



Responses: proposed further Main Modifications
to the Purbeck Local Plan

Consultation References: FMM01 – FMM26

Responses raised through the Council's online form

Consultee: Ralph Watts

Event Name: Purbeck Local Plan Further Proposed Main Modifications

Consultee reference: 1184929

Consultation reference: FMM01

Further Proposed Main Modification: FMMCD1, FMMCD2, FMMCD3

Does respondent consider Further Proposed Main Modification is legally compliant: Yes

Does respondent consider Further Proposed Main Modification is sound: Yes

Details of the reasons why the respondent considers the Further Proposed Main Modification is / is not legally compliant or sound: In my view these Main Modifications need to be considered together as a set, rather than individually. My reasoning is that they stand together and work together. The issues arising from the deemed NPPF compliance concerns about the Strategic SANG at Morden and the linked holiday park on the Drax estate are complex, and need to be considered as a whole. I consider that the additional heathland mitigation opportunities and habit assessment requirements that the Council has developed through discussions with the various stakeholders involved to offset the lack of availability of the Morden SANG constitute a pragmatic solution to the problem that confronted them. I support the emerging Purbeck Local Plan, whose soundness will be improved once the proposed Main Modifications have been integrated into the body of the plan. The emerging Purbeck Local Plan represents an important step forward for Dorset, and will establish a firm foundation for the Dorset Council Local Plan now being developed.

Changes respondent considers are necessary to make the Further Proposed Main Modification legally compliant or sound: I do not consider that any changes need to be made.

Comments on Interim Strategy, Memoranda of Understanding, updated policies map, SA or HRA:

Section or paragraph: FMMCD4 (a, b, c, d, e), FMMCD5 (a, b, c)

Comments: In my view these Memoranda of Understanding and Policy Maps need to be considered together, since they form a whole and work together. They must also be seen in the context of the Main Modification documents referred to in my Part B response, since the Memoranda and Maps represent the implementation and delivery vehicles for those Modifications. I consider these MoUs and Maps provide a sound response to the lack of availability of the anticipated Strategic SANG at Morden, providing suitable mitigation for the adverse impact on protected heathland and habitats that would otherwise occur.

Consultee: Steve Smith on behalf of Wool Parish Council

Event Name: Purbeck Local Plan Further Proposed Main Modifications

Consultee reference: 1189783

Consultation reference: FMM02

Further Proposed Main Modification: all of them

Does respondent consider Further Proposed Main Modification is legally compliant: Yes

Does respondent consider Further Proposed Main Modification is sound: Yes

Details of the reasons why the respondent considers the Further Proposed Main Modification is / is not legally compliant or sound: Wool Parish Council is satisfied that, with the proposed limited FMMs, the Purbeck Local Plan will be found legally compliant and sound. Wool Parish Council trusts that the Purbeck Local Plan will now be allowed to continue relatively unchanged within the overarching Dorset Council Plan which is currently being produced.

Changes respondent considers are necessary to make the Further Proposed Main Modification legally compliant or sound: None

Consultee: Wool Parish Council

Event Name: Purbeck Local Plan Further Proposed Main Modifications

Consultee reference: 1189783

Consultation reference: FMM02

Wool Parish Council endorses the response below from Wool Flora and Fauna et al.

Wool Parish Council request that if the Purbeck Local Plan is adopted then the housing numbers for Wool in the PLP are carried forward into the Dorset Local Plan. Whilst WPC object to the housing numbers for Wool in the PLP they are more palatable than the numbers in the DLP.

SUSTAINABILITY APPRAISAL

This document must surely qualify as the most incomprehensible script I have had the misfortune to encounter. It can hardly rate as a consultative document as it appears to be a closed book - A total turn off. This and the War of Attrition from consultation after consultation accounts for the total lack of fight by the residents of Wool who have felt defeated. It is not that they do not concern themselves about the future of Wool a semi-Rural Parish in one of England's most biodiverse rich Counties Dorset - they feel defeated and therefore we would ask the inspector to interpret low response in this way and urge her suggestion of only one more consultation combining Purbeck and Dorset. The consultation is not fit for purpose and should be abandoned. After all, it is only a stop-gap to quick delivery of more unwanted (by local people) houses and justification for V2 and a holiday Park IV.

Sustainability surely implies enduring – this hardly registers as a sustainability appraisal it is simply an attempt to justify stopgap mitigation measures to allow progressive development generally into the future and particularly in the interim time before any Dorset plan is produced - This to allow for the Purbeck plan to be passed as sound. It does not directly address the modification needed for altering housing from the green belt. It does not give a firm site for relocation of houses but in modification MM3 chapter 2 43 It needs to reflect the constraints around many settlements including towns whilst also recognising the constrained nature of land and the relative accessibility of some other settlements, notably Wool and Moreton.

ASSESSMENT OF DELIVERABILITY MANAGEMENT EFFICIENCY AND SUSTAINABILITY OF NEW SANG TYPES

1. Enhancing public access to Wareham Forest, Winfrith Heath?? surely not acceptable. Wareham Forest is used as a functionally (feeding) linked habitat for Annex 1 Birds (Lilly and Mallard) Winfrith Heath is part of the Dorset European site areas! (Winfrith Heath is a Dorset Heath SAC site – does this idea really equate to enhancing Public Access. Surely SANGs are to achieve the reverse of this).
2. Improving Heathland EG Morden Bog area Heathland that there is need to improve is due to ineffective management by Natural England and the Naturalist Trust? This is required by Habitats Regulations. The adjoining SANG could help this but Natural England. “It is unlikely to function in a way directly linked to specific development across the area”.
3. SAMMS wardening is a last resort in protecting Heathland- who is going to do it? Efficacy of getting people to keep dogs on leads has been very questionable at Studland. Will they give all time protection against Heath Fires – more likely with Climate Change.
4. Increasing capacity of SANGs. is a short-term measure 47(SA) this is likely to be inappropriate EG Combe Wood - would this mean extending the inappropriate SANG even further into the Ancient Woodland- the most fragile area with 25 Ancient Trees, Bat Roosts- pure deciduous Ancient Woodland. Acquiring extra land for this may involve further negotiations with different owners. Wyatt Homes offers increasing capacity of a SANG but only deliverable by 2024. Another reason for waiting – delay of this plan.
5. STRATEGIC SANGS are not restricted to supporting a particular development and will rely on more car use and may attract others than new residents - increase CO₂ production 51 (SA) “minimising car travel to and through a Heathland site” but increasing the need to reach the SANG by car!
6. Bere Heath offered by the Wildlife Trust, Court Farm is not available till 31st of March 2023 so does not cover the time span of this interim strategy. Natural England SANG advice also states the Morden Park location is favoured but this still needs to be negotiated.

7. Conflicts between aspirations of Holiday Residents and SANG users if a holiday park is to double up as a SANG.

51 providing a network of mitigation strategies would increase pollution as car based travel would be needed to reach them.

47 "All mitigation strategies that help to achieve mitigation short-term will ensure that all new residential development does not have an adverse effect upon the Dorset Heaths habitat sites in Purbeck"

WE DISAGREE- there is no evidence – see above

Rules for SANGS have not been thoroughly thought through. These ideas have been thrown out to drive housing supply - in particular Short Term.

These new SANG possibilities amount to weakening and removing the carefully considered parameters of Traditional SANGs in particular

1. They were to be set up in perpetuity so unaffected by ownership changes.
2. They were to be available on occupancy of new properties
3. They were located near and specific to housing developments and therefore encouraging access by local new residents on foot not drawing people in by cars.
4. They are measures to counteract damage to European Site Heathlands. Now and in the past.

They lack the robustness of traditional SANGs are offered in part as stop gaps. they are the opposite therefore to sustainability.

Most of these result in reduced protection for Dorset's protected heathlands registered in the Habitats and Species regulations as opposed to Traditional SANGS.

THE COMMENTARY CHART

The repeated statement that the suggested SANGs would need to be delivered promptly to ensure there are not potential negative impacts over medium and long-term does not inspire confidence in these as mitigation measures. Deliverability with land and ownership is certainly a likely problem. Although + are given regarding protection habitats and species for increasing capacity of the SANG at Bog Lane it goes on in the text to say it is unlikely here to help protect and enhance habitats and species. Chart do not promote clarity in the discussion on sustainability rather confusion.

31 this is the only option when any sustainability as we see it- restrict development until mitigation measures are an actuality through the Dorset Council plan,

Further comments on the sustainability appraisal

P38 the charts we would challenge the statement and positive plus that increased housing and increased population improves services and facilities - certainly in the short-term the reverse of this happened in areas where facilities are generally in balance with the present population EG doctors surgeries can be put under severe pressure.

Infrastructure by developers invariably lags behind Building and taking up new residents EG Purbeck Gate In Wool where 2/3 years on (the timescale of this interim strategy) promises still remain to be fulfilled and needed replacement of sewage pipes is still unsolved problem allowing sewage flooding to be experienced by nearby established properties. So services and facilities in the short-term is not a positive. There is no evidence of prompt delivery! in villages where a small general stores is struggling this may be the case EG Bere Regis but the new idea of dispersed housing does not seemingly involve these villages for more housing.

Chart 145 The mitigation by proposing Morden Park SANG in isolation (is favoured by Natural England) is clearly an unknown quantity so how can it operate for mitigation but then there would not be the pressure for it if there was not a trade in by removing the green belt.

An aim to meet as much of Purbeck's housing need in a hurry is not a good aim and U and M might be applied to promote services and facilities because if extra houses are not built in the green belt there may be no need identified in the area of Lytchett and it would help protect and enhance Habitats and Species. 158 here again is the assumption that more houses in this area with the removal of the green belt would not promote a need for them. Is there a need here?

154 the pausing of residential development and a SANG or mitigation is in place. In place would certainly protect and enhance Habitats and Species otherwise what use SANGs and mitigation. It should have ++ significant positive effect. These charts are unreliable and based on incorrect assumptions

The overarching aim of planning is to achieve sustainable development. C in the three derogation test C is the environment. This interim strategy with the aim of meeting as much of Purbeck's housing needs as possible by removing the embargo on development in certain areas of the green belt - notably around Upton and Lytchett Matravers, Wareham is crossed out there must have been a rethink here, puts further pressures on Dorset's fragile environment in particular the Dorset Heathlands European sites by increasing people pressure. This has to be mitigated and the consultation revolves around this. The measures involve the production of a variety of SANG's see as already mentioned. Many of these are short-term and indeed the interest strategy is short-term. Sustainability involves a concept of continuity, indeed possibly perpetuity. This sustainability appraisal is there for a contradiction in terms. It is in fact an attempt at justification. Justifying an interim plan. The favoured strategic SANG by natural England is uncertain (15sa). The technical tables evaluating sustainability justifying the interim plan are based on inaccurate statements and assumptions. It is unclear how these housing areas released will harness and increase tourism or is this putting the holiday park which is dependent on the Chanborough part producing a SANG into the "development category". Houses in the green belt at Lytchett and Upton are in an area where there are facilities which would therefore provide basic services. But the drawing in of a possible increase in housing at Wool negates this. Should a separate assessment for sustainability be applied here? The chart for reasonable alternatives to mitigation restricting development in Wool would certainly have a positive effect on reducing increased flooding and consequent coastal changes. Restricting development would certainly protect habitats and species against further damage neutral is inappropriate and we challenged the efficacy of the different new SANG approaches in doing this - there is no evidence. Certainly restricting development would minimise further pollution which is already occurring in the catchment of Poole Harbour European site S.P.A. Ramsar . These interim SANGs would have a neutral effect. Air pollution by increasing CO2 damaging to Dorset Heathland S.A.C's European sites, we argue would be lessened by restricting development.

Appropriate assessments need to consider success of Mitigation approaches to date and check that mitigation is fit for purpose "YES!" (Plan section Policy Table 49 H.R.A. document)

INTERIM STRATEGY DOCUMENT – V2 COMMENTS

MM45 we oppose the removal of green belt land at Lytchett Matravers and Upton because it conflicts with the government NPPF houses on green belt. Surely the addition of more houses here will promote the need for a SANG in the north of Purbeck, not the compensation by provision of a SANG. This is back-to-front talk.

NPPF 13 Protecting Green Belt Land

NPPF 140 " boundaries should only be altered in exceptional circumstances- evidenced and justified".

1. Will these houses be used to provide local need – Lynchet & Upton or to accommodate overspill (urban sprawl from Bournemouth) in which case it is not addressing Purbeck's need, is not satisfying Purbeck's need for housing delivery now – there is no urgency so this is not an exceptional circumstance.
2. The need for a holiday park does not fit in with these prerequisites.
3. Producing a SANG instead of green belt is not justification for it. The removal of the green belt from Morden Park is surely to facilitate the landowners Charborough Park in their wish to build a holiday park not to provide as many houses as possible in Purbeck. Not a valid reason.
4. Justification here cannot run with the idea of it providing land in 2 of its stainable locations around 2 of the district towns i.e. Upton and Lytchett Matravers- the most sustainable locations in terms of access to facilities (agreed) whilst as part of the dispersal policy ear marking one (Wool??) of its key villages which has few facilities and little infrastructure. Run with the Hare and Hunt with the Hound surely. The idea of dispersal is certainly to spread development evenly but dumping it on one key village hardly qualifies spreading evenly or keeping to optimum dense sites. The idea of Dorset's new strategic policy - dispersal as giving justification is phony. To carry out proper dispersal would involve many settlements not one. It would involve planners in lots of work which of course dumping does not. It would in some circumstances promote facilities - a struggling village shop and thereby reduce car travel. This proposal for dispersal would not be sustainable. Proper dispersal could reduce the necessity for SANGs.

N.P.P.F. 2019 - Plan making should contribute to conserving and enhancing the natural environment and reducing pollution.

Changing strategic policies is not justifiable in this instance. Not a valid reason under 13 Protecting Green Belt Land NPPF 13. Changing strategic policies i.e. going for a dispersal of housing across the District- (with the feeble reflection 44 "of a clear preference" expressed in a 2018 consultation - a spread of housing in smaller amounts was frequently expressed but not just one or possibly two huge allocations EG Wool and Moreton). This is not sustainable so is not a tenable strategic Policy.

(46 how will removing houses from the greenbelt allow new houses to be built in one of its key service villages)

WE OPPOSE PARAGRAPH 43 AMENDED TEXT (Appendix 6)- DELETE
SUGGEST NEW WORDING.

RECOGNITION OF THE HUGE LEVEL OF ENVIRONMENTAL IN WOOL NEEDS ADDRESSING AS HOUSING ALREADY PROPOSED WILL CAUSE HUGE BIODIVERSITY LOSS. IN TOTAL NEGATION OF THE 2020 GOVERNMENT BIODIVERSITY STRATEGY AND INCREASE CLIMATE CHANGE PROBLEMS ALREADY PRESENT - POLLUTION AND FLOODING.

We make no apologies for here listing all the constraints even though repetitions of previous presentations. as from earliest days of consultations there has been a mindset - Sue Bellamy pointed this out when questioned why Wool - " there is nothing there plenty of open space".

This mindset has permeated the whole approach to Wool despite the massive amount of evidence provided by us as to the high environmental value of the land. It has been brushed aside consultation after consultation.

Is not now the time with the climate and ecological emergency to put the environment at the top of the soundness agenda-

despite support from Natural England ignoring this

QUOTES

- Wool is suitable for housing
- I see no problems
- There are no constraints,

and in the sites of conservation importance 3.2.10 designated sites of conservation importance from E.A.D developers previous consultancy document Natural England has advised to Purbeck District Council that a development of 1000 new Dwellings in Wool would not adversely affect the integrity of European sites and could be undertaken in accordance with Purbeck District obligation under the habitats and species regulations 2017. We refute this.

The state of England's Rivers is a hot topic at present. The Parliamentary Environmental Committee have mentioned Poole Harbour in an attack on rivers and pollution.

The river Frome SSSI running through Wool is polluted at present but an extra 1000 houses will increase sewage Levels by double the amount Wessex Water have stated the sewage station at Wool has not the capacity to accommodate further large-scale housing. It floods at present polluted water into the Frome during storm events EG Arwen and one other within 7 months.

All housing sites so far proposed are on flood risk areas - many level 2-3 level 3 should not be used for more building - other sites should be used, N.P.P.F. and within Climate Change level 2 should probably be included because the change has not been taken into account in estimating risk levels. The Frome is in the catchment area for Poole Harbour. Poole Harbour mentioned S.P.A. European Site is already polluted is already on a knife edge as seen by green slime algae covering large areas and the emission of methane gas (more serious than CO₂ in bringing about climate change).

Natural England site 1 confirmation of nitrate neutrality reflecting Poole Harbour S.P.A. and Ramsar site European site is still needed. Set aside of agricultural land for denitrification is in its infancy- no evidence of the level of the Grampian Principle beyond or scientific doubt has been produced. Tony Juniper Natural England has spoken publicly saying nitrate neutrality measures have still to be confirmed as sound.

Further evidence against statement "Wool is a less constrained village"

50% of Wool's Parish is covered by environmental designations at all levels.

1 European Heathland site S.A.C.

1 SSSI river Frome carrying pollution into the Poole Harbour S.P.A. site

River Frome is only 0.5 K from development site and runs all through centre of Village

10 SNCI Sites of Conservation Interest

1 L.N.R Local Nature Reserve

13 Ancient Woodlands

2 areas under stewardship management - to protect wildlife - Organic Fields- river Frome Water Meadows.

1 Dorset wildlife managed verge (on the road to the proposed SANG)

Dr A Warne's recent paper "Conservation of Biodiversity as provided by a beetle survey of Wool" States only 60% of records are restricted to statutory and non-statutory designated sites and only 9% of the rare and notable species.

50 priority species (15 on development sites) and species in the SANG.

17 of the 18 species of bats in the UK breed in Wool - all protected.

12 are recorded on development sites including the very rare Barbastelle Bat

30 Veteran Trees most in the SANG but not registered.

Miles of hedges (priority habitat) approximately 70% of all hedges on development sites are "species-rich" and the one around the Dorset plan site of 400 new houses is a remnant of one of the oldest hedges in parish approx. 14th century

And this is backed up by the fact that NPPF guidelines I-XI are contravened by using Wool

46 Sustainability Appraisal where in which key village is the evidence for a strong demand for housing (not in Wool). Wool has been consistently against large increases of housing. In one consultation, Have Your Say many people opted for the lowest level of housing as there was no option of no increase in housing, this was pointed out and I believe accepted as a fault in that consultation. There is a small demand for

affordable housing but this is not per se quid-pro-quo consequence of large-scale housing allocations. developers are seemingly determined to get out of providing this.

One wonders what the Council Deems optimum density for Wool – Infinity probably.

Further Evidence against statement – Wool is a less constrained village

43 the constraints in Wool are multiple as applied to National Planning Policy Framework within which locally prepared environmentally sound plans for housing can be produced.

2019 N.P.P.F. conserving and enhancing the natural environment. 15

- I. N.P.P.F. 2019 - Plan making should contribute to conserving and enhancing the natural environment and reducing pollution
- II. Para 171 allocations of land of lesser environmental value should be preferred . Para 170 minimise impact on and providing net gains for biodiversity establish coherent ecological networks that are more resilient to current and future pressures.
- III. Planning authorities need to consider potential impacts of development on Protected and Priority Species when considering site allocations.
- IV. Proposed development on land within or outside an SSSI likely to have an adverse effect should not normally be permitted except where the benefits of the development in THAT site clearly outweigh the impact. The river Frome SSSI is only 0.5 kilometers from development sites.
- V. Para 20 the presence of Protected Species or habitats is material consideration in the assessment of development proposals.
- VI. Green Infrastructure opportunities and requirements need to be considered at the earliest stages of development (Purbeck local plan promised this later)
- VII. Para 20 section 15 para 170 it is an offence to disturb wild animals of any such (priority) species including ability to survive, breed, rear or nurture young or migrate (see bat section of complaint).
- VIII. Para 175 development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused unless there are wholly exceptional reasons and a suitable compensation strategy exists. Also N.P.P.F. para 033 ref ids 033201902 Ancient Woodland.
- IX. Some habitats are more sensitive to change and are at greater risk of being lost or damaged due to direct or indirect impacts of Climate Change and human activity.
- X. Care needs to be taken to ensure that any benefits promised will lead to genuine and demonstrable gains for biodiversity. Mr Squirrel has made assurances without evidence that the plan will result in biodiversity gain. This flies in the face of evidence to the contrary - 3000 + species animals and plants are recorded over the last 25 years in the parish and all those lichens and fungi which remain unrecorded for Coombe Wood - a likely habitat as it is a wet wood partly lying on clay and has plenty of deadwood habitat.
- XI. N.P.P.F. para 118 gives a mitigation hierarchy
AVOIDANCE - and significant harm to wildlife species and habitats be avoided for example through locating on an alternative site with less harmful impacts? (i.e. the need in that place is not essential).
MITIGATION - effective measures where these cannot provide complete protection or partly avoided

AS WELL AS REMOVING PARAGRAPH 43 (Appendix 6)

REMOVE PARAGRAPH 46 AMENDED TEXT (Appendix 5)

POLICY V2 REMOVE.

JUSTIFICATION AND EVIDENCE THEREOF ARE IN THE TEXT ABOVE including reference to the NPPF 13 Protecting the Green Belt document

POLICY I5

Morden Park suitable strategic alternative natural green space (SANG) and Holiday Park.

REMOVE

JUSTIFICATION – Please see Interim Policy regarding SANGs

There is no justification in removing greenbelt for The Holiday Park even if it helps negotiation to provide a SANG in this area (see previous iterations on justification and removing green belt. We surely do not need to repeat these here).

There is not the urgency for a SANG if the Green Belt is not removed with the consequence of more housing in Lytchett and Upton as in 2 years time the Wyatt SANG could be delivered and that offered by Dorset Natural Trust Court Farm.

TOURISIM

EE4

DELETE AMENDED POLICY A AND H WORD CHANGE TO TOURIST ACTIVITY INCLUDING ACCOMMODATION

Tourist activity resulting in adverse impact particularly in accumulation upon landscape, biodiversity in designated local, national (SSSI's e.g. river Frome in Wool) and International sites should be assessed and relocated as carry capacity increases. In particular any impact of proposed development either alone or in combination with other existing proposed developments should be assessed under the Conservation of Habitats and Species regulations 2019 and refused.

OUR JUSTIFICATION AS EVIDENCED. Tourism an economic driver? Only promotes jobs in a seasonal way so not thoroughly sustainable and not if the carrying capacity is reached.

- a) Deterioration to footpath (the poor quality at Durdle Door may have contributed to a death this year).
- b) Increasing CO2 to output as cars are queuing in order to reach the coast- certainly seen during the summer with Bestival and idling engines increasing climate change pressures. idling engines must have contributed massively to CO2 production in car exhaust.
- c) Disappearance of species which are sensitive to disturbance EG in the last 10 years the possibility of seeing water voles in the Frome has declined, even more so the chance of seeing an otter.
- d) Noise pollution increase removal of Tranquillity. Often the reason for getting away for it all.
- e) Strain on local facilities e.g. Doctors surgeries are under much greater pressure in summer months
- f) Stopping efficient traffic flow.
- g) Increased sewage pollution

So tourism is not a limitless panacea for economic growth.

How often have you heard "we just don't go there anymore or it's- just too busy". One can kill the Golden Goose that lays the Golden Egg.

The quality of the tourist experience must be taken into account.

SUMMARY REGARDING THE INTERIM PLAN FOR PURBECK

N.P.P.F. 2019

There are 3 overriding principles in plan-making as regard habitats and species regulations paragraph 24 where a land use plan strategic plan is

- A. likely to have significant effect on a European site(Poole Harbour Ramsar SPA European Heathland SAC Ramsar) The plan making authority must for that plan before the plan is given effect make an appropriate assessment of the implications for this site in view of these sites conservation objectives.
- B. The presumption in favour of sustainable development DOES NOT APPLY where the development requires appropriate assessment because of its potential impacts on a priority habitat site.
- C. The principle of no scientific doubt should be applied in the absence of demonstration of 10 adverse effects the Grampian Principle furthermore as in Article Para 3a 4 European law it makes it a Statutory requirement for planning authorities to undertake A HABITATS AND SPECIES assessment of the potential impacts of plans including European protected sites and protected species.

Derogation test

- The development must be for overriding public interest or public health and safety.
- There are no statutory alternative to the proposed development.
- The favourable conservation status of the European protected site must be maintained.

The habitats and species assessments by Lilly relies on wholesale mitigation, which we are led to believe is the answer. Mitigation is a prop. The more a plan relies on mitigation the less sound it becomes.

Are these mitigation measures up to the level of certainty stated in the Grampian principle - NO SCIENTIFIC DOUBT. Nitrate removal mitigation has no such evidence as yet - according to Tony Juniper- Natural England in a public interview on television.

The raft of SANGs suggested for this plan (is this in the hope that at least one will be effective or that in total they will prove effective in protecting Dorset European Site Heathlands. The best option an unrestricted SANG in Morden Park area is still unresolved - there are queries about its deliverability. The Dorset Plan states there will be a review of the success of mitigation but no such promises are made for this short-term plan. Removal of the greenbelt with consequent added population pressure could therefore have a negative effect on our 2 European Sites - Dorset Heathland and Poole Harbour.

The development short-term is not for overriding public interest - a Holiday Park - hardly!

There is a Statutory alternative to the proposed development - delay till 2024. We therefore strongly urge the plans rejection - the conception of which - speed in delivering houses and a holiday park is flawed - unsound we suggest delay until there is more certainty and a more rigorous approach can be made delay and deal with this in the Dorset Plan

Wool Flora and Fauna response to Purbecks Interim Plan

Rachel Palmer BSc – Chair

Dr A Warne PHD – Vice Chair

Mr T Branston BSc -

Mrs E Foulger Bsc

Mrs Marion Alderson

Mrs S Potticary Secretary

Mr I P Duckworth BSc

HABITATS REGULATIONS ASSESSMENT

This document we will largely leave to our ecologist consultant Dr A C Warne to avoid repetition and to get a more erudite response. We the signed up members request that this is included in our response. We would however emphasize the importance of Wool for Nightjar and emphasize that busier urban areas are avoided (Lily and Mallard 5.7) that breeding success is lower on busier sites. Wool is at present a semi-rural Parish and the suggested increase of houses will turn it into a town thus leading to 6.13 "direct loss of foraging habitat and flight path being blocked by the presence of built development". This is exactly what will happen with the planned and proposed development of Wool. There is a superb wildlife corridor running from Heathland in the north of the parish through to Coombe Wood one of its Functionally Linked Habitats for Feeding – deciduous, conifer and felled areas. This corridor will be broken up by the line of houses sited and covering not only the route but also en route linked feeding areas, the insect rich hedgerows and Organics Fields. This corridor is used as observed with frequency throughout the summer months. Coombe Wood is not included in the list 216 and should be. How much study of Nightjar populations has been done in and around Wool? Why not apply the target of safe passage of birds (Annexe 1) moving between nesting and feeding sites (Table 7 H.R.A. document). Or is Wool again the exception having "no (environmental) constraints!!

It is interesting that in 2012 there was no suggestion of housing in Wool at all – Why? Why not now.

INACCURACY

1. Wool is near S.P.A. Heathland it actually occurs within the parish boundary 5.41 HR a document
2. Possible additional option- Bovington Middle school - NO the school is within in 400m. (SPD advice. I.M.S document. This use would be consistent with the Dorset Heath).

INCONSISTENCIES AND CONFUSION

1. A spread of homes across the district well better meet housing needs (rather than focusing all development in the last constrained West of Dorset) (47 I.M.S. document). Is this not exactly what they are suggesting for consideration in Wool in the west of Wool with one of the largest allocations.
2. Local Plan will not be delivered on greenbelt. Surely this is in total contradiction to putting houses on greenbelt or 47 I.M.S does this not apply to after this plan is passed and the green belt boundaries are changed.

The French Farm enlargement of SANG by Wyatt homes Natural England supports this but its deliverability is after the time span of this plan so there is no justification in hastening the house delivery before the Dorset Plan in 2024 is achieved. (141 I.M.S). - what is meant by unplanned development.

Throughout this document the idea that Nitrate Neutrality can be achieved is prevalent but here under additional considerations the Poole Harbour nitrate matter is stated as needing proper policy consideration. This has been discussed with Natural England, a consistent policy approach needs to be set out. HERE, HERE but as we have said as yet there is NO EVIDENCE FOR NITRATE NEUTRALITY BEING ACHIEVED.

(P4 Nick Squirrel Natural England I.M.S. Document).

Consultee: Cllr Alex Brenton, DC Councillor

Event Name: Purbeck Local Plan Further Proposed Main Modifications

Consultee reference:

Consultation reference: FMM03

Further Proposed Main Modification: 77 Chapter 6 policy I5

Does respondent consider Further Proposed Main Modification is legally compliant: Yes

Does respondent consider Further Proposed Main Modification is sound: Yes

Details of the reasons why the respondent considers the Further Proposed Main Modification is / is not legally compliant or sound: The Further Main Modification is sound because, consideration has now been taken of arguments and the Council is prepared to consider and develop other sites for strategic SANGS and use other powers if necessary to purchase or acquire a site. This clarifies the objectives and removes accusations of predetermination.

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

Further Proposed Main Modification: Policy FMM 76

Does respondent consider Further Proposed Main Modification is legally compliant: Yes

Does respondent consider Further Proposed Main Modification is sound: Yes

Details of the reasons why the respondent considers the Further Proposed Main Modification is / is not legally compliant or sound: This amendment is clear about intentions and allows alternative sites to be considered.

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

Consultee: Goretta Quinn-Bagley

Event Name: Purbeck Local Plan Further Proposed Main Modifications

Consultee reference:

Consultation reference: FMM04

Further Proposed Main Modification: FMMCD1

Does respondent consider Further Proposed Main Modification is legally compliant:

Does respondent consider Further Proposed Main Modification is sound: No

Details of the reasons why the respondent considers the Further Proposed Main Modification is / is not legally compliant or sound: I believe that the plan is not sound as across the plan there are proposals to remove land from Green Belt status, without evidence of "Exceptional Circumstances" for such actions. NPP140 – "once established Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified." There is no evidence or justification shown in the plan. Furthermore NPPF 141 " Before concluding that exceptional circumstances exist to justify changes to Green Belt Boundaries, the strategic policy making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. There is no evidence that the Council has examined all other options. A Council cannot approve changes to boundaries where "no evidence" exists that other options have been examined fully.

Changes respondent considers are necessary to make the Further Proposed Main Modification legally compliant or sound: To make the Further Proposed Main Modifications sound all reference to removal of land from Green Belt should be removed or evidence and justification should be shown. The Council should show that it has examined fully all other reasonable options for development. Also the "perceived" need for such a large number of houses on Green Belt in Dorset needs to be reviewed and challenged in the light of the new political landscape. Quote "no more ugly houses on Green Belt" and of course the climate crisis. The demand for houses has also been affected by Brexit and the pandemic.

Further Proposed Main Modification: FMMCD4C

Does respondent consider Further Proposed Main Modification is legally compliant:

Does respondent consider Further Proposed Main Modification is sound: No

Details of the reasons why the respondent considers the Further Proposed Main Modification is / is not legally compliant or sound: With reference to SANGs across the County, the Council has not considered reasonable alternatives for strategic SANGs but is again considering releasing Green Belt without full evidence or justification for doing so. The SANGS proposes are unsound, not only because they are being proposed on Green Belt but also their size and position in relation to the development is inadequate and therefore will

not take pressure off the natural habitats which they are meant to assist in preserving. The Council's local plan policies and strategy for habitat site mitigation do not meet the requirements of The Conservation of Habitat and Species Regulation 2017. The SANG planned at Flowers Drove is Lytchett Matravers is on a site in the north of the village, approximately one and a half miles from the main proposed development of 95 houses. Residents, if they were to use it, would drive there creating increased CO2 emissions or they would not use it at, preferring to drive to Wareham forest, Morden Bog and other areas of natural beauty, more easily accessible from the southern edge of the village. Areas of sensitive habitat will still be damaged by the increased population – a lose, lose situation. Natural England are supposed to be protecting, through the development of easily accessible SANGs, the natural habitat of these unique areas. Yet the Memorandum of Understanding between Dorset, Wyatt Homes and Natural England are proposing an inadequate and inappropriate SANG which does not even fulfil Natural England's own criteria of a 2.3m circular walk

Changes respondent considers are necessary to make the Further Proposed Main

Modification legally compliant or sound: To make the Further Proposed Main Modifications sound all reference to removal of land from Green Belt should be removed or evidence and justification should be shown. The Council should show that it has examined fully all other reasonable options for development. Also the "perceived" need for such a large number of houses on Green Belt in Dorset needs to be reviewed and challenged in the light of the new political landscape. Quote "no more ugly houses on Green Belt" and of course the climate crisis. The demand for houses has also been affected by Brexit and the pandemic.

Consultee: Goretta Quinn-Bagley

Event Name: Purbeck Local Plan Further Proposed Main Modifications

Consultee reference:

Consultation reference: FMM04



**Dorset
Council**

DORSET COUNCIL
18 JAN 2022
Digital Mail Room

Response form for: Purbeck Local Plan Further Proposed Main Modifications consultation

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

In response to comments received on the Purbeck Local Plan Proposed Main Modifications Consultation, which closed earlier this year, the council is consulting on limited Further Proposed Main Modifications around Policy V2 and I5, which are considered necessary to ensure that the plan is sound.

The Purbeck Local Plan Examination Interim Mitigation Strategy For Heathland Habitat Sites (2018/19 to 2023/24) [Interim Strategy] sets out Further Proposed Main Modifications around policy V2 and I5 and considers a range of projects that could provide heathland mitigation in the event that the strategic SANG at Morden is not delivered.

The key Further Proposed Main Modifications (referenced as **FMM6**, **FMM7**, **FMM76** and **FMM77**) are detailed in Appendix 5 of the Interim Strategy

These Further Proposed Main Modifications give rise to a series of minor consequential Further Proposed Main Modifications: **FMM3**, **FMM66** and **FMM82**, which are set out in Appendix 6 of the Interim Strategy.

The council has also published an updated Habitats Regulation Assessment (HRA), Sustainability Appraisal Addendum (SA), policies maps to take account of the Further Proposed Main Modifications, and a series of Memoranda of Understanding to support the Interim Strategy.

These documents can be found on-line at www.dorsetcouncil.gov.uk/plpmainmods.

The council is inviting comments on the key and consequential Further Proposed Main Modifications; Interim Strategy, the Memoranda of Understanding, policies map, the updated Habitats Regulation Assessment and Sustainability Appraisal Addendum only. 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 hearing sessions or in earlier responses.

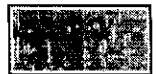
Once the consultation is closed, the council will prepare a summary of the issues raised in representations to the consultation and provide its response. The council's summary, and full copies of the representations, will then be sent to the Planning Inspector for her consideration. If the Inspector's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

PART A

	Your contact details	Agent's Details (if applicable)
Name	Goretti Quinn-Bagley	
Organisation//Group (if applicable)		
Address line 1	[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 supports the representation.



Please note:

- The consultation period starts on **6 December 2021** and will last for 7 weeks until 11.45pm on **24 January 2022**.
- 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).
- Respondents must complete Part A of this response form and separate Part B forms for each Further Proposed Main Modification that they might wish to comment on.
- All respondents must provide their name and address and/or email address.
- All forms must be signed and dated.
- Responses cannot be treated as confidential. By making a response you agree to your name and comments being made available for public viewing.
- Information on the council's privacy policy is available on our website at: <https://www.dorsetcouncil.gov.uk/your-council/about-your-council/data-protection/dorset-council-general-privacy-notice.aspx> .

- The council will not accept any responsibility for the contents of comments submitted. We reserve the right to remove any comments containing defamatory, abusive or malicious allegations.
- If you are part of a group that shares a common view, please include a list of the contact details of each person (including names, addresses, emails, telephone numbers and signatures) along with a completed form providing details of the named lead representative.
- Purbeck Local Plan Examination: Interim Mitigation Strategy For Heathland Habitat Sites (2018/19 to 2023/24), including Further Proposed Main Modifications to Policies V2: Green Belt and I5: Morden Park strategic suitable alternative natural green space (SANG) and holiday park, and their supporting text and Consequential Further Proposed Main Modifications, proposed Purbeck Local Plan (2018-2034), Memoranda of Understanding supporting the Interim Strategy and policies map as well as updated Habitats Regulations Assessment and Sustainability Assessment Addendum documents, are available to view on the Council's website at www.dorsetcouncil.gov.uk/plpmainmods. Paper copies of the Interim Mitigation Strategy including modifications and updated inset map for Morden are available to consult at libraries in Dorchester, Corfe Castle, Lytchett Matravers, Swanage, Upton, Wareham, Wool and Hamworthy. Paper copies of the Habitats Regulations Assessment, Sustainability Appraisal and Memoranda Of Understanding are available to loan from libraries on request. You must follow any procedures relating to 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 01305 838517 or planningpolicy@dorsetcouncil.gov.uk.
- Response forms returned in the post should reference the **Purbeck Local Plan, Further Proposed Main Modifications Consultation, and be sent to Spatial Planning Team, County Hall, Colliton Park, Dorchester, DT1 1XJ**. Forms can be returned by email, referencing Purbeck Local Plan Further Proposed Main Modifications Consultation, to the email above.
- Please tick the box if you would like to be notified of the following:

Adoption of the Local Plan.

PART B

1. Which Further Proposed Main Modification does your representation relate to?

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

Further Proposed Main Modifications reference number	FMMCD1
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2. Do you consider that the Further Proposed Main Modification is:

Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

To be considered legally compliant the Further 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 Further Proposed Main Modification[s] that you are seeking to make a representation on.

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

I believe that the plan is not sound as across the plan there are proposals to remove land from Green Belt status, without evidence of "Exceptional Circumstances" for such actions. NPP140 – "once established Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified." There is no evidence or justification shown in the plan.

Furthermore NPPF 141 " Before concluding that exceptional circumstances exist to justify changes to Green Belt Boundaries, the strategic policy making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. There is no evidence that the Council has examined all other options. A Council cannot approve changes to boundaries where "no evidence" exists that other options have been examined fully.

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 Further Proposed Main Modification legally compliant or sound. You will need to say why this change will make the Further 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 make the Further Proposed Main Modifications sound all reference to removal of land from Green Belt should be removed or evidence and justification should be shown. The Council should show that it has examined fully all other reasonable options for development.

Also the "perceived" need for such a large number of houses on Green Belt in Dorset needs to be reviewed and challenged in the light of the new political landscape. Quote "no more ugly houses on Green Belt" and of course the climate crisis.

The demand for houses has also been affected by Brexit and the pandemic.

Please continue on a separate sheet if necessary.

PART B

1. Which Further 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.

Further Proposed Main Modifications reference number	FMMCD4C
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2. Do you consider that the Further Proposed Main Modification is:

Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

To be considered legally compliant the Further 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 Further Proposed Main Modification[s] that you are seeking to make a representation on.

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

With reference to SANGs across the County, the Council has not considered reasonable alternatives for strategic SANGs but is again considering releasing Green Belt without full evidence or justification for doing so.

The SANGS proposes are unsound, not only because they are being proposed on Green Belt but also their size and position in relation to the development is inadequate and therefore will not take pressure off the natural habitats which they are meant to assist in preserving.

The Council's local plan policies and strategy for habitat site mitigation do not meet the requirements of The Conservation of Habitat and Species Regulation 2017.

The SANG planned at Flowers Drove is Lytchett Matravers is on a site in the north of the village, approximately one and a half miles from the main proposed development of 95 houses. Residents, if they were to use it, would drive there creating increased CO2 emissions or they would not use it at, preferring to drive to Wareham forest, Morden Bog and other areas of natural beauty, more easily accessible from the southern edge of the village. Areas of sensitive habitat will still be damaged by the increased population – a lose, lose situation.

Natural England are supposed to be protecting, through the development of easily accessible SANGs, the natural habitat of these unique areas. Yet the Memorandum of Understanding between Dorset, Wyatt Homes and Natural England are proposing an inadequate and inappropriate SANG which does not even fulfil Natural England's own criteria of a 2.3m circular walk.

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 Further Proposed Main Modification legally compliant or sound. You will need to say why this change will make the Further 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)

A precedent has been set with the moratorium on the Purbeck Local Plan 2, being adopted, while issues are resolved over the proposal of a SANG, which has been deemed unsound, because it was being proposed on Green Belt. The proposed SANG at Flowers Drive, Lytchett Matravers has the same unsound features and should be removed from the plan while a new more suitable site in terms of location and size is sought.

An alternative site should not be on Green Belt and it should include Natural England's own rules of a minimum 2.3m circular walk.

Please continue on a separate sheet if necessary.

PART C

1. Comments on Interim Strategy, Memoranda of Understanding, updated policies map, SA or HRA.

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

Document:	
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Please continue on a separate sheet if necessary.

Please sign and date this form:	
Signature: © Quinn Bagley	Date: 16.1.2022

Consultee: Dr Ian Wright on behalf of LYMPWatch

Event Name: Purbeck Local Plan Further Proposed Main Modifications

Consultee reference: 1190632

Consultation reference: FMM05

Further Proposed Main Modification: Green Belt at Wareham (Policy V2)

Does respondent consider Further Proposed Main Modification is legally compliant: Yes

Does respondent consider Further Proposed Main Modification is sound: No

Details of the reasons why the respondent considers the Further Proposed Main Modification is / is not legally compliant or sound: LYMPWatch has no objection to reversing the removal of Green Belt around Wareham as detailed in FMM 7: Policy V2 LYMPWatch does object to the removal of the clear statement in the original Policy V2 listing the reasons why the Council will protect the Green Belt as designated on the policies map. These are in order to: a. prevent the spread of the Poole, Bournemouth and Christchurch conurbation; b. safeguard the countryside from encroachment; c. preserve the special character of Wareham; d. prevent neighbouring settlements of Holton Heath, Lytchett Matravers, Lytchett Minster, Morden (East and West), Organford, Sandford, Upton and Wareham merging. This original statement in the draft plan which names areas and settlements sends a message to residents that Dorset Council are aware of local concerns. The removal of all local details from the policy hollows it out so its clear message is lost. The reason given for the change is to avoid unnecessary duplication between national and local planning policy. Paragraph 138 in the NPPF only states the general aims and functions of the Green Belt, but LYMPWatch believe it is important that this Purbeck Local Plan contains specific local details to best protect important related areas of Green Belt. The proposed changes only mention efforts to provide SANGS. Whilst SANGS are a way of mitigating for loss of Green Belt they are only part of the policy; so it is important that the original wording in statements a, b, c, and d above remain in place to fully describe the policy. In conclusion LYMPWatch feels it is important to specify the areas that will be protected by Green Belt policy in the Local Plan in order to maximise their protection and avoid generalised use of 'Exceptional Circumstances' to more easily eat away at the Green Belt and erode the aims of the Plan.

Changes respondent considers are necessary to make the Further Proposed Main Modification legally compliant or sound: The original statement in the draft plan Policy V2 which lists the reasons why the Council will protect local Green Belt as designated in the policies map and clearly relates this to local settlements should be maintained as this provides detail to local residents to better understand the aims of the plan.

Consultee: Jim Clark

Event Name: Purbeck Local Plan Further Proposed Main Modifications

Consultee reference:

Consultation reference: FMM06

Further Proposed Main Modification: FMMDC1

Does respondent consider Further Proposed Main Modification is legally compliant: No

Does respondent consider Further Proposed Main Modification is sound: No

Details of the reasons why the respondent considers the Further Proposed Main Modification is / is not legally compliant or sound: With regard to the development of 95 homes at Lytchett Matravers by Wyatt Developments it does not seem reasonable to me that the protection of the Green Belt should be removed. There are other options such as brownfield sites across Dorset, and once the Green Belt is breached then there will be much more intrusive development.

Changes respondent considers are necessary to make the Further Proposed Main Modification legally compliant or sound: I believe that DC should refuse to accept further developments of the size of Wyatt's and approve only infill or restricted small sites.

Consultee: Edwin Macknamara on behalf of Arne Parish Council

Event Name: Purbeck Local Plan Further Proposed Main Modifications

Consultee reference:

Consultation reference: FMM07

Further Proposed Main Modification: Proposed Main Modification (FMMM)6

Does respondent consider Further Proposed Main Modification is legally compliant: Yes

Does respondent consider Further Proposed Main Modification is sound: No

Details of the reasons why the respondent considers the Further Proposed Main Modification is / is not legally compliant or sound: The Parish Council has concerns about the loss of Green Belt and used as SANGS to mitigate for development elsewhere. The loss of Green Belt for this purpose has not been justified and should be reconsidered. In particular the proposals affecting the Mordon Bog (Charborough Estate) as a SANG to permit the development of a Holiday Park illustrates the concerns.

Changes respondent considers are necessary to make the Further Proposed Main Modification legally compliant or sound: The Council is considered to be over reliant on the use of Green Belt Land to mitigate for development elsewhere. The Council should reconsider this and justify this Modification. The erosion of the Green Belt around Lytchett Matravers is an example of the excessive and unjustified intrusion into the Green Belt.

Consultee: David Tarver

Event Name: Purbeck Local Plan Further Proposed Main Modifications

Consultee reference:

Consultation reference: FMM08

Further Proposed Main Modification: MM 6 and 7

Does respondent consider Further Proposed Main Modification is legally compliant: No

Does respondent consider Further Proposed Main Modification is sound: No

Details of the reasons why the respondent considers the Further Proposed Main

Modification is / is not legally compliant or sound: I refer primarily to Policy V2: Green Belt and the proposed modifications with respect to the proposed plans for Lytchett Matravers. The amendment seeks to delete statements that "The Council will protect the green belt, as designated on the policies map, to: a) Prevent the spread of the Poole, Bournemouth and Christchurch conurbation, b) Safeguard the countryside from encroachment, d) Prevent neighbouring settlements of Holton Heath, Lytchett Matravers, Morden, Organford, Sandford, Upton and Wareham merging." These reasons are precisely why the green belt must be preserved. Redesignating the green belt will lead to all these undesirable consequences becoming a permanent reality. There is no valid justification for these amendments, which simply brush aside the purpose of the green belt to give the green light to unfettered development. The proposed justifications that development on green belt will "not irrevocably damage the strategic function and purpose of the green belt", that "there is limited brownfield land available for housing development" and that "a spread of homes across the District will better meet housing needs" are neither evidence based, nor constitute exceptional circumstances. Removal of land from the green belt can only be permitted in exceptional circumstances, which have not been provided. There is also no detailed survey evidence of the availability (or lack) of brownfield land or suitable non-greenbelt land in Purbeck or more widely in Dorset, nor evidence that such land will be fully utilised before green belt is destroyed. Lytchett Matravers has already been subjected to considerable development without additional infrastructure. There is no evidence that the proposed development will be sustainable, or backed up by necessary infrastructure or access, which are already strained. There can be no doubt that, contrary to the proposed modification, further development on green belt WILL most definitely cause irrevocable damage to its strategic function and purpose. The proposed compensation of the Flowers Drove SANG will not compensate for the loss of local green belt at all and is not suitable. The current green belt land has established paths and tracks that are enjoyed by walkers and cyclists. The proposed Flowers Drove SANG is a field, which could not fulfil that recreational purpose. It is not even large enough to provide the required circular walk of at least 2.3 km. The proposed modifications appear to be designed to falsely justify the discarding of existing essential protections to fulfil a development quota.

Changes respondent considers are necessary to make the Further Proposed Main Modification legally compliant or sound: Any modifications must acknowledge that development on green belt WOULD irrevocably damage its strategic function and purpose, WOULD risk the merging of neighbouring settlements and WOULD NOT safeguard the countryside from encroachment. Modifications must also present evidence on the availability and use of brown field sites in Dorset and identify the infrastructure needs and remedies required to make any development sustainable.

Consultee: Tim Whittle

Event Name: Purbeck Local Plan Further Proposed Main Modifications

Consultee reference:

Consultation reference: FMM09

Further Proposed Main Modification: green belt

Does respondent consider Further Proposed Main Modification is legally compliant: No

Does respondent consider Further Proposed Main Modification is sound: No

Details of the reasons why the respondent considers the Further Proposed Main Modification is / is not legally compliant or sound: I do not believe that the plan is compliant as there has been no objective evaluation of further development of none green belt sites not just locally but across the county. The needs of the local population do not justify this development based on a small return of sampling needs that was commissioned. I have seen no exceptional circumstances that evidence the need to severe the green belt in the way proposed .

Changes respondent considers are necessary to make the Further Proposed Main Modification legally compliant or sound: Further evaluation of the need cross county. Further evaluation of alternative sites that are not green belt and/or where they will have less impact on the green belt principles.

Consultee: Alf Bush on behalf of Lytchett Matravers Parish Council

Event Name: Purbeck Local Plan Further Proposed Main Modifications

Consultee reference: 1191250

Consultation reference: FMM10

Further Proposed Main Modification: FMM 6

Does respondent consider Further Proposed Main Modification is legally compliant:

Does respondent consider Further Proposed Main Modification is sound: No

Details of the reasons why the respondent considers the Further Proposed Main Modification is / is not legally compliant or sound: In its response to Matter C from June 7 2019, it states that 'the Council could theoretically deliver Purbeck's local housing need without making changes to Green Belt boundaries'. The Council has not demonstrated that it has adhered to NPPF 140 that Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. NPPF 141 (a) requires that the Local Plan makes as much use as possible of suitable brownfield sites and underutilised land before considering Green Belt. By its own admission the Council has not complied with that. The Council asserts that the re-designation of Green Belt is modest and will not irrevocably harm its function or purpose. Since the South East Dorset Green Belt was created in 1980, this 'modest' re-designation of the Green Belt has increased the number of houses in Lytchett Matravers by over 600; a 50% increase over its size in 1980. That is not modest, that has destroyed a good deal of openness and has irrevocably harmed the function and purpose of the Green Belt around Lytchett Matravers.

Changes respondent considers are necessary to make the Further Proposed Main Modification legally compliant or sound: NPPF requires that the Council is rigorous in its identification and use of brownfield sites and underutilised land. Since Green Belt is just 2.9% of the Dorset Council area, it is necessary to demonstrate that the remaining 97.1% of the area does not have any brownfield and/or underutilised land as an alternative. NPPF requires that the Council's strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. The Council has consistently and clearly failed to adhere to that requirement.

Comments on Interim Strategy, Memoranda of Understanding, updated policies map, SA or HRA:

Section or paragraph: Memorandum of understanding between Dorset Council, Wyatt Homes and Natural England

Comments: Natural England guidelines (The Dorset Heathlands Planning Framework 2020-2025) states that a SANG should include 'a circular walk of 2.3-2.5 km in length'. The proposed SANG in Flowers Drove, Lytchett Matravers is not sufficient to provide close to that. At 7.2 hectares the maximum walk along the fence line would be 1.64 km. Further these guidelines also state that sites must have free parking where the amount of car parking space should be determined by the anticipated numbers using the site and arriving by car. Since this proposed SANG has been rated as having the capacity to support 410 houses, the rural lane is inadequate for that level of traffic and the planned space for parking is similarly inadequate.

Consultee: Amanda Backhouse

Event Name: Purbeck Local Plan Further Proposed Main Modifications

Consultee reference: 1191015

Consultation reference: FMM11

Further Proposed Main Modification: FMMCDI

Does respondent consider Further Proposed Main Modification is legally compliant: No

Does respondent consider Further Proposed Main Modification is sound: No

Details of the reasons why the respondent considers the Further Proposed Main Modification is / is not legally compliant or sound: I have been reading and listening to the PLP2 and the discussions regarding this for a few years now. I do not believe that removing land from green belt has been looked at correctly and therefore this section is not sound. To continue to remove green belt without correctly going through the process to exhaust brown field sites is irresponsible. The brownfield sites used and the windfall that has occurred around Lytchett Matravers in the past few years has adequately met the housing demand that has been requested in the PLP2.. The NPPF states that re-designating Green Belt should only be contemplated if there are exceptional circumstances. The statement 'a spread of homes across the District will better meet housing needs' certainly does not constitute any 'exceptional circumstance'. This village can no longer sustain its green belt being taken away, it would damage the strategic function and the very purpose of the Green belt to protect the boundaries of this wonderful place. The Council needs to look again at why the Green belt has to be taken when all other options have not been exhausted - it is their main priority to preserve our countryside and the very reason that Green Belt areas were created.

Changes respondent considers are necessary to make the Further Proposed Main Modification legally compliant or sound: In my opinion the Council does need to reassess the housing required for the Purbecks. With the pandemic people now work very differently than in 2018/19. The shift of workforces due to Brexit has also changed the type of housing required. Brownfield sites and windfall sites could meet the needs of this area. The Dorset Council do need to look at finding more Brown Field and windfall sites in the rest of the county. The Further Proposed Main Modification regarding the use of the Green Belt Land needs to be struck through and the Council needs to find another way to meet housing needs and to not accept increased housing where needs have not been justified.

Further Proposed Main Modification: FMMCD4C

Does respondent consider Further Proposed Main Modification is legally compliant: No

Does respondent consider Further Proposed Main Modification is sound: No

Details of the reasons why the respondent considers the Further Proposed Main

Modification is / is not legally compliant or sound: The proposed SANG at Flowers Drove, Lytchett Matravers is just a field next to a narrow lane. The field goes nowhere and is a 1.5km walk. The SANG, according to Natural England should be a circular walk of at least 2.3km. This SANG is proposed to cater for 410 houses so I estimate that say 10% of these drove to this SANG on a sunny day they would need car parking for those 41 cars - I do not see a proposed car park big enough or an area big enough to cater for half that amount. Dog walkers would drive to Wareham Forest rather than use this field with no parking and a very short closed in walk.

Changes respondent considers are necessary to make the Further Proposed Main

Modification legally compliant or sound: If the Green Belt were not released and built on then the residents of the village would use the many footpaths which are well maintained around Lytchett Matravers. The Parish Council works hard to do this and if the Council gave more money to keep these clear, place more in Green Belt land and place fences to aid the land owners then this would be much better use of the money.

Consultee: Mr & Mrs Dunlop

Event Name: Purbeck Local Plan Further Proposed Main Modifications

Consultee reference: 1190181

Consultation reference: FMM12

Further Proposed Main Modification: FMMCD4c - memo of understanding between DC, WH & NE

Does respondent consider Further Proposed Main Modification is legally compliant: No

Does respondent consider Further Proposed Main Modification is sound: No

Details of the reasons why the respondent considers the Further Proposed Main Modification is / is not legally compliant or sound: The Flowers Drove SANG is a field that goes nowhere. The proposed SANG is supposedly able to cater for 410 houses, so it will need a large car park to accommodate traffic on a very rural lane. A SANG according to Natural England should have a circular walk of at least 2.3 km. Flowers Drove can only manage around 1.5 km and is therefore not suitable. Not only for this PLP2 but also the DLP. The Flowers Drove SANG will do nothing to offset the harm to the green belt and heathland. Wareham forest has ample parking for cars and horse boxes. Nothing like this could be accommodated in Flower Drove.

Changes respondent considers are necessary to make the Further Proposed Main Modification legally compliant or sound: The 'memorandum of understanding' FMMCD4c - should be deleted from PLP2 and all its content removed. Memorandum FMMCD4c makes reference for additional capacity at Flowers Drove to allow for further green belt release through the DLP. This is wholly inappropriate and wrong - the DLP is being consulted on separately and any deviation would be confusing to the public and as such unlawful.

Responses raised through the post / e-mail

Consultee: Mr G M Rigler Campaign for the Protection of Rural England

Event Name: Purbeck Local Plan Further Proposed Main Modifications

Consultee reference: 1191922

Consultation reference: FMM13



The countryside charity
Dorset

DORSET COUNCIL
17 JAN 2022
Digital Mail Room

The Purbeck Local Plan
Further Main Modifications Consultation,
Dorset Council,
County Hall,
Colliton Park,
Dorchester, DT1 1XJ.

Please reply to:



Dear Sirs / Madams,

14th January 2022

**REPRESENTATIONS concerning "FURTHER" PROPOSED MAIN
MODIFICATIONS
to a PLAN initiated by PURBECK DISTRICT COUNCIL**

Further to the recent release of yet some more proposed main modifications to a plan initiated by an abolished district council in respect of the period 2018 to 2034, please find enclosed a set of duly completed forms to assist conclusion of this matter, expected to benefit the locality (and its communities) and to adequately protect the natural capital of Purbeck.

Every effort has been made to express our representations clearly but we would wish to participate in any oral part of the residual examination that the Planning Inspector may require.

Yours faithfully,

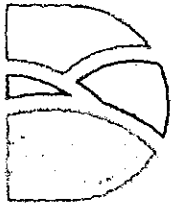


Gerald Rigler : Chairman – Purbeck & Poole Group of Dorset CPRE

NB : Please note, whilst every effort has been taken to present accurate information for due consideration, that as we are neither a decision maker nor a statutory consultee, we cannot accept any responsibility for any unintentional errors or omissions. No doubt the decision makers will satisfy themselves on any facts before reaching the appropriate sustainable decision in the "public interest".

Dorset CPRE | Charity no: 211974
PO Box 9018 | Dorchester | Dorset | DT1 9GY
www.dorset-cpre.org.uk
info@dorset-cpre.org.uk | Tel: 0333 577 0360

The Campaign to Protect Rural England exists to promote the beauty, tranquillity and diversity of rural England by encouraging the sustainable use of land and other natural resources in town and country.



**Dorset
Council**

Response form for: Purbeck Local Plan Further Proposed Main Modifications consultation

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

In response to comments received on the Purbeck Local Plan Proposed Main Modifications Consultation, which closed earlier this year, the council is consulting on limited Further Proposed Main Modifications around Policy V2 and I5, which are considered necessary to ensure that the plan is sound.

The Purbeck Local Plan Examination Interim Mitigation Strategy For Heathland Habitat Sites (2018/19 to 2023/24) [Interim Strategy] sets out Further Proposed Main Modifications around policy V2 and I5 and considers a range of projects that could provide heathland mitigation in the event that the strategic SANG at Morden is not delivered.

The key Further Proposed Main Modifications (referenced as **FMM6, FMM7, FMM76** and **FMM77**) are detailed in Appendix 5 of the Interim Strategy

These Further Proposed Main Modifications give rise to a series of minor consequential Further Proposed Main Modifications: **FMM3, FMM66** and **FMM82**, which are set out in Appendix 6 of the Interim Strategy.

The council has also published an updated Habitats Regulation Assessment (HRA), Sustainability Appraisal Addendum (SA), policies maps to take account of the Further Proposed Main Modifications. and a series of Memoranda of Understanding to support the Interim Strategy.

These documents can be found on-line at www.dorsetcouncil.gov.uk/plpmainmods.

The council is inviting comments on the key and consequential Further Proposed Main Modifications, Interim Strategy, the Memoranda of Understanding, policies map, the updated Habitats Regulation Assessment and Sustainability Appraisal Addendum only. 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 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 all the Proposed Further Main and Main Modifications, the council will then take a decision about whether to adopt the local plan subject to all Further Main and Main Modifications.

PART A

	Your contact details	Agent's Details (if applicable)
Name	G. M. RIGLER	
Organisation / Group	PURBECK & POOLS GROUP of DORSET CPRE	
Address line 1	[REDACTED]	
Address line 2		
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 supports the representation.


> 100

Please note:

- The consultation period starts on **6 December 2021** and will last for 7 weeks until 11.45pm on **24 January 2022**.
- 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).
- Respondents must complete Part A of this response form and separate Part B forms for each Further Proposed Main Modification that they might wish to comment on.
- All respondents must provide their name and address and/or email address.
- All forms must be signed and dated.
- Responses cannot be treated as confidential. By making a response you agree to your name and comments being made available for public viewing.
- Information on the council's privacy policy is available on our website at:
<https://www.dorsetcouncil.gov.uk/your-council/about-your-council/data-protection/dorset-council-general-privacy-notice.aspx>

- The council will not accept any responsibility for the contents of comments submitted. We reserve the right to remove any comments containing defamatory, abusive or malicious allegations.
- If you are part of a group that shares a common view, please include a list of the contact details of each person (including names, addresses, emails, telephone numbers and signatures) along with a completed form providing details of the named lead representative 
- Purbeck Local Plan Examination: Interim Mitigation Strategy For Heathland Habitat Sites (2018/19 to 2023/24), including Further Proposed Main Modifications to Policies V2: Green Belt and I5: Morden Park strategic suitable alternative natural green space (SANG) and holiday park, and their supporting text and Consequential Further Proposed Main Modifications, proposed Purbeck Local Plan (2018-2034), Memoranda of Understanding supporting the Interim Strategy and policies map as well as updated Habitats Regulations Assessment and Sustainability Assessment Addendum documents, are available to view on the Council's website at www.dorsetcouncil.gov.uk/plpmainmods. Paper copies of the Interim Mitigation Strategy including modifications and updated inset map for Morden are available to consult at libraries in Dorchester, Corfe Castle, Lytchett Matravers, Swanage, Upton, Wareham, Wool and Hamworthy. Paper copies of the Habitats Regulations Assessment, Sustainability Appraisal and Memoranda Of Understanding are available to loan from libraries on request. You must follow any procedures relating to 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 01305 838517 or planningpolicy@dorsetcouncil.gov.uk.
- Response forms returned in the post should reference the **Purbeck Local Plan, Further Proposed Main Modifications Consultation, and be sent to Spatial Planning Team, County Hall, Colliton Park, Dorchester, DT1 1XJ**. Forms can be returned by email, referencing Purbeck Local Plan Further Proposed Main Modifications Consultation, to the email above.
- Please tick the box if you would like to be notified of the following:

Adoption of the Local Plan (or any other concluding process)

 DATA PROTECTION
INHIBITS COMPLIANCE
WITH THIS REQUEST

PART B

1. Which Further Proposed Main Modification does your representation relate to?

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

Further Proposed Main Modifications reference number	FPMM6
--	--------------

2. Do you consider that the Further Proposed Main Modification is:

Legally compliant	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

To be considered legally compliant the Further 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 Further Proposed Main Modification[s] that you are seeking to make a representation on.

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

The Further Proposed Main Modification 6 (FPMM6) is not certainly legally compliant for any practical use since it is being progressed without due respect to relevant law concerning protection of valued species and countryside habitats (in accordance with the NPPF which Natural England is not empowered to relax by simply pursuing mitigation rather than avoidance say at Moreton Station and especially at Wool) and also without due respect for the constraints allowing the exceptional characteristics of Dorset to be kept undamaged : all within the context of relevant law and guidance being in an unusually extended state of flux. As an example, the mooted changes to 'permitted development rights' are expected to have significant effects on Local Plans.

After so many modifications, it is also held that the proposed documentation is inconsistent with national policy, since the Nolan Principle of "Transparency" has now been abrogated.

FPMM6 is not sound since it fosters the unsustainable concept of more public access (with their dogs) to areas that, notwithstanding the uninformed views of some (including Natural England), do contain protected species (flora and fauna) and the valued woodland that must not be damaged. It is stressed that the existing SANGs have led to local extinctions of protected species and the introduction of pest species because of litter and the loss of relevant predators operating in the SANGs. No wonder the matter is being reviewed for protection of any residual eco-systems and their bio-diversity, as well as being reviewed to remove the above-mentioned 'conflict of laws' that create illegality. Obviously, with such a track record, all future SANGs must comply with relevant laws concerning the protection of valued bio-diversity (wherever it exists in Dorset) otherwise illegal activity is involved as well as being unsustainable.

It is also noted that the current situation, created by the non-withdrawal of the proposed Purbeck Local Plan, is essentially seeking to prepare a misleading set of proposals derived from outdated criteria (data and views, some of dubious relevance to Dorset) that have been significantly modified by so many modifications that reliance upon public understanding and acceptance cannot be expected. It is recalled that even the initial consultation document involved a poor commitment to "Openness" : a relevant Nolan Principle, endorsed by government. Also, comment A1 of our representation in November 2018 refers.

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 Further Proposed Main Modification legally compliant or sound. You will need to say why this change will make the Further 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)

It does not seem wise to invest any further effort to continue developing this flawed proposed local plan (produced by a defunct district council) when another supervening local plan is required (from Dorset Council) that should be based on better evidence, clarified law/guidance (*following the readjustment of views about planning caused by reactions to the pandemic, the Climate Emergency and the fact that 'growth' cannot be perpetual*) and involving :-

- 1 : less pollution to watercourses / Poole harbour,
- 2 : better satisfactory consultation and monitoring procedures,
- 3 : adequate delivery of the right number, type and quality of dwellings in the right places (*given relevant predictions about shrinking birth rates and reducing life expectancies*),
- 4 : less damage to the exceptional countryside and wildlife of Dorset (*formally protected or otherwise*), and
- 5 : effective coordination with the planning by other bodies affecting the life and living of the communities in Dorset, including the Dorset LEP (*pursuing growth*) and Dorset CCG (*prejudicing timely accessibility for treatment of major traumas, in pursuit of clinical excellence whilst ignoring governmental ambitions for extra housing / population growth*).

Please continue on a separate sheet if necessary.

PART B

1. Which Further 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.

Further Proposed Main Modifications reference number	FPMM 7
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2. Do you consider that the Further Proposed Main Modification is:

Legally compliant	<input checked="" type="checkbox"/>		No	<input checked="" type="checkbox"/>
Sound	<input checked="" type="checkbox"/>		No	<input checked="" type="checkbox"/>

To be considered legally compliant the Further 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 Further Proposed Main Modification[s] that you are seeking to make a representation on.

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

The Further Proposed Main Modification 7 (FPMM7) is not certainly legally compliant for any practical use since it is being progressed without due respect to relevant law concerning protection of valued species and countryside habitats (in accordance with the NPPF which Natural England is not empowered to relax by simply pursuing mitigation rather than avoidance say at Moreton Station and especially at Wool) and also without due respect for the constraints allowing the exceptional characteristics of Dorset to be kept undamaged : all within the context of relevant law and guidance being in an unusually extended state of flux. As an example, the mooted changes to 'permitted development rights' are expected to have significant effects on Local Plans.

After so many modifications, it is also held that the proposed documentation is inconsistent with national policy, since the Nolan Principle of "Transparency" has now been abrogated.

FPMM7 is not sound since it fosters the unsustainable concept of more public access (with their dogs) to areas that, notwithstanding the uninformed views of some (including Natural England), do contain protected species (flora and fauna) and the valued woodland that must not be damaged. It is stressed that the existing SANGs have led to local extinctions of protected species and the introduction of pest species because of litter and the loss of relevant predators operating in the SANGs. No wonder the matter is being reviewed for protection of any residual eco-systems and their bio-diversity, as well as being reviewed to remove the above-mentioned 'conflict of laws' that create illegality. Obviously, with such a track record, all future SANGs must comply with relevant laws concerning the protection of valued bio-diversity (wherever it exists in Dorset) otherwise illegal activity is involved as well as being unsustainable.

It is also noted that the current situation, created by the non-withdrawal of the proposed Purbeck Local Plan, is essentially seeking to prepare a misleading set of proposals derived from outdated criteria (data and views, some of dubious relevance to Dorset) that have been significantly modified by so many modifications that reliance upon public understanding and acceptance cannot be expected. It is recalled that even the initial consultation document involved a poor commitment to "Openness" : a relevant Nolan Principle, endorsed by government. Also, comment A1 of our representation in November 2018 refers.

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 Further Proposed Main Modification legally compliant or sound. You will need to say why this change will make the Further 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)

It does not seem wise to invest any further effort to continue developing this flawed proposed local plan (produced by a defunct district council) when another supervening local plan is required (from Dorset Council) that should be based on better evidence, clarified law/guidance (*following the readjustment of views about planning caused by reactions to the pandemic, the Climate Emergency and the fact that 'growth' cannot be perpetual*) and involving :-

- 1 : less pollution to watercourses / Poole harbour,
- 2 : better satisfactory consultation and monitoring procedures,
- 3 : adequate delivery of the right number, type and quality of dwellings in the right places (*given relevant predictions about shrinking birth rates and reducing life expectancies*),
- 4 : less damage to the exceptional countryside and wildlife of Dorset (*formally protected or otherwise*), and
- 5 : effective coordination with the planning by other bodies affecting the life and living of the communities in Dorset, including the Dorset LEP (*pursuing growth*) and Dorset CCG (*prejudicing timely accessibility for treatment of major traumas, in pursuit of clinical excellence whilst ignoring governmental ambitions for extra housing / population growth*).

Please continue on a separate sheet if necessary.

PART B

1. Which Further Proposed Main Modification does your representation relate to?

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

Further Proposed Main Modifications reference number	FPMM 76
--	---------

2. Do you consider that the Further Proposed Main Modification is:

Legally compliant	<input checked="" type="checkbox"/>		No	<input checked="" type="checkbox"/>
Sound	<input checked="" type="checkbox"/>		No	<input checked="" type="checkbox"/>

To be considered legally compliant the Further Proposed Main Modification 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 Further Proposed Main Modification[s] that you are seeking to make a representation on.

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

The Further Proposed Main Modification 76 (FPMM76) is not certainly legally compliant for any practical use since it is being progressed without due respect to relevant law concerning protection of valued species and countryside habitats (in accordance with the NPPF which Natural England is not empowered to relax by simply pursuing mitigation rather than avoidance say at Moreton Station and especially at Wool) and also without due respect for the constraints allowing the exceptional characteristics of Dorset to be kept undamaged : all within the context of relevant law and guidance being in an unusually extended state of flux. As an example, the mooted changes to 'permitted development rights' are expected to have significant effects on Local Plans.

After so many modifications, it is also held that the proposed documentation is inconsistent with national policy, since the Nolan Principle of "Transparency" has now been abrogated.

FPMM76 is not sound since it fosters the unsustainable concept of more public access (with their dogs) to areas that, notwithstanding the uninformed views of some (including Natural England), do contain (or will adversely affect) protected species (flora and fauna) and the valued habitat that must not be damaged. It is stressed that the existing SANGs have led to local extinctions of protected species and the introduction of pest species because of litter and the loss of relevant predators operating in the SANGs. No wonder the matter is being reviewed for protection of any residual eco-systems and their bio-diversity, as well as being reviewed to remove the above-mentioned 'conflict of laws' that create illegality. Obviously, with such a track record, all future SANGs must comply with relevant laws concerning the protection of valued bio-diversity (wherever it exists in Dorset) otherwise illegal activity is involved as well as being unsustainable.

It is also noted that the current situation, created by the non-withdrawal of the proposed Purbeck Local Plan, is essentially seeking to prepare a misleading set of proposals derived from outdated criteria (data and views, some of dubious relevance to Dorset) that have been significantly modified by so many modifications that reliance upon public understanding and acceptance cannot be expected. It is recalled that even the initial consultation document involved a poor commitment to "Openness" : a relevant Nolan Principle, endorsed by government. Also, comment A1 of our representation in November 2018 refers.

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 Further Proposed Main Modification legally compliant or sound. You will need to say why this change will make the Further 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)

It does not seem wise to invest any further effort to continue developing this flawed proposed local plan (produced by a defunct district council) when another supervening local plan is required (from Dorset Council) that should be based on better evidence, clarified law/guidance (*following the readjustment of views about planning caused by reactions to the pandemic, the Climate Emergency and the fact that 'growth' cannot be perpetual*) and involving :-

- 1 : less pollution to watercourses / Poole harbour,
- 2 : better satisfactory consultation and monitoring procedures,
- 3 : adequate delivery of the right number, type and quality of dwellings in the right places (*given relevant predictions about shrinking birth rates and reducing life expectancies*),
- 4 : less damage to the exceptional countryside and wildlife of Dorset (*formally protected or otherwise*), and
- 5 : effective coordination with the planning by other bodies affecting the life and living of the communities in Dorset, including the Dorset LEP (*pursuing growth*) and Dorset CCG (*prejudicing timely accessibility for treatment of major traumas, in pursuit of clinical excellence whilst ignoring governmental ambitions for extra housing / population growth*).

Please continue on a separate sheet if necessary.

PART B

1. Which Further Proposed Main Modification does your representation relate to?

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

Further Proposed Main Modifications reference number	FPMM77
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2. Do you consider that the proposed Main Modification is:

Legally compliant	Yes		No	<input checked="" type="checkbox"/>
Sound	Yes		No	<input checked="" type="checkbox"/>

To be considered legally compliant the Further 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 Further Proposed Main Modification[s] that you are seeking to make a representation on.

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

The Further Proposed Main Modification 77 (FPMM77) is not certainly legally compliant for any practical use since it is being progressed without due respect to relevant law concerning protection of valued species and countryside habitats (in accordance with the NPPF which Natural England is not empowered to relax by simply pursuing mitigation rather than avoidance say at Moreton Station and especially at Wool) and also without due respect for the constraints allowing the exceptional characteristics of Dorset to be kept undamaged : all within the context of relevant law and guidance being in an unusually extended state of flux. As an example, the mooted changes to 'permitted development rights' are expected to have significant effects on Local Plans.

After so many modifications, it is also held that the proposed documentation is inconsistent with national policy, since the Nolan Principle of "Transparency" has now been abrogated.

FPMM77 is not sound since it fosters the unsustainable concept of more public access (with their dogs) to areas that, notwithstanding the uninformed views of some (including Natural England), do contain (or will adversely affect) protected species (flora and fauna) and the valued habitat that must not be damaged. It is stressed that the existing SANGs have led to local extinctions of protected species and the introduction of pest species because of litter and the loss of relevant predators operating in the SANGs. No wonder the matter is being reviewed for protection of any residual eco-systems and their bio-diversity, as well as being reviewed to remove the above-mentioned 'conflict of laws' that create illegality. Obviously, with such a track record, all future SANGs must comply with relevant laws concerning the protection of valued bio-diversity (wherever it exists in Dorset) otherwise illegal activity is involved as well as being unsustainable.

It is also noted that the current situation, created by the non-withdrawal of the proposed Purbeck Local Plan, is essentially seeking to prepare a misleading set of proposals derived from outdated criteria (data and views, some of dubious relevance to Dorset) that have been significantly modified by so many modifications that reliance upon public understanding and acceptance cannot be expected. It is recalled that even the initial consultation document involved a poor commitment to "Openness" : a relevant Nolan Principle, endorsed by government. Also, comment A1 of our representation in November 2018 refers.

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 Further Proposed Main Modification legally compliant or sound. You will need to say why this change will make the Further 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)

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Please continue on a separate sheet if necessary.

PART C

1. Comments on Interim Strategy, Memoranda of Understanding, updated policies map, SA or HRA.

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

Document:

FMMCD46

It is noted that some reliance seems to have been placed upon a comment made by The Planning Inspector that, with Main Modifications, the Plan is likely to be capable of being found suitable; but that was before so many Main Modifications were produced and obviously before the final conclusions of The Planning Inspector.

This document, defining a 'memorandum of understanding between Dorset Council and Dorset Wildlife Trust' (apparently like other such memoranda submitted by Dorset Council) is little more than a 'work in progress' subject to various caveats that render them somewhat pointless.

This particular document seeks to relate to a dubious need for a holiday park in a vulnerable natural area and even the specification for a SANG adds nothing to what the planning authority would need to enforce in complying with legislation, observing legitimate constraints on developments (in the public interest, not just those of developers) and seeking compliance with the NPPF. The current concerns about the sustainability of SANGs (*for the purpose of proposing a sound Local Plan*) have not been addressed and this is particularly surprising in the case of Court Farm since the declaration of a Climate Emergency (some time ago) should already have prompted planners to minimize vehicular movements by abandoning the concept of "strategic" SANGs. "Strategic" SANGs tried to facilitate the construction of too many dwellings (irrespective of their type and real local need) on greener (sometimes 'floodable'!) locations rather than on derelict, underused or misused urban sites. No doubt it is appreciated that such urban sites could (and should, in a sound Local Plan) not only be prioritized for re-use but also be required to incorporate suitable public realm for exercise including the exercise of dogs.

Please continue on a separate sheet if necessary.

Please sign and date this form:

Signature:



Date:

14-1-22

Consultee: Dr A C Warne

Event Name: Purbeck Local Plan Further Proposed Main Modifications

Consultee reference: 1190865

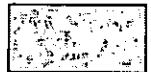
Consultation reference: FMM14

PART A

	Your contact details	Agent's Details (if applicable)
Name	A.C.Warne	
Organisation/ Group (if applicable)		
Address line 1	[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 supports the representation.



Please note:

- The consultation period starts on **6 December 2021** and will last for 7 weeks until 11.45pm on **24 January 2022**.
- 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).
- Respondents must complete Part A of this response form and separate Part B forms for each Further Proposed Main Modification that they might wish to comment on.
- All respondents must provide their name and address and/or email address.
- All forms must be signed and dated.
- Responses cannot be treated as confidential. By making a response you agree to your name and comments being made available for public viewing.
- Information on the council's privacy policy is available on our website at:
<https://www.dorsetcouncil.gov.uk/your-council/about-your-council/data-protection/dorset-council-general-privacy-notice.aspx>

- The council will not accept any responsibility for the contents of comments submitted. We reserve the right to remove any comments containing defamatory, abusive or malicious allegations.
- If you are part of a group that shares a common view, please include a list of the contact details of each person (including names, addresses, emails, telephone numbers and signatures) along with a completed form providing details of the named lead representative.
- Purbeck Local Plan Examination: Interim Mitigation Strategy For Heathland Habitat Sites (2018/19 to 2023/24), including Further Proposed Main Modifications to Policies V2: Green Belt and I5: Morden Park strategic suitable alternative natural green space (SANG) and holiday park, and their supporting text and Consequential Further Proposed Main Modifications, proposed Purbeck Local Plan (2018-2034), Memoranda of Understanding supporting the Interim Strategy and policies map as well as updated Habitats Regulations Assessment and Sustainability Assessment Addendum documents, are available to view on the Council's website at www.dorsetcouncil.gov.uk/plpmainmods. Paper copies of the Interim Mitigation Strategy including modifications and updated inset map for Morden are available to consult at libraries in Dorchester, Corfe Castle, Lytchett Matravers, Swanage, Upton, Wareham, Wool and Hamworthy. Paper copies of the Habitats Regulations Assessment, Sustainability Appraisal and Memoranda Of Understanding are available to loan from libraries on request. You must follow any procedures relating to 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 01305 838517 or planningpolicy@dorsetcouncil.gov.uk.
- Response forms returned in the post should reference the **Purbeck Local Plan, Further Proposed Main Modifications Consultation, and be sent to Spatial Planning Team, County Hall, Colliton Park, Dorchester, DT1 1XJ**. Forms can be returned by email, referencing Purbeck Local Plan Further Proposed Main Modifications Consultation, to the email above.
- Please tick the box if you would like to be notified of the following:

Adoption of the Local Plan.

PART B

1. Which Further Proposed Main Modification does your representation relate to?

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

Further Proposed Main Modifications reference number	All
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2. Do you consider that the Further Proposed Main Modification is:

Legally compliant	Yes	<input type="checkbox"/>	No	<i>ND</i>
Sound	Yes	<input type="checkbox"/>	No	<i>ND</i>

To be considered legally compliant the Further 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 Further Proposed Main Modification[s] that you are seeking to make a representation on.

PART C


1. Comments on Interim Strategy, Memoranda of Understanding, updated policies map, SA or HRA.

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

Document:	<i>Interim Strategy</i>
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Please see attached text

Please continue on a separate sheet if necessary.

Please sign and date this form.	
Signature: 	Date: <i>21-1-22</i>

Comments on the consultation process.

This consultation is the 2nd time a consultation has been across the Christmas period. Consultations and public hearings have also been across the summer holiday period. Can pitching consultations at such times be regarded as fair to the public if you want to get a cross section of responses?

Comments on FMMDC1.

The Interim mitigation Strategy for Heathland Habitat Sites

Preface

By putting this forward as an interim strategy the Council are making an overall change to policies that concern the whole of the former Purbeck District. The actual changes proposed are only small components of this much greater plan so the implications for the whole plan consequentially needs to be considered. The term interim is a misrepresentation because the interim policies in this document are incomplete and need more consideration when the Dorset Council Plan is consulted on further

Since the start of the Purbeck Local Plan consultation process there have been many changes to the legislation, the planning framework and Dorset Council's own intentions. The Environment Act 2021 has important implications in the first section for improving the natural environment and while it may be some time until the targets and plans become set a plan such as the Purbeck Plan should bear these in mind and maybe even anticipate some of them. At least the principles need to be included in impact Assessments, this might also include monitoring the success or otherwise of plan. Part 6 of the Environment Act 2021 legislates about environmental gain in planning and the general duty to conserve and enhance biodiversity. Although some of these aspects are mentioned in the Purbeck Plan they are very inadequately covered. Sections 102 & 103 of the Act places duties on public authorities and sections 104, 105 etc require local authorities to prepare local nature recovery strategies.

The report of the Parliamentary Environment Audit Committee on Water Quality in Rivers 2022 has also highlighted issues that need to be taken into account for both the Purbeck Local Plan and the Dorset Council Local Plan. This report includes a section about Natural England's policy of Nitrate Neutrality and their policy not to approve any Appropriate Assessment made under the Habitats Regulations and the fact that this is holding up house building. (see advice on achieving Nitrate Neutrality in the Solent June 2020, this includes mention of the same problem in Poole Harbour). This should be applied to the Purbeck Plan but also to the Dorset Plan where a full assessment of the Frome and Stour catchments can be made not just a limited but linked part in Purbeck. Natural England's advice to the Council seems

nonexistent here and they have not responded to my requests for evidence for where nitrate neutrality is working and the time lag involved in delivering it.

Because there is an inadequate assessment of the environment the plan becomes entwined in the different priorities that can be applied to different environmental designations. This is not new as demonstrated several years ago by proposals on Raynham Marshes in East London where the competing requirements of Green Belt and SSSI were in conflict. One would have expected that by now the need to be clear about these competing objectives should have been sorted out. These amendments include a clear conflict where removing housing from encroaching on Green Belt increases the pressures on Internationally Important wildlife sites.

The Purbeck Plan as it stands could cause untold damage in one of the most important parts of Britain for biodiversity. The Dorset Council and its advisers seem to have no concept of this or at least do not wish to admit it as demonstrated by the quotation from Council minutes concerning the National Park proposal reproduced later in this preamble.

Dorset has well documented cases of species loss and decline as described under ecological emergency in the Dorset Council's Climate and Ecological Emergency Strategy 2021. This largely blames agricultural intensification and appears to play down the effect of increased housing but there is considerable evidence for this particularly resulting from the mushroom growth of Bournemouth.

I understand that the Local Plan for Bournemouth Christchurch and Poole (BCP) has just been produced for consultation and this proposes through the cooperation agreement that Dorset could take some 9000 houses from the government required number for BCP. This could add to the very considerable pressures on Purbeck and simply turn parts into extensions of BCP. Dorset and Purbeck in particular is recognised as a biodiversity hotspot in Britain with the 10 km squares with the largest number of plants and mammals. This richness is just the type of situation that the Environment Act 2021 aims to protect.

The Purbeck Plan must include policies to show that the Environment Act 2021 is being complied with here.

COP 26 has hopefully made us more aware of climate change and its environmental consequences, but is Dorset Council taking notice?

There is still little or nothing in the plan that refers to the Dorset Council's Climate and Ecological Emergency Strategy, although the draft was only produced in mid-
2

2020 there must have been considerable thinking about this before then and this could have been included in revised versions of the Purbeck Local Plan.

As part of the ecological emergency element the treatment of sites labelled as being of international importance (SPA, SAC Ramsar) should not be treated in isolation but as important sites supported within a wider countryside matrix, very rich in wildlife generally. Purbeck in particular is one of the richest areas for wildlife in Britain and the Purbeck Plan fails to recognise this and is more a recipe for destruction of wildlife rather than upholding the former PDC strapline "thriving communities in balance with the natural environment". The preliminary assessments for the plan, HRA etc did not adequately assess this countryside wide wildlife matrix and its importance to sustaining the Internationally Important sites.

The Council's ambition as stated elsewhere in Council documents is to place climate change and the ecological emergency at the front and centre of the council's wider policies but this is not in any way addressed in the plan.

The Council's proposals affect such a wide area of Purbeck that all or most proposals require some form of mitigation, usually the provision of a SANG. Much of the use being mitigated for is dog walking and not at all compatible with the objectives of internationally important heathland particularly because of disturbance to ground nesting birds. Nationally important wildlife areas seem to be currently seen as recreation areas in a large part due to the misguided application of the CROW Act by Natural England where the former Countryside Commission element pushed the provisions and the former English Nature element appeared to be muzzled; a clear example of a conflict of interest within the body that is supposed to advise on these areas. I wonder whether Natural England carried out a HRA of their Crow Act implementation? The advice of Natural England at the public hearings was that "they see no problems" despite massive evidence to the contrary. Natural England are carrying out an assessment of the case for additional National Parks including a Dorset and East Devon National Park, again this demonstrates the conflict of interest between the Natural England local planning advisor and those assessing the National Park case. Dorset Council are in a dilemma as shown by the response to a question at a recent meeting - *The Government are yet to formally respond to the recommendations of the Glover Report on the Landscapes Review: National Parks and AONB and as such, Dorset Council is not in a position to act on them. If Government supported some of the recommendations, the position for Dorset may well be very different to what it is now. When the Government indicates what its actions are likely to be, Dorset Council will be in a position to move forward with an appropriate approach in response. Whatever the outcome of the Review, there will be a need to have a Local Plan in place covering the whole of Dorset as soon as possible.* This last sentence reveals the confused state of affairs where The Purbeck Local Plan and the Dorset Council Local Plan would pre-empt the NP consultation

conclusions and cause a deterioration of the environment, this would be clearly so in Wool where a preset mindset that the area has few designations and plenty of suitable areas has underlain planning policy but is demonstrably not true as the area has not been properly assessed in the past and current assessments have been ignored.

Comments on FMMCD1 itself.

I have found it very difficult to unthread the altered policies and their implications from each other so have had to present these comments as a single text.

The Council believe the plan is sound but the environmental objective set out in NPP21 is inadequately covered as exemplified by the Council's view of Wool where it is clearly the intention that housing displaced by reducing encroachment on the Green Belt is destined for Wool because they claim the land is less constrained and is more sustainable. They ignore the comments made in writing and at the public examination and have not taken up offers of more evidence that Wool has exceptional wildlife value. Expansion of Wool is not sustainable because it will simply serve commuters to Poole / Bournemouth or Dorchester

The modifications proposed add to the case that the Purbeck Plan should be fully integrated into the Dorset Plan because they muddle the whole scheme although it gives Dorset Council the opportunity to change and increase housing allocations across Purbeck.

Purbeck is the most sensitive part of Dorset for its biodiversity and the original Purbeck Plan was very bad for biodiversity but the continuously increasing housing burden proposed in the Dorset Council Plan threatens wholesale destruction.

Tourism is seen as an economic driver in Purbeck which opens up all manner of problems but importantly the extent of environmental destruction resulting from the plan proposals may well destroy what many people come to the area to enjoy.

Assessing the modifications as separate units is difficult as the proposed changes have ramifications throughout the plan. The confusion is compounded by the way that the changes have been shoehorned in so that parts become very confusing and in places very ambiguous.

The way the modifications are presented is confusing, surely it would be best to clearly state what the proposed changes are, right at the beginning so it can be seen where the justifications are leading but they don't appear until Appendix 3 pages 82 – 91 almost an afterthought!

Paragraph 24 to 26 - "Council considers" etc but this does not make it clear why. Throughout the plan this type of expression is used without any justification.

Provision of holiday chalets – the principle of horse trading to get a SANG is basically unsound and opens up all sorts of complications. This does not seem like an exceptional circumstance for removal of Green Belt land that is fully evidenced or justified (NPPF21). In the modified plan it is very confusing whether the Holiday Park is still a live issue, Appendices 3 and 5 reproduce mostly the same material but the holiday park appears in one but not the other. At places in the text it seems to suggest that the Holiday Park is still an ambition.

Paragraph 26 - the Council does not accept that it's HRA is unlawful etc but the HRA is by Footprint Ecology not Dorset Council and Footprint Ecology is not a Competent Authority for this section, so it is not valid. Since the HRA is not an assessment by a competent authority it therefore does not conform to the requirements for soundness in NPPF 19 etc. The HRA is in many instances tailored to fit the Council's requirements, see comments on the HRA itself.

Paragraph 35 states - includes land north of Studland – what is this? Poole harbour is north of Studland and Sandbanks is the next place North much of Studland West is part of the new mega-NNR. This suggestion makes no sense.

Paragraph 38 - Natural England's statement and their letter of 26-7-19 is very ambiguous and applies to all the SANGs and Heathland mitigation as all sites are to some or a large extent not in "favourable condition" or only "recovering". So why has this site singled out by Natural England? In the letter they say that a SANG at Morden Bog will be required to operate in a different way to SANGs linked directly to allocation sites to implement measures to bring sites into favourable conservation status where they do not meet this standard. I cannot find in the Habitats Regulations where this requirement is. It is not clear why it is differently applied to sites directly or indirectly linked to allocation sites. How does this provision apply to other forms of mitigation? Could it be applied to Poole Harbour which is not directly linked this would, if it can be applied require a reduction of at least 25% in nitrates would be needed rather than something less than the 15% due to human sewage?

Table 6 - I hope this is a mistake (these regularly occur in the plans) – 1200 houses in Wool north of the railway seems an unlikely proposition as most of the land immediately north of the railway is flood meadows and beyond this the MoD Bovington Ranges. This relates to a mistake in the Dorset Plan (21.1.1) where on 5

one hand Wool is correctly identified as a large rural village but in contrast to the erroneous map, Dorset Plan 4.1, where Wool is **not** shown as being rural and this is used to justify its expansion. This makes it potentially a greater target area for housing but as this is hopefully a mistake and allocations should not be justified by this. Both of these mistakes have huge implications if not corrected.

Housing allocations were originally made on the basis of a very biased and flawed assessment in the SHLAA process where many of the constraints were unevenly applied or simply not mentioned.

Paragraph 104 - I don't know how you estimate mitigation capacity there are some figures produced later on but this is a very vague measurement and how therefore you can estimate that there is a surplus of mitigation areas through existing and proposed SANG's goes to illustrate the simplistic view of the Council and its understanding of the biodiversity under threat. There is nothing about biodiversity net gain in addition to SANGs and how this policy might be applied to actually mitigate the real damage and loss to the wildlife on the sites proposed for development.

Paragraph 108 - it would be helpful to know what exactly the Council's re-examination results here are. What exactly is meant by homes on heathland habitat sites or is this simply very ambiguous wording since these would not be possible under the Council's own heathlands policy.

How is the Council going to contribute towards bringing sites into "favourable status" when Natural England and Dorset Wildlife Trust who themselves own and manage some of them are failing to do so!

Paragraph 111, 112, 113 - this is a very confusing section on the relationship between the existing local plans of the former district councils and the Dorset Council local plan that is in preparation. In particular it does not include a clear statement about the Purbeck Plan that is in preparation and what is its status - simply that it is likely to be material for a short period. This makes it clear that the Purbeck local plan should be totally included as part of the Dorset Council plan, not pushing through to prejudge things proposed in the Dorset local plan. This is particularly so for Wool where a double approach gives two bites the same cherry with increased from 470 in the draft Purbeck plan to over 800 in the draft Dorset Council local plan. This may be the result of the withdrawal of housing proposals from the Green Belt that it is implied are to be dumped on Wool and Moreton. The interim period is so short that no mitigation measures are likely to be demonstrably working.

Paragraph 116 - the "review of habitat site mitigation" a core element of the Purbeck Plan will be completed as part of the Dorset Council Local Plan and will consider whether the impacts of growth planned across Dorset can be mitigated, it is suggested therefore that there is only a need for the Purbeck plan to provide certainty around mitigation for homes to be built up to 2024 when the Dorset Plan is hoped to be complete but the plan gives indicative permission for the full housing target not just what can be provided by 2024 . However considering the nitrates in Poole harbour policy does not deliver results for 25+ years and the Heath Policy is flawed by allowing residential accommodation adjacent to internationally important heathlands there is a considerable lack of mitigation available in such a short term. **Policies are only as good as their application** and the existing mitigation policies are clearly flawed. Can Dorset Council propose wholesale mitigation when they propose a review to see whether the plan growth can be mitigated, yet the Council claims throughout both plans that the mitigation policy is sound – which is it?

Paragraph 1 to 3 - mitigating the deficit. Considering that there are flaws in the HRA assessment that state for example that conifer forestry is a linked habitat to the SPA but that deciduous woodland while providing a much better food resource that is widely used is not a linked habitat. It mentions Coombe Wood as a potential SANG or portion of an SANG but this is very ill considered and should be removed as a proposal. Coombe Wood is used by Nightjars for feeding as is the adjacent organic farmland much of which is planned for houses.

Paragraph 128 - more confusion, what does the sentence "the Council recognises that bringing forward delivery of the Heathland support area/land identified for nitrates mitigation for planned developments under policy H4 will not create additional mitigation capacity" mean? The heathlands mitigation and the nitrate mitigation in Poole Harbour policy are being confused and in any case the nitrate policy has a 25 year time lag so will not actually deliver mitigation until the end of this period, so should no houses be built until it delivers! The memorandum of understanding FMMCD4e for any makes it rather clearer that the proposal is for a SANG and nitrate mitigation but that is still confused as SANG is not specifically mentioned. If it is an SANG there are distinct policies that are applied but heathlands support area is less defined and therefore less secure. HSA agreements are less binding or restrictive than an agreement for an SANG for example time span could be much shorter but nitrate reduction areas would need a very long time span e.g. the life of the housing – maybe in perpetuity for them to be effective.

In the Memorandum of Understanding between the Morton Estate and the Council the introduction includes statements about Morden Park and the Charborough Estate. Is it necessary to include all this introduction as the MoU refers to another area not Morden where the closeness of the name makes it very likely to cause confusion.

The MoU does state that the Council wishes to establish a permanent nitrate mitigation site but this is not stated so unequivocally in paragraph 128- it only says the Council has opened discussions. It would help if a single map showed the geographical relationship between the development site at Morton, the mitigation site and Winfrith Heath.

The sites listed include Knoll Cottage Caravan Park at Winfrith and Rowland's Wait at Bere Regis which are both examples of the failure of the Heathland Policy as they were given planning permission yet are both adjacent to internationally important sites.

Footnotes. The numbers appended to these suggest they refer to items in the text but these don't seem to be included so making it very difficult to know what they relate to.

Appendices

The Appendices contain much of the significant information about the changes but are presented in such a way that they are totally confusing as well as indicating considerable uncertainty about what mitigation will be delivered for some sites. Many of the changes have ramifications that permeate throughout original plan but with such a confusing presentation it is difficult to follow some of these through. This has clearly puzzled others as in paragraph 4.13 of the HRA it says "at the moment it is not clear how the mitigation in Purbeck will be delivered" yet the Council claim that there is certainty.

Appendix 3 & 6

Paragraph 3/47 and 6/47 – These mention alternative strategies and the removal of land from the Green Belt which spreads development more evenly across the district. But this is confusing. Does it mean that Lychett, Upton and Wareham are the most sustainable locations or does it mean that the removal of house proposals from the Green Belt will be focussed elsewhere on more sustainable locations such as Wool and Morton as mentioned later in this appendix? These two locations already have far greater allocations than anywhere else in the plan so the alterations create a greater imbalance in the spread of development and create a far less sustainable less even spread of development in Purbeck. The value of Wool for its biodiversity is being ignored yet again. Will the displaced housing be added to the already increased housing proposed in the Dorset Council Local Plan. It is yet another instance where the two plans need integration especially if the BCP proposal to transfer 9000 houses is to be resisted.

Conclusion

I do not consider this plan either legally compliant or sound. The modifications and the way they are presented is even more muddled than the original plan and the whole continues to propose a disaster for wildlife and the environment. The proposition that you can mitigate for everything using proposals for which there is little or no evidence of their success is potential disaster for the environment. I therefore consider these interim modifications should be rejected and the Purbeck Plan be integrated into a complete Dorset Plan.

Dr.A.C.Warne, Ecologist, Entomologist and Conservationist.

PART C

1. Comments on Interim Strategy, Memoranda of Understanding, updated policies map, SA or HRA.


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

Document:	SA
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Please see attached document.
2/1/22

Part C comment - this is a comment on the SA

Please continue on a separate sheet if necessary.

Please sign and date this form:	
Signature: 	Date: 2/1/22

Sustainability Appraisal, SA.

In comments on earlier versions of the Sustainability Appraisal I said how impossible to understand I found this document. No attempt has been made to make it more understandable and things have been made even worse by the new sections. Its format is a deterrent to consideration by the public and is therefore it is not fit for a general consultation.

It also illustrates why having two plans both in draft covering the same area is extremely confusing. The suggestion by the Purbeck Local Plan inspector that Purbeck Local Plan should be integrated into the Dorset Local Plan seems to be the logical route yet Dorset Council seem to want both plans as it gives them two bites of the cherry for many areas of Purbeck.

For many elements of the Sustainability Appraisal the comment is included that they are already being taken into account in the Dorset Council Local Plan which is behind Purbeck Local Plan and not yet examined in public before an inspector.

This all serves to illustrate why a rethink of the Purbeck Local Plan and its incorporation into the Dorset Council Local Plan is essential.

The new proposed wording for Policy V2 creates a new problem where preserving the Green Belt impacts on internationally important wildlife sites. Because there is no overall assessment of the environment there is no evaluation of what criteria should be used when judging the differing values of designated sites.

Paragraph 26 and 108 - how do you assess/measure adequate mitigation?

Morden Park is in the green belt, How is the holiday park compatible with this or is this part of the removal? NPPF 21 says buildings would not be appropriate for the green belt.

Paragraph 13 Enabling" = horse trading and is not an acceptable principle.

Paragraph 38 - some services and facilities are needed without being tied to an increase in population. The sewage flooding problems in Wool which are a result of development (Purbeck Gate) without the provision of adequate necessary improvements in services has resulted in an unacceptable and unpleasant problem.

Paragraph 47 what evidence justifies this statement?

Paragraph 48 - this uses the phrase protect and enhance habitats and species from the adverse effects of residential development. How can you justify this when it is proposed to destroy the feeding areas of the nightjar directly by development and indirectly by using a feeding area for a SANG? This paragraph is an assumption for which there is no evidence since you don't know what is there now and therefore what might be delivered. As currently proposed net gain for biodiversity is likely to deliver the lowest common denominator not the characteristic biodiversity of the destroyed or affected area. Biodiversity net gain is a policy that may well work in areas like East Anglia but is certainly not appropriate for areas such as Dorset.

Methodology and Assessment - in the earlier consultation I pointed out that placing the key (paragraph 103) to the tables halfway through the tables, the start of paragraph 51, makes understanding the SA extremely difficult. The assessment process used is extremely biased and shows little or no effect on sites. The gradings used in these tables depend very much on one's standpoint or on what one wants the table to show and makes them fairly useless.

The table and snapshot of assessment of reasonable alternatives to further modification mainly shows that the effects are unknown and so this table is fairly pointless.

Paragraph 52 and associated table - The heathland SPD – the table says this has only just been updated and revision is not proposed until 2025 yet in the Dorset Council Plan this SPD is proposed to be altered by changing the boundaries and conditions around Corfe so this comment in the SA for Purbeck Local Plan is not true.

Water quality - this is not true and is based on a biased assessment in the HRA of the nitrogen reduction in Poole Harbour. SPD proposals do not deliver for 25 to 30 years, during this time nitrate levels will continue to rise and a point will come when the ecosystem will break down.

Air quality - this presumably should include aspects of global warming. Methane will be produced by the anaerobic decomposition in the mud beneath the algal mats as exemplified by the bad smell around parts of Poole Harbour in midsummer Dorset Council local plan also fails to take this into account. Methane is a far more

damaging greenhouse gas than carbon dioxide so the nitrate problem is far reaching.

Paragraph 53 - some of the effects are not at all uncertain. One of the long-term effects of climate warming is sea level rise and this will have an effect around Poole Harbour. The increased frequency of hot dry weather in summer will increase the probability of fires particularly on the internationally important heathlands this is a disaster for many species and while vegetation may recover in a few years other components of the heathland ecosystem do not recover for very much longer.

Many of the comments assessing the amended proposals operate across the area so that what is unknown for the specific approach proposals applies equally across all the Purbeck Plan area.

Paragraph 58 - the Dorset Council local plan appears to say that it will include mitigation measures to mitigate the mitigation!

Monitoring - in earlier versions I commented on the proposals for monitoring. The monitoring proposals for the amendments are again meaningless, for example in paragraph 60 mention of the delivery of all forms of mitigation to ensure benefits are reduced as soon as possible - this implies simply ticking boxes to say you have delivered as a SANG, not that it is actually reducing the impacts of the damage that the housing etc might bring.

Paragraphs 1 & 66 - the story of the SA since the main modification consultation, the story of the SA and the Purbeck Area Plan thus far, this "story" all becomes extremely confusing especially as there are increasing numbers of references to the Dorset Council local plan again making it clear that the Purbeck Plan should be properly integrated into the Dorset Council local plan.

Paragraph 81 I thought that it was the former Purbeck District Council that had been involved in the proposals with Charborough Estate over the holiday park.

Before paragraph 121 the Question asks "how do the modifications to the plan assist in the objective to protect and enhance habitats and species". The answer is a series of bland assumptions for which there is no evidence.

Paragraphs 121 - 123 the plan uses incompatible phrases, "help to achieve" has a lower expectation of success than "will ensure" and "does not have an adverse effect" which all illustrate the woolly approach to these issues and certainly shows no enhancement.

Tables following paragraph 125 and including 126 - these tables seem to reproduce those earlier and are again full of unknowns so forming no overview of assessment. Tables under 126 here again comments about SPDs from earlier apply.

Paragraph 127 - as before, comments relating to climate change.

Tables 145 - first item – surely housing is dependent on a SANG, so if there is no SANG there are no houses, so there is no impact. Third item - the tourist development has been removed so why is it included? Protect and enhance habitats and species gain no development should take place without a SANG.

Paragraph 151 - Court Farm DWT site has been purchased through the nitrate reduction strategy although this is an optimistic strategy that will not deliver for 25 to 30 years using all or part or as a SANG may be possible but it is remote from Morden Bog and may not be used by the target people and thereby cause increased car use.

Paragraph 154 – I would think that it is essential that SANGs are in place before houses are occupied this has already been made a condition of planning permissions elsewhere in the Purbeck area.

Paragraph 160 - refers to paragraph 43 of appendix 1 in the main modifications this is the sting in the tail of this whole modified plan by proposing Wool in this way increases the damage on top of what is already proposed. I have outlined previously the surprising biodiversity importance of Wool, due to a wide range of seminatural biotopes in close proximity forming a mosaic that is supported by an organic farming regime.

The limited modifications in the Sustainability Assessment have considerable implications for a much wider undefined areas within the former Purbeck District.

Another illustration of why the plan needs proper integration into the Dorset Council local plan.

Paragraph 162 policy V2 - the removal of land from the green belt hardly counts as sustainable development. Creating a SANG to substitute here is simply applying a different label to land already in the green belt so this is all rather deceptive.

Paragraph 166 - the Council has an "Annual Infrastructure Statement" or is this something that they will be producing in the future. I cannot find any reference to a current "Annual Infrastructure Statement" on the Dorset Council planning information website. If it is going to be like other so called monitoring will it be just a box ticking exercise.

PART C


1. Comments on Interim Strategy, Memoranda of Understanding, updated policies map, SA or HRA.

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

Document:	HRA
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Please see attached document

Please continue on a separate sheet if necessary.

Please sign and date this form:	
Signature: 	Date: 2-1-22

The Habitats Regulations Assessment - HRA.

Although in the text Footprint Ecology admit that they are not a competent authority under the requirements of the Habitats Regulations Assessments, Dorset Council who in this case are the competent authority have not taken ownership of this document.

This is a very turgid document and this makes it difficult to sort out where the modifications are being assessed. It seems more concerned with the process than the assessment itself.

NPPF 21 urges and a precautionary approach at each stage of the HRA process. The use of mitigation in every situation is an indicator of the considerable sensitivity of Purbeck - a far greater sensitivity than much of the rest of Dorset it therefore needs to be properly integrated into the Dorset Plan so that there can be an overall balanced assessment by Dorset Council.

.An appropriate assessment is supposed to provide a greater scrutiny of the HRA. Following appropriate assessment a plan may be adopted, if an adverse effect on the integrity of the site is identified it can be ruled out. This begs the question is the wholesale mitigation proposed sufficient to prevent an adverse effect on the integrity of the internationally important sites. I do not believe that the HRA does this because it leaves out some of the very real problems of the proposed mitigation and this is confirmed by Dorset Council's proposal to report on the effectiveness of mitigation suggesting they themselves are not convinced it will deliver the desired effects. Now mitigation is hypothetical until it is actually applied and monitored and this might be too late if there are still adverse effects. Mitigation measures need to be right from the start.

The HRA seems to want to provide a conclusion that will please the Council so it fails to mention several important issues that are negative aspects of the strategy, in consequence it is very biased. For example it fails to mention several issues that make it dubious that the set-aside of land policy for reducing nitrates can achieve a halt to the deterioration of Poole Harbour. A balanced assessment must include both positive and negative points.

1. It does not make it clear that there is an existing and worsening situation in Poole Harbour where additional areas have developed a damaging algal mat since the original assessment.

2. It does not mention the 25 to 30 year timelag between setting aside land and there being a reduction of nitrate entering Poole Harbour - mitigation should work from the first occupation of new housing.
3. The original NE/EA assessment suggested a 25% nitrate reduction is needed to get Poole Harbour into "Favourable Condition" but only 15% is estimated to come from housing and much more needs to be done to help Poole Harbour recover.
4. The production of methane, a very much worse gas than carbon dioxide contributing to global warming, is likely to be produced by the anaerobic decomposition taking place under the algal mats as evidenced by the smell in midsummer not only around Holes Bay but now around Brands Bay.
5. It does not mention that Salmon using the Frome are genetically a different population to that in the Hampshire Rivers and so very much what biodiversity strategies should be addressing. The Frome is also in unfavourable condition due to excessive nitrates.

Similarly with the heathlands policy.

Functionally linked areas are now mentioned in the HRA but these only refer to forestry plantations in Wareham Forest. The original Habitats and Species Directive on which the habitats policy etc is based says "sites should be designated to present the physical and biological factors essential to their life and reproduction". This means that feeding areas should be included not just nesting sites and this is not considered. It is stated in Table 7 and paragraph 6.12 that deciduous woodland is much more important as feeding areas for nightjars yet only the forestry plantations are included as functionally linked areas. Deciduous woodland is inappropriate for a SANG as for example proposed at Coombe Wood where Nightjars feed as they also do over the adjacent organic farmland that will be destroyed by housing. Woodlark also follow the same pattern of commuting but over a smaller range.

The HRA plays down effects by for example in paragraph 5.41 saying the housing allocations for Wool are relatively far from Heathland. It would be more accurate and informative if actual distances were used in these assessments rather than wording that helps dismiss potential problems – but this suits the Council because they have always seen Wool as a potential growth area despite very real constraints. The proposal at Coombe Wood does not mention the thriving Dormouse population that would be severely threatened by "opening up".

Paragraph 5.78 says :“It is not necessary at this stage for all the details covering mitigation to be set out in order to demonstrate no adverse effects” Mitigation measures need to be very clear about their objectives and the likely hood of achieving them. There need to be fall back options if they fail to achieve their objectives. Some of the proposals suggest these can be ironed out at the application stage but since the plan gives an indicative permission for development the mitigation measures will need to be very thoroughly examined at this later stage. If the objectives are not achieved it will be difficult / too late to go back. Monitoring is essential for all such measures.

Paras. 6.19 Disruption of commuting routes for birds from heathland to feeding areas is mentioned as potentially harmful yet the proposed Wool development creates a linear area of housing and employment that not only destroys some feeding areas but is a barrier on commuting routes but this specific problem is not mentioned. Nor that this is also a corridor for bats.

It is clear from the research quoted in the text that staff of Footprint Ecology have carried out much of the research in the area themselves mainly centred on Wareham Forest but this results in areas outside this getting perfunctory assessment often ignoring or downplaying important issues.

I would point out that fires can also occur on heaths away from urban areas as at Cranemoor at Bovington and that there are many predators outside urban areas that predate rare species such as Kestrels on Lizards.

The HRA must include both positive and negative effects on all the heathland with a proper weighing up of these as a conclusion. It does not do this.

The HRA as presented is still not an accurate assessment because it does not present both positive and negative issues to make an unbiased conclusion.

Table 4 - Policies E7, E8, E9 these policies are excluded from screening because policies in the plan avoid or reduce harm to internationally important sites on the basis of the case “People versus Wind” but the decision not take into account any mitigation measures here seems bizarre. The Purbeck plan is entirely dependent on mitigation measures for being able to deliver housing. The need for mitigation implies that there are likely significant effects but as nothing is yet in place the effectiveness of mitigation cannot be assessed and therefore based on the precautionary principle (NPPF 21) these aspects should be much more fully considered.

Water abstraction is not considered because of data in the Wessex Water "Water Resources Management Plan" but existing levels of nitrate in groundwater shown in this plan are close to the 50 mg/L human consumption standard and although at the one site quoted in the plan there is an suggestion that catchment management may be having a beneficial effect I'm a little surprised because of the time it takes nitrates to leach down to the water table. This needs viewing with great care both for nitrates in water for human consumption but also for nitrates eventually reaching the River Frome and Poole harbour.

Paragraph 8.8 This paragraph talks about land coming out of agricultural production for unspecified reasons but not all land coming out of agricultural production will contribute to a reduction in nitrates in Poole Harbour. Organic farmland coming out of production and being built on may lead to an increase in nitrates. Planning should allow Dorset Council to resist more indoor dairy and meat production that produce vast quantities of slurry that is often to be seen being applied at temperatures below 4degrees centigrade when nitrates will not be assimilated by grass and it is more able to go into the groundwater or be washed directly into streams.

Air quality is not considered but methane, ammonia and other problem gases should be included.

Page 313 - all large housing sites require further detailed assessment. I do not feel that these go far enough and do not consider functionally linked areas (feeding areas) or impacts on species such as bats, dormice etc.

Map 7 - this map is the eastern Purbeck plan view but if housing losses are to be displaced from Wareham /Lytchett /Upton to Wool and Moreton as implied in the modifications this should be considered. Also on Map 7 the large magenta coloured block between Wool and Winfrith Heath is not all new employment much already exists and the regular changes in the status of the site suggest it is not the most popular site for employment but it will however form a block to commuting wildlife from the Heath to feeding areas especially when the additional housing proposals in the Dorset Council plan are added in.

Conclusions

1. This document may not fulfil the aims of a Habitats Regulations Assessment because Footprint Ecology is not an appropriate body.
2. The conclusions drawn from some convincing evidence seem weak and biased towards the Local Plan.
3. There are aspects of the plan that are not adequately considered.
4. This HRA fails to demonstrate that the Purbeck Local Plan is sound in its conformity to the Habitat Regulations.

Consultee: Mr A Bagley

Event Name: Purbeck Local Plan Further Proposed Main Modifications

Consultee reference: 1191476

Consultation reference: FMM15

PURBECK LOCAL PLAN

DORSET COUNCIL
25 JAN 2022
Digital Mail Room

Further Proposed Main Modifications Consultation



**Dorset
Council**

Response form for: Purbeck Local Plan Further Proposed Main Modifications consultation

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

In response to comments received on the Purbeck Local Plan Proposed Main Modifications Consultation, which closed earlier this year, the council is consulting on limited Further Proposed Main Modifications around Policy V2 and I5, which are considered necessary to ensure that the plan is sound.

The Purbeck Local Plan Examination Interim Mitigation Strategy For Heathland Habitat Sites (2018/19 to 2023/24) [Interim Strategy] sets out Further Proposed Main Modifications around policy V2 and I5 and considers a range of projects that could provide heathland mitigation in the event that the strategic SANG at Morden is not delivered.

The key Further Proposed Main Modifications (referenced as **FMM6, FMM7, FMM76** and **FMM77**) are detailed in Appendix 5 of the Interim Strategy

These Further Proposed Main Modifications give rise to a series of minor consequential Further Proposed Main Modifications: **FMM3, FMM66** and **FMM82**, which are set out in Appendix 6 of the Interim Strategy.

The council has also published an updated Habitats Regulation Assessment (HRA), Sustainability Appraisal Addendum (SA), policies maps to take account of the Further Proposed Main Modifications. and a series of Memoranda of Understanding to support the Interim Strategy.

These documents can be found on-line at www.dorsetcouncil.gov.uk/plpmainmods.

The council is inviting comments on the key and consequential Further Proposed Main Modifications, Interim Strategy, the Memoranda of Understanding, policies map, the updated Habitats Regulation Assessment and Sustainability Appraisal Addendum only. 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 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 all the Proposed Further Main and Main Modifications, the council will then take a decision about whether to adopt the local plan subject to all Further Main and Main Modifications.

PART A

	Your contact details	Agent's Details (if applicable)
Name	Alan Bagley	
Organisation/ Group (if applicable)	Residents of Glebe Rd Lytchett Matr	
Address line 1	[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 supports the representation.



Please note:

- The consultation period starts on **6 December 2021** and will last for 7 weeks until 11.45pm on **24 January 2022**.
- 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).
- Respondents must complete Part A of this response form and separate Part B forms for each Further Proposed Main Modification that they might wish to comment on.
- All respondents must provide their name and address and/or email address.
- All forms must be signed and dated.
- Responses cannot be treated as confidential. By making a response you agree to your name and comments being made available for public viewing.
- Information on the council's privacy policy is available on our website at:
<https://www.dorsetcouncil.gov.uk/your-council/about-your-council/data-protection/dorset-council-general-privacy-notice.aspx>

- The council will not accept any responsibility for the contents of comments submitted. We reserve the right to remove any comments containing defamatory, abusive or malicious allegations.
- If you are part of a group that shares a common view, please include a list of the contact details of each person (including names, addresses, emails, telephone numbers and signatures) along with a completed form providing details of the named lead representative.
- Purbeck Local Plan Examination: Interim Mitigation Strategy For Heathland Habitat Sites (2018/19 to 2023/24), including Further Proposed Main Modifications to Policies V2: Green Belt and I5: Morden Park strategic suitable alternative natural green space (SANG) and holiday park, and their supporting text and Consequential Further Proposed Main Modifications, proposed Purbeck Local Plan (2018-2034), Memoranda of Understanding supporting the Interim Strategy and policies map as well as updated Habitats Regulations Assessment and Sustainability Assessment Addendum documents, are available to view on the Council's website at www.dorsetcouncil.gov.uk/plpmainmods. Paper copies of the Interim Mitigation Strategy including modifications and updated inset map for Morden are available to consult at libraries in Dorchester, Corfe Castle, Lytchett Matravers, Swanage, Upton, Wareham, Wool and Hamworthy. Paper copies of the Habitats Regulations Assessment, Sustainability Appraisal and Memoranda Of Understanding are available to loan from libraries on request. You must follow any procedures relating to 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 01305 838517 or planningpolicy@dorsetcouncil.gov.uk.
- Response forms returned in the post should reference the **Purbeck Local Plan, Further Proposed Main Modifications Consultation, and be sent to Spatial Planning Team, County Hall, Colliton Park, Dorchester, DT1 1XJ**. Forms can be returned by email, referencing Purbeck Local Plan Further Proposed Main Modifications Consultation, to the email above.
- Please tick the box if you would like to be notified of the following:

Adoption of the Local Plan.

PART B

1. Which Further Proposed Main Modification does your representation relate to?

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

Further Proposed Main Modifications reference number	FMMCDI
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2. Do you consider that the Further Proposed Main Modification is:

Legally compliant	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

To be considered legally compliant the Further 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 Further Proposed Main Modification[s] that you are seeking to make a representation on.

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

The Plan is not legally compliant or sound as there are proposals to release land from "Green Belt" status even as regards the proposed SANGS, for example in Morden and Lytchett Matravers. This is without evidence being shown of the "Exceptional Circumstances" required in NPPF 140.

Furthermore NPPF 141 says that before a release from "Green Belt" land is even considered all alternative options must be examined.

Both regarding the above SANGS and indeed in the wider PLP no such investigation of alternatives has been shown to have been explored. The examination that was made for the Purbeck Local Plan was cursory, also it only considered the Purbeck area when it should have considered Dorset as a whole.

Consequently these modifications are not legally compliant or sound and by implication all the "Green Belt" release proposals in the Purbeck Local Plan are not legally compliant or sound.

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 Further Proposed Main Modification legally compliant or sound. You will need to say why this change will make the Further 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 was initiated more than four years ago. Since then there have been considerable changes in the realities of political attitudes to "Green Belt" and the need for new housing especially in places like Dorset, with its poor infrastructure and few employment opportunities exacerbated by Brexit and Covid. Consequently new developments will effectively become dormitory settlements with all climate implications on climate damage. The Plan should be modified to reflect these changes by removing any Green Belt development and reassessing overall housing needs brought about by societal changes.

Please continue on a separate sheet if necessary.

PART B

1. Which Further 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.

Further Proposed Main Modifications reference number	FMMCD4C
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2. Do you consider that the Further Proposed Main Modification is:

Legally compliant	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

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- be appraised for their sustainability.

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

Many of the proposed SANGS in the Purbeck local Plan including the ones at Morden and Lytchett Matravers are on existing "Green Belt" land. No justification is shown how these SANGS will mitigate the deleterious effects of development. In fact for example the proposed SANG in Lytchett Matravers will have a negative effect.

It is 1 ½ miles from the proposed main large development of 95 houses so to use it residents would by necessity have to drive. In practice any new residents being on the southern extremity of the village, instead of using the proposed SANG will no doubt drive to already overused areas of Natural Beauty and Natural Habitat and Wareham Forest.

All this is contrary to any Climate Change mitigation.

The proposed Flowers Drove SANG does not meet Natural England's requirement for SANGS to have a 2.3 KM circular walk. Consequently Natural England in their Memorandum of Understanding with Dorset & Wyatt homes is not even meeting its own criteria.

So the SANG proposals in the plan do not meet even their own requirements or the "Habitat and Species Regulations 2017". Hence for these reasons and those listed above the modifications are neither legally compliant nor sound

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 Further Proposed Main Modification legally compliant or sound. You will need to say why this change will make the Further 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 issues around the proposed SANG at Morden which are clearly not legally compliant or sound have a knock on effect on similar SANG Green Belt proposals in the Purbeck Local Plan; by implication and precedent will also not be legally compliant or sound. Consequently the proposed SANGS on Green Belt land in the Purbeck Local Plan should be removed. Alternatives which are appropriate in size and location should be sought and should certainly comply with Natural England's own rules of a minimum of a 2.3 Km circular walk.

Please continue on a separate sheet if necessary.

PART C

1. Comments on Interim Strategy, Memoranda of Understanding, updated policies map, SA or HRA.

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

Document:	
------------------	--

Please continue on a separate sheet if necessary.

Please sign and date this form:	
Signature: Alan Babgley	Date: 22/1/2022

Residents of Glebe Road, Lytchett Matravers.

The following people believe the Modifications to the Purbeck Local Plan are unsound and therefore the Plan is unsound.

Name	Address	e-mail	Tel	Signature				
P.C. WHITE								
L. COSLETT								
E. ATTWOOD								
R. ENGLAND								
J. HODGEN								
J. E. CLARK								
G.M. CLARK								
M.A. LANE								
AMANDA SIMMONDS								
TRACY CRAMPION-MILLER								
SARAH CRAMPION-MILLER								
B.P.W. COSLETT								

Residents of Glebe Road, Lytchett Matravers.

The following people believe the Modifications to the Purbeck Local Plan are unsound and therefore the Plan is unsound.

Name	Address	e-mail	Tel	Signature
PAM STANSFIELD				
oliver Pickard				
Harry Pickard				
LES SMALL				
DEBBIE SMALL				
ROMAINE SEDDON				
Storm Langley-Taylor				
Tom Seddon				
ANDREW SEDDON				
Pat Longdon				
MICHELE PICKARD				
MATT PICKARD				
REA RIACH				

Residents of Glebe Road, Lytchett Matravers.

The following people believe the Modifications to the Purbeck Local Plan are unsound and therefore the Plan is unsound.

Name	Address	e-mail	Tel	Signature
AP TOON	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
C STEWARD				
G BUSHAWAY				
K Bushaway				
M TURNER				
W Wakeling				
C.J. Wakeling				
Jon Fickard				
C. Fovier				

Residents of Glebe Road, Lytchett Matravers.

The following people believe the Modifications to the Purbeck Local Plan are
unsound and therefore the Plan is unsound.

Name	Address	e-mail	Tel	Signature
Matt King	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Clive King				
J. HUNTER				
V. Campbell				
L. Boddhouse				
M Boddhouse				
M. MILLER				
S. ALLEN				
R. GREENE				
T. NICHOLS				
J NICHOL				

NAME	Address	e-mail	Tel:	Signature
CAROL HOLDEN				
Barry Lister				
Angel G Lister				
Fiona woods				
Jayne Perry				
Jim Sofianos				

Consultee: Ms R Palmer

Event Name: Purbeck Local Plan Further Proposed Main Modifications

Consultee reference: 1185234/1187112

Consultation reference: FMM16

PART A

	Your contact details	Agent's Details (if applicable)
Name	MRS RACHEL PALMER BSc.	CHAIR
Organisation / Group (if applicable)	WOOD FLORA AND FAUNA	
Address line 1	[REDACTED]	
Address line 2	[REDACTED]	
Town / City	[REDACTED]	
County	[REDACTED]	
Post Code	[REDACTED]	
E-mail address	—	

Group Representations

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

7

Please note:

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- All respondents must provide their name and address and/or email address.
- All forms must be signed and dated.
- Responses cannot be treated as confidential. By making a response you agree to your name and comments being made available for public viewing.
- Information on the council's privacy policy is available on our website at:
<https://www.dorsetcouncil.gov.uk/your-council/about-your-council/data-protection/dorset-council-general-privacy-notice.aspx> .

- The council will not accept any responsibility for the contents of comments submitted. We reserve the right to remove any comments containing defamatory, abusive or malicious allegations.
- If you are part of a group that shares a common view, please include a list of the contact details of each person (including names, addresses, emails, telephone numbers and signatures) along with a completed form providing details of the named lead representative.
- Purbeck Local Plan Examination: Interim Mitigation Strategy For Heathland Habitat Sites (2018/19 to 2023/24), including Further Proposed Main Modifications to Policies V2: Green Belt and I5: Morden Park strategic suitable alternative natural green space (SANG) and holiday park, and their supporting text and Consequential Further Proposed Main Modifications, proposed Purbeck Local Plan (2018-2034), Memoranda of Understanding supporting the Interim Strategy and policies map as well as updated Habitats Regulations Assessment and Sustainability Assessment Addendum documents, are available to view on the Council's website at www.dorsetcouncil.gov.uk/plpmainmods. Paper copies of the Interim Mitigation Strategy including modifications and updated inset map for Morden are available to consult at libraries in Dorchester, Corfe Castle, Lytchett Matravers, Swanage, Upton, Wareham, Wool and Hamworthy. Paper copies of the Habitats Regulations Assessment, Sustainability Appraisal and Memoranda Of Understanding are available to loan from libraries on request. You must follow any procedures relating to 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 01305 838517 or planningpolicy@dorsetcouncil.gov.uk.
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- Please tick the box if you would like to be notified of the following:

Adoption of the Local Plan.

Wool Flora and Fauna response to Purbecks Interim Plan

Rachel Palmer BSc – Chair

Dr A Warne PHD – Vice Chair

Mr T Branston BSc -

Mrs E Foulger Bsc

Mrs Marion Alderson

Mrs S Potticary Secretary

Mr I P Duckworth BSc

PART B

1. Which Further Proposed Main Modification does your representation relate to?

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

Further Proposed Main Modifications reference number	FMM7
---	------

2. Do you consider that the Further Proposed Main Modification is:

Legally compliant	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

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- be appraised for their sustainability.

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- 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.

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

INTERIM STRATEGY DOCUMENT – V2 COMMENTS

MM45 we oppose the removal of green belt land at Lytchett Matravers and Upton because it conflicts with the government NPPF houses on green belt. Surely the addition of more houses here will promote the need for a SANG in the north of Purbeck, not the compensation by provision of a SANG. This is back-to-front talk.

NPPF 13 Protecting Green Belt Land

NPPF 140 " boundaries should only be altered in exceptional circumstances- evidenced and justified".

1. Will these houses be used to provide local need – Lynchet & Upton or to accommodate overspill (urban sprawl from Bournemouth) in which case it is not addressing Purbeck's need, is not satisfying Purbeck's need for housing delivery now – there is no urgency so this is not an exceptional circumstance.
2. The need for a holiday park does not fit in with these prerequisites.
3. Producing a SANG instead of green belt is not justification for it. The removal of the green belt from Morden Park is surely to facilitate the landowners Charborough Park in their wish to build a holiday park not to provide as many houses as possible in Purbeck. Not a valid reason.
4. Justification here cannot run with the idea of it providing land in 2 of its stainable locations around 2 of the district towns i.e. Upton and Lytchett Matravers- the most sustainable locations in terms of access to facilities (agreed) whilst as part of the dispersal policy ear marking one (Wool??) of its key villages which has few facilities and little infrastructure. Run with the Hare and Hunt with the Hound surely. The idea of dispersal is certainly to spread development evenly but dumping it on one key village hardly qualifies spreading evenly or keeping to optimum dense sites. The idea of Dorset's new strategic policy - dispersal as giving justification is phony. To carry out proper dispersal would involve many settlements not one. It would involve planners in lots of work which of course dumping does not. It would in some circumstances promote facilities - a struggling village shop and thereby reduce car travel. This proposal for dispersal would not be sustainable. Proper dispersal could reduce the necessity for SANGs.

N.P.P.F. 2019 - Plan making should contribute to conserving and enhancing the natural environment and reducing pollution.

Changing strategic policies is not justifiable in this instance. Not a valid reason under 13 Protecting Green Belt Land NPPF 13. Changing strategic policies i.e. going for a dispersal of housing across the District- (with the feeble reflection 44 "of a clear preference" expressed in a 2018 consultation - a spread of housing in smaller amounts was frequently expressed but not just one or possibly two huge allocations EG Wool and Moreton). This is not sustainable so is not a tenable strategic Policy.

REMOVE V2 GREEN BELT MAIN MODIFICATION FMM7 

JUSTIFICATION FOR REMOVING LAND FROM THE ACTUAL GREEN BELT AS ABOVE

4. Having regard to your comments in question 3, please set out what change(s) you consider necessary to make the Further Proposed Main Modification legally compliant or sound. You will need to say why this change will make the Further 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)

REMOVE V Z GREENBELT MAIN MODIFICATION
FMM7

Please continue on a separate sheet if necessary.

PART B

1. Which Further 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.

Further Proposed Main Modifications reference number	FMM3
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2. Do you consider that the Further Proposed Main Modification is:

Legally compliant	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

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- justified - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
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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 Further Proposed Main Modification[s] that you are seeking to make a representation on.

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

We make no apologies for here listing all the constraints even though repetitions of previous presentations. as from earliest days of consultations there has been a mindset - Sue Bellamy pointed this out when questioned why Wool - " there is nothing there plenty of open space".

This mindset has permeated the whole approach to Wool despite the massive amount of evidence provided by us as to the high environmental value of the land. It has been brushed aside consultation after consultation.

Is not now the time with the climate and ecological emergency to put the environment at the top of the soundness agenda-
despite support from Natural England ignoring this
QUOTES

- Wool is suitable for housing
- I see no problems
- There are no constraints,

and in the sites of conservation importance 3.2.10 designated sites of conservation importance from E.A.D developers previous consultancy document Natural England has advised to Purbeck District Council that a development of 1000 new Dwellings in Wool would not adversely affect the integrity of European sites and could be undertaken in accordance with Purbeck District obligation under the habitats and species regulations 2017. We refute this.

The state of England's Rivers is a hot topic at present. The Parliamentary Environmental Committee have mentioned Poole Harbour in an attack on rivers and pollution.

The river Frome SSSI running through Wool is polluted at present but an extra 1000 houses will increase sewage Levels by double the amount Wessex Water have stated the sewage station at Wool has not the capacity to accommodate further large-scale housing. It floods at present polluted water into the Frome during storm events EG Arwen and one other within 7 months.

All housing sites so far proposed are on flood risk areas - many level 2-3 level 3 should not be used for more building - other sites should be used, N.P.P.F. and within Climate Change level 2 should probably be included because the change has not been taken into account in estimating risk levels. The Frome is in the catchment area for Poole Harbour. Poole Harbour mentioned S.P.A. European Site is already polluted is already on a knife edge as seen by green slime algae covering large areas and the emission of methane gas (more serious than CO₂ in bringing about climate change).

Natural England site 1 confirmation of nitrate neutrality reflecting Poole Harbour S.P.A. and Ramsar site European site is still needed. Set aside of agricultural land for denitrification is in its infancy- no evidence of the level of the Grampian Principle beyond or scientific doubt has been produced. Tony Juniper Natural England has spoken publicly saying nitrate neutrality measures have still to be confirmed as sound.

Further evidence against statement "Wool is a less constrained village"

50% of Wool's Parish is covered by environmental designations at all levels.

1 European Heathland site S.A.C.

1 SSSI river Frome carrying pollution into the Poole Harbour S.P.A. site

River Frome is only 0.5 K from development site and runs all through centre of Village

10 SNCI Sites of Conservation Interest

1 L.N.R Local Nature Reserve

13 Ancient Woodlands

2 areas under stewardship management - to protect wildlife - Organic Fields- river Frome Water Meadows.

1 Dorset wildlife managed verge (on the road to the proposed SANG)

Dr A Warne's recent paper "Conservation of Biodiversity as provided by a beetle survey of Wool" States only 60% of records are restricted to statutory and non-statutory designated sites and only 9% of the rare and notable species.

50 priority species (15 on development sites) and species in the SANG.

17 of the 18 species of bats in the UK breed in Wool - all protected.

12 are recorded on development sites including the very rare Barbastelle Bat

30 Veteran Trees most in the SANG but not registered.

Miles of hedges (priority habitat) approximately 70% of all hedges on development sites are "species-rich" and the one around the Dorset plan site of 400 new houses is a remnant of one of the oldest hedges in parish approx. 14th century

CONTRAVENTION OF SOME OF THESE
INVOLVES IGNORING
LOCAL
CONSTRAINTS

And this is backed up by the fact that NPPF guidelines I-XI are contravened by using Wool

46 Sustainability Appraisal where in which key village is the evidence for a strong demand for housing (not in Wool). Wool has been consistently against large increases of housing. In one consultation, Have Your Say many people opted for the lowest level of housing as there was no option of no increase in housing, this was pointed out and I believe accepted as a fault in that consultation. There is a small demand for affordable housing but this is not per se quid-pro-quo consequence of large-scale housing allocations. developers are seemingly determined to get out of providing this.

One wonders what the Council Deems optimum density for Wool – Infinity probably.

Further Evidence against statement – Wool is a less constrained village

43 the constraints in Wool are multiple as applied to National Planning Policy Framework within which locally prepared environmentally sound plans for housing can be produced.

2019 N.P.P.F. conserving and enhancing the natural environment. 15

STATUTORY REQUIREMENTS

- I. N.P.P.F. 2019 - Plan making should contribute to conserving and enhancing the natural environment and reducing pollution
- II. Para 171 allocations of land of lesser environmental value should be preferred . Para 170 minimise impact on and providing net gains for biodiversity establish coherent ecological networks that are more resilient to current and future pressures.
- III. Planning authorities need to consider potential impacts of development on Protected and Priority Species when considering site allocations.
- IV. Proposed development on land within or outside an SSSI likely to have an adverse effect should not normally be permitted except where the benefits of the development in THAT site clearly outweigh the impact. The river Frome SSSI is only 0.5 kilometers from development sites.

- V. Para 20 the presence of Protected Species or habitats is material consideration in the assessment of development proposals.
- VI. Green Infrastructure opportunities and requirements need to be considered at the earliest stages of development (Purbeck local plan promised this later)
- VII. Para 20 section 15 para 170 it is an offence to disturb wild animals of any such (priority) species including ability to survive, breed, rear or nurture young or migrate (see bat section of complaint).
- VIII. Para 175 development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused unless there are wholly exceptional reasons and a suitable compensation strategy exists. Also N.P.P.F. para 033 ref ids 033201902 Ancient Woodland.
- IX. Some habitats are more sensitive to change and are at greater risk of being lost or damaged due to direct or indirect impacts of Climate Change and human activity.
- X. Care needs to be taken to ensure that any benefits promised will lead to genuine and demonstrable gains for biodiversity. Mr Squirrel has made assurances without evidence that the plan will result in biodiversity gain. This flies in the face of evidence to the contrary - 3000 + species animals and plants are recorded over the last 25 years in the parish and all those lichens and fungi which remain unrecorded for Coombe Wood - a likely habitat as it is a wet wood partly lying on clay and has plenty of deadwood habitat.
- XI. N.P.P.F. para 118 gives a mitigation hierarchy
AVOIDANCE - and significant harm to wildlife species and habitats be avoided for example through locating on an alternative site with less harmful impacts? (i.e. the need in that place is not essential).
MITIGATION - effective measures where these cannot provide complete protection or partly avoided

AS WELL AS REMOVING PARAGRAPH 43 (Appendix 6)
REMOVE PARAGRAPH 46 AMENDED TEXT (Appendix 5)

4. Having regard to your comments in question 3, please set out what change(s) you consider necessary to make the Further Proposed Main Modification legally compliant or sound. You will need to say why this change will make the Further 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)

WE OPPOSE PARAGRAPH 43 AMENDED TEXT (Appendix 6)- DELETE FMM3
SUGGEST NEW WORDING.

RECOGNITION OF THE HUGE LEVEL OF ENVIRONMENTAL IN WOOL NEEDS ADDRESSING AS HOUSING ALREADY PROPOSED WILL CAUSE HUGE BIODIVERSITY LOSS. IN TOTAL NEGATION OF THE 2020 GOVERNMENT BIODIVERSITY STRATEGY AND INCREASE CLIMATE CHANGE PROBLEMS ALREADY PRESENT - POLLUTION AND FLOODING.

Please continue on a separate sheet if necessary.

PART B

1. Which Further Proposed Main Modification does your representation relate to?

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

Further Proposed Main Modifications reference number	FMM6
---	------

2. Do you consider that the Further Proposed Main Modification is:

Legally compliant	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

To be considered legally compliant the Further Proposed Main Modification 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 Further Proposed Main Modification[s] that you are seeking to make a representation on.

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

JUSTIFICATION

This is more or less the same as Para 43 in FMM3 without actually naming Wool. Therefore all justification is written up and Modification Para 43 and surely duplication is not required. However challenge the idea of a strong demand for housing – certainly not apparent in questionnaires or consultations from the residents of Wool – quite the reverse.

A separate issue surely best addressed under the V2 Green Belt Amended Policy is that a SANG at Lytchett Matravers will improve accessibility of access to Green Bely. What Green Belt is left if its removed here. Absolute nonsense seemingly.

23/1/22

Please continue on a separate sheet if necessary.

SEE JUSTIFICATION
FOR REMOVAL
UNDER FMM3

4. Having regard to your comments in question 3, please set out what change(s) you consider necessary to make the Further Proposed Main Modification legally compliant or sound. You will need to say why this change will make the Further 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)

REMOVE PARA 46 FMM6 MAIN MODIFICATIONS

23.1.22

Please continue on a separate sheet if necessary.

PART B

1. Which Further Proposed Main Modification does your representation relate to?

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

Further Proposed Main Modifications reference number	MM77
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2. Do you consider that the proposed Main Modification is:

Legally compliant	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
	Sound	Yes	<input type="checkbox"/>	No

To be considered legally compliant the Further 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 Further Proposed Main Modification[s] that you are seeking to make a representation on.

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

POLICY I5 MM77

Morden Park suitable strategic alternative natural green space (SANG) and Holiday Park.

REMOVE

JUSTIFICATION – Please see Interim Policy regarding SANGs

There is no justification in removing greenbelt for The Holiday Park even if it helps negotiation to provide a SANG in this area (see previous iterations on justification and removing green belt. We surely do not need to repeat these here).

There is not the urgency for a SANG if the Green Belt is not removed with the consequence of more housing in Lytchett and Upton as in 2 years time the Wyatt SANG could be delivered and that offered by Dorset Natural Trust Court Farm.

INCOMPATIBLE WITH N.P.P.F 13 PROTECTING
GREEN BELT LAND.
SEE PREVIOUS TEXT
AS FOR V2

23/1/22

4. Having regard to your comments in question 3, please set out what change(s) you consider necessary to make the Further Proposed Main Modification legally compliant or sound. You will need to say why this change will make the Further 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)

DELETE MM77

POLICY 15 MM77

Morden Park suitable strategic alternative natural green space (SANG) and Holiday Park.

REMOVE

Please continue on a separate sheet if necessary.

PART B

1. Which Further Proposed Main Modification does your representation relate to?

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

Further Proposed Main Modifications reference number	FMM66
---	-------

2. Do you consider that the Further Proposed Main Modification is:

Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

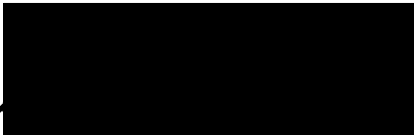
To be considered legally compliant the Further Proposed Main Modifications must:

- 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 Further Proposed Main Modification[s] that you are seeking to make a representation on.



23/01/22

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

JUSTIFICATION

OUR JUSTIFICATION AS EVIDENCED. Tourism is an economic driver. Only promotes jobs in a seasonal way so not thoroughly sustainable and not if the carrying capacity is reached.

- a) Deterioration to footpath (the poor quality at Durdle Door may have contributed to a death this year).
- b) Increasing CO2 to output as cars are queuing in order to reach the coast- certainly seen during the summer with Bestival and idling engines increasing climate change pressures. idling engines must have contributed massively to CO2 production in car exhaust.
- c) Disappearance of species which are sensitive to disturbance EG in the last 10 years the possibility of seeing water voles in the Frome has declined, even more so the chance of seeing an otter.
- d) Noise pollution increase removal of Tranquillity. Often the reason for getting away for it all.
- e) Strain on local facilities e.g. Doctors surgeries are under much greater pressure in summer months
- f) Stopping efficient traffic flow.
- g) Increased sewage pollution

So tourism is not a limitless panacea for economic growth.

How often have you heard "we just don't go there anymore or it's- just too busy". One can kill the Golden Goose that lays the Golden Egg.

The quality of the tourist experience must be taken into account.



23/01/22

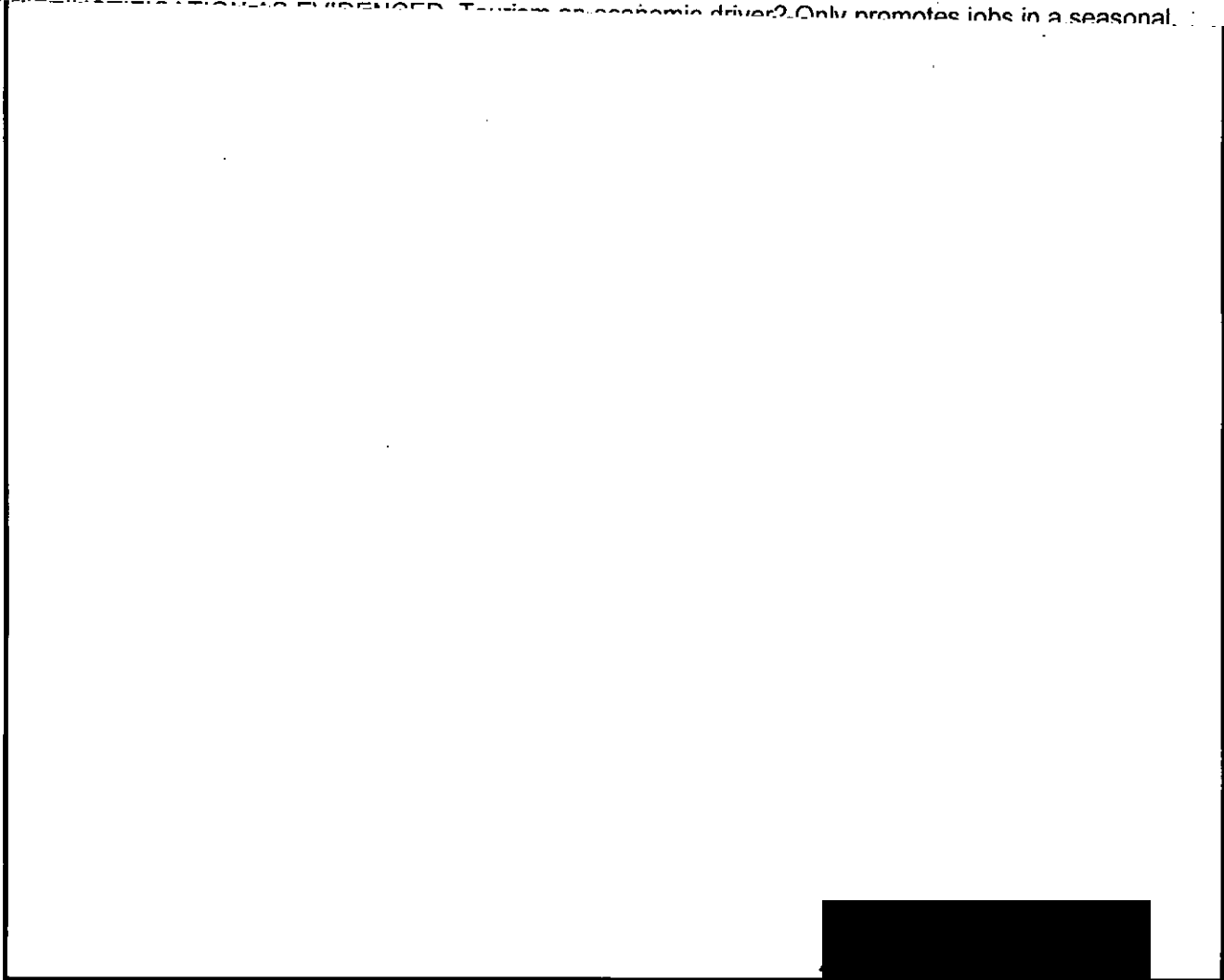
Please continue on a separate sheet if necessary.

4. Having regard to your comments in question 3, please set out what change(s) you consider necessary to make the Further Proposed Main Modification legally compliant or sound. You will need to say why this change will make the Further 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)

DELETE AMENDED POLICY A AND H
WORD CHANGE TO TOURIST ACTIVITY INCLUDING ACCOMMODATION

Tourist activity resulting in adverse impact particularly in accumulation upon landscape, biodiversity in designated local, national (SSSI's e.g. river Frome in Wool) and International sites should be assessed and relocated as carry capacity increases. In particular any impact of proposed development either alone or in combination with other existing proposed developments should be assessed under the Conservation of Habitats and Species regulations 2019 and refused.

INTERNATIONAL TOURISM ENHANCED Tourism as economic driver? Only promotes jobs in a seasonal...



Please continue on a separate sheet if necessary.

23/01/22

PART C

1. Comments on Interim Strategy, Memoranda of Understanding, updated policies map, SA or HRA.

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

Document:

SUMMARY INTERIM MITIGATION STRATEGY

SUMMARY REGARDING THE INTERIM PLAN FOR PURBECK

N.P.P.F. 2019

There are 3 overriding principles in plan-making as regard habitats and species regulations paragraph 24 where a land use plan strategic plan is

- A. likely to have significant effect on a European site(Poole Harbour Ramsar SPA European Heathland SAC Ramsar) The plan making authority must for that plan before the plan is given effect make an appropriate assessment of the implications for this site in view of these sites conservation objectives.
- B. The presumption in favour of sustainable development DOES NOT APPLY where the development requires appropriate assessment because of its potential impacts on a priority habitat site.
- C. The principle of no scientific doubt should be applied in the absence of demonstration of 10 adverse effects the Grampian Principal furthermore as in Article Para 3a 4 European law it makes it a Statutory requirement for planning authorities to undertake A HABITATS AND SPECIES assessment of the potential impacts of plans including European protected sites and protected species.

Derogation test

- The development must be for overriding public interest or public health and safety.
- There are no statutory alternative to the proposed development.
- The favourable conservation status of the European protected site must be maintained.

The habitats and species assessments by Lilly relies on wholesale mitigation, which we are led to believe is the answer. Mitigation is a prop. The more a plan relies on mitigation the less sound it becomes.

Are these mitigation measures up to the level of certainty stated in the Grampian principle - NO SCIENTIFIC DOUBT. Nitrate removal mitigation has no such evidence as yet - according to Tony Juniper- Natural England in a public interview on television.

The raft of SANGs suggested for this plan (is this in the hope that at least one will be effective or that in total they will prove effective in protecting Dorset European Site Heathlands. The best option an unrestricted SANG in Morden Park area is still unresolved - there are queries about its deliverability. The Dorset Plan states there will be a review of the success of mitigation but no such promises are made for this short-term plan. Removal of the greenbelt with consequent added population pressure could therefore have a negative effect on our 2 European Sites - Dorset Heathland and Poole Harbour.

The development short-term is not for overriding public interest - a Holiday Park - hardly!

There is a Statutory alternative to the proposed development - delay till 2024. We therefore strongly urge the plans rejection - the conception of which - speed in delivering houses and a holiday park is flawed - unsound we suggest delay until there is more certainty and a more rigorous approach can be made delay and deal with this in the Dorset Plan

Signature:



Date: 23/01/22


PART C

1. Comments on Interim Strategy, Memoranda of Understanding, updated policies map, SA or HRA.

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

Document:	SUSTAINABILITY APPRAISAL	SEE AS ATTACHED
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Please continue on a separate sheet if necessary.

Please sign and date this form:	
Signature:	
Date:	23rd JANUARY 2022

SUSTAINABILITY APPRAISAL

This document must surely qualify as the most incomprehensible script I have had the misfortune to encounter. It can hardly rate as a consultative document as it appears to be a closed book - A total turn off. This and the War of Attrition from consultation after consultation accounts for the total lack of fight by the residents of Wool who have felt defeated. It is not that they do not concern themselves about the future of Wool a semi-Rural Parish in one of England's most biodiverse rich Counties Dorset - they feel defeated and therefore we would ask the inspector to interpret low response in this way and urge her suggestion of only one more consultation combining Purbeck and Dorset. The consultation is not fit for purpose and should be abandoned. After all, it is only a stop-gap to quick delivery of more unwanted (by local people) houses and justification for V2 and a holiday Park IV.

Sustainability surely implies enduring – this hardly registers as a sustainability appraisal it is simply an attempt to justify stopgap mitigation measures to allow progressive development generally into the future and particularly in the interim time before any Dorset plan is produced - This to allow for the Purbeck plan to be passed as sound. It does not directly address the modification needed for altering housing from the green belt. It does not give a firm site for relocation of houses but in modification MM3 chapter 2 43 It needs to reflect the constraints around many settlements including towns whilst also recognising the constrained nature of land and the relative accessibility of some other settlements, notably Wool and Moreton.

ASSESSMENT OF DELIVERABILITY MANAGEMENT EFFICIENCY AND SUSTAINABILITY OF NEW SANG TYPES

1. Enhancing public access to Wareham Forest, Winfrith Heath?? surely not acceptable. Wareham Forest is used as a functionally (feeding) linked habitat for Annex 1 Birds (Lilly and Mallard) Winfrith Heath is part of the Dorset European site areas! (Winfrith Heath is a Dorset Heath SAC site – does this idea really equate to enhancing Public Access. Surely SANGs are to achieve the reverse of this).
2. Improving Heathland EG Morden Bog area Heathland that there is need to improve is due to ineffective management by Natural England and the Naturalist Trust? This is required by Habitats Regulations. The adjoining SANG could help this but Natural England. "It is unlikely to function in a way directly linked to specific development across the area".
3. SAMMS wardening is a last resort in protecting Heathland- who is going to do it? Efficacy of getting people to keep dogs on leads has been very questionable at Studland. Will they give all time protection against Heath Fires – more likely with Climate Change.
4. Increasing capacity of SANGs. is a short-term measure 47(SA) this is likely to be inappropriate EG Combe Wood - would this mean extending the inappropriate SANG even further into the Ancient Woodland- the most fragile area with 25 Ancient Trees, Bat Roosts- pure deciduous Ancient Woodland. Acquiring extra land for this may involve further negotiations with different owners. Wyatt Homes offers increasing capacity of a SANG but only deliverable by 2024. Another reason for waiting – delay of this plan.
5. STRATEGIC SANGS are not restricted to supporting a particular development and will rely on more car use and may attract others than new residents - increase CO₂ production 51 (SA) "minimising car travel to and through a Heathland site" but increasing the need to reach the SANG by car!
6. Bere Heath offered by the Wildlife Trust, Court Farm is not available till 31st of March 2023 so does not cover the time span of this interim strategy. Natural England SANG advice also states the Morden Park location is favoured but this still needs to be negotiated.
7. Conflicts between aspirations of Holiday Residents and SANG users if a holiday park is to double up as a SANG.

51 providing a network of mitigation strategies would increase pollution as car based travel would be needed to reach them.

47 "All mitigation strategies that help to achieve mitigation short-term will ensure that all new residential development does not have an adverse effect upon the Dorset Heathlands habitat sites in Purbeck"

WE DISAGREE- there is no evidence – see above

Rules for SANGS have not been thoroughly thought through. These ideas have been thrown out to drive housing supply - in particular Short Term.

These new SANG possibilities amount to weakening and removing the carefully considered parameters of Traditional SANGs in particular

1. They were to be set up in perpetuity so unaffected by ownership changes.
2. They were to be available on occupancy of new properties
3. They were located near and specific to housing developments and therefore encouraging access by local new residents on foot not drawing people in by cars.
4. They are measures to counteract damage to European Site Heathlands. Now and in the past.

They lack the robustness of traditional SANGs are offered in part as stop gaps. they are the opposite therefore to sustainability.

Most of these result in reduced protection for Dorset's protected heathlands registered in the Habitats and Species regulations as opposed to Traditional SANGS.

THE COMMENTARY CHART

The repeated statement that the suggested SANGs would need to be delivered promptly to ensure there are not potential negative impacts over medium and long-term does not inspire confidence in these as mitigation measures. Deliverability with land and ownership is certainly a likely problem. Although + are given regarding protection habitats and species for increasing capacity of the SANG at Bog Lane it goes on in the text to say it is unlikely here to help protect and enhance habitats and species. Chart do not promote clarity in the discussion on sustainability rather confusion.

31 this is the only option when any sustainability as we see it- restrict development until mitigation measures are an actuality through the Dorset Council plan.

Further comments on the sustainability appraisal

P38 the charts we would challenge the statement and positive plus that increased housing and increased population improves services and facilities - certainly in the short-term the reverse of this happened in areas where facilities are generally in balance with the present population EG doctors surgeries can be put under severe pressure.

Infrastructure by developers invariably lags behind Building and taking up new residents EG Purbeck Gate In Wool where 2/3 years on (the timescale of this interim strategy) promises still remain to be fulfilled and needed replacement of sewage pipes is still unsolved problem allowing sewage flooding to be experienced by nearby established properties. So services and facilities in the short-term is not a positive. There is no evidence of prompt delivery! in villages where a small general stores is struggling this may be the case EG Bere Regis but the new idea of dispersed housing does not seemingly involve these villages for more housing.

Chart 145 The mitigation by proposing Morden Park SANG in isolation (is favoured by Natural England) is clearly an unknown quantity so how can it operate for mitigation but then there would not be the pressure for it if there was not a trade in by removing the green belt.

An aim to meet as much of Purbeck's housing need in a hurry is not a good aim and U and M might be applied to promote services and facilities because if extra houses are not built in the green belt there may be no need identified in the area of Lytchett and it would help protect and enhance Habitats and Species. 158 here again is the assumption that more houses in this area with the removal of the green belt would not promote a need for them. Is there a need here?

154 the pausing of residential development and a SANG or mitigation is in place. In place would certainly protect and enhance Habitats and Species otherwise what use SANGs and mitigation. It should have ++ significant positive effect. These charts are unreliable and based on incorrect assumptions

The overarching aim of planning is to achieve sustainable development. C in the three derogation test C is the environment. This interim strategy with the aim of meeting as much of Purbeck's housing needs as possible by removing the embargo on development in certain areas of the green belt - notably around Upton and Lytchett Matravers, Wareham is crossed out there must have been a rethink here, puts further pressures on Dorset's fragile environment in particular the Dorset Heathlands European sites by increasing people pressure. This has to be mitigated and the consultation revolves around this. The measures involve the production of a variety of SANG's see as already mentioned. Many of these are short-term and indeed the interest strategy is short-term. Sustainability involves a concept of continuity, indeed possibly perpetuity. This sustainability appraisal is there for a contradiction in terms. It is in fact an attempt at justification. Justifying an interim plan. The favoured strategic SANG by natural England is uncertain (15sa). The technical tables evaluating sustainability justifying the interim plan are based on inaccurate statements and assumptions. It is unclear how these housing areas released will harness and increase tourism or is this putting the holiday park which is dependent on the Chanborough part producing a SANG into the "development category". Houses in the green belt at Lytchett and Upton are in an area where there are facilities which would therefore provide basic services. But the drawing in of a possible increase in housing at Wool negates this. Should a separate assessment for sustainability be applied here? The chart for reasonable alternatives to mitigation restricting development in Wool would certainly have a positive effect on reducing increased flooding and consequent coastal changes. Restricting development would certainly protect habitats and species against further damage neutral is inappropriate and we challenged the efficacy of the different new SANG approaches in doing this - there is no evidence. Certainly restricting development would minimise further pollution which is already occurring in the catchment of Poole Harbour European site S.P.A. Ramsar. These interim SANGs would have a neutral effect. Air pollution by increasing CO2 damaging to Dorset Heathland S.A.C's European sites, we argue would be lessened by restricting development.

L14
H.R.A. "Appropriate assessments need to consider success of Mitigation approaches to date and check that mitigation is fit for purpose? "YES!" (Plan section Policy Table 49 H.R.A. document)

PART C

1. Comments on Interim Strategy, Memoranda of Understanding, updated policies map, SA or HRA.

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


Document:	H.R.A
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HABITATS REGULATIONS ASSESSMENT

This document we will largely leave to our ecologist consultant Dr A C Warne to avoid repetition and to get a more erudite response. We the signed up members request that this is included in our response. We would however emphasize the importance of Wool for Nightjar and emphasize that busier urban areas are avoided (Lily and Mallard 5.7) that breeding success is lower on busier sites. Wool is at present a semi-rural Parish and the suggested increase of houses will turn it into a town thus leading to 6.13 "direct loss of foraging habitat and flight path being blocked by the presence of built development". This is exactly what will happen with the planned and proposed development of Wool. There is a superb wildlife corridor running from Heathland in the north of the parish through to Coombe Wood one of its Functionally Linked Habitats for Feeding – deciduous, conifer and felled areas. This corridor will be broken up by the line of houses sited and covering not only the route but also en route linked feeding areas, the insect rich hedgerows and Organics Fields. This corridor is used as observed with frequency throughout the summer months. Coombe Wood is not included in the list 216 and should be. How much study of Nightjar populations has been done in and around Wool? Why not apply the target of safe passage of birds (Annexe 1) moving between nesting and feeding sites (Table 7 H.R.A. document). Or is Wool again the exception having "no (environmental) constraints!!

It is interesting that in 2012 there was no suggestion of housing in Wool at all – Why?
Why not now.

Please continue on a separate sheet if necessary.

Please sign and date this form.	
Signature: 	Date: 23/01/22

PART C

1. Comments on Interim Strategy, Memoranda of Understanding, updated policies map, SA or HRA.

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

Document: **DORSET WILDLIFE TRUST MEMORANDUM OF UNDERSTANDING**

This site is positioned in north western Purbeck where Natural England states one is needed but perhaps keeping the Green Belt boundaries as they are will put less pressure on this need. However there is no certain date for delivery and if not till March 2024. This would fit with 154 Cherts Sustainability Appraisal to pause - restrict development until suitable mitigation is in place - ie till such time as the complete Dorset Plan is in place in 2024. Remove the Interim Purbeck PLAN.

Please continue on a separate sheet if necessary.

Please sign and date this form:	
Signature: [REDACTED]	Date: 23/01/22

PART C

1. Comments on Interim Strategy, Memoranda of Understanding, updated policies map, SA or HRA.

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

Document:	COMMENTS ON LETTER FROM NATURAL ENGLAND
-----------	---

Comments on Natural England letter 2016

Site 1. Wool - Natural England have voiced concerns on landscape impacts (AONB) to the south of Dorset Green, but mention the appropriate SANG. They ignore biodiversity issues, Ancient Woodland (Combe Wood) is Ancient Woodland (PAWS have equal protection, Priority species including rare bats and the fact it is used as feeding area for Nightjar (Functionally linked area).

They mention Nutrient Neutrality for Poole Harbour SPA/Ramsar, they do not quote their Chairman's statement "Nitrate neutrality is essential but as yet there is no firm evidence of this being achieved. This is left to the developer.

11 Possible Additional Options including the Bovington Middle School that is within the 400m zone of SAC Dorset Heathland -- Does he mean housing or a SANG(with dogs off the lead) it is contrary th Heathland SPD.

Please continue on a separate sheet if necessary.

Please sign and date this form:	
Signature:	Date: 23/01/22

PART C

1. Comments on Interim Strategy, Memoranda of Understanding, updated policies map, SA or HRA.

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

Document:	<i>INACCURACY</i>
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INACCURACY

1. Wool is near S.P.A. Heathland it actually occurs within the parish boundary 5.41 HR a document *Willet*
2. Possible additional option- Bovington Middle school - NO the school is within in 400m. (SPD advice. I.M.S document. This use would be consistent with the Dorset Heath). *Natural England.*

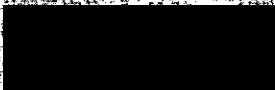
INCONSISTENCIES AND CONFUSION

1. A spread of homes across the district well better meet housing needs (rather than focusing all development in the last constrained West of Dorset) (47 I.M.S. document). Is this not exactly what they are suggesting for consideration in Wool in the west of Wool with one of the largest allocations.
2. Local Plan will not be delivered on greenbelt. Surely this is in total contradiction to putting houses on greenbelt or 47 I.M.S does this not apply to after this plan is passed and the green belt boundaries are changed.

The French Farm enlargement of SANG by Wyatt homes Natural England supports this but its deliverability is after the time span of this plan so there is no justification in hastening the house delivery before the Dorset Plan in 2024 is achieved. (141 I.M.S). - what is meant by unplanned development.

Throughout this document the idea that Nitrate Neutrality can be achieved is prevalent but here under additional considerations the Poole Harbour nitrate matter is stated as needing proper policy consideration. This has been discussed with Natural England, a consistent policy approach needs to be set out. HERE, HERE but as we have said as yet there is NO EVIDENCE FOR NITRATE NEUTRALITY BEING ACHIEVED. (P4 Nick Squirrel Natural England I.M.S. Document).

Please continue on a separate sheet if necessary.

Please sign and date this form:	
Signature: 	Date: <i>23/01/22</i>

Consultee: Clare Lees

Event Name: Purbeck Local Plan Further Proposed Main Modifications

Consultee reference: 1189887

Consultation reference: FMM17

From: Clare Lees [REDACTED]
Sent: 08 December 2021 15:54
To: planningpolicyteamb
Subject: Purbeck Local Plan Modifications.

Follow Up Flag: Follow up
Flag Status: Completed

Dear Sirs,

Memorandum of Understanding with The Bournemouth Canine Association.

It should be a matter of record that the Organford Caravan Site is a mobile home site which is the beneficiary of a lawful development certificate and a mistake in the Purbeck Planning Office which drew the boundary far larger than would have been otherwise permissible. This site, with well over 100 caravans, has been through no planning process, has undertaken no environmental impact assessment, is within 5km of heathland and is in green belt. It has made no community contributions in terms of s106 agreements or CIL payments. Yet despite this the MOU states:

13. The parties have yet to agree the detailed design of the proposed SANG or the proportion of the site which could be made available for this use, but as a matter of principle the council is satisfied that there is potential for the site to act strategically in mitigating the impacts from residential development within the Purbeck area. The parties are satisfied that there is potential:

a) for the site to be accessed on foot by the occupiers of those park homes at Organford Manor Country Park Homes to the west

It is inequitable that other developments, other landowners and other developers are effectively subsidising this type of "Park Home" development which is exploitative of both the residents within the site and the wider Dorset community.

I estimate there are 800 such residential mobile home within a 2km radius of Lytchett Minster and Dorset Council are not only failing to regulate these sites but are now facilitating their existence by this MOU. The only people which will be able to access this site other than in a car, will be the residents of this Park Home site.

Yours faithfully,

Clare Lees.

[REDACTED]

Consultee: Historic England

Event Name: Purbeck Local Plan Further Proposed Main Modifications

Consultee reference:

Consultation reference: FMM18

planningpolicyteamb

From: Harfield, Rebecca [REDACTED]
Sent: 10 December 2021 13:26
To: planningpolicyteamb
Subject: Purbeck Local Plan Further Proposed Main Modifications Consultation - Historic England

Dear Sir or Madam

Thank you for consulting Historic England on the Purbeck Local Plan Further Proposed Main Modifications and associated SA update.

I can confirm that we do not wish to comment.

Kind regards

Rebecca

Rebecca Harfield MRTPI, IHBC, M.ICOMOS
Historic Environment Planning Adviser (South West) | Project Lead for Tewkesbury High Street Heritage Action Zone
Development Advice | Regions
Historic England, 1st Floor Fermentation North, Hawkins Lane, Bristol, BS1 6JQ
Direct Dial: [REDACTED] | Mobile: [REDACTED]



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Work with us to champion heritage and improve lives. Read our Future Strategy and get involved at historicengland.org.uk/strategy.

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From: [REDACTED]
Sent: 06 December 2021 12:26
To: Harfield, Rebecca [REDACTED]
Subject: FW: Purbeck Local Plan Further Proposed Main Modifications Consultation 6 December 2021 - 24 January 2022 - Org

From: planningpolicyteamb <planningpolicyteamb@dorsetcouncil.gov.uk>

Sent: 06 December 2021 12:20

Cc: [REDACTED]

Subject: Purbeck Local Plan Further Proposed Main Modifications Consultation 6 December 2021 - 24 January 2022 - Org

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Dear Sir/Madam

In response to comments received on the Purbeck Local Plan Proposed Main Modifications consultation, which closed earlier this year, the council is consulting on limited Further Proposed Main Modifications around Policy V2 and I5, which are considered to be necessary to ensure that the plan is sound.

Please find attached notification of the consultation. Full details can be found within the attached letter.

All documents can be found online at www.dorsetcouncil.gov.uk/plpmainmods. Responses should be submitted by **11:45pm on 24th January 2022**.

Yours faithfully

**Strategic Planning Team
Economic Growth and Infrastructure
Dorset Council**

planningpolicy@dorsetcouncil.gov.uk
dorsetcouncil.gov.uk



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Consultee: Corfe Mullen Town Council

Event Name: Purbeck Local Plan Further Proposed Main Modifications

Consultee reference:

Consultation reference: FMM19

planningpolicyteamb

From: [REDACTED]
Sent: 16 December 2021 11:30
To: planningpolicyteamb
Subject: FW: Purbeck Local Plan Further Proposed Main Modifications Consultation 6 December 2021 - 24 January 2022 - Org
Attachments: consult letter-v2-hj.pdf; poster-final.pdf

Dear Sirs,

Corfe Mullen Town Council Planning Committee met on 14 December 2021 and discussed the Purbeck Local Plan Further Proposed Main Modifications Consultation. Members of the Committee agreed there were no further comments to add on behalf of Corfe Mullen Town Council.

Kind regards

Catherine

Catherine Horsley
Deputy Town Clerk, Corfe Mullen
Tele No. [REDACTED] (lines open 9am-2pm)
Please note my working hours are: Mon-Thurs 8.30am – 4.30pm, Fri 8.30am – 4pm



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-----Original Message-----

From: "planningpolicyteamb" <planningpolicyteamb@dorsetcouncil.gov.uk>
Sent: Monday, 6 December, 2021 12:19
To:
Cc: [REDACTED]

Subject: Purbeck Local Plan Further Proposed Main Modifications Consultation 6 December 2021 - 24 January 2022 - Org

Dear Sir/Madam

In response to comments received on the Purbeck Local Plan Proposed Main Modifications consultation, which closed earlier this year, the council is consulting on limited Further Proposed Main Modifications around Policy V2 and I5, which are considered to be necessary to ensure that the plan is sound.

Please find attached notification of the consultation. Full details can be found within the attached letter.

All documents can be found online at www.dorsetcouncil.gov.uk/plpmainmods. Responses should be submitted by **11:45pm on 24th January 2022**.

Yours faithfully

Strategic Planning Team

**Economic Growth and Infrastructure
Dorset Council**

planningpolicy@dorsetcouncil.gov.uk
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Consultee: Bere Regis Parish Council

Event Name: Purbeck Local Plan Further Proposed Main Modifications

Consultee reference:

Consultation reference: FMM20

planningpolicyteamb

From: Bere Regis Parish Council Crocker [REDACTED]
Sent: 17 December 2021 22:48
To: planningpolicyteamb
Subject: Purbeck Local Plan further proposed main modifications consultation

Bere Regis Parish Council is satisfied that, with the proposed limited FMMs, the Purbeck Local Plan will be found legally compliant and sound. We trust that the Purbeck Local Plan will now be allowed to continue relatively unchanged within the overarching Dorset Council Plan which is currently being produced.

Amanda Crocker
Clerk to Bere Regis Parish Council

Consultee: Highways England

Event Name: Purbeck Local Plan Further Proposed Main Modifications

Consultee reference: 1191428

Consultation reference: FMM21

From: Gallacher, Gaynor [REDACTED]
Sent: 12 January 2022 10:35
To: planningpolicyteamb
Subject: Purbeck Local Plan Further Proposed Main Modifications Consultation - National Highways comments

Dear Planning Policy team

Thank you for providing National Highways with the opportunity to comment on proposed further main modifications to the Purbeck Local Plan. National Highways is the strategic highway authority with responsibility for the A35 (west of Bere Regis) and A31 trunk roads, and was known as Highways England at the time of our earlier representations.

It is noted that the modifications relate only to the Interim Mitigation Strategy for Heathland Habitat Sites (2018/19 to 2023/24), policies V2 and I5 and associated documents, and as such National Highways has no comments on the further changes proposed.

Kind regards
Gaynor

Gaynor Gallacher
South West Operations – Assistant Planning Manager (Highways Development Management)

National Highways | Ash House | Falcon Road, Sowton Ind. Estate | Exeter | EX2 7LB
Web: <http://www.nationalhighways.co.uk>

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<https://www.gov.uk/government/organisations/highways-england> | info@highwaysengland.co.uk

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Consider the environment. Please don't print this e-mail unless you really need to.

Consultee: Diana Parry

Event Name: Purbeck Local Plan Further Proposed Main Modifications

Consultee reference: 1192535

Consultation reference: FMM22

planningpolicyteamb

From: Diana Parry [REDACTED]
Sent: 17 January 2022 10:58
To: planningpolicyteamb
Subject: Planning Consultation

Dear Sir or Madam

Unfortunately I have been seriously ill and am only now well enough to get back to normal, hence this last minute submission.

The Inspector who reviewed the housing plan for PDC prior to DC taking over, reduced the number of houses required in Wool from 1,000 to 400, DC immediately put this back up to 1,000 when they took over. There has been considerable infilling and proposals for an extension to Hillside Estate since then, has this number been deducted from the proposed total, if not it should be.

The number of people in Wool needing houses has consistently been under 25, how does that warrant building 1,000.

Since that inspectors review Wool has had serious flooding problems with Purbeck Gate, Frome Avenue, Bailey's Drove and the main Dorchester Road flooding, a problem only likely to get worse with global warming and increasing pollution from cars commuting. The A352 between Wool and Warmwell also floods regularly.

Unfortunately Purbeck Gate Estate has suffered with many problems, I understand that the builders had their own Building Inspectors not PDC Inspectors, which has resulted in all sorts of problems, both to buildings and the resulting layout. The layout is so bad that DC has still not adopted the roads, Police, Ambulances and Dustbin lorries regularly have trouble getting through to where they are needed. Also the Maintenance Fees have been greatly increased, we do not want this to happen again.

Since the closure of the Winfrith Atomic Site the number of local jobs has dropped and the Business Park has done very little to improve this situation. At that time Wool and Braytown became joined, why now with less jobs do we need more houses?

Increasing the number of houses just means more commuting and the transport links are not compatible with more housing. The trains that stop in Wool are 50% less than in my childhood and yesterday there was an announcement reducing the frequency, the bus to Dorchester and Weymouth now goes via Lulworth adding at least 5 miles and 20 minutes to traveling time, both of these developments increases the pollution at a time when we should be cutting it.

Yours Sincerely
D R PARRY (Mrs)

Consultee: Mr A Elliott Terence O'Rourke on behalf of Bloor Homes Southern

Event Name: Purbeck Local Plan Further Proposed Main Modifications

Consultee reference: 1190247

Consultation reference: FMM23

planningpolicyteamb

From: Andrew Elliott [REDACTED]
Sent: 18 January 2022 17:23
To: planningpolicyteamb; planningpolicyteamb
Cc: Rebecca Fenn-Tripp
Subject: Re: Purbeck LP Further Proposed Main Modifications Consultation - Bloor Homes Southern
Attachments: 220118 Purbeck LP FMM response Bloor Homes.pdf; Form.pdf

Dear Sir/Madam

I attach a response to the consultation on behalf of Bloor Homes.

Could you confirm safe receipt of these comments? Thanks.

Kind regards

Andrew

Andrew Elliott MRTPI
Technical Director – Town Planning

Office: [REDACTED]
Mobile: [REDACTED]



From: planningpolicyteamb <planningpolicyteamb@dorsetcouncil.gov.uk>

Date: Monday, 6 December 2021 at 12:20

Cc: [REDACTED]

Subject: Purbeck Local Plan Further Proposed Main Modifications Consultation 6 December 2021 - 24 January 2022 - Org

Dear Sir/Madam

In response to comments received on the Purbeck Local Plan Proposed Main Modifications consultation, which closed earlier this year, the council is consulting on limited Further Proposed Main Modifications around Policy V2 and I5, which are considered to be necessary to ensure that the plan is sound.

Please find attached notification of the consultation. Full details can be found within the attached letter.

All documents can be found online at www.dorsetcouncil.gov.uk/plpmainmods. Responses should be submitted by **11:45pm on 24th January 2022**.

Yours faithfully

Strategic Planning Team
Economic Growth and Infrastructure
Dorset Council

planningpolicy@dorsetcouncil.gov.uk

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TERENCE
O'ROURKE

To: planningpolicy@dorsetcouncil.gov.uk
18 January 2022
Our Reference: [REDACTED]

Dear Sir/Madam

**Bloor Homes Southern
Land interest at Lytchett Minster and Bere Farm**

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

Bloor Homes 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.

We observe that the current consultation on Further Main Modifications now involves a significant variation of approach to strategic mitigation, as set out in an Interim Mitigation Strategy. This includes the identification of additional SANG sites with delivery potentially related both to housing sites in the Purbeck Plan and housing sites that may potentially come forward in due course as part of a future Dorset Local Plan.

Bearing in mind the identified shortfall in SANG, Bloor Homes reiterates the availability of its land interest in the Lytchett Minster and Bere Farm area for development and supporting strategic SANG as set out in earlier representations to the Purbeck Plan (and also now its 2021 representations to the new Dorset Plan).

Bearing in mind previous involvement in these matters, in the event that a further hearing is proposed in relation to the Further Main Modifications, Bloor Homes reserves the right to attend the session as necessary for continuity in relation to its objection, examination statement and hearing appearance.

Yours faithfully,

[REDACTED]
Andrew Elliott MRTPI
Technical Director

cc

Rebecca Fenn-Tripp

Bloor Homes

LONDON
23 Heddon Street
London
W1B 4BQ

BIRMINGHAM
3 Edmund Gardens
117 Edmund Street
Birmingham
B3 2HJ

BOURNEMOUTH
Everdene House
Deansleigh Road
Bournemouth
BH7 7DU

TELEPHONE
020 3664 6755

www.torltd.co.uk



Response form for: Purbeck Local Plan Further Proposed Main Modifications consultation

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

In response to comments received on the Purbeck Local Plan Proposed Main Modifications Consultation, which closed earlier this year, the council is consulting on limited Further Proposed Main Modifications around Policy V2 and I5, which are considered necessary to ensure that the plan is sound.

The Purbeck Local Plan Examination Interim Mitigation Strategy For Heathland Habitat Sites (2018/19 to 2023/24) [Interim Strategy] sets out Further Proposed Main Modifications around policy V2 and I5 and considers a range of projects that could provide heathland mitigation in the event that the strategic SANG at Morden is not delivered.

The key Further Proposed Main Modifications (referenced as **FMM6**, **FMM7**, **FMM76** and **FMM77**) are detailed in Appendix 5 of the Interim Strategy

These Further Proposed Main Modifications give rise to a series of minor consequential Further Proposed Main Modifications: **FMM3**, **FMM66** and **FMM82**, which are set out in Appendix 6 of the Interim Strategy.


The council has also published an updated Habitats Regulation Assessment (HRA), Sustainability Appraisal Addendum (SA), policies maps to take account of the Further Proposed Main Modifications. and a series of Memoranda of Understanding to support the Interim Strategy.

These documents can be found on-line at www.dorsetcouncil.gov.uk/plpmainmods.

The council is inviting comments on the key and consequential Further Proposed Main Modifications, Interim Strategy, the Memoranda of Understanding, policies map, the updated Habitats Regulation Assessment and Sustainability Appraisal Addendum only. 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 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 all the Proposed Further Main and Main Modifications, the council will then take a decision about whether to adopt the local plan subject to all Further Main and Main Modifications.

PART A

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

Group Representations

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

Please note:

- The consultation period starts on **6 December 2021** and will last for 7 weeks until 11.45pm on **24 January 2022**.
- 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).
- Respondents must complete Part A of this response form and separate Part B forms for each Further Proposed Main Modification that they might wish to comment on.
- All respondents must provide their name and address and/or email address.
- All forms must be signed and dated.
- Responses cannot be treated as confidential. By making a response you agree to your name and comments being made available for public viewing.
- Information on the council's privacy policy is available on our website at: <https://www.dorsetcouncil.gov.uk/your-council/about-your-council/data-protection/dorset-council-general-privacy-notice.aspx> .

- The council will not accept any responsibility for the contents of comments submitted. We reserve the right to remove any comments containing defamatory, abusive or malicious allegations.
- If you are part of a group that shares a common view, please include a list of the contact details of each person (including names, addresses, emails, telephone numbers and signatures) along with a completed form providing details of the named lead representative.
- Purbeck Local Plan Examination: Interim Mitigation Strategy For Heathland Habitat Sites (2018/19 to 2023/24), including Further Proposed Main Modifications to Policies V2: Green Belt and I5: Morden Park strategic suitable alternative natural green space (SANG) and holiday park, and their supporting text and Consequential Further Proposed Main Modifications, proposed Purbeck Local Plan (2018-2034), Memoranda of Understanding supporting the Interim Strategy and policies map as well as updated Habitats Regulations Assessment and Sustainability Assessment Addendum documents, are available to view on the Council's website at www.dorsetcouncil.gov.uk/plpmainmods. Paper copies of the Interim Mitigation Strategy including modifications and updated inset map for Morden are available to consult at libraries in Dorchester, Corfe Castle, Lytchett Matravers, Swanage, Upton, Wareham, Wool and Hamworthy. Paper copies of the Habitats Regulations Assessment, Sustainability Appraisal and Memoranda Of Understanding are available to loan from libraries on request. You must follow any procedures relating to 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 01305 838517 or planningpolicy@dorsetcouncil.gov.uk.
- Response forms returned in the post should reference the **Purbeck Local Plan, Further Proposed Main Modifications Consultation, and be sent to Spatial Planning Team, County Hall, Colliton Park, Dorchester, DT1 1XJ**. Forms can be returned by email, referencing Purbeck Local Plan Further Proposed Main Modifications Consultation, to the email above.
- Please tick the box if you would like to be notified of the following:

Adoption of the Local Plan.

PART B

1. Which Further Proposed Main Modification does your representation relate to?

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

Further Proposed Main Modifications reference number	
---	--

2. Do you consider that the Further Proposed Main Modification is:

Legally compliant	Yes		No	
Sound	Yes		No	

See covering letter

To be considered legally compliant the Further 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 Further Proposed Main Modification[s] that you are seeking to make a representation on.

3. Please give details of why you consider the Further 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 Further Proposed Main Modification legally compliant or sound. You will need to say why this change will make the Further 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 Interim Strategy, Memoranda of Understanding, updated policies map, SA or HRA.

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

Document:	
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Please continue on a separate sheet if necessary.

Please sign and date this form:	
Signature:	Date:

Consultee: Wareham Town Council

Event Name: Purbeck Local Plan Further Proposed Main Modifications

Consultee reference: 1188328

Consultation reference: FMM24

planningpolicyteamb

From: Bev Churchill [REDACTED]
Sent: 21 January 2022 09:48
To: planningpolicyteamb
Cc: [REDACTED]
Subject: Local Plan Consultation Response
Attachments: Wareham Town Council Consultation Response January 2022.pdf

Good morning

Please find attached the Consultation response from Wareham Town Council.

Kind regards

Bev Churchill
PA to the Mayor and Town Clerk



Town Hall | East Street | Wareham | Dorset | BH20 4NS
[REDACTED] (10:00 to 13:00hrs - answer phone outside these times)

Please think about the environment. Do you need to print this email?

This email and any attachments to it may be confidential and are intended solely for the use of the individual to whom it is addressed. Any views or opinions expressed are solely those of the author and do not necessarily represent those of Wareham Town Council. If you are not the intended recipient of this email, please delete the contents in full and notify the sender. Please contact the sender if you believe you have received this email in error.



Purbeck Local Plan Further Proposed Main Modifications December 2021 Response of Wareham Town Council and Wareham Neighbourhood Plan Steering Group

1. Introduction

Dorset Council is currently consulting on the [Purbeck Local Plan Further Proposed Modifications](#) with responses due by 24th January 2022.

This report identifies the further proposed main modifications affecting Wareham and makes recommendations for responses by Wareham Town Council and Wareham Neighbourhood Plan Steering Group.

Now that the Wareham Neighbourhood Plan has been passed by referendum the Plan has become part of the Dorset's Development Plan and carries full weight in decisions for the Wareham area. The recommendations set out below are in line with the adopted Neighbourhood Plan and would strengthen planning policy in the area.

The Further Proposed Main Modifications concern Policies V2 covering the Green Belt and Policy I5 Morden Park strategic suitable alternative natural green space (SANG) and holiday park, and their supporting text.

The proposed amended Purbeck Local Plan with the modifications highlighted as track changes can be found below:

<https://www.dorsetcouncil.gov.uk/documents/35024/286429/sd01-purbeck-local-plan-with+track-changes.pdf/981459f1-143b-516b-f387-8c2405affcba>

2. Policy V2 Green Belt

When the Draft Purbeck Local Plan was submitted for Examination in January 2019 Policy V2 proposed "to remove land from the greenbelt at Lytchett Matravers, Upton and Wareham to support its strategic policy of spreading housing development across the District". At that time this was in line with the emerging Neighbourhood Plan which was proposing housing development in the Green Belt west of Westminster Road and north of Carey Road together with a SANG west of Carey in order to meet the housing requirement of 300 set by Purbeck District Council.

However, during Summer 2019 it became clear that a SANG to cater for proposed housing development west of Westminster Road as proposed in the draft Neighbourhood Plan was undeliverable. At the same time the new Dorset Council consulted on increased housing development on the former Middle School site. This meant that there was no need to remove land from the Green Belt west of Westminster Road to achieve the housing target of 300.

Following the advice of the Neighbourhood Plan Examiner, the Town Council agreed to withdraw the Neighbourhood Plan and consult on a new Plan which did not propose any housing development in the Green Belt. Dorset Council agreed with this position and following a successful referendum in which 90.5% of those voting

supported the Plan, the Neighbourhood Plan was Made by Dorset Council in November 2021.

This proposed Main Modification to Policy V2 and supporting text deletes reference to amending the Green Belt Boundary at Wareham. This is fully in line with the recently Made Wareham Neighbourhood Plan.

Recommendation: that the deletion of Wareham from Local Plan Policy V2 and supporting text be supported.

3. Policy I5

This Further Main Modification proposes to remove reference to a holiday park at the junction of the A35 and B3075 roads known as Morden but to retain the proposal for a strategic SANG at this location.

Clearly the Local Plan Examiner is concerned that the proposed hole in the Green Belt at Morden Park Corner would be contrary to National Planning Policy which could prevent the Plan from being found Sound. Removal of the proposal for a holiday park together with retention of the Green Belt is likely to allow the Examiner to find the Local Plan Sound. Although this proposal is outside the parish of Wareham it is desirable that the Purbeck Local Plan is adopted to further strengthen planning policy in the area outside the Parish. It is therefore recommended that this Modification be supported.

Recommendation: that the deletion of reference to a holiday park from Policy I5 together with retention of the Green belt and resultant changes to the supporting text be supported.

10th January 2022

Consultee: Wareham Neighbourhood Plan Steering Group

Event Name: Purbeck Local Plan Further Proposed Main Modifications

Consultee reference: 1188328

Consultation reference: FMM25

From: [REDACTED]
Sent: 23 January 2022 17:41
To: planningpolicyteamb
Cc: [REDACTED]
Subject: Purbeck Local Plan Further Main Modifications
Attachments: Purbeck Local Plan Modifications 10th Jan 2022.docx

Expires: 22 July 2022 00:00

Dear Sir

The Wareham Neighbourhood Plan Steering Group considered that attached report on the Further main Modifications on 13th January and unanimously agreed the recommendations.

I would be grateful if you would place their comments these before the Local Plan Inspector.

Kind regards

David Evans

David Evans PhD, MRTPI
Vice Chair – Wareham Neighbourhood Plan Steering Group

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]

**Purbeck Local Plan Further Proposed Main Modifications
December 2021
Response of Wareham Town Council and
Wareham Neighbourhood Plan Steering Group**

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Dorset Council is currently consulting on the [Purbeck Local Plan Further Proposed Modifications](#) with responses due by 24th January 2022.

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Recommendation: that the deletion of reference to a holiday park from Policy I5 together with retention of the Green belt and resultant changes to the supporting text be supported.

10th January 2022

Consultee: Dr A Langley

Event Name: Purbeck Local Plan Further Proposed Main Modifications

Consultee reference: 1191908

Consultation reference: FMM26

planningpolicyteamb

From: A Langley [REDACTED]
Sent: 24 January 2022 09:17
To: planningpolicyteamb
Subject: A Langley - Purbeck Local Plan Further Main Modifications Consultation Response
Attachments: A Langley (1191908) PLP FMMs consultation response 230122.pdf

Dear Policy team,

Please find attached my response to the PLP FMM consultation. If you have any problems with the file, please let me know.

Kind regards,

Andrew Langley
[REDACTED]



Response form for: Purbeck Local Plan Further Proposed Main Modifications consultation

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

In response to comments received on the Purbeck Local Plan Proposed Main Modifications Consultation, which closed earlier this year, the council is consulting on limited Further Proposed Main Modifications around Policy V2 and I5, which are considered necessary to ensure that the plan is sound.

The Purbeck Local Plan Examination Interim Mitigation Strategy For Heathland Habitat Sites (2018/19 to 2023/24) [Interim Strategy] sets out Further Proposed Main Modifications around policy V2 and I5 and considers a range of projects that could provide heathland mitigation in the event that the strategic SANG at Morden is not delivered.

The key Further Proposed Main Modifications (referenced as **FMM6**, **FMM7**, **FMM76** and **FMM77**) are detailed in Appendix 5 of the Interim Strategy

These Further Proposed Main Modifications give rise to a series of minor consequential Further Proposed Main Modifications: **FMM3**, **FMM66** and **FMM82**, which are set out in Appendix 6 of the Interim Strategy.

The council has also published an updated Habitats Regulation Assessment (HRA), Sustainability Appraisal Addendum (SA), policies maps to take account of the Further Proposed Main Modifications. and a series of Memoranda of Understanding to support the Interim Strategy.

These documents can be found on-line at www.dorsetcouncil.gov.uk/plpmainmods.

The council is inviting comments on the key and consequential Further Proposed Main Modifications, Interim Strategy, the Memoranda of Understanding, policies map, the updated Habitats Regulation Assessment and Sustainability Appraisal Addendum only. 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 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 all the Proposed Further Main and Main Modifications, the council will then take a decision about whether to adopt the local plan subject to all Further Main and Main Modifications.

PART A

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

Group Representations

If your representation is on behalf of a group, ensure the lead representative

completes the contact details box above. Also, please state here how many people supports the representation.

Please note:

- The consultation period starts on **6 December 2021** and will last for 7 weeks until 11.45pm on **24 January 2022**.
- 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).
- Respondents must complete Part A of this response form and separate Part B forms for each Further Proposed Main Modification that they might wish to comment on.
- All respondents must provide their name and address and/or email address.
- All forms must be signed and dated.
- Responses cannot be treated as confidential. By making a response you agree to your name and comments being made available for public viewing.
- Information on the council's privacy policy is available on our website at:
<https://www.dorsetcouncil.gov.uk/your-council/about-your-council/data-protection/dorset->

[council-general-privacy-notice.aspx](#) .

- The council will not accept any responsibility for the contents of comments submitted. We reserve the right to remove any comments containing defamatory, abusive or malicious allegations.
- If you are part of a group that shares a common view, please include a list of the contact details of each person (including names, addresses, emails, telephone numbers and signatures) along with a completed form providing details of the named lead representative.
- Purbeck Local Plan Examination: Interim Mitigation Strategy For Heathland Habitat Sites (2018/19 to 2023/24), including Further Proposed Main Modifications to Policies V2: Green Belt and I5: Morden Park strategic suitable alternative natural green space (SANG) and holiday park, and their supporting text and Consequential Further Proposed Main Modifications, proposed Purbeck Local Plan (2018-2034), Memoranda of Understanding supporting the Interim Strategy and policies map as well as updated Habitats Regulations Assessment and Sustainability Assessment Addendum documents, are available to view on the Council's website at www.dorsetcouncil.gov.uk/plpmainmods. Paper copies of the Interim Mitigation Strategy including modifications and updated inset map for Morden are available to consult at libraries in Dorchester, Corfe Castle, Lytchett Matravers, Swanage, Upton, Wareham, Wool and Hamworthy. Paper copies of the Habitats Regulations Assessment, Sustainability Appraisal and Memoranda Of Understanding are available to loan from libraries on request. You must follow any procedures relating to 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 01305 838517 or planningpolicy@dorsetcouncil.gov.uk.
- Response forms returned in the post should reference the **Purbeck Local Plan, Further Proposed Main Modifications Consultation, and be sent to Spatial Planning Team, County Hall, Colliton Park, Dorchester, DT1 1XJ**. Forms can be returned by email, referencing Purbeck Local Plan Further Proposed Main Modifications Consultation, to the email above.
- Please tick the box if you would like to be notified of the following:

Adoption of the Local Plan.

PART B

1. Which Further Proposed Main Modification does your representation relate to?

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

Further Proposed Main Modifications reference number

6

2. Do you consider that the Further Proposed Main Modification is:

Legally compliant Yes **X** No

Sound Yes No **X**

To be considered legally compliant the Further 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 Further Proposed Main Modification[s] that you are seeking to make a representation on.

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

While not disagreeing with the conclusion of FMM6, I disagree that in paragraph 47, "*the majority of homes that will be delivered through the Purbeck Local Plan will not be delivered on green belt*" is in any way exceptional. In fact, this would be the norm. This bullet point should be deleted from the list.

4. Having regard to your comments in question 3, please set out what change(s) you consider necessary to make the Further Proposed Main Modification legally compliant or sound. You will need to say why this change will make the Further 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)

Removal of spurious justification for "exceptional circumstances".

PART B

1. Which Further 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.

Further Proposed Main Modifications reference number	77 (& 76, 82)
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2. Do you consider that the Further Proposed Main Modification is:

Legally compliant	Yes	X	No
-------------------	-----	----------	----

Sound	Yes	No	X
-------	-----	----	----------

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The word "Park" should be deleted from the policy as it is no longer associated with the potential holiday park at Morden. (Also applies to FMM82)

Any SANG would have to comply with the Habitats Regulations in addition to the list of criteria in this policy.

Since delivery of this SANG is now questionable and other strategies can cover the need for mitigation, especially within the expected life of this Plan, this policy is not effective and is not required.

4. Having regard to your comments in question 3, please set out what change(s) you consider necessary to make the Further Proposed Main Modification legally compliant or sound. You will need to say why this change will make the Further 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)

Delete policy I5 and associated wording throughout the plan as it cannot be held to be effective within the life of the Plan.

PART B

1. Which Further Proposed Main Modification does your representation relate to?

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

Further Proposed Main Modifications reference number	66
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2. Do you consider that the Further Proposed Main Modification is:

Legally compliant	Yes	<input checked="" type="checkbox"/>	No
-------------------	-----	-------------------------------------	----

Sound	Yes	No	<input checked="" type="checkbox"/>
-------	-----	----	-------------------------------------

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

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

The wording commits the Council to permit four vaguely-defined classes of tourist facility without condition ("...the Council **will** permit..."). "Campsite" and "caravan site" can mean different things to different people.

The section on "For tourism related activities...." does not read correctly as it stands.

The wording paraphrases the multitude of considerations that would apply to any actual application which is dangerous, giving the impression that only a subset of law or policy applies in the case of tourism development.

Developments may adversely affect AONB or Green Belt even if they are not located **within** them.

Repetition of the HRA conditions is undesirable. There should be universal policies in the Plan under Environment that capture the requirement for all development to comply with the Regulations (currently embodied in E7-E9). They should be sufficient to remove the need to repeat them in other policies.

Under the section on "Existing tourist accommodation", sub-paragraph f) is drafted as a stand-alone condition, whereas I think it is intended to be subject to sub-paragraphs h) & i). [If the development affects five or fewer lettable rooms, it passes the test of f) and there is no requirement to proceed further down the chain].

4. Having regard to your comments in question 3, please set out what change(s) you consider necessary to make the Further Proposed Main Modification legally compliant or sound. You will need to say why this change will make the Further 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 remove ambiguities and omissions and simplify the wording.

Suggested revised wording.

Policy EE4: Supporting vibrant and attractive tourism

Development opportunities to enhance the visitor economy will be supported where they are of a scale, type and appearance appropriate to the locality and provide local economic benefits.

Hotels and bed and breakfast accommodation should be distributed in accordance with the settlement hierarchy, inside the settlement boundaries identified on the Policies Map.

Outside settlement boundaries, the Council may permit:

- i. conversion of existing buildings;
- ii. limited new development that is closely related to existing buildings;
- iii. campsites for temporary tourist tented accommodation; and
- iv. sites for temporary touring caravan and touring motorhome accommodation.

For all tourist related activities and tourist accommodation:

- a. they shall not result in harmful impacts upon local services and the capacity of roads and other infrastructure; and
- b. the scale of any proposed buildings, and nature of the development shall not harm the character and value of any landscape or settlement potentially affected by the proposals, and avoid any adverse impact to the amenity of neighbouring uses; and
- c. they can demonstrate that they would result in benefits for the economy of Purbeck; and
- d. they comply with this Plan, national policies and the law.

Existing tourist accommodation

Proposals that would lead to the loss or change of use of a hotel or other accommodation in Use Class C1 will only be permitted:

- e. where either the proposal would affect five or fewer lettable bedrooms, or it can be demonstrated that there is no market interest in acquisition or investment to allow the continued profitable operation of the business, and
- f. the planning application demonstrates that the facility has been realistically marketed without success for a continuous period of 9 months over the 12 month period prior to the application being submitted; and
- g. the proposal complies with this Plan, national policies and the law.

PART B

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

Further Proposed Main Modifications reference number

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

Legally compliant Yes No

Sound Yes No

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PART C

1. Comments on Interim Strategy, Memoranda of Understanding, updated policies map, SA or HRA.

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

Document: Interim Strategy

Summary

I do not agree with all aspects of the Interim Mitigation Strategy (or the SA), as explained in my previous representations and below. However, given the short period that this Plan is likely to survive, I agree with the Council's general approach to an interim solution.

Comments

The withdrawal of the GB change at Morden, if accepted as a further modification, would render most of my comments below irrelevant. However, I have responded to some of the Council's statements that continue to refer to this GB release as the status of the FMMs is uncertain.

Paragraph 9

A key consideration is the harm to the GB that would result from the creation of a large hole in it in an incoherent location. This point seems to have been lost or relegated. The focus should not just be on the mooted benefits of, and the mechanics of providing, a SANG whose function can be provided in other ways.

Paragraph 9d (and 11c, 18)

"the quantity of land released from the Green Belt for holiday homes is not proportionate with the size of the strategic SANG (Key Issue: the council's approach to release of Green Belt and delivery of a holiday park at Morden have not been fully evidenced and justified); "

The issue is not only that the size of the SANG is not proportionate to the loss of GB. The loss of GB is also disproportionate to the size of the proposed holiday park (originally 70-80 but now up to 100 chalets). A **very** much smaller loss of GB in a much more sustainable location could provide the same number of needed, permanent dwellings.

Paragraph 10

I disagree with the Council's conclusion that only its summary points 9 a) to d) have merit. Please refer to my previous representations.

Paragraph 13

In the 2016 Partial Review Options Consultation, there was no mention of releasing GB at Morden for the holiday park. For example, in Preferred Option 11, *"This land is located within the green belt, but the Council considers that the provision of a strategic SANG offers very special circumstances that can justify development within the green belt."*

Paragraphs 20 & 21

I disagree with the Council's assertion that on balance "exceptional circumstances", sufficient to justify the release of such a large area of GB at Morden, and within the parameters of the NPPF, have been established.

Please refer to my previous submissions:

- Response to the MM consultation. Freeths LLP on behalf of CPRE and me. (Jan 21)
- Representations on August 2019 Examination Documents. Section 3. (8 Sep 2019)
- Green Belt Boundary Changes at Morden. (22 July 2019)
- Statement on Matters, Issues and Questions. Matter H, Infrastructure. (6 Jun 2019)

Paragraphs 22-26.

I disagree that adverse effects from this type of development in this location and extending over the area indicated on the policies map can simply be ruled out because the "chalets" could be located 400m from the protected sites' boundaries. Consideration is also needed of the wider implications of the change in land-use (e.g. recreation, use of the lake and areas away from the chalets, lighting, noise...).

Any SANG at Morden would also have to demonstrate no LSE.

Paragraphs 185-191.

8 or 16ha per 1000 population are not lower and upper bounds for SANGs, so Table 14 does not show size limits, just a rough estimate of a possible range. A SANG's "capacity" is not solely related to its area, as stated in para. 185. Site-specific analysis is needed to estimate how many visitors a SANG is likely to attract. It is not clear that the conclusion in para. 191 is justified (and certainly not to four significant figures accuracy), though it might be reasonable to regard the range 400 to 800 as a rough estimate of the potential capacities.

PART C

1. Comments on Interim Strategy, Memoranda of Understanding, updated policies map, SA or HRA.

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Document:

Sustainability Appraisal
Addendum

The possibility of increasing SANG/HIPS close to existing population centres, and thereby deflecting *their* residents from the heaths rather than the residents of new developments has not been considered.

Some of the conclusions in this appraisal seem counter-intuitive and biased. As an example, at para. 154 the last three SA objectives are assessed as "neutral" to Restricting Development but described as:

"No development would mean habitats, and species and local geodiversity would not be negatively impacted by development. "

"No development would mean landscapes, townscapes and historical assets would not be negatively impacted by development. " and

"No development would mean pollution would not increase as a result of development. "

Surely those are all positive changes relative to not restricting development?

PART C

1. Comments on Interim Strategy, Memoranda of Understanding, updated policies map, SA or HRA.

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

Document: Policy Map Key

Needs to be updated for the changes to Policy I5.

PART C

1. Comments on Interim Strategy, Memoranda of Understanding, updated policies map, SA or HRA.

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

Document: HRA at MMs and FMMs

Visitor Pressure

Policy EE4 (supporting tourism) is screened out for LSE on the grounds that it is non-quantitative and non-specific (Table 4 p. 56). But tourism is an important source of effects on European sites in Purbeck and there is no Plan-level assessment of their magnitude or how they apply in-combination with, for example, the LSEs of residents. It is even argued in paragraphs 7.9 & 7.10 that because visitor-pressure outweighs resident-pressure, any increase in the latter can be ignored in that instance.

The human pressures on protected sites in Purbeck arise from both visitors and residents. The English population is projected to grow at around 0.4%pa over the next decade, so even if Purbeck's share of national tourism remains static, it can be expected to grow by a similar amount (in terms of visitor-days). Any ambitions by the Council to grow tourism (as expressed in EE4) may add to this rate of increase.

In 2019, the South West Research Company's report on tourism in Dorset showed about 5.9M visitor-days in Purbeck¹, of which, 63% were day-visits. By comparison, the number of resident-days is about 17.5M in 2022². There is no a priori reason to suppose that some human pressures from visitors are less than those of residents³ (perhaps the opposite). A 1% increase in visitor-days would be roughly equivalent to a 0.34% increase in resident-days. But that would be equivalent to an extra 72 households⁴ in the District, which is significant in comparison with the Plan's housing target of around 180 dwellings per annum. [This is not intended as a serious comparison of effects, just an order-of-magnitude comparison to show that visitor pressure may be significant.]

These statistics suggest that the LSEs of visits to Purbeck need to be assessed in-combination with other development in the Local Plan and national trends.

1 SWRC Ltd. The Impact of Dorset's Visitor Economy 2019.

2 Based on a Purbeck population of 47,900 in 2022 (ONS 2018-based Household Population Projection).

3 The effects of visitors are obviously not identical to those of residents, but some effects will be comparable.

4 Based on 21,500 households in Purbeck in 2022 (ONS 2018-based Stage 1 Household Projection).

They would have an impact on avoidance or mitigation measures, funding and monitoring. The existing SPDs on the Dorset Heaths, Poole Harbour Recreation and Nitrogen Neutrality claim to address some of the LSEs of *development* (including some tourist developments) within the District, but they do not capture the LSEs of day-visitors, for example. It would be wrong to assume that visitor pressure will always be mitigated by steps taken in other Plans; it is unlikely that LPAs some distance from Purbeck will be worrying about whether their residents spend their leisure time there.

The Effectiveness of Existing Mitigation

Paras. 5.26-5.37

SANGs must be judged by the net reduction in visits to sensitive sites that they cause, not by the number of visits to themselves. For example, the Bog Lane SANG is described (para. 5.26) as "slowly drawing visitors". But the implication is that the development at Westgate in Wareham may currently be generating more visits to sensitive sites than the SANG is offsetting i.e. the mitigation is not working. This SANG is currently held to have "additional capacity" for even more development in Wareham⁵, but it has no capacity for future development if it is already failing to attract enough visits to offset the development relying upon it.

In aggregate, the visits to SANGs should at least equal the visits to sensitive sites that would otherwise arise from new development i.e. the number of visits to those sensitive sites should be static or falling. This is not easy to prove. For the larger developments that have their own SANGs or other mitigation, it may be helpful to survey their residents to establish where they go rather than monitor the dozens of locations they visit.

The Urban Heaths Partnership (UHP) Dorset Heaths 2019 visitor survey did not set out to establish whether SANGs are effective e.g. para. 6.11 on p.89 of that survey:

"Overall, 7% of interviewees mentioned a SANG as one of the alternative sites they visit. This perhaps seems low, but it is important to note this doesn't indicate that SANGs only draw 7% of users away from Heaths. It clearly shows that some of the heath visitors do use the SANGs/HIP sites, however it is impossible to determine what proportion of people have switched to visiting the SANGs/HIP sites instead of the heaths. Those people who visit the SANGs all the time, or even some of the time, are not likely to be interviewed on the heaths and would not therefore be picked up in this survey. "

Nor did the survey establish whether overall visits to the surveyed sites had increased or decreased over time.

One result that was clear from the survey was that dog-walking generates a high number of trips and that attractive sites close to developments within walking distance are most likely to be effective.

The UHP Annual Monitoring Report 2018-19 likewise does not establish the effectiveness of the SANGs that were monitored in deflecting sufficient trips from sensitive sites.

5 See para. 5.56 of the HRA and footnote 26 on p. 25 of the Interim Mitigation Strategy.

The overall effectiveness of SANGs in Purbeck, with its high coverage of widely-distributed and attractive European sites is not proven. Some SANGs may work, and others not. Experience in other areas may not carry over to Purbeck's unique characteristics. The reliance on SANGs as mitigation of LSEs is therefore questionable in the context of the precautionary principle, and I do not agree with the general conclusion at para. 5.31 that

"It would therefore seem that there is evidence of SANGs working across Dorset and in Purbeck. "

Much better, objective evidence of performance is needed before a conclusion of "no LSE" could be drawn confidently. The existing SANGs in Purbeck might help to establish that evidence before extending the strategy to other sites.

Specific Mitigation for different allocations

Paras. 5.38-5.60

For new developments mitigated by SANGs, the estimated number of trips to sensitive sites that would arise from their residents should be declared up front. That would at least set a baseline for the SANGs' performance in offsetting those trips and a reference level for subsequent monitoring. At the moment, there are no objective criteria to assess SANGs against.

Para. 5.46 is hardly compelling as a justification for "no LSE".

"Around 24ha of SANG have been proposed as part of the previous Options consultation. The SANG is reasonably large but the challenge will be to create a suitable alternative to the heaths given that the site is an open pit. It may take many years before the SANG could fully develop its potential into a suitable and appealing visitor destination, and the SANG would need to be functioning prior to development being occupied. Additional land, outside the pit, is likely to be necessary to ensure a functioning SANG can be delivered within a reasonable timescale. Natural England has been in discussion with the developer, the former Purbeck District Council and Dorset Wildlife Trust (who are responsible for the management of the heath at Winfrith/Tadnoll). The developer has proposed that a large field adjacent to the designated sites could be used to support visitor/habitat management and this would allow for the relocation of a car-park and disperse visitor pressure on the heaths. Previous advice from Natural England is that there is a reasonable and robust chance to avoid additional pressure on the designated sites. "

Morden SANG and small sites

Paras. 5.67-5.71

Please refer to previous representations.

Fragmentation and Mobile Species

Atlantic Salmon

The recent scientific literature establishes the Frome and Piddle as functionally-linked habitats for the River Avon SAC. The HRA relies essentially upon opinion that LSEs can be ruled out because the interchange of populations is at a low

level. A proper scientific assessment of this by experts in genetics and the chalk-stream salmon populations is needed before it is discounted, particularly as this issue is relatively new and the populations are acutely at risk. The effects of all development within the catchments of the Frome and Piddle (including those in other Plans and the emerging Dorset Local Plan) need to be assessed.

Nightjars

The following reference might help to set some objective criteria for the impact of light-pollution on Nightjars, which is a LSE for development (including employment development) that is within range of Nightjar foraging. Sierró A and Erhardt A, "Light pollution hampers recolonization of revitalised European Nightjar habitats in the Valais (Swiss Alps)", *Journal of Ornithology* 160(10):1-13 April 2019.

Formal Integrity Test

For the reasons given in previous representations and above, I do not agree entirely with the conclusions in paras. 10.3-10.8.

Please sign and date this form:



Date: 23 Jan 2022