
- 106 The Local Plan places a shop on Redbridge Pit without any reference whatsoever to any cross-border consultation with Crossways, West Dorset District Council or Dorset Council. Local people have been completely ignored, there was no consultation with Moreton and Crossways Parish Councils to assess the viability of putting a shop on Redbridge Pit, yet the success or failure of the proposed shop would rely on existing local people using the shop, not the relatively small number (by retail standards) who would live on Redbridge Pit.
- 107 The water, sewerage and electricity providers to Crossways have formally stated that they do not have the capacity to supply the proposed development

108 Broadband supply is already barely capable of coping with demand. For example when Zoom Parish Council meetings are held in Moreton involving about 6 separate people at least 2 only have audio but no video provision. Crossways Parish Council suffers a similar broad band shortfall.

109 There is nothing definite in the Local Plan about health service provision unlike the provision for Wareham in strategic policy *16 Wareham integrated health and social care*.

### **The Local Plan is not consistent with national policy**

110 The proposed housing on Redbridge Pit fails the Policy V1 MM5 **Amended policy**(page 30) and the Policy H8 **Submission draft policy** (page 134) and **Amended policy** (page 135) and the NPPF on page 22 paragraph 79.

111 The Local Plan will not enable the delivery of sustainable development because there is no provision in the Local Plan for employment in Moreton.

112 Travel to work in the Innovation Park would have to be by car because the train station in Wool is about 3 miles from the Park. There is no dedicated cycle path from Moreton to the Innovation Park.

113 Travel to work in Dorchester or Weymouth would have to be by car because the train service is totally inadequate. The hourly service and onward travel by bus within Dorchester or Weymouth, at considerable cost means that only about 2% of Moreton and 2% of Crossways people travel to work by train (ONS 2011 Census results).

114 The proposed development will also not be sustainable because there is nothing to sustain it – no infrastructure, no services, no employment, no evidence of cross-boundary working, no water, no electricity and no sewerage and very poor broadband.

115 The NPPF states on page 6 in paragraph 11 that:

*a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;*

116 Planning to put around 490 houses and around 65 care units on a green field (Redbridge Pit) not in or adjoining any Purbeck settlement boundary, in open countryside, is not positively seeking opportunities to meet the development needs of Purbeck since:

a. The proposal is not allowed under the Purbeck Local Plan Policy V1 MM5 **Amended policy**(page 30) and Policy H8 **Submission draft policy** (page 134) and **Amended policy** (page 135) and the NPPF on page 22 paragraph 79.

b. The development would be between 10 and 25 miles from where approximately 80% of Purbeck's population lives.

c. The development would be about 25 miles from Purbeck's largest town of Swanage which has over 5759 houses and which according to the extant Swanage Local Plan is effectively depopulating. The Swanage Local Plan shows on page 19 in Table 1 that in 1991 the Swanage population was 9,520 and in 2013 it was 9,570, an increase of only 50 people over 21 years, an increase of 0.53%. During this same period the UK population rises from 57,438,500 in 1991 to 64,105,70, an increase of 6,667,00 or 11.6%.

e. The Swanage Local Plan states on page 19 in paragraph 67 that:

*Swanage has a higher proportion of older people than both the Dorset and the UK average with almost 31.5% of the population aged 65 and over compared to 26% for Dorset and 17% for the UK.*

117 Instead of putting care units in Swanage with the highest proportion of older people in Dorset, Purbeck plans to put them 25 miles away on a green field and near to a community – Moreton Station – which D92, page 22, paragraph 90 states has:

*....one of the highest populations of under 65s in Purbeck.*

118 Instead of recognising that Swanage is gradually atrophying and needs significantly more houses to prevent its current decline, only 40 houses (page 95), or 0.7% of its current housing stock has been allocated to Swanage. By comparison Redbridge Pit is a green field open countryside, has no houses and its housing increase is 490%.

119 The Local Plan does not satisfy the NPPF page 6, paragraph 11 a) quoted above because of its lack of concern for Swanage and the other towns in Purbeck which are all between 10 and 25 miles from Redbridge Pit.

120 The NPPF also states on page 8 in paragraph 16 a) that:

*16. Plans should:*

*a) be prepared with the objective of contributing to the achievement of sustainable development<sup>10</sup>*

121 As stated above, there is nothing sustainable about Moreton or Crossways and placing 490 houses and 65 care units on a green field will make these communities even less sustainable.

122 Only about 2% catch the train to travel to work (ONS 2011 Census results) and only about 2% of Crossways population uses the bus service. Despite at least 400 houses having been built in the area over the last 20 years the percentage catching the train and bus has if anything declined slightly.

123 2% of inhabitants catching a bus or 2% catching the train does not make an area sustainable.

124 The other 98% plus (the first bus from Crossways is at 07:40 and the last bus from Dorchester is at 17:55) travel by private car.

125 The Inspector who conducted the examination of the extant West Dorset Local Plan ( Mr Crysell, page 31, paragraph 153, 14 August 2015) stated in his Main Modifications letter that Crossways is

*....a dormitory of Dorchester.*

Moreton, although much smaller is also a dormitory of Dorchester.

126 By definition dormitories are not sustainable communities. The Cambridge University on line dictionary defines a dormitory town as:

*a place from which many people travel in order to work in a bigger town or city.*

127 This is exactly what people of working age do in Moreton and Crossways.

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

### **The Purbeck Local Plan**

128 The proposed housing on Redbridge Pit fails the Policy V1 MM5 **Amended policy**(page 30), and the Policy H8 **Submission draft policy** (page 134) and **Amended policy** (page 135) and the NPPF on page 22 paragraph 79.and should be deleted from the Purbeck Local Plan

### **MM35 Amended Policy**

129 The proposed allocation of around 490 new homes and around 65 extra care units, should not proceed, according to the conditions in the Purbeck Local Plan Submission and its Main Modifications MM5,35 and 43.

130 The rest of the comments on this Main Modifications consultation page are of purely theoretical value because the proposed around 490 new homes and around 65 extra care units should not proceed because they fail both Purbeck Council's **submission draft policy** and **amended policy**.

131 The proposed **..350sqm of convenience retail floor space**; should not proceed until a masterplan has been considered by Dorset Council and Moreton and Crossways Parish Councils.

132 The proposed **...financial contribution**... should be made to a feature which the majority of Moreton residents use, namely the proposed health centre. The percentage of Moreton and Crossways people who use the station is only about 2% and many of them appear to not have a car (ONS 2011 Census results).

133 This would be in addition to the contribution required in paragraph h and should be clearly labelled as such. This is to prevent the developers trying to hide a smaller contribution than that required in paragraph h.

134 The proposal in paragraph h to allow **an applicant** to be **able to demonstrate that it would be unnecessary and unreasonable to seek contributions** is definitely not agreed.

135 Applicants will use this paragraph to enable them to pay a very small or no contribution. The people of Moreton and Crossways would then be left with an overburdened and underfunded health centre.

136 The following new sub-paragraph should be added:

*m. The applicant is to contribute to new GP facilities at the health centre such that the health services available will be up to the same standard as those provided as part of strategic policy 16.*

137 The following new sub-paragraph on electric car charging should be added:

*n. The applicant is to ensure that sufficient electric car charging facilities are provided to enable overnight charging of at least one car per household for all households, on the assumption that all households have at least one battery powered car.*

138 The average number of cars per household in Crossways is 1.4 per household (ONS 2011 Census results)

## Concerns about the Purbeck Local Plan

- 139 The subsequent paragraphs have been added to illustrate a strong concern about the lateness and dubiousness of the Purbeck Local Plan.
- 140 The failure to construct a hierarchy correctly in MM4 and then to include a term meaning very small (quantum) to describe a very large housing allocation is indicative of my concern about the 11 years it has taken to produce a Purbeck Local Plan which still has major problems.
- 141 The plan could easily have been completed and endorsed by an Inspector by 2017 as required in the NPPF (page 11 paragraph 33) – I have participated in every stage of plan's progress. But for a variety of self-inflicted reasons the Purbeck Local Plan has still not been adopted.
- 142 The section on retail provision is illustrative.
- 143 The very comprehensive draft West Dorset plan for Crossways stated in 2018, three years after the extant Local Plan had been adopted, that retail provision should be part of a masterplan for Crossway and the surrounding area.
- 144 The Purbeck Local Plan had been in draft for 10 years with no mention of a shop on Redbridge Pit until the Main Modifications were published. But the MM35 retail proposal only consists of a very brief 8 words.
- 145 Thus where West Dorset had comprehensive statements about the need for masterplanning and a dedicated policy for cross-boundary strategic matters including retail provision after less than 3 years, after more than 10 years Purbeck only have 8 words about providing a shop and no masterplanning.
- 146 My concern is heightened by the fact that Purbeck planners have proceeded on the wrong assumption about the boundaries of Redbridge Pit and the Caravan Park. They appear to have overlooked the production by their own Purbeck District Council planning compatriots of a Moreton Station Settlement Boundary Review in 2015.
- 147 Redbridge Pit boundary and the boundary of the caravan park are clearly not within or adjoining Moreton Station settlement boundary as the Purbeck District document at the start of this review of MM35 shows.
- 148 The failure to recognise that neither of the Redbridge Pit or caravan park boundaries adjoins the Moreton Station settlement boundary invalidates Purbeck's whole rationale for housing on Redbridge Pit.
- 149 Quarries are treated as a green fields in planning terms. Because Redbridge Quarry does not adjoin Moreton Station settlement boundary it is in planning terms a stand-alone green field in open countryside. Development on a stand-alone green field is not acceptable according to the Purbeck Local Plan Submission, the Main Modifications and the NPPF.
- 150 Purbeck is, therefore, in the unique position of having policies which in accordance with the NPPF, disbar one of its own policies.

- 151 One of the many reasons given by the Ministry of Housing, Communities and Local Government (MHC&LG) for proposing a new 30 month Local Plan process in their recent consultation *Planning for the future* was that some Local Plans are so long in production that they are overtaken by events. This has practically happened to the Purbeck Local Plan.
- 152 On the assumption that the Purbeck Local Plan will be finalised in 2021, within a few months it will be overtaken by the consultation on the Dorset Council Local Plan which aims to be adopted in 2023.
- 153 Thus a Local Plan which has taken 11 years to produce will only be extant for 2 years at most.
- 154 This then begs the question: is there any point in continuing with the Purbeck Local Plan?
- 155 West Dorset stopped the review of their Local Plan, which was adopted in 2015, in preparation for the Dorset Local Plan.
- 156 Given that the Purbeck Local Plan still has major problems, especially over its very doubtful settlement hierarchy, the role of Crossways, the future of Moreton Station and the need for masterplanning in the Crossways- Moreton Station area to substantiate Purbeck's proposals for their Local Plan, and the fact that the Purbeck Local Plan will start to be overtaken by the consultation on the Dorset Local Plan within a few months of the Purbeck Local Plan's possible adoption, it would be better now for Dorset planners to stop work on the Purbeck Plan and concentrate on the Dorset Local Plan.



**Consultee:** [REDACTED]

**Event Name:** Purbeck Local Plan proposed Main Modifications

**Consultee reference:** 1190247

**Consultation reference:** 19

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To:

planningpolicy@dorsetcouncil.gov.uk

7 January 2021

Our Reference: 151047

Dear Sir/Madam

**Land interest at Lytchett Minster and Bere Farm**

**Response to Purbeck Local Plan Main Modifications Consultation**

submitted an examination hearing statement during 2019 in relation to green belt matters and attended the corresponding local plan hearing.

There was considerable discussion during the hearings in relation to the justification for green belt boundary alteration at Morden Park, associated SANG provision that would be 'enabled' by a holiday park development, and consideration of alternatives for a strategic SANG in North Purbeck.

In the event that a further hearing is proposed in relation to this matter, reserves the right to attend the session as necessary for continuity in relation to its original objection, examination statement and appearance on green belt matters.

Yours faithfully,

Andrew Elliott MRTPI  
Technical Director



## Response form for Purbeck Local Plan proposed Main Modifications consultation

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

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

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

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

*continued overleaf*

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

- Review of capacity from small sites [SD88];
- Proposed amendments to HRA [SD89];
- Appropriate assessment statement [SD96];
- Addendum to SA re settlement hierarchy [SD92];
- Strategy for mitigating effects on European sites, and Green Belt changes at Morden [SD93];
- Summary of viability issues raised by respondents and Council / Dixon Seale response to those concerns [SD97];
- Examination stage – viability update Purbeck Local Plan [SD117];
- Memorandum of understanding between Dorset Council and Savills on viability related issues for housing sites around Wool October 2019;
- Memorandum of understanding between Dorset Council and Wyatt Homes on viability related issues for Lytchett Matravers and Upton October 2019;
- Memorandum of understanding between Dorset Council and the Moreton Estate on viability related issues for Moreton Station/Redbridge Pit October 2019;
- Proposed changes to care provision [SD95]; and
- Planning the care provision in Purbeck [SD115]

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

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

## PART A

	Your contact details	Agent's Details (if applicable)
Name		██████████
Organisation / Group (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 support the representation

**Please note:**

- The consultation period starts on **Friday 13 November 2020** and will last for 9 weeks until 11.45pm on **Friday 15 January 2021**.
- Only representations made in this period will be referred to the Planning Inspector for consideration.
- Responses must be made using this form (sent in the post or attached to an e-mail) or online at this link [www.dorsetcouncil.gov.uk/plp-main-modifications](http://www.dorsetcouncil.gov.uk/plp-main-modifications) .
- Respondents must complete Part A of this response form and separate Part B forms for each proposed Main Modification that they might wish to comment on.
- All respondents must provide their name and address and/or email address.
- All forms must be signed and dated.
- Responses cannot be treated as confidential. By making a response you agree to your name and comments being made available for public viewing.
- Information on the council's privacy policy is available on our website at: [www.dorsetcouncil.gov.uk/your-council/about-your-council/data-protection/dorset-council-general-privacy-notice.aspx](http://www.dorsetcouncil.gov.uk/your-council/about-your-council/data-protection/dorset-council-general-privacy-notice.aspx) .
- The council will not accept any responsibility for the contents of comments submitted. We reserve the right to remove any comments containing defamatory, abusive or malicious allegations.
- If you are part of a group that shares a common view, please include a list of the contact details of each person (including names, addresses, emails, telephone numbers and signatures) along with a completed form providing details of the named lead representative.
- The proposed Main Modifications to the Purbeck Local Plan, proposed Purbeck Local Plan (2018-2034) policies map and the relevant background and evidence documents, are available to view on the Council's website at [www.dorsetcouncil.gov.uk/plp-main-modifications](http://www.dorsetcouncil.gov.uk/plp-main-modifications) .
- Hard copies of the consultation documents are available to loan from libraries in Dorchester, Lytchett Matravers, Swanage, Upton, Wareham and Wool. Please contact the libraries separately to ascertain their opening times, availability of documents to loan and for full details of their procedures to restrict the spread of COVID-19. You must follow any procedures relating to the COVID-19 in the libraries.
- If you have questions relating to the consultation, or the process for making a response, please contact the Planning Policy team on [01929556561](tel:01929556561) or [planningpolicy@dorsetcouncil.gov.uk](mailto:planningpolicy@dorsetcouncil.gov.uk).
- Response forms returned in the post should reference the Purbeck Local Plan Proposed Main Modifications Consultation, Dorset Council, Spatial Planning Team and be sent to South Walks House, South Walks Road, Dorchester, DT1 1UZ.
- Please tick the box if you would like to be notified of the following:

Adoption of the Local Plan.

## PART B

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

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

<b>Proposed Main Modifications reference number</b>	MM6, MM7, SD93 and MMCD3 - Green Belt and Morden
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### 2. Do you consider that the proposed Main Modification is:

- Legally compliant      Yes       No       See covering letter
- Sound      Yes       No

### To be considered legally compliant the proposed Main Modifications must:

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

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

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

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

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

See covering letter. Continued objection to green belt strategy and policy approach.

**Please continue on a separate sheet if necessary.**



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

See covering letter

**Please continue on a separate sheet if necessary.**

**Consultee:** [REDACTED]

**Event Name:** Purbeck Local Plan proposed Main Modifications

**Consultee reference:**

**Consultation reference:** 20

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[Redacted]

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**From:** [Redacted]  
**Sent:** 08 January 2021 21:19  
**To:** Planning Policy  
**Cc:** 'east stoke'; Cllr. Cherry Brooks  
**Subject:** Purbeck Local Plan

Dear Sirs,

On behalf of [Redacted] I would like to make a couple of comments on the Modifications to the Purbeck Local Plan. I have delegated authority to respond to the consultation and have tried to use the online form, but these comments do not really fit the criteria of whether the plan is sound or not. The form seems unnecessarily complex, for example, having to provide the details of every member of the Parish Council! We also note that the deadline for comment in your letter of 10 November is today 08 January 2021 but the website states 15 January.

However, E [Redacted] would make the following observations on the proposed changes for your consideration:

Page 19/20 Para 3 - The amended text makes reference to the plan relating to the area formerly covered by Purbeck District Council but now part of Dorset Council. Throughout the document though it does refer to "District" rather than "Purbeck" some clarification is suggested.

Page 181 Para 209 - It is unclear whether the remaining 7.6ha area of the Magnox site could still be used for employment?

Page 261 Small and Medium Sites with planning permission – There is no reference to the Royale Life Park Home sites currently being developed in East Stoke and Bere Regis. In the case of the one in East Stoke this change of use did not require planning permission but are for year round permanent occupancy. As this means an increase in homes should they not be included in the totals as windfall?

Yours Faithfully

[Redacted Signature]

**Consultee:** [REDACTED]

**Event Name:** Purbeck Local Plan proposed Main Modifications

**Consultee reference:** 1190735

**Consultation reference:** 21

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## Response form for: Purbeck Local Plan proposed Main Modifications consultation

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

The Purbeck Local Plan was submitted for examination, by a Planning Inspectorate appointed by the Secretary of State, in January 2019. Public examination hearing sessions were held in July, August and October 2019. The Inspector examining the local plan issued a Post Hearing Note in March 2020. The council has prepared a schedule of proposed Main Modifications to the presubmission draft of the local plan as part of its examination. These proposed Main Modifications are considered necessary to ensure that the local plan is legally compliant and/or sound.

Proposed Main Modifications have been suggested by the Inspector, respondents (including those participants at the hearing sessions) and by the council.

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

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

*continued overleaf*

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

- Review of capacity from small sites [SD88];
- Proposed amendments to HRA [SD89];
- Appropriate assessment statement [SD96];
- Addendum to SA re settlement hierarchy [SD92];
- Strategy for mitigating effects on European sites, and Green Belt changes at Morden [SD93];
- Summary of viability issues raised by respondents and Council / Dixon Seale response to those concerns [SD97];
- Examination stage – viability update Purbeck Local Plan [SD117];
- Memorandum of understanding between Dorset Council and Savills on viability related issues for housing sites around Wool October 2019;
- Memorandum of understanding between Dorset Council and Wyatt Homes on viability related issues for Lytchett Matravers and Upton October 2019;
- Memorandum of understanding between Dorset Council and the Moreton Estate on viability related issues for Moreton Station/Redbridge Pit October 2019;
- Proposed changes to care provision [SD95]; and
- Planning the care provision in Purbeck [SD115]

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

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

## PART A



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

### 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 support the representation

8
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**Please note:**

- The consultation period starts on **Friday 13 November 2020** and will last for 9 weeks until 11.45pm on **Friday 15 January 2021**.
- Only representations made in this period will be referred to the Planning Inspector for consideration.
- Responses must be made using this form (sent in the post or attached to an e-mail) or online at this link [www.dorsetcouncil.gov.uk/plp-main-modifications](http://www.dorsetcouncil.gov.uk/plp-main-modifications) .
- Respondents must complete Part A of this response form and separate Part B forms for each proposed Main Modification that they might wish to comment on.
- All respondents must provide their name and address and/or email address.
- All forms must be signed and dated.
- Responses cannot be treated as confidential. By making a response you agree to your name and comments being made available for public viewing.
- Information on the council's privacy policy is available on our website at:  
[www.dorsetcouncil.gov.uk/your-council/about-your-council/data-protection/dorsetcouncil-general-privacy-notice.aspx](http://www.dorsetcouncil.gov.uk/your-council/about-your-council/data-protection/dorsetcouncil-general-privacy-notice.aspx) .
- The council will not accept any responsibility for the contents of comments submitted. We reserve the right to remove any comments containing defamatory, abusive or malicious allegations.
- If you are part of a group that shares a common view, please include a list of the contact details of each person (including names, addresses, emails, telephone numbers and signatures) along with a completed form providing details of the named lead representative.
- The proposed Main Modifications to the Purbeck Local Plan, proposed Purbeck Local Plan (2018-2034) policies map and the relevant background and evidence documents, are available to view on the Council's website at [www.dorsetcouncil.gov.uk/plp-main-modifications](http://www.dorsetcouncil.gov.uk/plp-main-modifications) .
- Hard copies of the consultation documents are available to loan from libraries in Dorchester, Lytchett Matravers, Swanage, Upton, Wareham and Wool. Please contact the libraries separately to ascertain their opening times, availability of documents to loan and for full details of their procedures to restrict the spread of COVID-19. You must follow any procedures relating to the COVID-19 in the libraries.
- If you have questions relating to the consultation, or the process for making a response, please contact the Planning Policy team on  **01929556561** or
-  **planningpolicy@dorsetcouncil.gov.uk**.
- Response forms returned in the post should reference the Purbeck Local Plan Proposed Main Modifications Consultation, Dorset Council, Spatial Planning Team and be sent to South Walks House, South Walks Road, Dorchester, DT1 1UZ.
- Please tick the box if you would like to be notified of the following:

Adoption of the Local Plan.



## PART B

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

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

<b>Proposed Main Modifications reference number</b>	25
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### 2. Do you consider that the proposed Main Modification is:

- Legally compliant Yes  No
- Sound Yes  No

### To be considered legally compliant the proposed Main Modifications must:

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

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

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

**3. Some or all of these considerations of soundness may be relevant to the proposed Main Modification[s] that you are seeking to make a representation on. Please give details of why you consider the proposed Main Modification is / is not legally compliant or sound. (Please be as precise as possible).**

The references to 'sustainable developments' do not actually evidence how sustainability is met. The plan does not show how it addresses the current decreasing levels of sustainability and cohesion of village communities. The failure to apply a fully residency policy throughout Purbeck coupled with the already high numbers of second homes and holiday lets, means that developments in honeypot areas leads to anything other than sustainable and cohesive communities.

**Please continue on a separate sheet if necessary.**

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

**Please continue on a separate sheet if necessary.**

## PART B

### 3. Which proposed Main Modification does your representation relate to?

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

<b>Proposed Main Modifications reference number</b>	26
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### 4. Do you consider that the proposed Main Modification is:

- Legally compliant Yes  No
- Sound Yes  No

### To be considered legally compliant the proposed Main Modifications must:

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

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

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

**3. Some or all of these considerations of soundness may be relevant to the proposed Main Modification[s] that you are seeking to make a representation on. Please give details of why you consider the proposed Main Modification is / is not legally compliant or sound. (Please be as precise as possible).**

The public consultation stated a figure of 168 developments pa had been agreed by the council and the public. Indeed it is what the public was consulted on. The new figure has not been consulted on.

**Please continue on a separate sheet if necessary.**

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

**Please continue on a separate sheet if necessary.**

## PART B

### 5. Which proposed Main Modification does your representation relate to?

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

<b>Proposed Main Modifications reference number</b>	29
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### 6. Do you consider that the proposed Main Modification is:

- Legally compliant Yes  No
- Sound Yes  No

### To be considered legally compliant the proposed Main Modifications must:

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

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

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

**3. Some or all of these considerations of soundness may be relevant to the proposed Main Modification[s] that you are seeking to make a representation on. Please give details of why you consider the proposed Main Modification is / is not legally compliant or sound. (Please be as precise as possible).**

The public were told that the principles of the Plan were to give development security and control thus ensuring that no unplanned development sites come forward. However, it is clear that there is great reliance on windfall sites to meet the targets and thus the principles of the plan are undermined.

**Please continue on a separate sheet if necessary.**



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

**Please continue on a separate sheet if necessary.**

## PART B

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

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

<b>Proposed Main Modifications reference number</b>	MM30
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### 2. Do you consider that the proposed Main Modification is:

- Legally compliant Yes  No
- Sound Yes  No

### To be considered legally compliant the proposed Main Modifications must:

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

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

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

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

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

933 dwellings do not have an allocated site. The local people have not been consulted on the location of these 933 dwellings. 933 dwellings will not be absorbed within the windfall category.

Plan numbers are not transparent.  $180pa \times 16 \text{ years (plan period)} = 2,880$ . Yet on age 95 the total figure is 3,199 plus 130 extra care beds. Where did the 319 properties materialise from?

**Please continue on a separate sheet if necessary.**

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

**Please continue on a separate sheet if necessary.**

## PART B

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

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

<b>Proposed Main Modifications reference number</b>	MM32
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### 2. Do you consider that the proposed Main Modification is:

- Legally compliant Yes  No
- Sound Yes  No

### To be considered legally compliant the proposed Main Modifications must:

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

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

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

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

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

(b) “new housing must deliver affordable homes”. The Council and the Government have failed to address the increasing problem of lack of affordability. It has been proven that the government’s definition of affordable does not meet the needs of the demographic expected! The affordable housing cost is reliant on the ‘local’ area prices, meaning that developments in areas where house prices are high, may well deliver housing at 80% of local market value but it remains outside of what is reasonably deemed to be affordable, especially when considering local income. Affordability is subjective and it remains misleading to use the term in such a broad way. The use of the word affordable is to deliberately mislead the public into believing that all the affordable allocation will be genuinely affordable, i.e. social, and that the properties will meet their needs. It will not.

(g) If sustainability is desirable then every new dwelling should be built electric car ready. The wording says “where possible” but it’s difficult to comprehend how or why a new build might not be able to achieve that!

(m) Again, inclusion of something neither the developers nor residents have any control over. There is no mention of how development can be mitigated in areas where there is no public transport and where there is no ‘sustainable modes of transport’ whatever that means!

**Please continue on a separate sheet if necessary.**

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

**Please continue on a separate sheet if necessary.**

## PART B

### 4. Which proposed Main Modification does your representation relate to?

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

<b>Proposed Main Modifications reference number</b>	MM36
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### 5. Do you consider that the proposed Main Modification is:

- Legally compliant Yes  No
- Sound Yes  No

### To be considered legally compliant the proposed Main Modifications must:

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

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

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

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



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

Despite assurances that the maximum number of dwellings to be built at Wool was 470, it is noted that this now states “around” 470. What are the precise limits numerically for “around”? “Around” was not consulted on!

The fluidity of numbers seems to serve only one purpose and that is the ability to dump extra development in areas which were hotly contested during the public consultations. The public consultations now have no real value as a result.

**Please continue on a separate sheet if necessary.**

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

**Please continue on a separate sheet if necessary.**

## PART B

### 7. Which proposed Main Modification does your representation relate to?

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

<b>Proposed Main Modifications reference number</b>	MM38
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### 8. Do you consider that the proposed Main Modification is:

- Legally compliant Yes  No
- Sound Yes  No

### To be considered legally compliant the proposed Main Modifications must:

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

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

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

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

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

Given the prescriptive methodology which determined the build numbers, why isn't it possible for the Council to be decisive on the numbers to be built in any location? Even the care units use the term "around".

**Please continue on a separate sheet if necessary.**

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

**Please continue on a separate sheet if necessary.**

## PART B

### 10. Which proposed Main Modification does your representation relate to?

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

<b>Proposed Main Modifications reference number</b>	MM39 (page124)
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### 11. Do you consider that the proposed Main Modification is:

- Legally compliant Yes  No
- Sound Yes  No

#### To be considered legally compliant the proposed Main Modifications must:

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

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

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

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

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

The Council identified three sites for up to 150 dwellings. This is now altered to “around”. Surely the sites have been assessed and it has been deemed now suitable for 150. “Around” calls into question the assessment skills of officers.

**Please continue on a separate sheet if necessary.**

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

**Please continue on a separate sheet if necessary.**



## PART B

### 13. Which proposed Main Modification does your representation relate to?

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

<b>Proposed Main Modifications reference number</b>	MM42
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### 14. Do you consider that the proposed Main Modification is:

- Legally compliant Yes  No
- Sound Yes  No

### To be considered legally compliant the proposed Main Modifications must:

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

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

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

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

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

This is nonsense. Where is the data that supports the statement that developments sold without a full residency requirement “have an important role in enhancing and maintaining the vitality of rural communities”? Where is the evidence that holiday lets offer any local economic contribution other than the use of cleaner (and even then this is often carried out by bigger firms from outside the area)?

‘Each small site’ is limited to a maximum of 30, 20, 15 or 5 dwellings, however, the plan does not detail how many small sites would be allowed per rural area or village etc. There is a reference to the ‘cumulative effect of the development’ but NOT to the cumulative number of more than one site within a rural area. The council promised that only ONE site per rural area would be allowed, however, that is not detailed in this plan, why?

**Please continue on a separate sheet if necessary.**

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

**Please continue on a separate sheet if necessary.**

## PART B

### 16. Which proposed Main Modification does your representation relate to?

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

<b>Proposed Main Modifications reference number</b>	MM43
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### 17. Do you consider that the proposed Main Modification is:

- Legally compliant Yes  No
- Sound Yes  No

### To be considered legally compliant the proposed Main Modifications must:

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

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

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

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

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

Change from “must not harm” to “does not harm”. What is the purpose of this change and how does it impact the meaning?

**Please continue on a separate sheet if necessary.**

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

**Please continue on a separate sheet if necessary.**

## PART B

### 19. Which proposed Main Modification does your representation relate to?

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

<b>Proposed Main Modifications reference number</b>	MM47
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### 20. Do you consider that the proposed Main Modification is:

- Legally compliant Yes  No
- Sound Yes  No

### To be considered legally compliant the proposed Main Modifications must:

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

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

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

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



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

The plan seeks to lay out the percentage split of types of allegedly affordable provision, however, the council and the inspector have not made provision to safeguard the 10% allowance for Social Housing. Given the need for good quality low cost homes, it is imperative that the Social housing, which is least profitable for the developers, is not the first to be lost should viability become an issue. The Social housing element should be protected and there should be an undertaking that it will be built without question.

**Please continue on a separate sheet if necessary.**

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

**Please continue on a separate sheet if necessary.**

## PART B

### 22. Which proposed Main Modification does your representation relate to?

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

<b>Proposed Main Modifications reference number</b>	MM50
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### 23. Do you consider that the proposed Main Modification is:

- Legally compliant Yes  No
- Sound Yes  No

#### To be considered legally compliant the proposed Main Modifications must:

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

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

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

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

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

The amendment allows for a further undermining of the purpose of a rural exception site. The council admits that the purpose is to deliver what it considers as affordable housing, but that UP TO 30% of the development can be sold on the open market to finance the development of the affordable!

The amendment removes the specific maximum of market housing at 30% and instead uses the term 'majority' when referring to the affordable units. In real terms, this means an increase of market housing allowed on the site which will be up to 49% with 51% being affordable in the worst case scenario. As most developers are private companies and NOT charities, it is highly likely that maximum advantage will be taken to maximise profits and it is naive to think otherwise!!

**Please continue on a separate sheet if necessary.**

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

**Please continue on a separate sheet if necessary.**

## PART B

### 25. Which proposed Main Modification does your representation relate to?

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

<b>Proposed Main Modifications reference number</b>	MM57
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### 26. Do you consider that the proposed Main Modification is:

- Legally compliant Yes  No
- Sound Yes  No

### To be considered legally compliant the proposed Main Modifications must:

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

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

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

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

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

West Lulworth Parish Council welcomes inclusion of the Second Homes policy H14. As was strongly expressed at the inspection hearings, we and many other Parish and Town Councils are still of the view that the policy should be extended to all dwellings built within the Purbeck Plan area. An extended policy would ensure genuinely sustainable developments for communities which will, in turn help with social cohesion and meet local need rather than developments where the developer intends to sell to the second home and holiday let market.

**Please continue on a separate sheet if necessary.**

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

**Please continue on a separate sheet if necessary.**



## PART B

### 28. Which proposed Main Modification does your representation relate to?

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

<b>Proposed Main Modifications reference number</b>	MM66
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### 29. Do you consider that the proposed Main Modification is:

- Legally compliant Yes  No
- Sound Yes  No

### To be considered legally compliant the proposed Main Modifications must:

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

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

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

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

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

The council has failed to consider that properties providing holiday accommodation are often also the permanent residence of the owner and accommodation provider. The council has not considered that many will want to remain in their homes on retirement. It is unreasonable for them to have to jump through hoops in order to change the use of their home from business to domestic.

**Please continue on a separate sheet if necessary.**

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

**Please continue on a separate sheet if necessary.**

## PART C

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

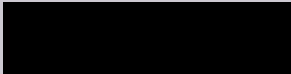
Separate Part C forms must be completed for each appraisal or evidence document commented upon, making clear the section or paragraph you're referring to

<b>Document</b>	
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**Please continue on a separate sheet if necessary.**

**Please sign and date this form:**

Signature:



Date: 15 January 2021