



Responses: proposed Main Modifications to the Purbeck Local Plan

Consultation references: 36 to 40

Consultee: [REDACTED]

Event Name: Purbeck Local Plan proposed Main Modifications

Consultee reference: 1190180

Consultation reference: 36



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 .
- 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 .
- The council will not accept any responsibility for the contents of comments submitted. We reserve the right to remove any comments containing defamatory, abusive or malicious allegations.
- If you are part of a group that shares a common view, please include a list of the contact details of each person (including names, addresses, emails, telephone numbers and signatures) along with a completed form providing details of the named lead representative.
- The proposed Main Modifications to the Purbeck Local Plan, proposed Purbeck Local Plan (2018-2034) policies map and the relevant background and evidence documents, are available to view on the Council's website at  www.dorsetcouncil.gov.uk/plp-main-modifications .
- Hard copies of the consultation documents are available to loan from libraries in Dorchester, Lytchett Matravers, Swanage, Upton, Wareham and Wool. Please contact the libraries separately to ascertain their opening times, availability of documents to loan and for full details of their procedures to restrict the spread of COVID-19. You must follow any procedures relating to the COVID-19 in the libraries.
- If you have questions relating to the consultation, or the process for making a response, please contact the Planning Policy team on  **01929556561** or  planningpolicy@dorsetcouncil.gov.uk.
- Response forms returned in the post should reference the Purbeck Local Plan Proposed Main Modifications Consultation, Dorset Council, Spatial Planning Team and be sent to South Walks House, South Walks Road, Dorchester, DT1 1UZ.
- Please tick the box if you would like to be notified of the following:



Adoption of the Local Plan.

PART B

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

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

Proposed Main Modifications reference number	MM3
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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).

N / A

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)

██████████ supports this Main Modification, insofar as it seeks to remove the land proposed for the Morden Park holiday park (policy I5) from the Green Belt.

This clarification is necessary to ensure the deliverability of the holiday park alongside the SANG.

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.

Proposed Main Modifications reference number	MM6
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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).

N / A

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)

██████████ supports this Main Modification, in so far as it relates to the Morden Park holiday park (Policy I5).

This clarification at paragraph 46 pertaining to Morden Park is necessary to ensure the deliverability of the holiday park alongside the strategic SANG to serve the north of Purbeck, and to clarify that the need for SANG, and the linked holiday park, meets the "exceptional circumstances" requirement of para 136 of the 2019 NPPF.

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.

Proposed Main Modifications reference number	MM7
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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).

N / A

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)

██████████ supports the amendments to the Green Belt Policy (V2) in so far as they relate to Morden Park. The changes pertaining to Morden Park clarify the relationship of the holiday village to the Green Belt.

The Estate notes that the requirement for the SANG to be available for use prior to completion of associated residential development aligns with paragraph 15 of the Memorandum of Understanding between Dorset Council, the Estate and Natural England, signed in June 2019.

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.

Proposed Main Modifications reference number	MM66
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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).

N / A

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)

██████████ supports this Main Modification as it gives primacy to Policy I5 when assessing the tourism element (holiday village) of the Morden Park allocation.

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.

Proposed Main Modifications reference number	MM76
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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).

N / A

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)

██████████ supports the changes in this Main Modification, as it clarifies the relationship between the allocation within Policy I5 and the Green Belt.

Further the Estate welcomes the acknowledgement that the scale of the holiday park is to be "of up to 100 units", which aligns with paragraph 17 of the Memorandum of Understanding between Dorset Council, the Estate and Natural England, signed in June 2019.

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.

Proposed Main Modifications reference number	MM77
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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).

While the [REDACTED] support the broad thrust of the changes within this Main Modification the test of proposed addition bullet (l), relating to the removal of rhododendron, does not fully reflect the wording of paragraph 16 of the Memorandum of Understanding between the Dorset Council, the Estate and Natural England (June 2019).

As currently worded, this bullet is not "effective" as it is not deliverable over the plan period, nor is it based on effective joint working.

Separately, the final additions to MM77 (below bullet (m)) need amendment in relation to funding of the strategic SANG, and when such information should be presented for consideration. This is needed to properly reflect paragraph 16 of the Memorandum of Understanding (MoU) between Dorset Council, the Estate and Natural England, signed in June 2019.

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)

Bullet (I) should be reworded from :

"I. Eradication of rhododendron; and"

To:

"I. Phased rhododendron clearance; and"

Secondly, the final sentence of this Modification should be amended from:

"The promoter of the holiday park will need to demonstrate that the holiday park can support the SANG provision in perpetuity."

To:

"The promoter of the holiday park will need to demonstrate through the requisite planning application that the holiday park can, with other available sources of funding, support the strategic SANG provision in perpetuity."

Please continue on a separate sheet if necessary.

PART C

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

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

Document

SD93 - Strategy for mitigating effects on European sites, and Green Belt changes at Morden

██████████ support the approach and conclusions of this document.

Please continue on a separate sheet if necessary.

Please sign and date this form:

Signature: ██████████

Date: 14 January 2021

Consultee: [REDACTED]

Event Name: Purbeck Local Plan proposed Main Modifications

Consultee reference: 1188067

Consultation reference: 37

Ms Beverley Doward
Planning Inspector: Purbeck Local Plan
C/O: Dorset Council,
Spatial Planning Team
South Walks House,
South Walks Road,
Dorchester,
DT1 1UZ

By Email Only: planningpolicy@dorsetcouncil.gov.uk

15th January 2020

Dear Ms Doward,

PURBECK LOCAL PLAN 2018-2034: MAIN MODIFICATIONS

As you know, ██████████ LLP is instructed by ██████████) in relation to the Examination in Public of the Purbeck Local Plan 2018-2034 (“the Plan”). Accordingly, we set out below ██████████’s response to your proposed Main Modifications to the Plan. We note that these have been agreed between you and Dorset Council (“the Council”).

██████████ remains acutely concerned about the deliverability of identified sites in Wareham, albeit that these sites are not proposed for allocation in the Purbeck Plan but the Wareham Neighbourhood Development Plan (NDP). This also raises another continued concern which is the proposed delegation of strategic capacity assessments and spatial strategy to the NDP which does not properly respect the primacy of the Local Plan. Crucially and as noted in the NDP, it cannot release land from the Green Belt unless exceptional circumstances are set in the Local Plan. Therefore, as matters stand if in the future the NDP does recognise that release of Green Belt land is required to meet its housing need it will not be able to do so having been provided no flexibility by the Local Plan. This despite evidence provided in the in the Council’s latest Green Belt Review that both Sites are suitable for release from the green belt for residential purposes. Two of only six such sites in the district.

Equally of importance is the fact that a NDP need only meet the basic conditions to be ‘Made’ which involves a far less rigorous examination into the credibility of its allocations than a Local Plan. Even allowing for this lower bar the NDP has already failed examination precisely due to issues with its proposed allocations which highlights the importance of the issue. The NDP remains unmade.

By deleting the proposed Green Belt release (and site) in the Local Plan, Wareham now has no meaningful room to expand given all other land is either flood plain, AONB or within the 400m buffer of ecological constraints. To draw the boundary of such an important town as Wareham as tightly as is now being proposed would be more acceptable if sufficient and robust evidence supported the proposed brownfield allocations for Wareham. This would then ensure that the Local Plan had sufficient confidence that those sites (and by association the housing target) were deliverable. However, the Local Plan has not done this.

The cornerstone of proposed development in Wareham is the “Wareham Health Hub” project introduced by the council during the examination process. This involves the complex reuse of three council owned and

interlinked brownfield sites including an existing operating care home and health facilities. The project requires considerable demolition and the relocating of existing uses meaning viability and deliverability are not assured. This is even more so given budget pressures experienced by councils in light of covid-19. The project appears considerably behind its proposed timeframe. Given its importance to housing delivery in Wareham it is recommended that the Inspector satisfies herself as to its deliverability.

Furthermore, the decision to entirely delete the Green Belt review, rather than to propose safeguarded land (for example), or indeed to simply retain the exceptional circumstances for a Green Belt review to be completed through the Neighbourhood Plan (as allowed by NPPF paragraph 136) means there is no available release valve should housing delivery falter, and local need not be met.

The Local Plan's omission of proper site assessment for Wareham's residential need combined with the "low bar" requirement of the NDP means that even if the NDP is made there is now the very real risk that Wareham will see very little development for many years, and local need will be exacerbated.

The sites proposed to be allocated at Wareham (from where the settlement capacity is calculated) are not viable, available, or deliverable.

Furthermore, it is perverse that the local plan now seeks to protect elements of the employment space – which is in turn partly proposed for housing development in the NDP – which it was not intending to do previously.

Hereunder, we comment on four main modifications that are most relevant to ██████████ and land at North Wareham. These are, in plan order:

1. **Chapter 2, Vision and Objectives, paragraphs 43 and 44**, where the intention to change the Green Belt boundary at Wareham has been deleted.
2. **Policy V1: Spatial strategy for sustainable communities**, where the housing target for Wareham has been reduced to 207 homes in the plan period.
3. **Chapter 4, Housing, paragraph 114**, which refers to a slightly increase housing need across the (old) district area but reiterates the role – and implied primacy – of the Wareham Neighbourhood Plan and its evidence.
4. **Chapter 5, Economy, Policy EE1**, where perversely areas of Westminster Road and Johns Road industrial areas in Wareham are now proposed to be protected for employment uses, where they were not in the submitted Purbeck Plan.

It is disappointing that the evidence which Purbeck Council collected to assess and review the Green Belt has been disregarded in favour of emerging evidence which has not been tested and is not in fact directly part of the Local Plan examination process. The evidence for the Wareham NDP is not part of the examination evidence for the Purbeck Local Plan and is being separately challenged by Welbeck through the NDP process. It is illogical that untested evidence can be relied upon and reliance for the delivery of houses in Wareham can be placed on site allocations which are not part of the Local Plan.

Sites used to derive the capacity for development in Wareham – in particular Westminster Road industrial estate – are active employment sites and not viable for development. ██████████ has submitted strong evidence which demonstrates this. This evidence, a report produced by Vail Williams, can be read at **Annex A**. It demonstrates that through recent independent transactions of industrial units within Westminster Road that they are demonstrably more valuable in their current use than the likely achievable residential land value. The fact that the owners of the units support the flexibility to explore residential use is not surprising, flexibility of use is rarely a bad thing for owners, but it not logical to assume, as the Local Plan does by not considering matters further, that they stand a realistic chance of coming forward in residential form.

There is sufficient sound evidence which supports the original proposals to remove Welbeck's sites at North Wareham from the Green Belt and to allocate both for housing development. These sites are viable,

deliverable and can mitigate all constraints including the provision of a significant Suitable Alternative Natural Greenspace, which Natural England has confirmed would be of a very high quality with outstanding features.

██████ has produced a master plan for the proposed SANG at North Wareham and this can be seen at **Annex B** to this letter. Welbeck initially had a proposal for a smaller SANG to which Natural England previously confirmed that there was SANG capacity for around 180 dwellings in Wareham. Through further discussion with Charborough Estate and careful planning Welbeck is now able to present a proposal will see the creation of over 19ha of natural greens pace. The principles of SANG are to provide areas of natural green space for informal recreation as mitigation for new development which may put pressure on nationally or internationally designated ecological sites, such as Special Protection Areas (SPAs). The SANG will provide a series of walking routes within a natural setting near to new developments to reduce visitor pressure on existing habitats. The proposed SANG will provide a high quality, heathland fringe landscape, with undulating walking routes and opportunities to experience nature at first hand.

The proposals have the potential to include:

- A 3.76 km circular walking route This will be surfaced with hoggin to ensure a low impact, decent walking surface is achieved
- Informal, mown paths will also be created, providing alternative routes around the SANG
- Visitor parking for 20 cars, including two disabled spaces
- Two pedestrian crossing points on Bere Road to enable a larger circular walk to be achieved
- Management and enhancement of areas of wet grassland
- New native tree and scrub planting. The proposed trees will include a mix of deciduous and evergreen species, reflecting the localised landscape context
- New planting will be introduced along key boundaries to create a degree of separation between the SANG and neighbouring uses
- Management of existing areas of acidic grassland and creation of new areas through the spreading of topsoil won from the proposed development areas to the east
- 25 m planted buffer to Wareham Forest, which includes new fencing to deter public access between the SANG and Northport Heath
- Creation of several viewpoints along the walking route which will afford panoramic views of Wareham Forest, the Seven Barrows and the Purbeck Hills, as well as providing elevated views over Wareham
- Provision of interpretation boards around the SANG which will provide information on the landscape setting, the history of the area and the ecology associated with the site and its context
- Protection of the tumuli which form part of the Seven Barrows SAM by new fencing and the introduction of interpretation boards providing information about the features and their history
- A secure area will be created for dogs to be off lead Livestock fencing will be introduced along vegetated boundaries to ensure that it is not visually obvious, but ensures dogs are contained within the defined area
- Existing internal fences will be removed to open up the grassland, reducing the perception of an agricultural landscape

- Informal paths will be cut through the areas of dense scrub to create fire breaks, as well as alternative routes to the circular path

Turning to the proposed modifications, each relate to Welbeck's position as set out above:

Proposed Main Modification (MM) 3: Chapter 2, Vision and Objectives, paragraphs 43 and 44.

This is the section of the plan where Green Belt changes are discussed, and the modification is short:

...removal of some land from the green belt at Lytchett Matravers, Upton and Wareham

██████ notes the continued need for homes in sustainable locations such as Wareham, and our submissions here outline that the proposed allocations in Wareham are largely unviable and undeliverable. Therefore, there continue to be exceptional circumstance to remove land from the Green Belt, at Wareham.

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

Policy V1 is where the housing targets for various locations in the (old) district are set out, and this is where the number for Wareham is set:

Policy V1: Spatial strategy for sustainable communities

1. To deliver the Council's vision for Purbeck, the Purbeck Local Plan makes provision for new ~~allocates sites for~~ housing as follows...

c. Neighbourhood plan sites at:

- *Wareham – ~~300~~ around 207 new homes including windfall*

As above, ██████ reiterates that the numbers and sites at Wareham are unrealistic and based on weak evidence. Moreover, the Neighbourhood Plan should be subservient to the Local Plan not vice versa.

Proposed Main Modification (MM) 27: Chapter 4, Housing, paragraph 114

Paragraph 114 of the Local Plan is where the distribution of new homes in Purbeck is explained, this is another place where the numbers for Wareham are reduced, and there is a reference to the NDP taking the lead where the Local Plan ought to:

Purbeck's housing need is calculated using the standard methodology introduced in the NPPF from July 2018 which requires 16880 homes per year to be built in Purbeck. Over the plan period of 16 years, this results in a total requirement of 2,68880 homes...

...The allocations needed to meet Purbeck's housing needs are split between:

- *Wareham Neighbourhood Plan – referendum and adoption is expected in 204921 and it is planning to deliver ~~300~~205 homes on 6 sites plus 100 homes as a result of predicted windfall development. However, this plan and it's 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.*

Justification for these changes, as stated in the modification document is:

- “To ensure that the local plan is justified. The proposed Main Modification reflects updated evidence on sources of housing land supply in Wareham (as referenced in the emerging Wareham Neighbourhood Plan).”

Again, as above, Welbeck reiterates that the numbers and sites at Wareham are unrealistic and based on weak evidence which is not part of the Local Plan examination. Moreover, the NDP should be subservient to the Local Plan not vice versa.

Proposed Main Modification (MM) 61: Chapter 5, Economy, Policy EE1

Policy EE1 is where the employment land supply (new allocations and protected existing sites) is listed. Through the main modifications, the protection of land at Westminster Road and Johns Road industrial areas is reintroduced into the Local Plan, where it was originally proposed to remove all protection:

Policy EE1: Employment land supply

To enable the growth of high quality employment opportunities and a prosperous local economy, provision is made for 47.0 46.01 hectares of available employment land...

ES13	West Minster Road	Wareham	2.5	0.0
	Industrial			
ES14	Johns Road	Wareham	0.5	0.0
	Industrial			

The Council's justification for this change is as follows:

To ensure that the local plan is effective and justified. The proposed Main Modification relating to safeguarded employment land at Wareham and Bere Regis reflects 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).

██████████ supports the protection of the two industrial estates as employment sites, and the evidence at **Annex A** of this letter demonstrates that Westminster Road is an active and viable employment location. The whole of the two sites should be protected.

The justification for the modification is perverse; again, the NDP is taking the lead over the strategic plan, and moreover it is the NDP which is seeking to allocate the rest of the two industrial areas for residential development. There is a very real risk here that the two plans will undermine each other, the NDP risks introducing housing adjacent to industrial uses which is not good spatial planning and/or the introduction of housing will mean that the continued use of the industrial areas becomes untenable because the two do not make good neighbours. Thus this would lead to the loss of protected employment.

Concluding Comments

██████████ is pleased to have had the opportunity to be involved in the examination of the Purbeck Local Plan 2018-2034, and to comment on these proposed Main Modifications. In this letter I have detailed several weaknesses and contradictions in the modified Local Plan which point to the need to reinstate the exceptional circumstances to release land from the Green Belt at Wareham. ██████████s sites at north

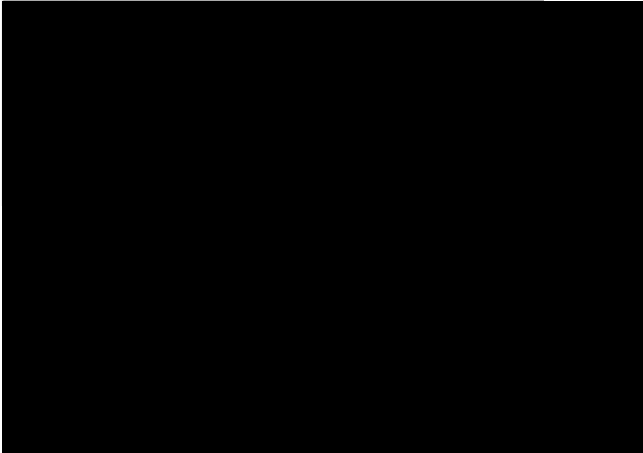
Wareham, and the associated SANG can be allocated through the Local Plan, or the exceptional circumstances could be set out to allow allocation in the Wareham NDP.

Alternatively, if you do not accept at this stage that the proposed allocations within the NDP have been demonstrated to be undeliverable, one or both of [REDACTED] sites should be released from the Green Belt and safeguarded for residential development at a future date if housing delivery in Wareham fails. This would recognise the uniquely constrained/undevelopable nature of all other expansion land around Wareham which means as matters stand there is no "Plan B" for housing delivery and "Plan A" has not been sufficiently tested for full confidence.

[REDACTED] is committed to remaining engaged on these sites and will make further submissions regarding them to the Wareham NDP submission and the emerging Dorset Plan.

I trust that these comments are useful, and the final report for the plan is awaited with interest.

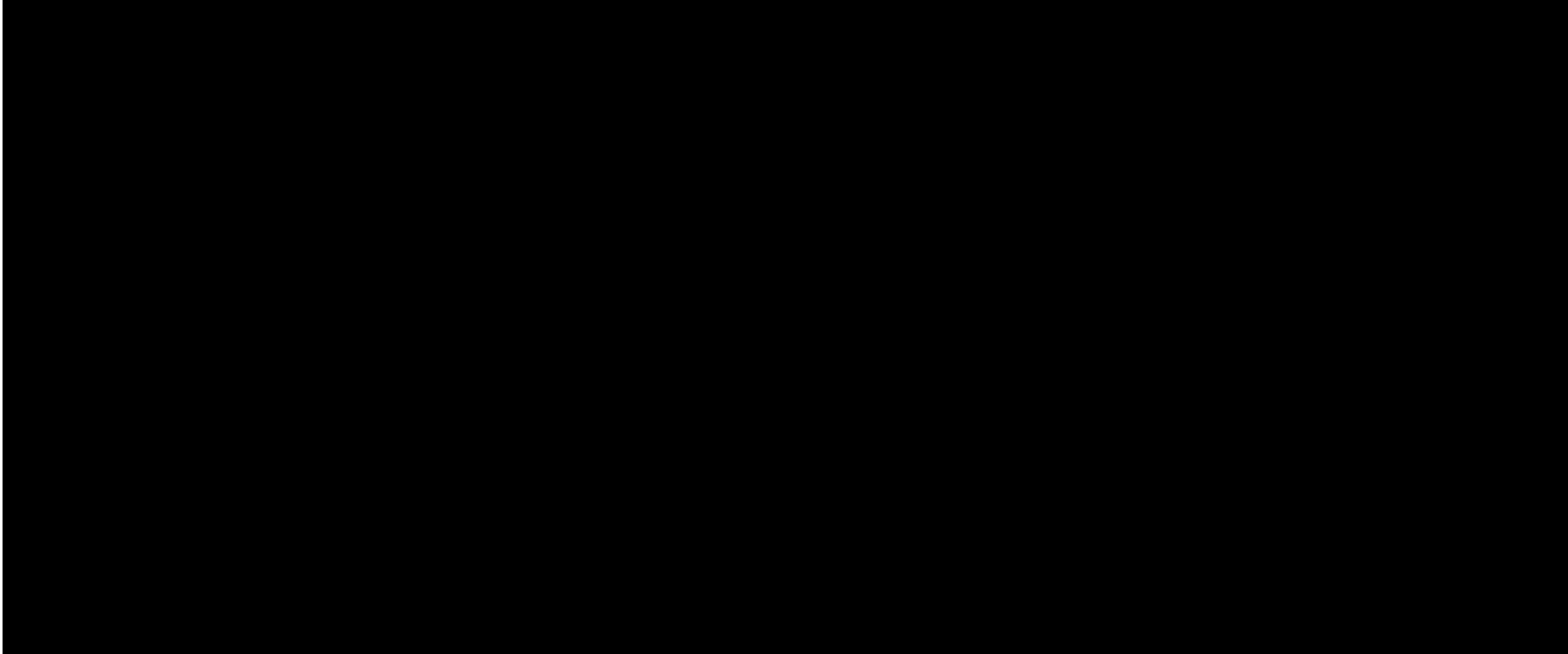
Yours sincerely



Northport Park Bere Road, Wareham

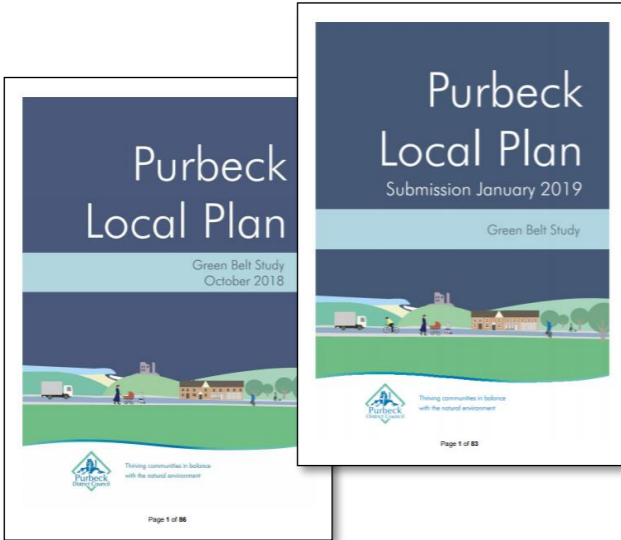


Proposed SANG Vision Document



Introduction

is promoting two sites on the north western side of Wareham for residential development through the Emerging Local Plan. The sites were identified as being suitable for release from the Green Belt in the Purbeck Local Plan - Green Belt Study (October 2018) and Local Plan Submission document (January 2019).



Criteria 1 - To check the unrestricted sprawl of large built-up area
 126. This land parcel is not positioned adjacent to the Bourne-mouth, Poole and Christchurch conurbation and therefore does not act as a check on the spread of the large built-up area.
Performs no significant function

Criteria 2 - To prevent neighbouring settlements from merging into one another
 127. Closely related to the edge of the Wareham, with no nearby settlements to the north or west, this site does not prevent neighbouring settlements from merging.
Performs no significant function

Criteria 3 - To assist in safeguarding the countryside from encroachment
 128. The site comprises undeveloped agricultural, horse culture and allotment land which makes a positive contribution toward the character of the countryside.
Fully satisfies

Criteria 4 - To preserve the setting and special character of historic towns
 129. Positioned to the north west of Wareham's historic town centre this site does not serve a significant function in preserving its setting or special character.
Performs no significant function

Criteria 5 - Strategic function of the green belt
 130. The site forms part of Parcel 6 in the Council's stage 1 district-wide green belt review. The parcel covers a large area and scores highly for its significance (constrained by the River Piddle and land which is part of European sites) and moderately for its openness / contribution that it makes toward the character of the countryside. The site is only partially visible from distant views, justifying the Wareham town walls, and is not considered as serving a significant function in preserving the setting and special character of Wareham. Were it to be developed, sensitive design would be necessary in terms of building heights and form focussing any built form development on the western end on lower ground and routing the existing housing off Northmoor Way so as to minimise harm caused to the openness of the green belt and lessen the degree of impact that development on the site

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Land adjacent to Carey Road and to the west of Westminster Road Industrial Estate- SHLAA0059

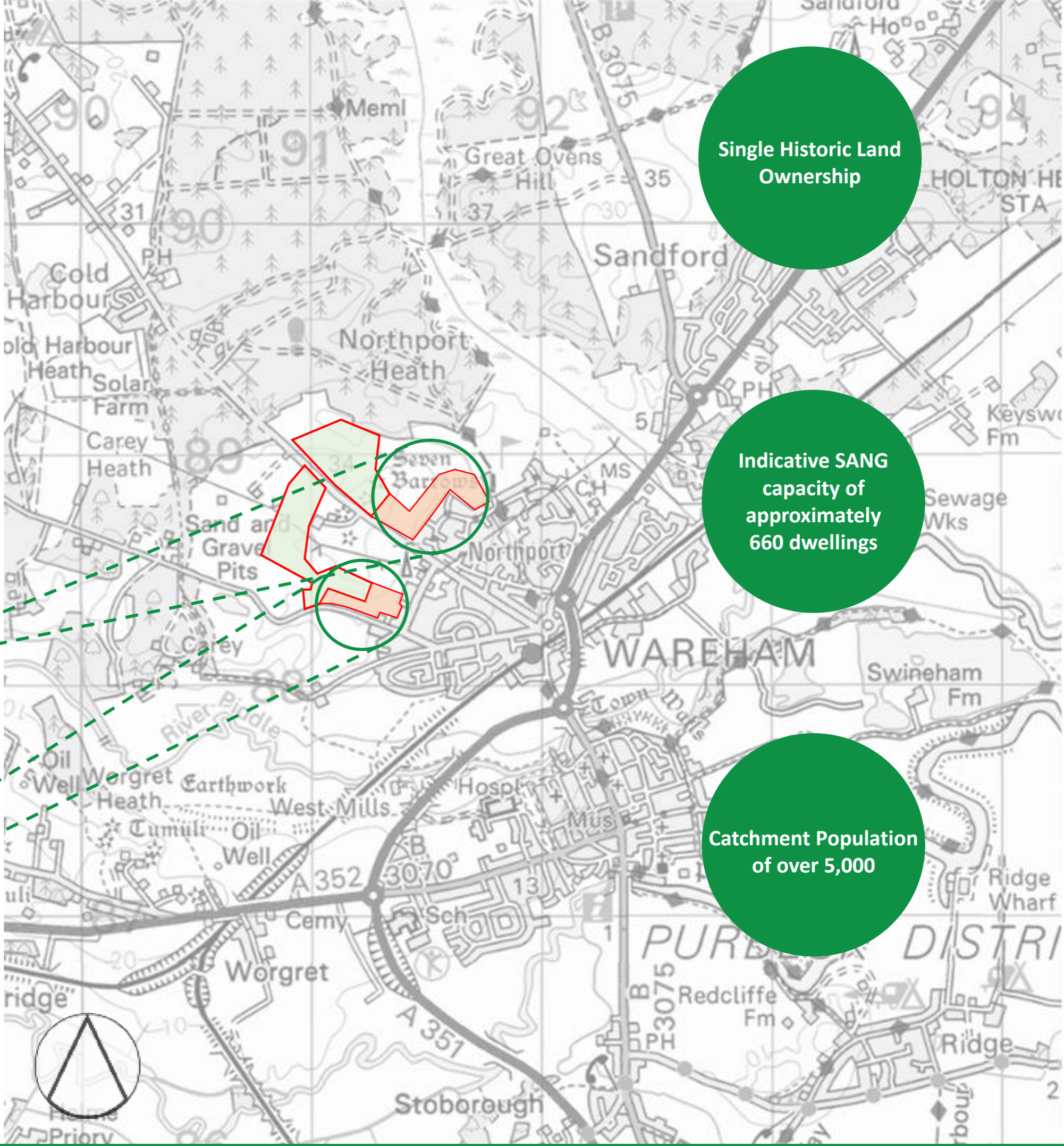
113. This site is situated to the north of Carey Road which forms southern boundary running in a south easterly to north easterly direction, behind the line of mature mainly deciduous trees. It includes a largely rectangular shaped field positioned next to Carey Road (the site's boundaries are defined on its other sides by field boundaries made up of existing vegetation including trees of varying size and maturity). Ground levels rise to the west and north of this part of the site (the boundary with Carey Road and rising ground levels create a strong sense of enclosure around the edges of this part of the site). There are few public views into the site, it being generally restricted by the landform and boundaries. Trees and vegetation growing along the southern boundary are important in defining the site's edges and screening views from Carey Road.

114. The second part of the SHLAA site is formed from an irregularly shaped grouping of two fields positioned next to the western boundary of Westminster Industrial Estate. Ground levels rise further to the west of the industrial estate. The site currently comprises areas of rough pasture / scrubland (the landscape positively contributes toward the wider scrubland which is characteristic of the North Wareham Heath/Forest area). The site has an open character, but wider views into the site are partially screened by the trees growing around its boundaries. The site's topography and landscape features combine to suggest that any potential development should be focussed on the fields towards the eastern side of the site on the lower ground (so as to lessen adverse impacts on the openness of the green belt). The fields are reasonably well defined by their vegetated boundaries which will create enclosure and serve to reduce the impact of views into the site, in addition, there is scope to strengthen the site boundaries through additional tree planting.

Annotations added on 10/20/19 10:40 AM

Criteria 1 - To check the unrestricted sprawl of large built-up area
 115. This land parcel is not adjacent to the Bourne-mouth, Poole and Christchurch conurbation and therefore does not act as a check on the spread of the large built-up area.
Performs no significant function

Page 70 of 86



Single Historic Land Ownership

Indicative SANG capacity of approximately 660 dwellings

Catchment Population of over 5,000

Experience

Both [REDACTED] and Ecology Solutions have substantial experience in developing and delivering SANGs in Southern England.

Uckfield, East Sussex

[REDACTED] has recently worked with Wealden District Council to deliver a 29.5 hectare SANG near Uckfield, East Sussex on land under Welbeck's control for the mitigation of recreational pressures on the protected environment of Ashdown Forest.

The SANG, now named Horsted Green Park, was officially opened in September 2019 and attracts significant numbers of visitors.

TRL, Crowthorne, Berkshire

Ecology Solutions has been involved in the design and delivery of a number of SANGs in the South East. As part of their work with Legal & General Property Partners Ltd, Ecology Solutions was involved in the design development and delivery of a 42.5 hectare SANG at the Transport Research Laboratory near Bracknell.

The proposals included the management and creation of new habitats, including broadleaved and coniferous woodland, acid and neutral grassland and heath, as well as the creation of a 3.5km walking loop.

The SANG at TRL is now in the early stages of establishment but already forms a valuable destination for informal recreation.

Moulsham Lane, Yateley, Hampshire

[REDACTED] and Ecology Solutions worked closely with the Ecology Officers at Hart District Council, as well as representatives from Natural England, to deliver a new SANG as part of the development of the wider site by Bellway Homes Ltd.

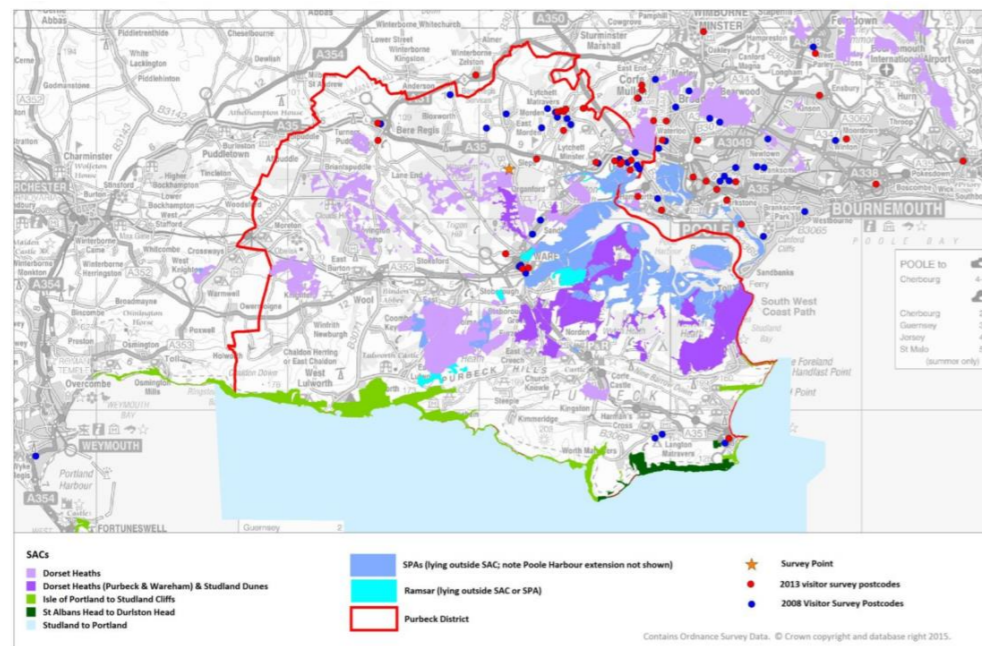
The SANG included a 1.7km walking route with large areas of grassland and bunding to create a visually interesting, undulating area of public open space. New waterbodies were also developed as part of the habitat creation programme. Rustic fencing was incorporated to ensure a secure area for dogs to be off the lead was achieved. Works on the SANG commenced in 2019.



Consultation

In line with the recommendations of the Green Belt Study, a strategic masterplan for the two residential sites has been produced by Boyer with technical assistance from Ecology Solutions and Stuart Michael Associates. The proposals seek to achieve around 155 homes in sustainable locations on the edge of Wareham. At present it assumes the existing allotments are relocated to a new location within the proposals.

It is recognised that the Isle of Purbeck is an ecologically sensitive area. With regards to the settlement of Wareham, the close proximity of Wareham Forest provides both an opportunity and constraint to potential new development. Whilst having a natural recreational resource nearby offers an excellent opportunity for improved mental and physical health through exercise, fresh air and connections to nature, it is also recognised that overuse of the resource can lead to a degrading of the environment which would have a negative impact on wildlife, including nationally protected species.



Whilst the proposed development sites are not within 400m of the Forest, or any other protected area, given their location in relation to the Wareham Forest Site of Special Scientific Interest (SSSI) and the Dorset Coast Special Protection Area (SPA), it is recognised that there is a requirement for an area of Suitable Alternative Natural Greenspace (SANG) to provide informal open space for residents of the new development.

██████████ and their ecological consultants Ecology Solutions have, over a number of years, discussed this matter with Natural England. This has culminated with discussions and site visits with senior personnel at Natural England and the production of an advice letter in September 2020.



Key Principles

Whilst further work will be required as the proposals progress, it has been agreed that the proposed SANG would:

- 1) provide suitable ecological mitigation for **both development areas**
- 2) be high quality with some **outstanding natural features**
- 3) provide a different, but still **high quality experience** to Wareham Forest
- 4) be accessible by both **foot and car**
- 5) be an asset to **existing** and **new** residents of Wareham and further afield
- 6) have considerable additional capacity to mitigate **other development** within Wareham

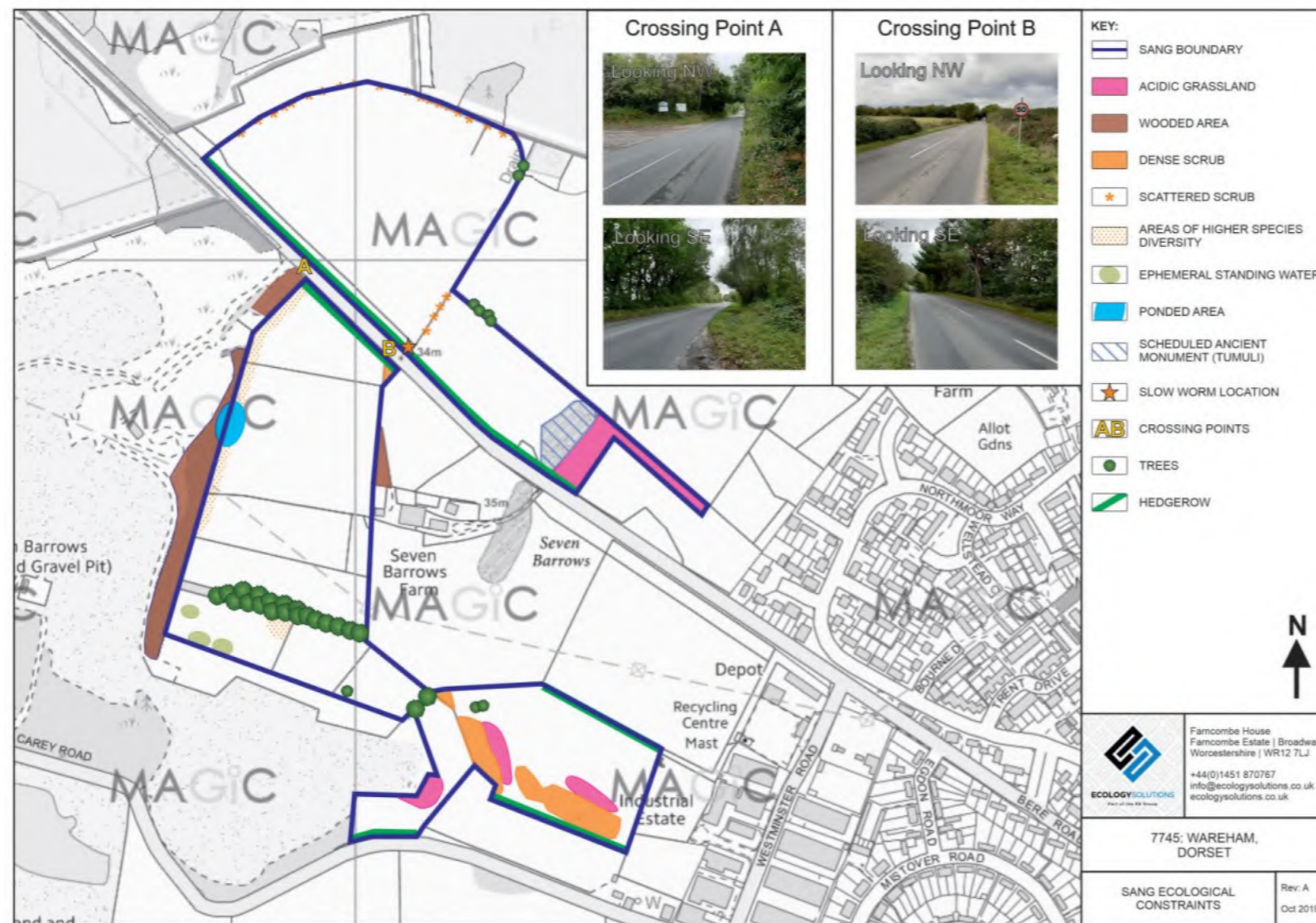
The Site and its Context

The site is located to the north west of Wareham and comprises a series of fields which are currently used for the grazing of cattle and horses. The site is split by Bere Road, which extends north west from Wareham, forming two parcels of land.

The northern part of the site, comprising approximately 8.1ha, extends north from the road corridor up towards the southern edge of Northport Heath, which forms part of the wider Wareham Forest. This part of the site is undulating, with a localised high point just to the north of Bere Road. The land then falls to the north, towards Northport Heath, and to the south east, towards Wareham. The northern part of the site is also characterised by the presence of three tumuli which form part of the wider Seven Barrows Scheduled Ancient Monument (SAM).

The southern part of the site extends south from Bere Road, down to Carey Road, which extends west from Wareham. The southern parcel is approximately 11ha. A sand and gravel pit lies to the west of this part of the site, with the south eastern part of this development (located just to the south west of the site) currently being restored to heathland. Seven Barrows Farm lies to the east of this part of the site. The land gently falls from Bere Road down towards Carey Road, which is located in a localised valley. Views of the Purbeck Hills to the south are possible from some of the more elevated parts of the site.

Ecology Solutions has undertaken a Phase 1 assessment of the site and the key habitats are identified on the Constraints Plan (below). Key features include areas of acidic grassland, wet grassland and mature broadleaf trees.



Existing Views



View from Northport Heath towards the northern part of the SANG



View from elevated location within northern part of the SANG towards Northport Heath

Existing Views



View from elevated location in northern part of the SANG, south west, towards the Seven Barrows SAM. The Purbeck Hills form a backdrop.



View south across horse paddocks in southern part of the SANG. The Purbeck Hills form a backdrop.

Existing Views



View from elevated location in southern part of the site over Wareham with the Purbeck Hills forming a backdrop.



View from elevated point in southern extent of the SANG looking south, over Carey Road, towards the Purbeck Hills.

The Proposals

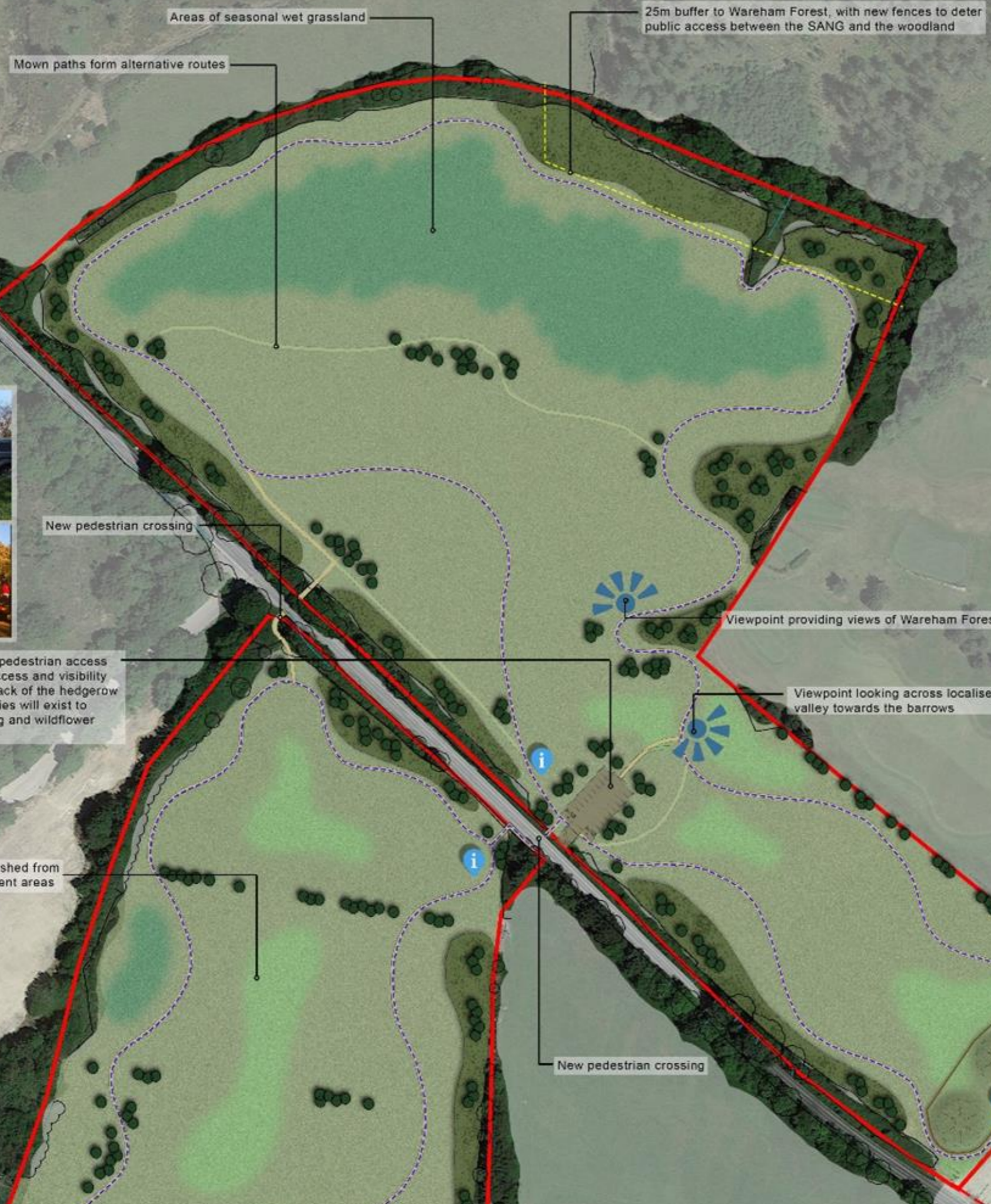
The proposals will see the creation of over 19ha of natural greenspace, which will be known as Northport Park. The principles of SANGs are to provide areas of natural greenspace for informal recreation as mitigation for new development which may put pressure on nationally or internationally designated ecological sites, such as Special Protection Areas (SPAs). The SANG will provide a series of walking routes in a natural setting near to new developments to reduce visitor pressure on existing habitats. Northport Park will provide a high quality, heathland fringe landscape, with undulating walking routes and opportunities to experience nature at first hand. The SANG is entirely in the ownership of the Charborough Estate. Having a single landowner provides a rare opportunity for consistent delivery on a phased basis.



The proposals comprise:

- A 1.5m wide, 3.56km circular walking route. This will be surfaced with hoggin to ensure a recessive, appropriate walking surface is achieved;
- Informal, mown paths will also be created, providing alternative routes around the SANG;
- Visitor parking for 20 cars, including two disabled spaces;
- Two pedestrian crossing points on Bere Road to enable a larger circular walk to be achieved;
- Management and enhancement of areas of wet grassland;
- Native tree and scrub planting will be encouraged through planting and natural regeneration. The proposed trees will include a mix of deciduous and evergreen species, reflecting the local landscape context;
- New planting will be introduced along key boundaries to create a degree of separation between the SANG and neighbouring uses;
- Management of existing areas of acidic grassland and creation of new areas through the spreading of topsoil won from the proposed development areas to the east;
- 25m native tree and scrub buffer to Wareham Forest, which includes new fencing to deter public access between the SANG and Northport Heath. This planting will comprise a mix of new planting and also natural regeneration;
- Creation of several viewpoints along the walking route which will offer panoramic views of Wareham Forest, the Seven Barrows and the Purbeck Hills, as well as providing elevated views over Wareham;
- Provision of interpretation boards around the SANG which will provide information on the landscape setting, the history of the area and the ecology associated with the site and its context;
- Protection of the tumuli which form part of the Seven Barrows SAM by new fencing and the introduction of interpretation boards providing information about the features and their history;
- The SANG will be fenced to make the area safe for off-lead dog walking. Livestock fencing will be introduced along vegetated boundaries to ensure that it is not visually obvious, but ensures dogs can run free within the defined area;
- Existing internal fences will be removed to open up the grassland, reducing the perception of an agricultural landscape;
- Informal paths will be cut through the areas of dense scrub to create fire breaks, as well as alternative routes to the circular path.





New car park with hoggin surface and pedestrian access to the land south of Bere Road. The access and visibility splays will require some minimal cut back of the hedgerow and regrading of the verge. Opportunities will exist to provide replacement hedgerow planting and wildflower grassland to the new verge.

New acidic grassland established from topsoil taken from development areas

New pedestrian crossing

New pedestrian crossing

25m buffer to Wareham Forest, with new fences to deter public access between the SANG and the woodland

Mown paths form alternative routes

Areas of seasonal wet grassland

Viewpoint providing views of Wareham Forest

Viewpoint looking across localised valley towards the barrows



New timber fencing around the barrows deters public access. An interpretation board will provide information on the Scheduled Ancient Monument

New footpath link between SANG, new development and existing residential areas of Wareham beyond

Northport Park, Wareham



Proposed Allotments

INDICATIVE PLANTING PALETTE

- Proposed Tree Planting**
- English Oak
 - Birch
 - Pine
 - Willow

- Proposed Scrub Planting**
- Heather
 - Gorse
 - Bilberry
 - Broom
 - Alder buckthorn

Rolled hoggin footpath with timber edges to create low impact, all-weather surface. Forms part of the wider 3.56km route

Existing areas of acidic grassland

New native tree and scrub planting to the boundaries creates a buffer to existing neighbouring uses.

New paths pass through areas of gorse, providing alternative routes as well as forming fire breaks

SANG will be enclosed with appropriate livestock netting type fencing to ensure a safe and secure area in which to run dogs off the lead.

Viewpoint south, with Purbeck Hills forming the backdrop

Opportunities to link to footpath to the south west

Footpath link to Westminster Road

Link to new agreed footpath which extends south to link with the Wareham Forest Way

Access into SANG and the southern development parcel from the residential areas off Carey Road



Key			
	SANG Boundary		Proposed Scrub
	3.56km, 1.5m wide Walking Route		Wet Grassland
	Proposed Trees		Acidic Grassland
	Hoggin Footpath		Mown Footpath
	Proposed Viewpoint (with bench)		Proposed Timber Post & Rail Fence
	Proposed Interpretation Board		Proposed Footpath Links

Northport Park, Wareham

A Phased Approach

The creation and management of a SANG is a significant cost. As a rule a SANG requires funding from the proposed developments that it is mitigating. The draft Purbeck Local Plan states that Wareham should deliver a **minimum** of 205 dwellings. At present the two development sites, promoted by [REDACTED] are not proposed for development despite being identified as suitable for release for residential development in the Purbeck District Council's 2018 Green Belt Study. However, the Purbeck Local Plan is not yet adopted and the recent 2019 merger of the Dorset authorities means that a new Dorset Local Plan covering the wider area will be required that, when adopted, will supersede the Purbeck Local Plan.



1974 - 2019



2019 Onwards

The new Dorset Local Plan will cover a significantly larger area and will take a more strategic view of the county's housing need. Wareham is one of the largest and most sustainable settlements within Purbeck and there is the potential for the Dorset Local Plan to require Wareham to accommodate higher housing growth that is more representative of the settlement's size and suitability.

Given the current uncertainties, [REDACTED] has designed Northport Park so that it can be delivered on a phased basis, with each phase being proportional to the quantum of housing that it is mitigating. At the smallest scale, a Heathlands Infrastructure Project (HIP) area can be provided that would be suitable to mitigate around 50 dwellings. From there, additional land can be added to increase the capacity of the SANG as new residential developments within the catchment area come forward and financially contribute.

The plan, on the right, illustrates the indicative approach to the phasing. This can be refined as the proposals evolve and the extent of development around Wareham is better understood.



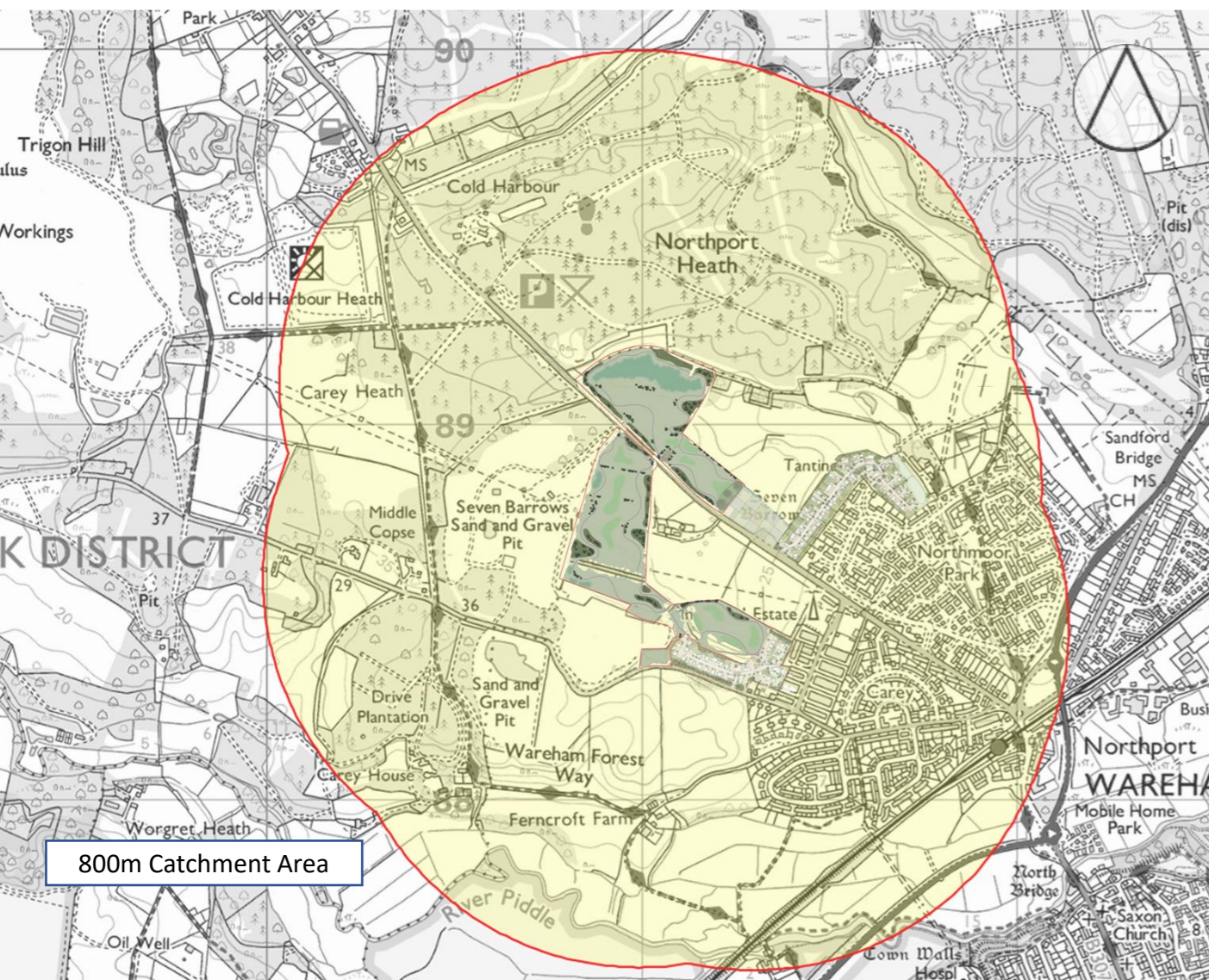
Catchment Areas

The proposals will see the creation of over 19ha of natural greenspace, with new footpath links created to the existing residential areas on the western side of Wareham.

The extract from Magic Map, below, illustrates the areas which are within 800m walking distance of the proposed SANG. This covers most of Northport, with most properties to the west of the A351 within the 800m catchment area.

The proposed footpath links will provide safe and easy access from the residential areas north of Bere Road, the Westminster Industrial Estate and the residential areas around Carey.

The SANG has the indicative capacity for approximately 660 new units / 1,583 population based on the requirement of 12ha per 1000 population. The proposed SANG would therefore provide open space for an additional 505 dwellings beyond those being promoted by ██████████ and at north west Wareham.



The proposals will also form an important visitor attraction for the wider area. The Magic Map extract above illustrates the 4km catchment area for Northport Park, which is based on the Natural England guidance, which states:

“SANGs avoid increased recreational pressure on the SPA from new residential development by providing alternative recreation areas that provide a similar experience to the SPA. SANGs have a catchment within which they can provide avoidance as follows:

- SANGs of 2-12 hectares have a catchment of two kilometres.*
- SANGs of 12-20 hectares have a catchment of four kilometres.*
- SANGs of 20 or more hectares have a catchment of five kilometres.*
- All SANGs without a parking area have a catchment limited to 400 metres.”*

As can be seen on the plan, the catchment area covers all of Northport and Wareham Town, which has a population of approximately 5,650. The catchment area also covers the southern part of the Parish of Wareham St Martin, which extends to the north, north east and west of Wareham town. The catchment area also extends south, incorporating the settlements of Stoborough and Ridge.

Northport Park is positioned on Bere Road, which is one of the key access routes from the wider catchment area to Wareham Forest. The SANG, and its car park, are ideally located to capture potential traffic and visitors to Wareham Forest, thereby reducing visitor pressures on the forest and heathland habitats.

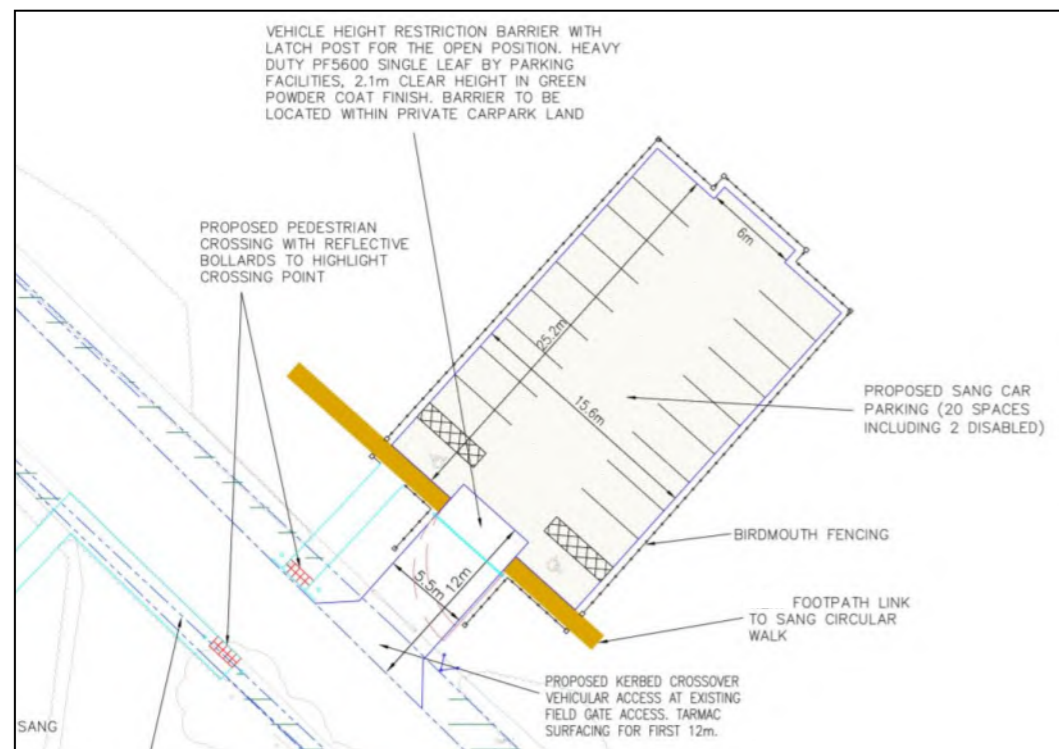
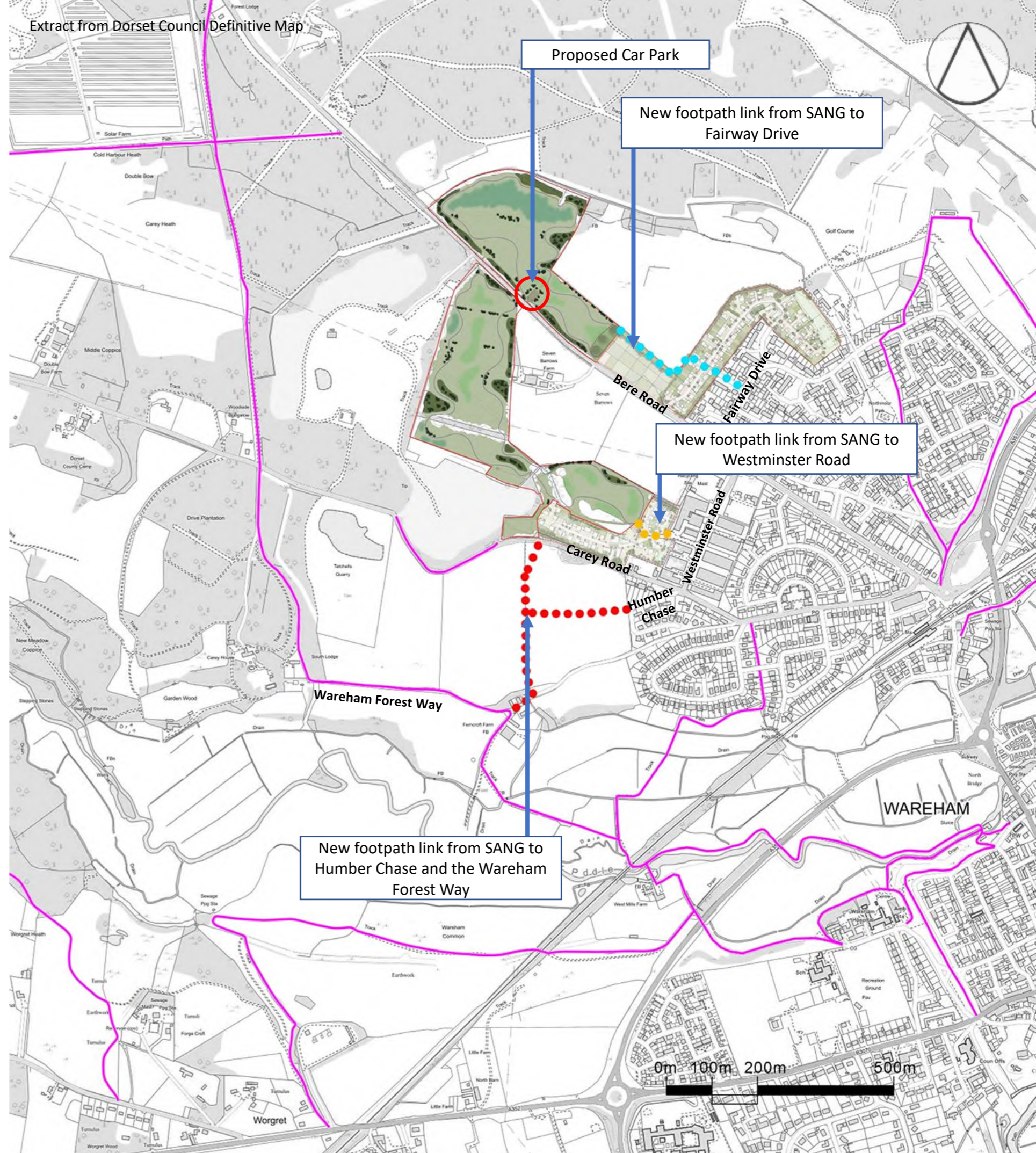
Connectivity

The proposals will include a 3.56km walking route around the SANG. The main route will be surfaced in recessive, low impact hoggin, while a series of informal mown paths will provide alternative routes around the SANG. The proposals also include the creation of footpath links to the new development areas and the existing settlement beyond.

The extract from the Dorset Definitive Map shows the localised footpath network that forms the context of the proposed SANG. The solid pink lines are existing adopted footpaths. There is an extensive network of paths within the wider landscape to the south, extending towards the Purbeck Hills. The Wareham Forest Way runs to the west of Wareham and a new link will be created between this route and the SANG (red dotted line).

Two new pedestrian links will also be created between the SANG and the existing settlement to the east. These are illustrated on the right. One route (blue dotted line) will link the northern part of the site with the residential areas of Northmoor Park, while a second route will be established linking the southern part of the SANG to Westminster Road.

Provision will also be made for visitors from further afield, with a car park located within the northern parcel, just off Bere Road. The parking will provide spaces for 20 cars including two disabled bays and will be finished in a simple self binding gravel / hoggin surface. Timber fencing will create a defensible edge to the car park, with new native planting softening views of the feature. A barrier will be included to restrict taller vehicles, with potential to lock the car park if required.





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landscape planning for planners and developers

Consultee: [REDACTED]
[REDACTED]

Event Name: Purbeck Local Plan proposed Main Modifications

Consultee reference: 996330

Consultation reference: 38

Our Ref: Winfrith
Your Ref: Purbeck Local Plan - Main Modifications

13 January 2021

Planning Policy Team
South Walks House
Dorchester
Dorset
DT1 1UZ

Sent via email to: planningpolicy@dorsetcouncil.gov.uk

Dear Sir/Madam,

**DORSET COUNCIL – PURBECK LOCAL PLAN MAIN MODIFICATIONS CONSULTATION:
REPRESENTATION ON BEHALF OF THE NUCLEAR DECOMMISSIONING AUTHORITY**

Introduction

We write to you on behalf of the [REDACTED] in respect of the emerging Purbeck Local Plan *Proposed Main Modifications* consultation.

[REDACTED] are the appointed property advisors for the [REDACTED] and provide planning advice across the [REDACTED]'s UK-wide estate. We have made representations to various planning policy consultations across the UK affecting multiple NDA assets.


These representations are made in respect of [REDACTED] owned land at Winfrith Nuclear Licensed Site (NLS). Winfrith is operated by Magnox Limited (the Site Licence Company) on behalf of the [REDACTED] appointed to undertake ongoing decommissioning and remediation activities.

Land within the NLS is subject to the decommissioning of redundant facilities and, where necessary, remediation of land. Magnox manage the site's decommissioning on behalf of the [REDACTED] in order to carry out decommissioning and waste management activities at the site. Magnox and the [REDACTED] will continue to engage with stakeholders regarding the planned future uses of the area following conclusion of the decommissioning process.

The Winfrith site is expected to reach its interim end state in 2025; however, prior to this date certain new development proposals may be required in connection with the required decommissioning, waste management and land remediation processes. The [REDACTED] continually seek for these to be provided for and supported by development plans relevant to its' sites.

Previous Representations

Prior to setting out the [REDACTED] current representations, it is helpful to highlight our previously submitted representations made to both the *Partial Review Options Consultation* in August 2016 and *Pre-Submission Draft Local Plan Consultation* in November 2018, where [REDACTED] support was noted for policy designations proposed and their general accordance with wider aspirations for the Winfrith site. The north-eastern portion of the Winfrith land ownership boundary was proposed for inclusion under the *Dorset Innovation Park LDO* designation (Reference: ES2) in earlier iterations of the Plan, for which [REDACTED] support was also noted.



More widely, representations have also been submitted to various stages of the *Bournemouth, Christchurch, Poole and Dorset Waste Plan*. These include representations to the *Pre-Submission Draft Waste Sites* consultation (January 2018), a Hearing Statement submitted to the *Examination in Public* (June 2016), and subsequent *Proposed Modifications* consultation (November 2018). The Plan was subsequently adopted in December 2019, with the Winfrith site allocated for decommissioning and potential long-term allocation for strategic employment under Policy 10 – *Decommissioning and restoration of Winfrith Nuclear Licensed Site*. At the Hearing, the [REDACTED] were supportive of this allocation but had recommended various changes to the policy wording to align with national guidance and ensure the soundness of the Plan. These changes were not taken forward in the adopted version of the *Waste Plan*.

Main Modifications Representation

Within the draft *Main Modifications* consultation document, the northern portion of the Winfrith NLS previously proposed for strategic employment allocation under *Strategic Employment Site ES2* is now proposed to be removed from the adopted version of the Plan. The justification for this is noted within the Council's response to the appointed Inspector's *Matters, Issues and Questions*; in that this land is not currently available for employment related development, and to not remove this land parcel "would be likely to fail to address Natural England's concerns regarding the Dorset Innovation Park preventing its restoration to heathland".

The [REDACTED] have no objection to removal of the northern part of the NLS from proposed allocation ES2; provided that this does not preclude any longer-term intentions to redevelop the wider NLS for alternative uses, likely to be sought within future iterations of the Plan. The removal of the northern land parcel from designation ES2 at the present time is considered beneficial for all parties, as it will enable the [REDACTED] and Magnox to finalise site restoration plans and reincorporate this land into Magnox's longer-term ambitions for remediation across the wider Winfrith NLS.

A Site Plan showing the extent of the Winfrith Nuclear Licensed site is enclosed for the Council's review, although it is appreciated that the Council will likely already have this document on file given previous consultation responses submitted to date¹.

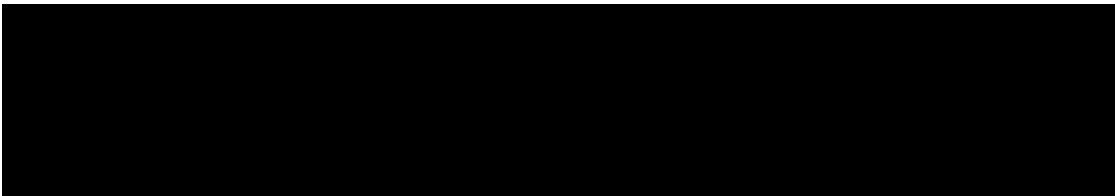
Conclusion

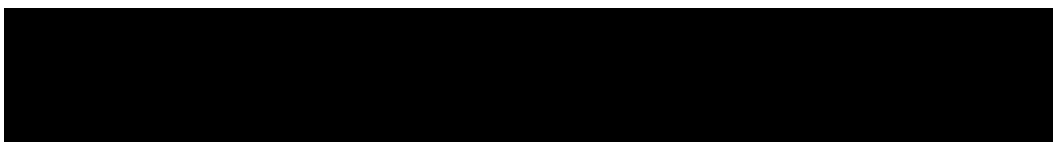
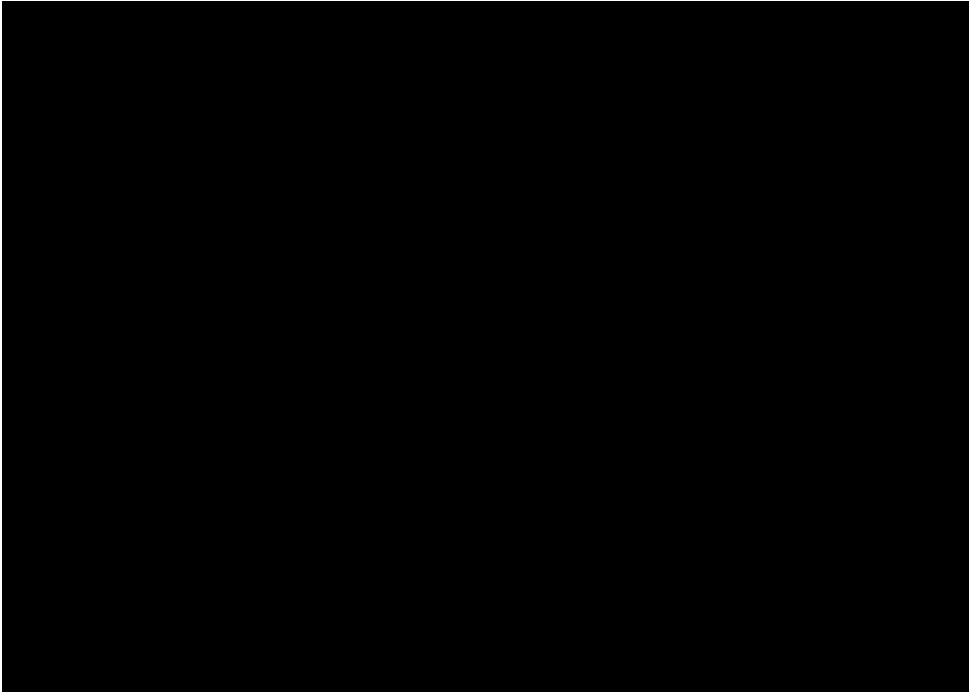
This representation has been made by [REDACTED] on behalf of the [REDACTED] in response to the current Main Modifications consultation for the emerging *Purbeck Local Plan*.

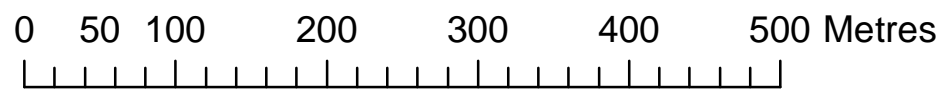
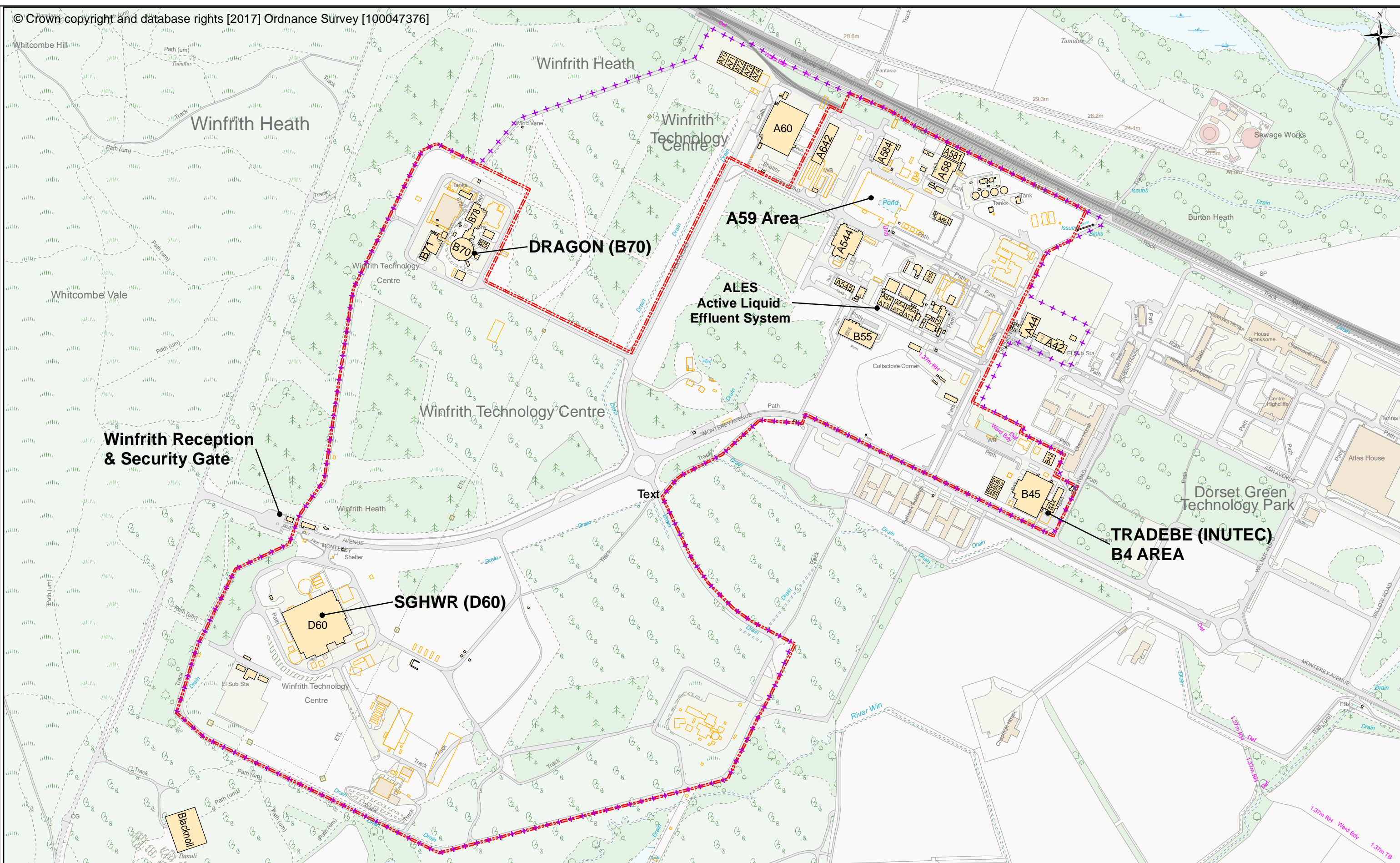
It is understood that Dorset Council will soon be consulting on the emerging *Dorset Council Local Plan*, to which the NDA will also be seeking to submit representations to protect longer-term aspirations for the Winfrith site.

In summary, the [REDACTED] have no objections to the proposed *Main Modifications* and continue to welcome the opportunity to proactively engage with the Council regarding future proposed policy wording and guidance which could impact upon decommissioning and remediation processes at the Winfrith site.

If any clarity is required in respect of the enclosed representation, please get in touch using the contact information below.







Winfrith Perimeter = 0.87Km²
 Nuclear Licensed Site = 0.74Km²

- Legend**
- Current Site Structures
 - Demolished Site Structures
 - Site Perimeter Fence
 - Nuclear Licensed Site Boundary



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Drawn: J Jenkinson	TITLE	Winfrith Site Plan		
Checked: C. Giles				
Approved: C. Giles				
METADATA FILE REF: A3_Winfrith_Site_Plan_20170808.xml	ISSUE DATE	DRG No.	CURRENT ISSUE	
	09/08/2017	GIS-17-08-043	1	

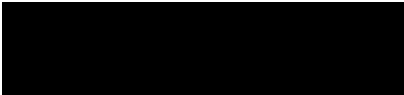
Consultee:



Event Name: Purbeck Local Plan proposed Main Modifications

Consultee reference: 1191135

Consultation reference: 39




Dorset Council
Spatial Planning Team
South Walks House
South Walks Road
Dorchester
DT1 1UZ

VIA EMAIL
5 JANUARY 2021

Dear Sir/Madam,

Purbeck Local Plan (2018-2034) – Proposed Main Modifications – December 2020

On behalf of our client, , we submit the following representation to above consultation. Our client's specific interest relates to land at Steppingstones Field, Stoborough - which they are promoting for residential development. A site location plan is attached at Appendix 1.

Background

These representations respond to changes in the published Main Modifications and follow on from previous representations made at each stage of the emerging Local Plan.

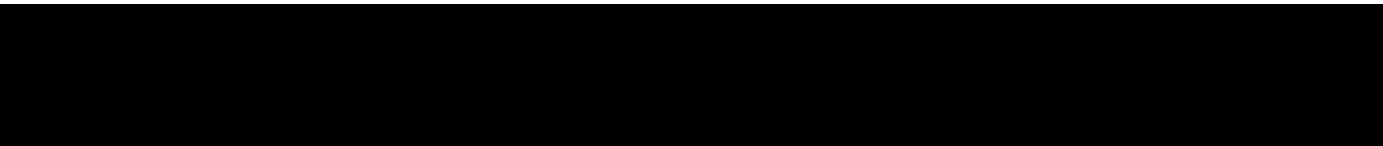
In summary, the representation supports the principle of the emerging 'small' sites Policy (H8) but suggests some minor amendments to the wording of the Policy to ensure that it is positively prepared and consistent with national policy as required by paragraph 35 of the National Planning Policy Framework (2019) (NPPF).

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

Policy H8 (Small sites next to existing settlements) has been amended, introducing a cap on individual sites according to the settlement they are located at. The aim is to ensure sustainable patterns of development in accordance with the spatial strategy for residential development.

Whilst the approach to directing housing growth towards locations / settlements in accordance with their role, function and inherent sustainability credentials is supported, Halsall Homes objects to the specific wording of MM43.

The imposition of a maximum housing figure per small site creates a conflict with the NPPF. At the heart of the Framework is a presumption in favour of sustainable development and this should be clearly reflected in the policy. However, as currently worded this would not allow for any new residential development, no matter how sustainable above imposed maximum figures. Furthermore, the individual site caps may prohibit the most sustainable sites from being developed, and lead to less suitable sites coming forward. The negative result of this could be ineffective use of land in sustainable locations, where sites cannot deliver to their full potential. This conflicts with the approach advocated in the NPPF where Plans should be positively prepared.





The 'small sites' policy should respond to the potential of individual sites and move away from rigid policy control. Policies contained within the Purbeck Local Plan Review should meet the development needs of their area and be sufficiently flexible to adapt to rapid change as set out within the NPPF (para. 11).

It is unclear what methodology has been followed in amending Policy H8 to include maximum site figures per settlement tier. These figures (as caps) appear arbitrary and are not justified. Paragraph 35 of the NPPF sets out that local plans are to be found 'sound' if they are justified and based on evidence.

Further commentary and requested amendment

The 'small' sites policy should be amended to provide greater flexibility for sites to come forward. The policy should reflect the specific context, constraints and opportunities presented by each site enabling a design-led approach to be followed.

The wording of the 'small' sites policy should therefore not include a maximum housing figure per site instead sites should be considered on their individual merits and on a case-by-case basis. Criterion 'a' of policy H8 should be amended to include the word "around" instead of "up to a maximum of" and would therefore read:

"a. the scale of proposed development is proportionate to the size and character of the existing settlement, around:

- i) 30 homes on any single 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 services village;***
- iv) 5 homes on any single small site adjoining other villages with a settlement boundary;"***

Policy H8 would then provide a guide figures for the scale of development that is likely to be considered acceptable. A judgement can then be made on the individual merits of the site and site context to inform the scale of the proposed development, ensuring greater flexibility for a design-led approach and making effective use of land as required by section 11 of the NPPF. As suggested above, the policy would not lack clarity in that the figures presented at each settlement tier show differentiation and would therefore be effective in guiding new sustainable levels of development.

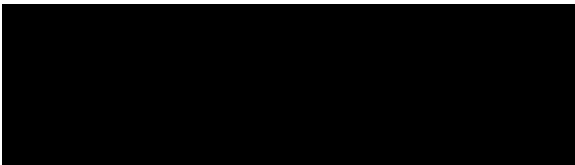
Criterion 'b' sets out that "individually and cumulatively, the size, appearance and layout of proposed homes does not harm the character and value of any landscape or settlements potentially affected by the proposals".

The wording 'homes does not harm the character and value of any landscape or settlements' is not supported. This does not account for the benefits of a development outweighing the impacts as part of any decision maker's planning balance. As currently worded, any harm, even minor, would mean that all development proposal would fail this particular criterion – and this is unhelpful in delivering new sustainable development.

Criterion 'b' should therefore be amended to read clearly and positively through the following suggested amendment:

"Individually and cumulatively, the size, appearance and layout of proposed homes conserves and protects the character and value of any landscape or settlements potentially affected by the proposals"

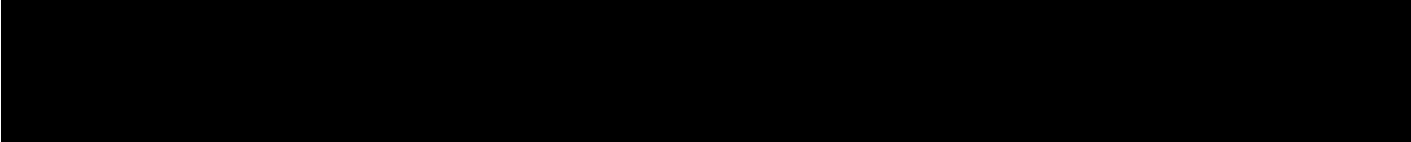
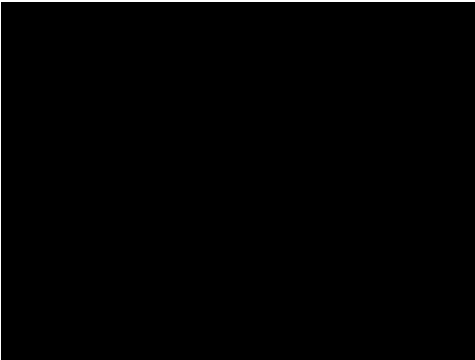


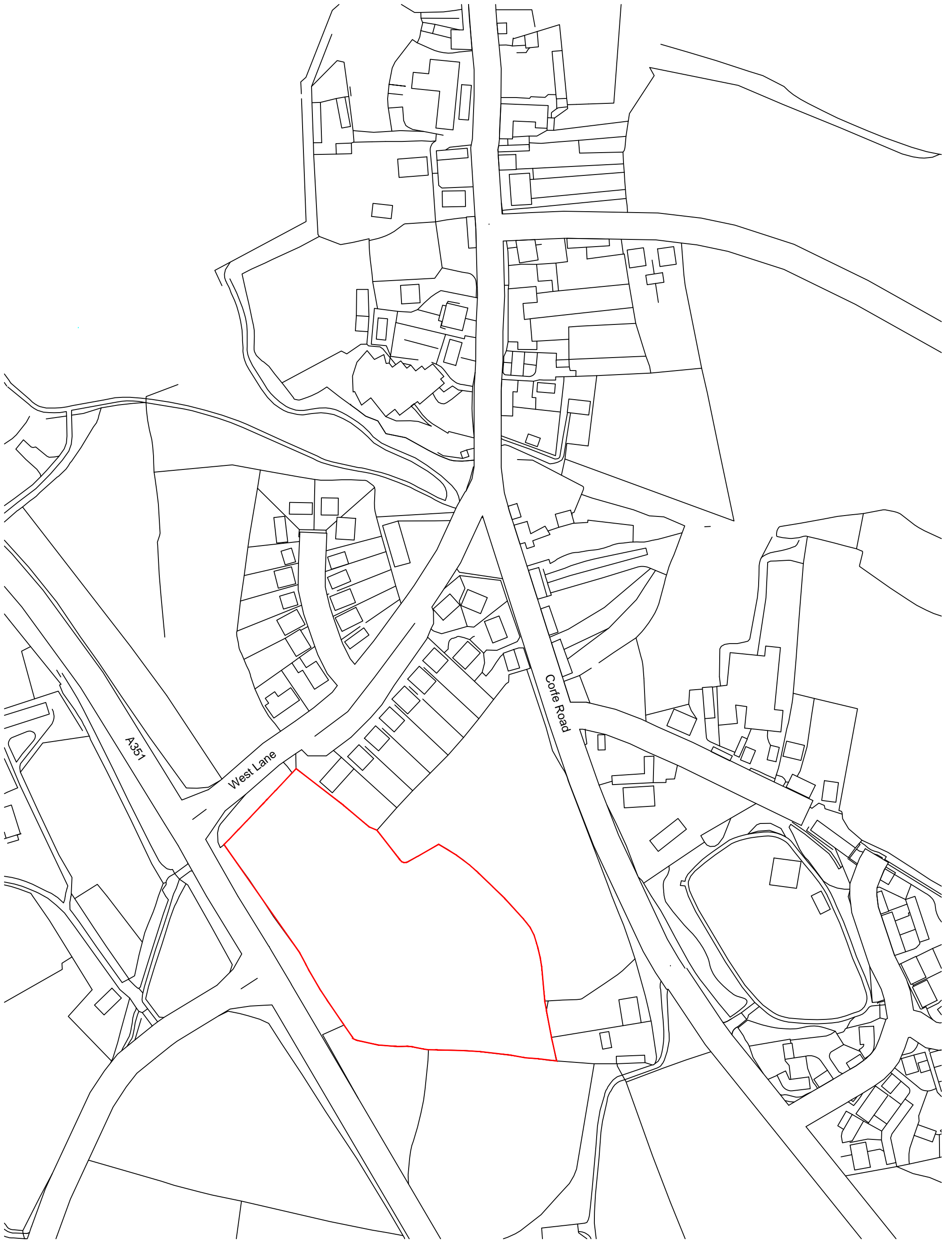


██████████ is promoting land at Steppingstones Field for residential development. The site is considered suitable for development and is capable of contributing to meeting housing needs in the area.

We trust the above information is helpful to assist the Council proceed in the preparation of the Local Plan. Please do not hesitate to contact me should you require any clarification of further information regarding this representations and we look forward to a confirmation of receipt.

Yours faithfully,





proj: 14-047 drg: 200 date: 12/03/2018 rev: -



Steppingstones, Stoborough
Appendix 1: Site Boundary

0 20 40 60 80 100
m 1:1000 @ A1 / 1:2000 @ A3

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Consultee: [REDACTED]

Event Name: Purbeck Local Plan proposed Main Modifications

Consultee reference:

Consultation reference: 40

Casey Read

From: [REDACTED]
Sent: 18 November 2020 10:32
To: Casey Read
Subject: RE: Purbeck Local Plan Proposed Main Modifications consultation 13 Nov - 8 January 2021 org
Attachments: HPE CM: Changes to [REDACTED] Land Use Planning consultation zones

Good morning

Thank you for the below email dated 13th November 2020.

Please note that [REDACTED]'s land use planning processes published at [REDACTED] may apply to some of the developments within the Purbeck Local Plan.

If you are a Local Authority with areas that are within an [REDACTED] consultation zone please be aware that in order for [REDACTED] to have no objections to such developments we will require:

- confirmation from relevant Council emergency planners that developments can be accommodated within any emergency plan required under the Radiation (Emergency Preparedness and Public Information) Regulations 2019; and
- that the developments do not pose an external hazard to the site.

Also please see the attached email which includes details of a letter sent to all local authority planning departments regarding forthcoming changes ONR is to make to our consultation zones.

Kind regards

From: Casey Read <casey.c.read@dorsetcouncil.gov.uk>
Sent: 13 November 2020 10:49
Cc: Sue Bellamy <sue.bellamy@dorsetcouncil.gov.uk>
Subject: Purbeck Local Plan Proposed Main Modifications consultation 13 Nov - 8 January 2021 org

Sent on behalf of Spatial Planning

Dear Sir/Madam

Please find attached the notification of consultation on the Purbeck Local Plan Modifications. Full details can be found in the attached letter.

All documents can be found on-line at www.dorsetcouncil.gov.uk/plpmainmods. Responses should be submitted by **11:45pm on 8th January 2021**.

Yours faithfully

Casey Read
Planning Assistant
Spatial Planning

Dorset Council

dorsetcouncil.gov.uk

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To receive the latest news from Dorset Council by email, visit

dorsetcouncil.gov.uk/e-newsletter

In the time of COVID-19 -

Please note the majority of Dorset Council's Planning staff have commenced working remotely in response to Government calls to stay at home, and our offices are closed to the public. Officers should be contactable via e-mail or telephone, although our ability to access files and post in the office will be limited. We may also experience some limitations in getting access to data files and emails on the Council's network. We would ask that you refrain from sending any documents or correspondence by post if at all possible and instead use electronic communication unless you have no alternative. Please accept our apologies in advance for any disruption to our service during this difficult time, which we are working hard to minimise as much as possible.

This e-mail and any files transmitted with it are intended solely for the use of the individual or entity to whom they are addressed. It may contain unclassified but sensitive or protectively marked material and should be handled accordingly. Unless you are the named addressee (or authorised to receive it for the addressee) you may not copy or use it, or disclose it to anyone else. If you have received this transmission in error please notify the sender immediately. All traffic may be subject to recording and/or monitoring in accordance with relevant legislation. Any views expressed in this message are those of the individual sender, except where the sender specifies and with authority, states them to be the views of Dorset Council. Dorset Council does not accept service of documents by fax or other electronic means. Virus checking: Whilst all reasonable steps have been taken to ensure that this electronic communication and its attachments whether encoded, encrypted or otherwise supplied are free from computer viruses, Dorset Council accepts no liability in respect of any loss, cost, damage or expense suffered as a result of accessing this message or any of its attachments. For information on how Dorset Council processes your information, please see www.dorsetcouncil.gov.uk/416433 This email has come from an external sender outside of ONR. Do you know this sender? Were you expecting this email? Take care when opening email from unknown senders. This email has been scanned for viruses and malicious content, but no filtering system is 100% effective however and there is no guarantee of safety or validity. Always exercise caution when opening email, clicking on links, and opening attachments.

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Casey Read

From: [REDACTED]
[REDACTED]
Sent: 24 April 2020 09:28
Subject: HPE CM: Changes to [REDACTED] Land Use Planning consultation zones
Attachments: Letter local planning authorities - Changes to [REDACTED] Land Use Planning consultation zones - April 2020.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Good Morning

Please see attached letter regarding changes to [REDACTED] Land Use Planning consultation zones .

Kind regards

Date: 24 April 2020

To: Head of Local Authority Planning Team

Dear Sir/Madam,

Changes to Land Use Planning consultation zones

has a non-statutory role when considering the impact of proposed developments on local detailed emergency planning arrangements for GB nuclear sites, and the potential for developments to pose external hazards to sites.

We therefore request local planning authorities to notify us of any application for planning permission within our consultation zones that meets our consultation criteria.


We currently request consultation for:



- All proposed developments on GB nuclear sites;
- Proposed developments that meet our consultation criteria within Detailed Emergency Planning Zones (DEPZ) around GB nuclear sites that are determined in accordance with the Radiation (Emergency Preparedness and Public Information) Regulations 2019; and
- Proposed developments that meet our consultation criteria within Outer Consultation Zones (OCZ) within which deems development could impact on the operability and viability of the detailed emergency planning arrangements or pose external hazards to sites. OCZ are areas which extend beyond the DEPZ out to a distance from the centre point of the site, where this distance is determined by the nature of the site. For sites without a DEPZ, the OCZ extends outward from the site perimeter fence.

In order to ensure consistency between sites and improve clarity about the developments request to be consulted upon we are planning to make the following changes to our consultation zones:

- Introduce OCZ around all GB nuclear sites (as not all sites currently have an OCZ) as follows:

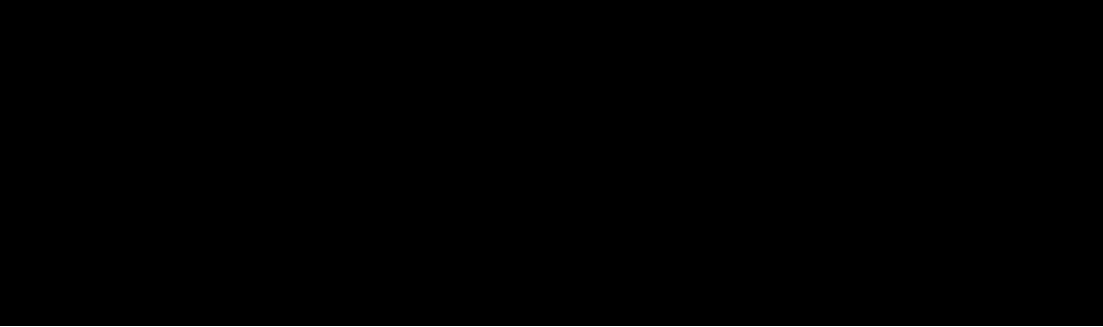
Site Type	OCZ
Operating reactor sites	8km
Reactor sites that are not operational but are not de-fuelled	8km
Reactor sites that are de-fuelled (adjacent site included in a National Policy Statement)	8km
Reactor sites that are de-fuelled (adjacent site not included in a National Policy Statement)	3km
Sellafield	10km
Dounreay	8km
AWE Aldermaston & AWE Burghfield	5km
Other nuclear sites (licensed, authorised defence and nuclear warship)	3km

- 
- Introduce a 30km consultation zone around all GB nuclear sites for certain types of significant development¹ due to the potential for such developments to pose external hazards to sites.

s current Land Use Planning policy, procedure and consultation criteria are published online at  and will be revised prior to the changes being implemented.

Should you have any queries with regard to these matters, please do not hesitate to contact me. I will write to you again to inform you when the changes are to be implemented.

Yours faithfully



¹ Significant developments are airports or other launch facilities, hydraulic fracturing (fracking) sites and major hazard facilities, i.e. those included within the scope of the Control of Major Accident Hazard Regulations 2015, the Offshore Installations Regulations 2015, the Offshore Installations (Safety Case) Regulations 2005, or the Pipelines Safety Regulations 1996.