

## Comment

<b>Consultee</b>	Mr & Mrs S Alderson (1192513)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Mr & Mrs S Alderson (1192513)
<b>Comment ID</b>	PLPP635
<b>Files</b>	H5-Alderson-PLPP635.pdf

---



If your representation relates to how the Council has consulted with other relevant bodies during the plan making process, it is likely to relate to how the plan process has complied with the duty to co-operate in relation to the planning of sustainable development.

3. Please give details of why you consider the policy, policies map or paragraph number of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible).

Our Concerns regarding the Local plans for Wool.

1. The plan is unsound, building 470 houses in Wool will not provide homes that local people can afford if sold at Market Value. The average cost of a home in Wool is £250k plus. Local people need genuinely affordable properties we suggest around £150k. The plans do not guarantee this will happen and the Planners and Council barely mention this aspect of the housing needs. The plan lacks clarity as a third of the proposed homes are on small sites which could be anywhere in the Purbeck Area.
2. Infrastructure, as usual with these large scale developments on green belt land, little if any thought is put into the infrastructure of the Village. It has been decided by outside influences to be adequate, to cope with the extra traffic, demand on the already overcrowded Doctor's Surgery, Schools, not to mention the Sewage and Water. Surveys in our opinion have not been conducted properly and have not taken into account the increases as mentioned, basing their findings on current conditions. I quote Laura Miller 29th Nov on Facebook. "We will insist on infrastructure up front, likely to be phased development so infrastructure in phases too." I enquired as to what infrastructure we can expect as was told there is not enough money for a bypass. Her reply was "we cannot predict what we need as that work needs to be done".  
PDC have had 3 YEARS to predict what's needed. Why is this not in the plan???

(Please continue on a separate sheet if necessary)

### 3. Environment

There is little mention of the devastating effect this development will have on the local Wild life and the ecology of the area. Wool sits on the rim of a flood plain. The water seeps from the surrounding hills down the fields, right down through Wool to the River Frome, and ending up in Poole Harbour. The risk of flooding is obvious considering the change in weather and climate. Should the ecosystem be disrupted, which will happen if this development goes ahead, the impact on both humans and wildlife will be catastrophic. The proposed green field sites are sensitive and have been organically farmed for many years and to break that, in our opinion, is a criminal act.

### 4. Health care

The sudden inclusion of the plan to build a 65 bed care home must be challenged. This was never included in any of the previous plans. The legality of this must be questioned as I believe none of Social Services, the local Surgery, NHS Direct or the CCG were involved in any form of discussion or consultation, which leads me to believe this could be a commercial venture by the would be developer. Such a huge building as this in Wool directly contravenes the planning principle found elsewhere in Pre-Submission Policy document that any developer should be sympathetic to our Village and in keeping with local architecture.

### 5. Consultation January 2018

The plan talks about the results of this consultation, and in Wool the most favoured option was option A 30% people voted for this. I also believe 60% of the population voted for no houses. Therefore I feel the process in Wool has been legally and morally questionable because it has repeatedly denied the stated wishes of the community.



3. This Consultation, as indeed indeed all previous consultations, in my opinion have been severely flawed, having been designed to prevent the community from responding easily and fully. It was not easy to respond online and only after I attended the Woolworth/PDC meeting last Friday at the Durberville Hall, was I given this form. I feel these should have been delivered to every household in Wool. Lots of older people don't have Computers or the confidence maybe to come along to the meetings.

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

Changes we believe should be made to the plan for the Wool area specifically.

1. Do not use Greenfield Sites, this in our opinion is not necessary and a criminal act.
2. Choose smaller brown field sites to develop the housing Wool residents need, not that, which the Landowner and Developer can make the most profit from.
3. Build genuinely affordable property, with control of Market value, and to whom properties can be bought and sold, ie Second homes, buy to let, non local Residents buying first time homes. Control of price rises for these affordable properties. Also some Social housing access for local people as there is very little in Wool.
4. Consider and act upon the impact those proposed developments will have on the area. Choose the option which cares for our environment and maintains the ecology of Wool and the surrounding Countryside. Once the land has been broken there is no turning back. We are a Village, let us remain a Village.

(Please continue on a separate sheet if necessary)

5. If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions of the examination, although all members of the public may observe the proceedings. Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

Yes

No

6. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary?

I feel we have made our feelings to you, therefore we do not feel it necessary to participate any further

(Please continue on a separate sheet if necessary)

Please sign and date this form:





Signature:

Date: 2/12/18

## Comment

**Consultee** Mr John Aldridge (1189854)  
**Email Address** [REDACTED]  
**Address** [REDACTED]  
**Event Name** Purbeck Local Plan Pre-submission Draft  
**Comment by** Mr John Aldridge (1189854)  
**Comment ID** PLPP277  
**Response Date** 02/12/18 22:53  
**Consultation Point** Small sites development ([View](#))  
**Status** Processed  
**Submission Type** Web  
**Version** 0.2  
**Are you responding on behalf of a group?** No

**Please tick the box(es) if you would like to be notified at an address/email address of the following:**

**Which policy / paragraph number / policies map does your comment relate to?** H8

**Do you consider that the Local Plan is legally compliant?** No

**Do you consider that the Local Plan is sound?** No

**Do you consider that the Local Plan complies with the duty to co-operate?** No

**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)**

Policy H8 107 new houses in the small village, West Lulworth, should be classified as a 'Major Development.' It's impact on the village would be huge and would change the village for ever. The

splitting up of this major development proposal so that it fits into the SHLAA criteria is a cynical attempt to get round regulations designed to protect us from such schemes. Elsewhere, schemes with as many as 25 – 28 houses have not been considered Small Sites and have had to be considered Major Developments.

West Lulworth has developed and grown over the years, mainly with individual houses, at the most a terrace of four. This has led to the varied character, both in style and historical succession, of the village that we love today.

Yes, I agree that we need more homes for people, and we should play our part. Land could be released in smaller parcels for just one or two houses that fit in with the existing infrastructure. We would avoid the blight of blocks of identical style of architecture which would always be at odds with what we have now. It would also allow for the gradual upgrading of the infrastructure to accommodate this expansion. Improvements in roads, transport, medical services always lag behind, especially with ill conceived, inadequately planned schemes.

AONBs Site SHLAA0065 in West Lulworth was considered 'not suitable for development because of adverse impact on the AONB. The same argument applies to rest of the West Lulworth sites. AONB are designations designed to protect special places (both landscape and the settlements). If these proposals were to be allowed, then all ANOB sites would be at risk.

Policy H14 Second homes. The last large housing development in West Lulworth was the demolition of a hotel and adjacent petrol station/garage and redevelopment of housing. Of the 11 private, non social houses, only 2 are used as homes by residents of the village. The other 9 were bought as investments, second homes or for holiday letting. Some houses in the village are only occupied for 2 or 3 weeks a year. If this scheme were to go ahead, the new houses would go the same way and would not be used as homes for families. This housing initiative by the government is not designed to provide profits for landlords and landowners but to provide homes for families.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?**      No

## Comment

Consultee	Mr John Aldridge (1189854)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr John Aldridge (1189854)
Comment ID	PLPP628
Response Date	02/12/18 22:53
Consultation Point	Policy H14: Second homes ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.3
Are you responding on behalf of a group?	No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? H14

Do you consider that the Local Plan is legally compliant? No

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? No

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

Policy H14 Second homes. The last large housing development in West Lulworth was the demolition of a hotel and adjacent petrol station/garage and redevelopment of housing. Of the 11 private, non social houses, only 2 are used as homes by residents of the village. The other 9 were bought as investments, second homes or for holiday letting. Some houses in the village are only occupied for 2



or 3 weeks a year. If this scheme were to go ahead, the new houses would go the same way and would not be used as homes for families. This housing initiative by the government is not designed to provide profits for landlords and landowners but to provide homes for families.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?** No

## Comment

<b>Consultee</b>	Mrs Jennifer Aldridge (1189912)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Mrs Jennifer Aldridge (1189912)
<b>Comment ID</b>	PLPP278
<b>Response Date</b>	02/12/18 23:18
<b>Consultation Point</b>	Policy H8: Small sites next to existing settlements ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Are you responding on behalf of a group?</b>	No
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	H8
<b>Do you consider that the Local Plan is legally compliant?</b>	No
<b>Do you consider that the Local Plan is sound?</b>	No
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	No

**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)**

West Lulworth ha been allocated 107 units- nearly a quarter of all the proposed sites in the whole Purbeck area –this is clearly unjust and compromises its ANOB and world heritage site status

We need reappraisal of the numbers of permanent occupied houses required in the area --not counting "holiday lets "which have very little or no economic benefit to the village merely adding to the decline of the village community .

A smaller number of new builds, in less prominent sites should be restricted to truly affordable homes (possibly via housing association means) for genuinely local people and families who have an established connection with the area

All other required sites need to be spread evenly over the whole Purbeck area

H8 b;

"Individually and cumulatively the size appearance and layout of proposed homes must not harm the character and value of any landscape or settlement s potentially affected by the proposals"

Most of the proposed sites in West Lulworth are not compliant with this statement

**145** "Housing growth should be directed to settlements that have good access to services and facilities ,whilst also recognising the need for small scale development in rural areas to support rural communities and appropriate services.

West Lulworth does not have good access to services and is gridlocked with tourists in the summer

1 Second homes ownership has contributed to raising house prices and reducing the numbers of homes that are available to local residents. leading to a decline in the local services, local shops / post offices / bus services,

Many of any new build would be second homes or holiday lets and empty for many weeks in the year—giving all the visual disadvantages and no advantages except to government figures

**150** The Council considers that the new homes delivered on small sites will make an important contribution i helping enhance the vitality of existing rural communities-

But only if the houses are lived in permanently and not holiday lets --which don't usually use the village shop ,buses or village maintenance services---as there are fewer people living in the village to provide these

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


a "St Ives " type curb on second homes and holiday lets

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?**      No

## Comment

<b>Consultee</b>	Elizabeth Allen (1192777)
<b>Email Address</b>	
<b>Address</b>	Unknown Unknown Unknown
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Elizabeth Allen (1192777)
<b>Comment ID</b>	PLPP661
<b>Response Date</b>	02/12/18 12:05
<b>Consultation Point</b>	Policies List ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Letter
<b>Version</b>	0.3
<b>Are you responding on behalf of a group?</b>	No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? Several

**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)**

1. The removal of the large scale development originally planned for Lytchett Minster is most welcome.
2. Protection of the Greenbelt remains a top priority and therefore any proposals to downgrade any part of it (e.g. Parcel 23) should be strongly resisted.
3. Any future housing development should be strictly within the Small Sites policy, focused on local needs, and not be permitted to open the door to large scale development.
4. We also hope that the new Unitary Authority will continue both to support the Plan and it's interaction with local people

## Comment

<b>Consultee</b>	Mrs Susan Allison (998009)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Mrs Susan Allison (998009)
<b>Comment ID</b>	PLPP211
<b>Response Date</b>	01/12/18 17:01
<b>Consultation Point</b>	Policy E1: Landscape ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.2

**Are you responding on behalf of a group?** No

**Please tick the box(es) if you would like to be notified at an address/email address of the following:**

**Which policy / paragraph number / policies map does your comment relate to?** E1

**Do you consider that the Local Plan is legally compliant?** Yes

**Do you consider that the Local Plan is sound?** Yes

**Do you consider that the Local Plan complies with the duty to co-operate?** Yes

**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)**

I support the Council's policy to conserve and enhance the natural beauty of the area.

## Comment

<b>Consultee</b>	Mrs Susan Allison (998009)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Mrs Susan Allison (998009)
<b>Comment ID</b>	PLPP212
<b>Response Date</b>	01/12/18 17:43
<b>Consultation Point</b>	Policy H14: Second homes ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.3

**Are you responding on behalf of a group?** No

**Please tick the box(es) if you would like to be notified at an address/email address of the following:**

**Which policy / paragraph number / policies map does your comment relate to?** H14

**Do you consider that the Local Plan is legally compliant?** Yes

**Do you consider that the Local Plan is sound?** Yes

**Do you consider that the Local Plan complies with the duty to co-operate?** Yes

**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)**

I support the council's policy

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)



Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?**      No

## Comment

<b>Consultee</b>	Mrs Susan Allison (998009)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Mrs Susan Allison (998009)
<b>Comment ID</b>	PLPP512
<b>Response Date</b>	03/12/18 18:42
<b>Consultation Point</b>	Environment ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.2

**Are you responding on behalf of a group?** No

**Please tick the box(es) if you would like to be notified at an address/email address of the following:**

**Which policy / paragraph number / policies map does your comment relate to?** Environment

**Do you consider that the Local Plan is legally compliant?** Yes

**Do you consider that the Local Plan is sound?** Yes

**Do you consider that the Local Plan complies with the duty to co-operate?** Yes

**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)**

I consider it right that the plan highlights the unusual degree of constraints due to the special environment of Purbeck

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?**      No

## Comment

<b>Consultee</b>	Mrs Susan Allison (998009)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Mrs Susan Allison (998009)
<b>Comment ID</b>	PLPP513
<b>Response Date</b>	03/12/18 18:42
<b>Consultation Point</b>	Objectives ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.2
<b>Are you responding on behalf of a group?</b>	No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? 39

Do you consider that the Local Plan is legally compliant? Yes

Do you consider that the Local Plan is sound? Yes

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

I support Purbeck DC's objectives

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?**      No

## Comment

<b>Consultee</b>	Mrs Susan Allison (998009)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Mrs Susan Allison (998009)
<b>Comment ID</b>	PLPP515
<b>Response Date</b>	03/12/18 18:44
<b>Consultation Point</b>	Policy V2: Green belt ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.2
<b>Are you responding on behalf of a group?</b>	No

**Please tick the box(es) if you would like to be notified at an address/email address of the following:**

<b>Which policy / paragraph number / policies map does your comment relate to?</b>	V2
<b>Do you consider that the Local Plan is legally compliant?</b>	Yes
<b>Do you consider that the Local Plan is sound?</b>	Yes
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	Yes

**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)**

I heartily endorse the Council's policy to protect the green belt especially in preventing the sprawl of the Poole/Bournemouth conurbation and the merging of the village where I live Lytchett Minster with adjacent villages



(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?**    No

## Comment

Consultee	Mrs Susan Allison (998009)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mrs Susan Allison (998009)
Comment ID	PLPP516
Response Date	03/12/18 18:45
Consultation Point	Climate change ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.2

Are you responding on behalf of a group? No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? 67

Do you consider that the Local Plan is legally compliant? Yes

Do you consider that the Local Plan is sound? Yes

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

I am reassured the the Council is aware of the problems of climate change and this is to be taken into account when assessing housing developments, in particular with regard to flood risk

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?**    No

## Comment

<b>Consultee</b>	Mrs Susan Allison (998009)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Mrs Susan Allison (998009)
<b>Comment ID</b>	PLPP517
<b>Response Date</b>	03/12/18 18:46
<b>Consultation Point</b>	Policy E3: Renewable energy ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.2

**Are you responding on behalf of a group?** No

**Please tick the box(es) if you would like to be notified at an address/email address of the following:**

**Which policy / paragraph number / policies map does your comment relate to?** E3

**Do you consider that the Local Plan is legally compliant?** Yes

**Do you consider that the Local Plan is sound?** Yes

**Do you consider that the Local Plan complies with the duty to co-operate?** Yes

**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)**

Whilst supporting the Council's policy I think it is remiss that they have not done anything to promote the use of solar energy in/on new homes

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?**    No

## Comment

<b>Consultee</b>	Mrs Susan Allison (998009)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Mrs Susan Allison (998009)
<b>Comment ID</b>	PLPP518
<b>Response Date</b>	03/12/18 18:47
<b>Consultation Point</b>	Policy E4: Assessing flood risk ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.2

**Are you responding on behalf of a group?** No

**Please tick the box(es) if you would like to be notified at an address/email address of the following:**

**Which policy / paragraph number / policies map does your comment relate to?** E4

**Do you consider that the Local Plan is legally compliant?** Yes

**Do you consider that the Local Plan is sound?** Yes

**Do you consider that the Local Plan complies with the duty to co-operate?** Yes

**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)**

I support the Council's policy regarding assessing flood risk but would like there to be emphasis on the risk of flooding to existing properties as well as new build



## Comment

<b>Consultee</b>	Mrs Susan Allison (998009)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Mrs Susan Allison (998009)
<b>Comment ID</b>	PLPP519
<b>Response Date</b>	03/12/18 18:47
<b>Consultation Point</b>	Policy H1: Local housing requirement ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.2

**Are you responding on behalf of a group?** No

**Please tick the box(es) if you would like to be notified at an address/email address of the following:**

**Which policy / paragraph number / policies map does your comment relate to?** H1

**Do you consider that the Local Plan is legally compliant?** Yes

**Do you consider that the Local Plan is sound?** Yes

**Do you consider that the Local Plan complies with the duty to co-operate?** Yes

**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)**

I support the Council's identification of the number of home needed in the life time of the plan as shown in the 2018 SMHA

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?**    No

## Comment

<b>Consultee</b>	Mrs Susan Allison (998009)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Mrs Susan Allison (998009)
<b>Comment ID</b>	PLPP520
<b>Response Date</b>	03/12/18 18:48
<b>Consultation Point</b>	Policy H2: The housing land supply ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.2
<b>Are you responding on behalf of a group?</b>	No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

<b>Which policy / paragraph number / policies map does your comment relate to?</b>	H2
<b>Do you consider that the Local Plan is legally compliant?</b>	Yes
<b>Do you consider that the Local Plan is sound?</b>	Yes
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	Yes

**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)**

I support the Council's proposal for the distribution of housing. Large scale development in the east of the area would lead to a threat of sprawl from the Poole/Bournemouth conurbation.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?**    No

## Comment

<b>Consultee</b>	Mrs Susan Allison (998009)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Mrs Susan Allison (998009)
<b>Comment ID</b>	PLPP521
<b>Response Date</b>	03/12/18 18:49
<b>Consultation Point</b>	Policy H7: Upton ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.2

**Are you responding on behalf of a group?** No

**Please tick the box(es) if you would like to be notified at an address/email address of the following:**

**Which policy / paragraph number / policies map does your comment relate to?** H7

**Do you consider that the Local Plan is legally compliant?** Yes

**Do you consider that the Local Plan is sound?** Yes

**Do you consider that the Local Plan complies with the duty to co-operate?** Yes

**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)**

I reluctantly support the development of land at Policemans Lane and the necessary release of green belt land. This area is susceptible to flooding, is very near a bird sanctuary and decreases the strategic gap between the conurbation and Lytchett Minster

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?**    No

## Comment

<b>Consultee</b>	Mrs Susan Allison (998009)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Mrs Susan Allison (998009)
<b>Comment ID</b>	PLPP522
<b>Response Date</b>	03/12/18 18:50
<b>Consultation Point</b>	Small sites development ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.2

**Are you responding on behalf of a group?** No

**Please tick the box(es) if you would like to be notified at an address/email address of the following:**

**Which policy / paragraph number / policies map does your comment relate to?** 149

**Do you consider that the Local Plan is legally compliant?** Yes

**Do you consider that the Local Plan is sound?** Yes

**Do you consider that the Local Plan complies with the duty to co-operate?** Yes

**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)**

I support the Council's policy on small sites but emphasise that the number must be proportional to the size of the village.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?**      No



## Comment

<b>Consultee</b>	Mrs Susan Allison (998009)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Mrs Susan Allison (998009)
<b>Comment ID</b>	PLPP523
<b>Response Date</b>	03/12/18 18:53
<b>Consultation Point</b>	Climate change ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.2

**Are you responding on behalf of a group?** No

**Please tick the box(es) if you would like to be notified at an address/email address of the following:**

**Which policy / paragraph number / policies map does your comment relate to?** 67

**Do you consider that the Local Plan is legally compliant?** Yes

**Do you consider that the Local Plan is sound?** Yes

**Do you consider that the Local Plan complies with the duty to co-operate?** Yes

**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)**

I support the Council's policy to manage and mitigate climate change

## Comment

<b>Consultee</b>	Mrs Susan Allison (998009)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Mrs Susan Allison (998009)
<b>Comment ID</b>	PLPP524
<b>Response Date</b>	03/12/18 18:53
<b>Consultation Point</b>	Policy H14: Second homes ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.2

**Are you responding on behalf of a group?** No

**Please tick the box(es) if you would like to be notified at an address/email address of the following:**

**Which policy / paragraph number / policies map does your comment relate to?** H14

**Do you consider that the Local Plan is legally compliant?** Yes

**Do you consider that the Local Plan is sound?** Yes

**Do you consider that the Local Plan complies with the duty to co-operate?** Yes

**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)**

The Council's policy should extend throughout the district, not just to AONB

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?** No

## Comment

<b>Consultee</b>	Mr Paul Ambrose (1190924)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Mr Paul Ambrose (1190924)
<b>Comment ID</b>	PLPP254
<b>Response Date</b>	02/12/18 18:19
<b>Consultation Point</b>	Policy I4: Recreation, sport and open space ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Are you responding on behalf of a group?</b>	Yes
<b>If yes, how many people do you represent?</b>	38
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	14
<b>Do you consider that the Local Plan is legally compliant?</b>	Yes
<b>Do you consider that the Local Plan is sound?</b>	Yes
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	Yes

**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)**

I think the plan must make clear that allotments are also valuable green spaces that have significant environmental and health benefits

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

The list should specifically state allotments so there is no ambiguity

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?** No

## Comment

<b>Consultee</b>	Mr Peter Anderson (1187399)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Mr Peter Anderson (1187399)
<b>Comment ID</b>	PLPP639 PLPP711 PLPP712 PLPP713 PLPP714 PLPP715

<b>Files</b>	<a href="#">Anderson-PLPP639.pdf</a>
--------------	--------------------------------------



## For Office Use Only

Requester ID: 050  
 Consultee ID: 1187399  
 Comment ID's: PLPP639

## PART B

1. Which part of the Purbeck Local Plan does your representation relate to? Separate forms must be completed for each separate policy or paragraph you wish to comment on.

Policy number	
Policies map	
Paragraph number	

See attached

2. Do you consider that the Local Plan is:

- |   |     |                          |    |                                     |
|---|-----|--------------------------|----|-------------------------------------|
| • Legally compliant                     | Yes | <input type="checkbox"/> | No | <input type="checkbox"/>            |
| • Sound                                 | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> |
| • Complies with the duty to co-operate. | Yes | <input type="checkbox"/> | No | <input type="checkbox"/>            |

If your representation relates to how the Council has prepared the Local Plan it is likely to relate to legal compliance. The Plan must:

- comply with Section 20 of the Planning and Compulsory Purchase Act 2004 and other related legislation;
- be in accordance with the Council's Local Development Scheme and Statement of Community Involvement;
- comply with the Town and Country Planning (Local Planning) (England) Regulations 2012, national planning policy and the duty to co-operate in relation to planning of sustainable development (section 110 of Localism Act 2011).

If your representation relates to the content of the Local Plan, it is likely to relate to its soundness. To be considered sound the plan must be:

- positively prepared - providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- 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.

If your representation relates to how the Council has consulted with other relevant bodies during the plan making process, it is likely to relate to how the plan process has complied with the duty to co-operate in relation to the planning of sustainable development.

3. Please give details of why you consider the policy, policies map or paragraph number of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible).

Please see attached.

(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 Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text 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)

5. If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions of the examination, although all members of the public may observe the proceedings. Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

Yes

No

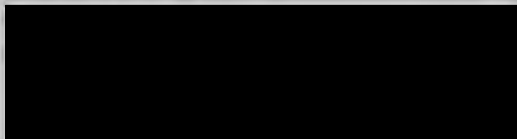
6. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary?

Please refer to the attached.

(Please continue on a separate sheet if necessary)

Please sign and date this form:

Signature:



Date:

3 December 2018

enc. Submission to the Inspector 03 Dec 2018

## Purbeck Local Plan Pre-submission draft (2018 to 2034) ('The Plan')

Submission to the Inspector

3 December 2018

Peter Anderson, [REDACTED]

### Summary

The Plan is unsound on a number of criteria:

- Affordability
- Lack of clarity on numbers
- Lack of Infrastructure requirement
- Second Homes Policy

### Affordability

The Plan repeats the word 'affordable' a multitude of times, over 120 in fact, as if by doing so it will make the impossible come true.

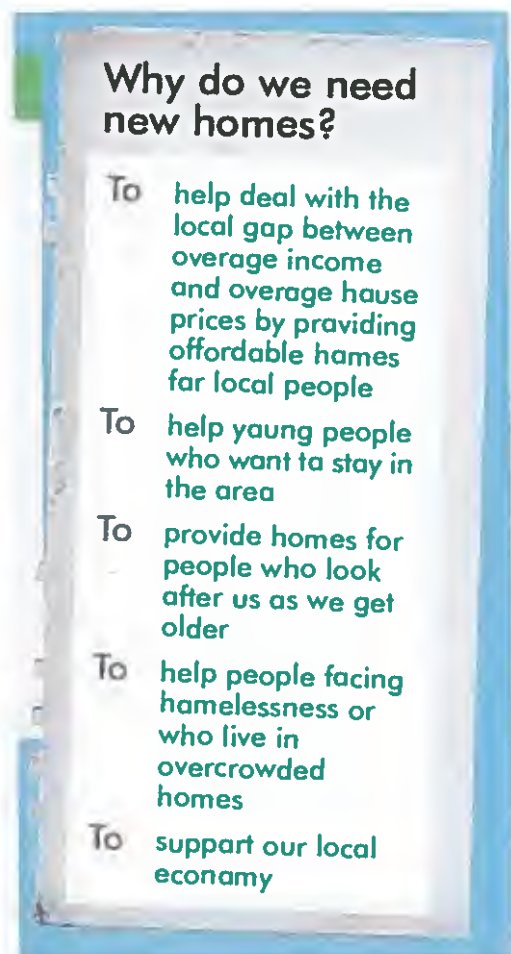
'Affordable', but by whom?

The consultation in January 2018 on page 2 gave us these reasons for building more new homes in Purbeck.

The average house in Purbeck costs 17 times the average salary. The average house price in Purbeck is about £250,000. To be genuinely affordable (to rent or purchase) for a Purbeck family on average income, a house must cost about £150,000. Even at 80% of market value (the Plan's definition of 'affordability') housing is still well outside the reach of the majority of local people.

When, during the consultation in January 2018, I questioned whether any of the proposed homes would be actually affordable by local people, young people, our carers, the homeless, I was told "well, they will be affordable by someone". Yes, just as a Gucci watch is affordable to someone.

**The Plan presents no evidence that building these additional houses will reduce house prices in the honeypot area of Purbeck by 40%.**



It is certainly not in the interest of the developers to cause such a drop in house prices.

And as you know developers can use viability as a reason for not delivering even the '80% of market price' housing, which the Plan labels 'affordable'.



Carl Godfrey, RA Summer Exhibition, 2018

## Clarity on Numbers

Para 42 is correct to claim that in the Jan 2018 consultation the most favoured option was Option A (spreading development) – 35% were in favour. But it fails to mention the significant proportion who disagreed with all the options presented - 28% across Purbeck, 60% in Wool.

A third (933) of the proposed 2,688 houses are on 'Small sites next to existing settlements and windfall within existing settlements (excluding Wareham)' Policy H2. **How can a proper plan have a third of the housing on undefined sites?**

## Infrastructure

The Plan spends a lot of time talking about what it 'expects'. For example policy H3. What teeth does the Plan have? Policy H5 says the Plan 'expects' developers to detail a program to reduce volumes of traffic on the A351 by encouraging the use of the C6 road. If that were feasible, why isn't it already implemented?

Apart from a couple of areas where developers are legally required to do something, the rest of the Plan is pure conjecture and not enforceable.

**This is not a plan for infrastructure, it's a wish list.**

## Healthcare

While the Plan discusses the healthcare needs for other areas, it omits any discussion of the healthcare impact of 470 houses plus care home in Wool. The present surgery is already so overstretched to the extent they have resorted to asking patients not to use the surgery. Young GPs cannot afford to move here.

The 65 bed care homes have appeared from nowhere. We certainly were not consulted about them.

**There is no policy in the Plan addressing healthcare in the Wool area.**

## Second Homes Policy (H14)

This policy only covers new homes in the AONB, and excludes holiday lets. As such, this policy is significantly different from that implemented in St Ives. **St Ives cannot be used as evidence to support H14.**

And surely **such a policy will push up house prices in the remainder of Purbeck** as people bank their money in second homes in the desirable Purbeck area.

## Suitable Alternative Natural Green Space (SANG)

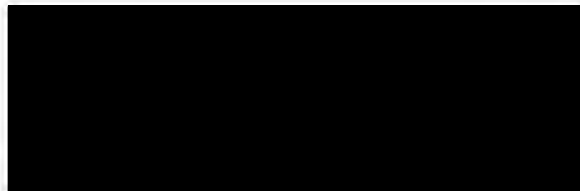
A SANG is mentioned in the heading for Chapter 4 Housing Wool. But there is **no mention of a SANG in the associated policy H5**. The only Policy mentioning a SANG is I5 relating to Morden Park.

## Green Belt

The Plan claims (para 43) that:

'The Council has established that delivery of its preferred approach to ensuring that the District's housing needs can be met in sustainable, accessible locations must involve the removal of some land from the green belt at Lytchett Matravers, Upton and Wareham'.

**Where is the evidence to justify the claim that the removal of green belt is essential to the delivery of housing need?**



Peter Anderson

03 December 2018

A pdf copy of this submission is available from



## Comment

<b>Consultee</b>	Mr Peter Anderson (1187399)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Mr Peter Anderson (1187399)
<b>Comment ID</b>	PLPP711
<b>Response Date</b>	03/12/18 11:24
<b>Consultation Point</b>	Policy V2: Green belt ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Letter
<b>Version</b>	0.2
<b>Files</b>	<a href="#">Anderson-PLPP639.pdf</a>

**Are you responding on behalf of a group?** No

**Please tick the box(es) if you would like to be notified at an address/email address of the following:**

**Which policy / paragraph number / policies map does your comment relate to?** All

**Do you consider that the Local Plan is sound?** No

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?** Yes

## Comment

<b>Consultee</b>	Mr Peter Anderson (1187399)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Mr Peter Anderson (1187399)
<b>Comment ID</b>	PLPP712
<b>Response Date</b>	03/12/18 11:24
<b>Consultation Point</b>	Policy H2: The housing land supply ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Letter
<b>Version</b>	0.2
<b>Files</b>	<a href="#">Anderson-PLPP639.pdf</a>

**Are you responding on behalf of a group?** No

**Please tick the box(es) if you would like to be notified at an address/email address of the following:**

**Which policy / paragraph number / policies map does your comment relate to?** All

**Do you consider that the Local Plan is sound?** No

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?** Yes

## Comment

<b>Consultee</b>	Mr Peter Anderson (1187399)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Mr Peter Anderson (1187399)
<b>Comment ID</b>	PLPP713
<b>Response Date</b>	03/12/18 11:24
<b>Consultation Point</b>	Policy H5: Wool ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Letter
<b>Version</b>	0.3
<b>Files</b>	<a href="#">Anderson-PLPP639.pdf</a>

**Are you responding on behalf of a group?** No

**Please tick the box(es) if you would like to be notified at an address/email address of the following:**

**Which policy / paragraph number / policies map does your comment relate to?** All

**Do you consider that the Local Plan is sound?** No

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?** Yes



## Comment

<b>Consultee</b>	Mr Peter Anderson (1187399)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Mr Peter Anderson (1187399)
<b>Comment ID</b>	PLPP714
<b>Response Date</b>	03/12/18 11:24
<b>Consultation Point</b>	Policy H11: Affordable housing ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Letter
<b>Version</b>	0.2
<b>Files</b>	<a href="#">Anderson-PLPP639.pdf</a>

**Are you responding on behalf of a group?** No

**Please tick the box(es) if you would like to be notified at an address/email address of the following:**

**Which policy / paragraph number / policies map does your comment relate to?** All

**Do you consider that the Local Plan is sound?** No

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?** Yes

## Comment

<b>Consultee</b>	Mr Peter Anderson (1187399)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Mr Peter Anderson (1187399)
<b>Comment ID</b>	PLPP715
<b>Response Date</b>	03/12/18 11:24
<b>Consultation Point</b>	Chapter 6: Infrastructure ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Letter
<b>Version</b>	0.2
<b>Files</b>	<a href="#">Anderson-PLPP639.pdf</a>

**Are you responding on behalf of a group?** No

**Please tick the box(es) if you would like to be notified at an address/email address of the following:**

**Which policy / paragraph number / policies map does your comment relate to?** All

**Do you consider that the Local Plan is sound?** No

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?** Yes

## Comment

Consultee	Dr Patrick Armitage (1187335)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dr Patrick Armitage (1187335)
Comment ID	PLPP1
Response Date	06/11/18 14:29
Consultation Point	Policy H5: Wool ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.2
Are you responding on behalf of a group?	No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to?	127-133
Do you consider that the Local Plan is legally compliant?	No
Do you consider that the Local Plan is sound?	No

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

- 1 *There appears to be an assumption that 470 houses will be built in Wool despite only 30% of respondents agreeing with the plan. Not very democratic!*
- 1 If houses are built, how many will be affordable. The government requires that 10% of all developments must be affordable. This means in Wool, 47 houses of which a maximum of 4

would be social rental housing. PDC does not own any 'council houses' and will not build any. Perhaps a read of this link may help change minds!  
<https://www.bbc.co.uk/news/uk-politics-45569453>. The social rental and 'affordable' housing should be built first to meet any apparent real needs of the community. Remember no real need for 400+ homes in the area has been demonstrated.

- 1 A lot more research is needed on the specific needs of particular communities, taking into account population demographics and economic considerations (potential employers). **The departure from the EU also needs to be considered in relation to enterprise bids etc which are not likely to be funded in the future.**
- 2 Where is the evidence that the proposed development will lead to more jobs? To my knowledge Purbeck Gate has not increased the number of employers in the area. How many jobs were created by the Winfrith Site Starter Units in 2000. The information in "Remembering Winfrith Site" by Peter Fry is very misleading when it mentions 1000 jobs because this figure refers to the site as a whole and as we know many of these jobs do not exist now the main employers are either leaving or shrinking their staff. There are no guaranteed employment opportunities in Wool evident from the Local Enterprise Partnership (see Comment #3 above).
- 3
- 4 The proposed Greenfield sites for 'development' are Grade 2 and 3 (on scale of 1-5 DEFRA Agricultural Land Classification). **It is ecologically and economically unsound to build on such areas.** The population of England is growing all the time- is it wise to destroy potential food growing land before all existing brownfield sites are used to their maximum? Natural England should be **challenged** on their protective stance regarding the degraded heathland and poor quality fields adjacent to the railway between Sandford and Holton Heath as this area would be ideal for development with close rail link and access to A35. On a similar ecological theme the proposed development in Wool will create a hard impermeable catchment thereby increasing run-off into the Frome with associated negative effects centred round increased pollution loadings and mobilisation of sediment and it's settlement on the river bed.
- 5
- 6 I have no objection to some increase in housing provided that brown field sites are used preferentially and any infilling does not encroach onto new green field areas Use of green field sites at this stage creates precedents for more future development in green field sites.
- 7
- 8 I would also hope that should new houses be built, unlike in Purbeck Gate, they will address green issues regarding insulation and the use of solar panels etc. Ensuring a low *carbon footprint* during and after construction and if possible being largely powered by renewable energy. A further aim should be to reduce waste to as near zero as possible through encouraging changes in behaviour and regulating materials. Developers should also consider the construction of 2-3 story blocks of flats offering either affordable social housing or sheltered accommodation. If the development in some form goes ahead every effort should be made to make it **a flagship project for green energy**. Kudos for landowner, developer and PDC (or its successor) and more importantly a sound long term investment. Short term thinking does not make economic sense and can negatively impact the environment.
- 9
- 10 Legal steps need to be taken to ensure that the landowner does not continue to have influence on a development which will benefit them in perpetuity.
- 11
- 12 We have been through many stages of consultation and I must say that I do not have much confidence that any points made are actually considered. We have had many meetings and reports but with few responses to specific points. For me it is important that if the project goes ahead green issues are properly funded. This may mean less profit for the developers but it is much easier to incorporate good design at the start of the project than later piecemeal changes

## Comment

**Consultee** Mrs Mandy Backhouse (1191015)  
**Email Address** [REDACTED]  
**Address** [REDACTED]  
**Event Name** Purbeck Local Plan Pre-submission Draft  
**Comment by** Mrs Mandy Backhouse (1191015)  
**Comment ID** PLPP371  
**Response Date** 03/12/18 14:41  
**Consultation Point** Policy H6: Lytchett Matravers ([View](#))  
**Status** Processed  
**Submission Type** Web  
**Version** 0.1

**Are you responding on behalf of a group?** No

**Please tick the box(es) if you would like to be notified at an address/email address of the following:**

**Which policy / paragraph number / policies map does your comment relate to?** POLICY H6

**Do you consider that the Local Plan is legally compliant?** Yes

**Do you consider that the Local Plan is sound?** No

**Do you consider that the Local Plan complies with the duty to co-operate?** Yes

**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)**

I do not believe that the Local Plan in relation to Policy H6 and the land adjacent to Wareham Road, Lytchett Matravers is sound in respect that the local infrastructure and local services have not been properly reviewed. The A35 is mentioned as able to sustain the increase of traffic but the surrounding country roads are not safe now and the increase in vehicles will make it much more dangerous. I have

lived in Lytchett Matravers all of my life and the journey up and down Wareham Road is precarious, particularly around school times. The additional cars now parked along the road make it a very stop/start journey and many take the alternative smaller country lane routes and as a walker of these roads I have had to jump into the verge on many occasions.

The doctors surgery, chemist and both junior and senior schools all seem to be mentioned but no detailed plan for improvement has been submitted. With a very ageing and now young family population the village must look at these factors before adding more pressure to them.

I love living in a village but I can honestly say that Lytchett Matravers is losing the community feel as it is too large now and the addition of 300 + people will only make it less community spirited and more of a town.

I know that you want to hear precise reasons why your plan is being opposed but it comes down to people and at the bottom end of the village there are less people to object to this planing and so we get less of a voice and that is really why this site has been approved which is a shame. The wildlife in this field and wooded area is diverse and beautiful, we see foxes, deer, badgers and a wide variety of birds and insects here, all will be lost to developers who give you the numbers you crave and their bank balances larger. We kid ourselves that we are providing much needed homes when there are commercial needs being answered by building in this village.

In relation to the personal impact of building on the green belt space at Glebe Road, Lytchett Matravers, this has adverse effect on the residential amenity of myself and my neighbours, by reason of (among other factors) noise, disturbance, overlooking, loss of privacy, overshadowing, etc.

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

To make Policy H6 sound and in the interest of the villagers I would like to see proof that the infrastructure of Lytchett Matravers, including the schools and doctors and particularly the roads from the village down to the main A35 will be improved, before any building is forced upon us.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?**      No

## Comment

<b>Consultee</b>	Mrs Pat Bailey (1190799)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	Unknown Unknown Unknown
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Mrs Pat Bailey (1190799)
<b>Comment ID</b>	PLPP169
<b>Response Date</b>	30/11/18 17:35
<b>Consultation Point</b>	Policy H5: Wool ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Other
<b>Version</b>	0.7
<b>Files</b>	<a href="#">H5-Bailey-PLPP169.pdf</a>
<b>Are you responding on behalf of a group?</b>	No
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	<input type="checkbox"/> The submission of Local Plan to the Secretary of State for Public Examination <input type="checkbox"/> The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report) <input type="checkbox"/> The adoption of the Purbeck Local Plan
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	H5
<b>Do you consider that the Local Plan is legally compliant?</b>	No
<b>Do you consider that the Local Plan is sound?</b>	No

**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)**

I enjoy wildlife.

Two doctors are leaving this year and only one doctor is being employed. Very difficult to get an appointment at the moment without another 1,000 or more people plus extra cars and lorries for the building of houses. At the moment Wool is a quiet village. It will become a town with very few shops and amenities.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?**      No





## For Office Use Only

Requester ID: 53  
 Consultee ID: 1190799  
 Comment ID's: PLPP169

## PART B

1. Which part of the Purbeck Local Plan does your representation relate to? Separate forms must be completed for each separate policy or paragraph you wish to comment on.

Policy number	HS
Policies map	
Paragraph number	

2. Do you consider that the Local Plan is:

- |   |     |                          |    |                                     |
|---|-----|--------------------------|----|-------------------------------------|
| • Legally compliant                     | Yes | <input type="checkbox"/> | No | <input type="checkbox"/>            |
| • Sound                                 | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> |
| • Complies with the duty to co-operate. | Yes | <input type="checkbox"/> | No | <input type="checkbox"/>            |

If your representation relates to how the Council has prepared the Local Plan it is likely to relate to legal compliance. The Plan must:

- comply with Section 20 of the Planning and Compulsory Purchase Act 2004 and other related legislation;
- be in accordance with the Council's Local Development Scheme and Statement of Community Involvement;
- comply with the Town and Country Planning (Local Planning) (England) Regulations 2012, national planning policy and the duty to co-operate in relation to planning of sustainable development (section 110 of Localism Act 2011).

If your representation relates to the content of the Local Plan, it is likely to relate to its soundness. To be considered sound the plan must be:

- positively prepared - providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- 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.

If your representation relates to how the Council has consulted with other relevant bodies during the plan making process, it is likely to relate to how the plan process has complied with the duty to co-operate in relation to the planning of sustainable development.

3. Please give details of why you consider the policy, policies map or paragraph number of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible).

I enjoy wild life .

③ Two doctors are leaving this year and only one doctor is being employed. Very difficult to get another an appointment at the moment without another 1,000 or more people plus extra cars and lorries for the building of houses. At the moment Wool is a quiet village. It will become a town with very few shops and amenities.

(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 Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support/justify the representation. (Please be as precise as possible)

[Empty response box for question 4]

(Please continue on a separate sheet if necessary)

5. If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions of the examination, although all members of the public may observe the proceedings. Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

Yes

No

6. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary?

(Please continue on a separate sheet if necessary)

**Please sign and date this form:**

Signature [REDACTED] Date:

## Comment

Consultee	mrs kathleen baker (1190919)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	mrs kathleen baker (1190919)
Comment ID	PLPP251
Response Date	02/12/18 17:30
Consultation Point	Policy H8: Small sites next to existing settlements ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? H8

Do you consider that the Local Plan is legally compliant? Yes

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? No

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

The duty to Co operate - Comments are hard to make with the small sites section hidden under the Upton banner.

The plan has so far failed to consider pre-existing controls on development such as AOSB, Conservation area status.

An Online consultation is not sufficient for such a significant change to an area, a minimum consultation should be a road show around each of the areas affected with large scale hard copy maps provided to the public with an opportunity to discuss and comment on the proposals.

The online comments process excludes those without access to the internet or the capability to follow the complicated comments procedure.

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

The scale of the proposal should be reduced by at least 75% to be in proportion with the size of the existing settlement. I would suggest 107 down to 25 and these should be carefully sited to avoid historic and picturesque areas of the village.

The Jurassic Coast AONB is one of the jewels in the Purbeck Areas crown bringing in considerable income from tourist, as well as supporting local seasonal employment. Further excess development would spoil the unique nature of village and have a detrimental effect on the appeal of the area.

Clearly I do understand that additional housing must be built somewhere within Purbeck and Lulworth may have to take its share, but as said the proposed quantity I consider to be excessive.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?**      No

## Comment

<b>Consultee</b>	mrs kathleen baker (1190919)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	mrs kathleen baker (1190919)
<b>Comment ID</b>	PLPP691
<b>Response Date</b>	02/12/18 17:30
<b>Consultation Point</b>	Arrangements for commenting on the Presubmission Purbeck Local Plan timings and next steps ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Are you responding on behalf of a group?</b>	No
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	H8
<b>Do you consider that the Local Plan is legally compliant?</b>	Yes
<b>Do you consider that the Local Plan is sound?</b>	No
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	No

**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)**

The duty to Co operate - Comments are hard to make with the small sites section hidden under the Upton banner.

The plan has so far failed to consider pre-existing controls on development such as AOSB, Conservation area status.

An Online consultation is not sufficient for such a significant change to an area, a minimum consultation should be a road show around each of the areas affected with large scale hard copy maps provided to the public with an opportunity to discuss and comment on the proposals.

The online comments process excludes those without access to the internet or the capability to follow the complicated comments procedure.

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

The scale of the proposal should be reduced by at least 75% to be in proportion with the size of the existing settlement. I would suggest 107 down to 25 and these should be carefully sited to avoid historic and picturesque areas of the village.

The Jurassic Coast AONB is one of the jewels in the Purbeck Areas crown bringing in considerable income from tourist, as well as supporting local seasonal employment. Further excess development would spoil the unique nature of village and have a detrimental effect on the appeal of the area.

Clearly I do understand that additional housing must be built somewhere within Purbeck and Lulworth may have to take its share, but as said the proposed quantity I consider to be excessive.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?**      No



## Comment

<b>Consultee</b>	Michael Baker (1190936)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Michael Baker (1190936)
<b>Comment ID</b>	PLPP274
<b>Response Date</b>	02/12/18 22:08
<b>Consultation Point</b>	Policies List ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Are you responding on behalf of a group?</b>	No
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	H8 Small sites next to existing settlements (West Lulworth)
<b>Do you consider that the Local Plan is legally compliant?</b>	Yes
<b>Do you consider that the Local Plan is sound?</b>	No
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	No

**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)**

This plan has not been well publicised. The small sites section is hidden under the Upton banner.

A proposal for such a significant change requires far wider consultation. Online consultation is not sufficient; many older people who would wish to comment are less Internet aware and would have been put off by the complicated comments procedure.

Face-to-face (village hall style) consultation meetings should be held in the areas likely to adversely impacted by this plan.

The plan does not consider pre-existing controls on development such as AONB and Conservation area status of West Lulworth.

The 8 small sites in West Lulworth when taken together amount to 107 units or around 25% of the additional housing requirement for the whole of the Purbeck area. This is disproportionately high and risks spoiling the unique nature of the village. It is this unique nature that makes the village such a popular tourist destination. Great care needs to be taken to ensure the village retains its appeal as many people and businesses rely on the tourist trade.

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

The scale of the proposal should be reduced considerably. No more than 25 units should be built in West Lulworth and these should be carefully sited to cause the least detrimental effect on the nature of the village.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?**      No

## Comment

Consultee	Mr Ian Bare (1190712)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Ian Bare (1190712)
Comment ID	PLPP143
Response Date	03/12/18 15:33
Consultation Point	Policy H5: Wool ( <a href="#">View</a> )
Status	Processed
Submission Type	Letter
Version	0.3
Files	<a href="#">H5-Bare-PLPP143-redacted.pdf</a>

Are you responding on behalf of a group? No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

The submission of Local Plan to the Secretary of State for Public Examination  
The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report)  
The adoption of the Purbeck Local Plan

Which policy / paragraph number / policies map does your comment relate to? H5

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? No

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

See Attached

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

See Attached

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?**      No



## For Office Use Only

Requester ID: 042  
 Consultee ID: 1190712  
 Comment ID's: PLPP143

**PART B**

1. Which part of the Purbeck Local Plan does your representation relate to? Separate forms must be completed for each separate policy or paragraph you wish to comment on.

Policy number	H 5
Policies map	
Paragraph number	

2. Do you consider that the Local Plan is:

- |   |     |                          |    |                                     |
|---|-----|--------------------------|----|-------------------------------------|
| • Legally compliant                     | Yes | <input type="checkbox"/> | No | <input type="checkbox"/>            |
| • Sound                                 | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> |
| • Complies with the duty to co-operate. | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> |

If your representation relates to how the Council has prepared the Local Plan it is likely to relate to legal compliance. The Plan must:

- comply with Section 20 of the Planning and Compulsory Purchase Act 2004 and other related legislation;
- be in accordance with the Council's Local Development Scheme and Statement of Community Involvement;
- comply with the Town and Country Planning (Local Planning) (England) Regulations 2012, national planning policy and the duty to co-operate in relation to planning of sustainable development (section 110 of Localism Act 2011).

If your representation relates to the content of the Local Plan, it is likely to relate to its soundness. To be considered sound the plan must be:

- positively prepared - providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- 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.

If your representation relates to how the Council has consulted with other relevant bodies during the plan making process, it is likely to relate to how the plan process has complied with the duty to co-operate in relation to the planning of sustainable development.

3. Please give details of why you consider the policy, policies map or paragraph number of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible).

Not being a lawyer I have no knowledge as to the legality of the process.

There is no means of knowing if the areas' needs have been objectively assessed. The Council appear to have followed a government instruction to build more houses and located them in areas which are not logical or practical eg. the lane going South from E. Barton to A352 is totally unsuitable for existing traffic without any further increase arising from the development. To put this right will be costly — who pays ratepayers or developer?

E. Barton Rd is too narrow now especially as a lot of the time time it is used as a car park for houses built recently adjacent to the railway.

470 new houses plus roadways will produce a lot of extra surface water on an already overloaded area. There doesn't seem to have been any properly executed impact assessment concerning the effect this will be of the additional surface water ending up into the already fragile River Win. I am part of a team that monitors ~~the~~ <sup>the</sup> ~~waterway~~ ~~the~~ fauna in this waterway, and yet more contamination getting in to it is not acceptable.

(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 Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text 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)

5. If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions of the examination, although all members of the public may observe the proceedings. Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

Yes

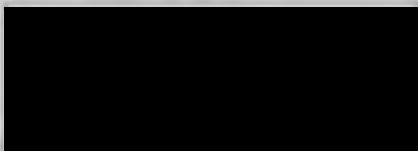
No

6. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary?

(Please continue on a separate sheet if necessary)

**Please sign and date this form:**

Signature:



Date: 01/12/18



## Comment

Consultee	Ms Susan Bedford (1190182)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Ms Susan Bedford (1190182)
Comment ID	PLPP86
Response Date	29/11/18 11:55
Consultation Point	Policy H8: Small sites next to existing settlements ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? 145

Do you consider that the Local Plan is legally compliant? Yes

Do you consider that the Local Plan is sound? Yes

Do you consider that the Local Plan complies with the duty to co-operate? No

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

The local plan has been extremely difficult to find, there has been no help for the older generation to put their point across effectively. It seems that PDC has made it as difficult as possible for residents

to have their say. In fact, both local Councillors Cherry Brooks and Barry Quinn did not even show up to the Parish Council meeting held on Monday evening. You also need an A level to complete this!

## Comment

<b>Consultee</b>	Ms Susan Bedford (1190182)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Ms Susan Bedford (1190182)
<b>Comment ID</b>	PLPP198
<b>Response Date</b>	01/12/18 15:03
<b>Consultation Point</b>	Policy H8: Small sites next to existing settlements ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Are you responding on behalf of a group?</b>	No
<b>If yes, how many people do you represent?</b>	2
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	148
<b>Do you consider that the Local Plan is legally compliant?</b>	Yes
<b>Do you consider that the Local Plan is sound?</b>	No
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	Yes

**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)**

There are 682 residents currently in West Lulworth. 132 are 0-15 yrs, 149 are over 65 yrs leaving 401 residents aged between 16-64 yrs I do not know the differing age groups in between 16-64 suffice to say just by looking around there appears to be more people between the ages of 45-64 than lower. The asking price of a property from November 2017 to November 2018 has seen an average of £400k in West Lulworth. PDC needs to look at the Hedonic Price Approach, the reason for the average house price in West Lulworth may have something to do with 'second home owners' but could also be very much to do with the amenity value associated with proximity to habitats, designated areas, domestic gardens and other natural amenities in the area. This nationwide study looked at the value of proximity to such a wide range of natural amenities in England. Overall, the study concluded that the house market in England revealed substantial amenity value attached to a number of habitats, protected and managed areas, private gardens and local environmental amenities such as West Lulworth. There is a further reason as to why the house prices are high in West Lulworth is that there are only a small number of houses (and obviously houses that come on the market) which makes them a premium.

PDC needs to think about the best way to provide more services and jobs in order to entice young people to live in West Lulworth. Even if PDC introduced affordable housing (which is unlikely with 'small sites') the average house price will be £320k taking the 80% rule which is not feasible for any first time buyer. Purbeck is the least affordable area in the UK where house prices are 14 times the average salary beating London which is 12. Whichever way you look at this, house prices are expensive due to second homes, holiday lets, a shortage of houses and people wanting to live in West Lulworth for health and personal well-being (usually the older generation).

Just supposing young people could afford to live in West Lulworth, outside of the tourist trade there are little or no jobs available for people here unless they are willing to commute further afield and studies suggest that many young people choose to live near their place of work or their place of education. West Lulworth cannot offer more jobs, a university or industry as that is not a reality.

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

Because of the very nature of West Lulworth it's isolation etc the truth is that West Lulworth is not a viable option for additional housing and defeats the governments commitment to provide more housing for the increasing population.

## Comment

<b>Consultee</b>	Ms Susan Bedford (1190182)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Ms Susan Bedford (1190182)
<b>Comment ID</b>	PLPP199
<b>Response Date</b>	01/12/18 15:36
<b>Consultation Point</b>	Policy H11: Affordable housing ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Are you responding on behalf of a group?</b>	No
<b>If yes, how many people do you represent?</b>	2
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	165
<b>Do you consider that the Local Plan is legally compliant?</b>	Yes
<b>Do you consider that the Local Plan is sound?</b>	No
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	Yes

**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)**

There is a reality that when a housing developer gets planning permission they are normally required by the council to make a number of the homes they build officially "affordable". This number varies across the country but is usually between 30 to 50 % and developers will be aware of the requirement before they begin drawing up plans. The less affordable housing a developer builds, the more profit they make, so the developer deploys the viability assessment. This would allow them to go back to PDC and say that the amount of affordable housing they originally agreed is no longer possible.

Developers often blame changes in their costs or lower than anticipated house prices (see Battersea Power Station development), meaning they won't make sufficient profits to build the number of affordable homes originally planned. Their case is strengthened by the fact the law was changed in 2012 to state that the developer must make "competitive returns" (in practice, 20 per cent profit) on the development.

The massive problem here is that you can't scrutinise these really important decisions because, guess what, the viability assessment is private. So affordable homes are being denied to people who really need them right across the country in this way, but local communities, journalists, campaigners and charities like Shelter are not being allowed to question it. And of course, it's those people desperate for an affordable place to live who lose out.

It can be argued that developers are simply following the instinct of most private companies in being competitive and taking the opportunity to make more money. The real issue is that they are allowed to do it so easily in the first place, and keep it a secret.

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

Developers are in the business to make money and the more profit the better. West Lulworth does not need 'new houses' that will ultimately turn into second homes.

## Comment

<b>Consultee</b>	Colin Leslie Beet (1191455)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Colin Leslie Beet (1191455)
<b>Comment ID</b>	PLPP574
<b>Response Date</b>	03/12/18 14:12
<b>Consultation Point</b>	Chapter 4: Housing ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Letter
<b>Version</b>	0.3
<b>Files</b>	<a href="#">Housing-Beet-PLPP574-redacted.pdf</a>
<b>Are you responding on behalf of a group?</b>	No
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	<input type="checkbox"/> The submission of Local Plan to the Secretary of State for Public Examination <input type="checkbox"/> The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report) <input type="checkbox"/> The adoption of the Purbeck Local Plan
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	Housing
<b>Do you consider that the Local Plan is legally compliant?</b>	No
<b>Do you consider that the Local Plan is sound?</b>	No

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?**      No





## For Office Use Only

Requester ID: 0055  
 Consultee ID: 1191455  
 Comment ID's: PLPP574

## PART B

1. Which part of the Purbeck Local Plan does your representation relate to? Separate forms must be completed for each separate policy or paragraph you wish to comment on.

Policy number	SHLAA - Small sites
Policies map	
Paragraph number	

2. Do you consider that the Local Plan is:

- |   |     |                          |    |                                     |
|---|-----|--------------------------|----|-------------------------------------|
| • Legally compliant                     | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> |
| • Sound                                 | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> |
| • Complies with the duty to co-operate. | Yes | <input type="checkbox"/> | No | <input type="checkbox"/>            |

If your representation relates to how the Council has prepared the Local Plan it is likely to relate to legal compliance. The Plan must:

- comply with Section 20 of the Planning and Compulsory Purchase Act 2004 and other related legislation;
- be in accordance with the Council's Local Development Scheme and Statement of Community Involvement;
- comply with the Town and Country Planning (Local Planning) (England) Regulations 2012, national planning policy and the duty to co-operate in relation to planning of sustainable development (section 110 of Localism Act 2011).

If your representation relates to the content of the Local Plan, it is likely to relate to its soundness. To be considered sound the plan must be:

- positively prepared - providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- 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.

If your representation relates to how the Council has consulted with other relevant bodies during the plan making process, it is likely to relate to how the plan process has complied with the duty to co-operate in relation to the planning of sustainable development.

3. Please give details of why you consider the policy, policies map or paragraph number of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible).

Legal compliance - Only heard about publication period for consults today (3 December 2018) closing date. Did not hear anything prior to this. Not even from Parish Council. Therefore Council did not ensure everyone was consulted.

Sandness -

SHAA small site in Withfrith Newburgh - Adj. to Thorncliffe is unsuitable for development. In order to gain access to the site, a bridge over the River Win must be negotiated making it unsuitable for development.

If starting to build on land next to river, this could create flooding issues. ~~My insurance~~ Currently ~~the~~ my property is deemed to be at risk of flooding by the insurance companies and they will not quote for insurance.

(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 Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support/justify the representation. (Please be as precise as possible)

Suggest unsuitability of ~~A~~ small site adj; to  
Thornicks -

(Please continue on a separate sheet if necessary)

5. If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions of the examination, although all members of the public may observe the proceedings. Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

Yes

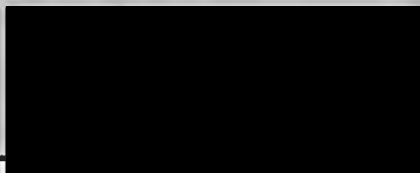
No

6. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary?

(Please continue on a separate sheet if necessary)

**Please sign and date this form:**

Signature:



Date: 3 December 2018

## Comment

<b>Consultee</b>	Colin Leslie Beet (1191455)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Colin Leslie Beet (1191455)
<b>Comment ID</b>	PLPP574 PLPP678
<b>Response Date</b>	03/12/18 14:12
<b>Consultation Point</b>	Arrangements for commenting on the Presubmission Purbeck Local Plan timings and next steps ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Letter
<b>Version</b>	0.2
<b>Files</b>	<a href="#">Housing-Beet-PLPP574-redacted.pdf</a>
<b>Are you responding on behalf of a group?</b>	No
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	<input type="checkbox"/> The submission of Local Plan to the Secretary of State for Public Examination <input type="checkbox"/> The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report) <input type="checkbox"/> The adoption of the Purbeck Local Plan
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	Housing
<b>Do you consider that the Local Plan is legally compliant?</b>	No
<b>Do you consider that the Local Plan is sound?</b>	No

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?** No



If your representation relates to how the Council has consulted with other relevant bodies during the plan making process, it is likely to relate to how the plan process has complied with the duty to co-operate in relation to the planning of sustainable development.

3. Please give details of why you consider the policy, policies map or paragraph number of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible).

Legal compliance - Only heard about publication period for consults today (3 December 2018) closing date. Did not hear anything prior to this. Not even from Parish Council. Therefore Council did not ensure everyone was consulted.

Sandness -

SHAA small site in Withfrith Newburgh - Adj. to Thorncliffe is unsuitable for development. In order to gain access to the site, a bridge over the River Win must be negotiated making it unsuitable for development.

If starting to build on land next to river, this could create flooding issues. ~~My insurance~~ Currently ~~the~~ my property is deemed to be at risk of flooding by the insurance companies and they will not quote for insurance.

(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 Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support/justify the representation. (Please be as precise as possible)

Suggest unsuitability of ~~A~~ small site adj; to  
Thornicks -

(Please continue on a separate sheet if necessary)

**5. If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?** Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions of the examination, although all members of the public may observe the proceedings. Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

Yes

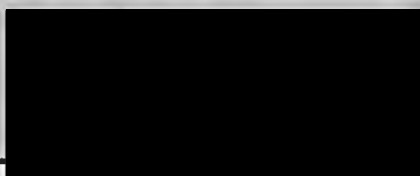
No

**6. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary?**

(Please continue on a separate sheet if necessary)

**Please sign and date this form:**

Signature:



Date: 3 December 2018

## Comment

<b>Consultee</b>	mrs dawn bellin (1188536)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	mrs dawn bellin (1188536)
<b>Comment ID</b>	PLPP74
<b>Response Date</b>	28/11/18 20:22
<b>Consultation Point</b>	Policy H8: Small sites next to existing settlements ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Are you responding on behalf of a group?</b>	No
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	145-150
<b>Do you consider that the Local Plan is legally compliant?</b>	No
<b>Do you consider that the Local Plan is sound?</b>	No
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	No

**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)**

Clearly West Lulworth is totally unsuitable to sustain an influx of 107 units. The village being a holiday destination for the thousands, the roads are totally at a gridlock during the summer. The sites suggested

would seriously affect the visual outlook to an area of outstanding natural beauty. There is also no supporting infrastructure to support this proposal.

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

The policy "adjacent to villages" is not providing sufficient protection for high designation locations within an AOB and needs to be reconsidered.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?** No

## Comment

<b>Agent</b>	Mr Mark Harris (1188715)
<b>Email Address</b>	[REDACTED]
<b>Company / Organisation</b>	Bidwells
<b>Address</b>	John Ormond Hosue 899 Silbury Boulevard Milton Keynes MK9 3XJ
<b>Consultee</b>	(1191125)
<b>Company / Organisation</b>	Bellway Homes Ltd and A & F Baggs
<b>Address</b>	Level 36 One Canada Square London E14 5AA
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Bellway Homes Ltd and A & F Baggs ( - 1191125)
<b>Comment ID</b>	PLPP378
<b>Response Date</b>	03/12/18 14:52
<b>Consultation Point</b>	Policy V1: Spatial strategy for sustainable communities ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Files</b>	Landscape Briefing Note
<b>Are you responding on behalf of a group?</b>	No
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	Policy V1
<b>Do you consider that the Local Plan is legally compliant?</b>	Yes

**Do you consider that the Local Plan is sound?** No

**Do you consider that the Local Plan complies with the duty to co-operate?** Yes

**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)**

### **Introduction**

Policy V1 sets out the land allocations which will be made as part of the 'vision' for Purbeck. The strategy includes four new allocations at Moreton Station (490 homes), Wool (470 homes) Lytchett Matravers (150 homes) and Upton (90 homes). The policy also clarifies that the proposed Neighbourhood Plan allocations in Wareham (200 homes on allocated sites plus 100 windfall) and in Bere Regis (105 homes) form part of the overall strategy to meet identified housing need.

These allocations are then subject to more detailed policies later in the plan, which we have addressed in separate submissions.

Our view is that policy V1 is unsound as the spatial strategy:

a) fails to reflect the Settlement Hierarchy set out in the Glossary to the Local Plan. This settlement hierarchy includes Wareham as one of three 'towns' at the top tier – it is therefore identified as one of the most sustainable locations for growth. By not allocating development in accordance with the settlement hierarchy, the plan has not been positively prepared in accordance with the principles of sustainable development set out in the Framework.

b) is not justified by the proper consideration of reasonable alternatives;

c) is not based on a robust evidence base prepared by the Local Planning Authority (LPA); and

d) is ineffective as it does not set out a strategy which will deliver the full housing requirement for the district.

These issues are addressed in turn below.

### **Sustainable development**

Swanage is the largest settlement in Purbeck and is the subject of a recently adopted Plan which sets out how 200 homes will be built in the town by 2027 as part of 960 dwellings in the South East of the District (the majority of which are expected to be built in Swanage – Swanage Local Plan paragraph 134). 50 of these homes were allowed on appeal, prior to the adoption of the plan meaning the plan makes specific provision for 150 new dwellings with the remainder, it is assumed, to be windfall development. Given this plan was adopted in 2017, logically, Swanage is not subject to any additional allocations in the Purbeck Local Plan.

Wareham (population of 5,496) sits alongside Upton as the other two main 'towns' in the District. Both have limited levels of growth allocated to them in the Pre-Submission version of the Plan despite 49% of the district's population being located in these settlements (plus Swanage). Overall just 24.6% of allocated development (excluding the assumed windfall allowance in the emerging Wareham Neighbourhood Plan) is directed to the most sustainable locations in the district over the plan period – in principle this is not considered to be a sustainable approach as it directs 75.4% of all allocated development to smaller, less sustainable settlements. Such an approach is contrary to the thrust of the National Planning Policy Framework, 2018 (the 'NPPF') particularly chapter 9 (Promoting sustainable transport) and chapter 7 (Ensuring the vitality of town centres).

At Preferred Options (Regulation 18) stage (June 2016), land West of Wareham was included within the preferred spatial strategy as a site for 500 dwellings. However, in the Pre-Submission version of the plan, development in Wareham is limited to the proposed allocations in the Neighbourhood Plan plus an allowance for windfall development over the plan period (300 units in total). The rationale for this change in strategy, effectively halving the level of development to be directed to one of the District's most sustainable locations, in our view, does not appear to be clearly justified by the evidence presented, other than there is local support for such an approach (evidence is covered in more detail below).

The Plan has to make decisions about a significant amount of growth within the District and as part of this, given the settlement hierarchy, we would expect for there to be more detailed justification as to why development cannot be accommodated in and around Wareham rather than effectively deferring to the limited allocations in the Neighbourhood Plan.

It would be expected that the town would take to take a proportion of the growth representative to its role. However, just 11% percent of growth is directed to the town, limited to the Neighbourhood Plan allocations.

The Housing Background Paper sets out that the development of the options was in part guided by the Sustainability Appraisal (SA) process. Paragraph 1.14 of the SA confirms that:

*Several aspects of the Plan have been through previous SA assessments where other reasonable and non-reasonable options have been explored and discounted, notably the spatial strategy as part of the SA of the New Homes for Purbeck Consultation of January 2018.*

The SA of the Spatial Strategy for growth is a key part of the evidence underpinning policy V1 yet it does not appear to be included with the background documents published as part of the pre-submission consultation. Given this omission, it is unclear whether the options presented, including the option taken forward in the Pre-Submission Plan, are 'sustainable' and what measures have been included to mitigate any negative impacts. The SA has focused on sites rather than the overall strategy and therefore a key part of the evidence base and justification for the strategy is missing.

As is set out later in this representation, growth at Wareham is significantly more sustainable than growth at Moreton Station, for example, and it is unclear how the LPA have come to the view, based on the evidence, that the current strategy is the most appropriate available to them.

### **The consideration of reasonable alternatives**

The Housing Background Paper (paragraph 68) confirms that in early 2018:

*Three options were proposed, taking account of constraints across the district, which could provide enough homes to address housing need.... Each of the options consulted upon offered an opportunity to achieve sustainable development, was consistent with national policy and does not have significant impact that outweighs the benefits of development (guided by the EICS and SA).*

The three options were:

- a) Spread of development as wide as possible, releasing some areas of less important green belt in the less constrained west of the District and on small sites. This option includes 470 homes at Wool, 440 homes at Redbridge Pit, 90 homes at Upton, 150 homes at Lytchett Matravers and 250 homes on smaller sites across the District.*
- b) The majority of development is focused on two main sites to the west of the District and on small sites. This option includes 650 homes at Wool, 500 homes at Redbridge Pit and 250 homes on smaller sites across the district.*
- c. Development is concentrated on two main sites to the west of the District. This option includes 800 homes at Wool and 600 homes at Redbridge Pit/Moreton Station.*

These options do not include the option for development to be focused on Wareham. No specific justification is given within the Housing Background Paper for removing land West of Wareham from the Plan, nor for limiting the level of development in one of the most sustainable settlements in the District, although paragraph 63 sets out that:

*Sites within the AONB and green belt were not selected unless the Council was satisfied that there are exceptional circumstances for housing development on the site.*

Paragraph 64 also sets out that:

*In preparing the options in the January 2018 New Homes for Purbeck consultation, there was an important recognition that development would be focused to the west of the District, where the potential land for housing is less constrained.*

Paragraph 65 goes on to state that:

*A further consideration in terms of preferred sites to be allocated in the Local Plan was the relationship between the sites and existing employment and the opportunity to support sustainable travel.*

Given LPA support for development West of Wareham at early consultation stages, the role of the town and the relationship with Poole/Bournemouth to the east (the major employment location in the area) we would have expected to see an option which assessed that focused additional development at Wareham, even give the constraints of AONB (covered in more detail below) and Green Belt.

The LPA may suggest that the future development of Wareham has been dealt with by the Wareham Neighbourhood Plan, However, our client's site lies outside of the designated Neighbourhood Plan area and cannot be considered as an allocation in this plan.

Not to give due consideration to increasing the level of development at Wareham means that the plan is unsound due to the lack of consideration of all reasonable alternatives.

### **Deficiencies in the Evidence Base**

Alongside the SA, the other key piece of evidence used to justify the strategy is the Strategic Housing Land Availability Assessment (SHLAA).

The role of the SHLAA is set out in the Planning Practice Guidance (ref ID: 3-003-20140306) which states:

*is the role of the assessment to provide information on the range of sites which are available to meet need, but it is for the development plan itself to determine which of those sites are the most suitable to meet those needs. (our emphasis underlined).*

Our client's site is referenced as SHLAA/0088. The site is listed in a section of the document titled Sites currently 'Unsuitable for Development' The conclusion on the site (SHLAA, page 132) is:

*Unsuitable in principle because site is not closely related to Wareham and no exceptional circumstances for major development in the Dorset Area of Outstanding Natural Beauty (AONB).*

The assessment goes on to reiterate that there is no opportunity to overcome the 'problem' (which is the location in the AONB), which is also identified as a constraint. The Assessment goes on to state that:

*There are no exceptional circumstances as alternative housing sites in sustainable locations (are available) outside the AONB.*

The SHLAA therefore effectively rules out further consideration of the site as part of the development strategy as it is considered unsuitable by virtue of its location in the AONB.

In drawing this conclusion, the SHLAA goes beyond the established role of the assessment process, which is to assess sites and provide a list from which plan making decisions can be made. It is not for the SHLAA to make decisions between sites or establish whether there are exceptional circumstances for major development in the AONB. These are separate parts of the plan making process.

There are two other main issues with this assessment and the conclusions drawn. Firstly, AONB is not an 'in-principle' constraint to development. The fact that there are criteria in the NPPF that allow the release of land in exceptional circumstances confirms this; a point noted several times in chapter 5 of the Environment and Infrastructure Capacity Study (EICS) (October 2017) and is also noted at paragraph 69 of the Partial Review Options Consultation Report (January 2017).

This EICS does not look at the landscape qualities of specific sites in the AONB, suggesting the LPA are in the process of carrying out a separate report. We assume this is the AONB Background Paper (January 2017). This report is not in the list of supporting evidence documents available on the Council webpage, so we assume it is no longer being relied upon to support the preparation of the Plan. The supporting evidence also does not include a Landscape Assessment, which would be a key to considering the specific impacts of development on the qualities of the AONB.

In light of the lack of site specific evidence, the EICS assumes all land in the AONB is 'highly sensitive' to development. This conclusion has been inappropriately carried through the development of the plan and seemingly applied to all sites in the AONB without proper, evidenced consideration as to their specific sensitivity to development.

Appended to this representation is a note prepared by Aspect Landscape Planning Consultants which established how development could be incorporated on land West of Wareham without harming the intrinsic value of the wider AONB. This follows on from previous advice provided to the LPA during a previous stage of consultation, which set out the view that harm to the landscape could largely be



mitigated. Given that there is no other technical evidence to the contrary, it is considered that the conclusion in the SHLAA that the site is unacceptable 'in-principle' is not justified.

The second major issue with the SHLAA is the conclusion that there are no exceptional circumstances to justify major development in the AONB as there are sustainable sites elsewhere in the district. Whilst it is our view that it is not for the SHLAA to establish if there are exceptional circumstances (see later discussion), this conclusion is not properly justified by evidence.

The conclusion is at odds with the conclusion on exceptional circumstances for Green Belt release, set out in the Green Belt Study (October 2018). Whilst it is acknowledged that Green Belt and AONB perform different functions, both are subject to 'exceptional circumstances' tests. In the Green Belt study, in setting out the exceptional circumstances for Green Belt it is stated that:

- 1 ...removing land from the Green Belt around Wareham will focus new homes in sustainable locations where new residents would be able to access existing services and facilities (paragraph 64)
- 2 The SANGs around Lytchett Matravers and Wareham will act as compensation which will help to offset the loss of the green belt land (paragraph 76)

The Green Belt study sets out clear and logical reasons for Green Belt release – but at no point can we see that a proper assessment of whether there are exceptional circumstances to justify major development in the AONB.

For plan making, our view is that such an assessment cannot be carried out on a site by site basis – it is best considered across the District as a whole before site specifics are covered.

The NPPF, paragraph 172 sets out the factors that should be looked at when considering whether exceptional circumstances exist for major development in the AONB, these include:

- a) *the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;*
- b) *the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and*
- c) *any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.*

The need to allocate land for 1,700 additional homes across the District is a challenge given there are a number of constraints and factors that need to be considered, particularly the need to accommodate the development sustainably. The AONB Background Paper (January 2017) referred to above essentially concludes that there are no exceptional circumstances for major development in the AONB because there are sustainable alternative sites available elsewhere. We have already addressed sustainability issues above, but to reiterate we do not consider that all of the sites included in the Plan are sustainable – or as sustainable as land West of Wareham. We also consider that there are a number of considerations that should be looked at in balancing whether there are exceptional circumstances – this necessitates a full review of the characteristics of an area, not just the availability of land elsewhere.

Key to consideration of whether there are exceptional circumstances is the level of constraint that environmental designations put on the opportunities for development. As noted in the Pre-Submission Plan (paragraphs 23-25), 20% of the district is covered by national and international designations including Special Protection Areas, Special Areas of Conservation or Ramsar sites. The southern half of the district of the district is covered by AONB. This includes land around a number of settlements, such as Wareham. A large area in the north of the District is also covered by Green Belt. Without consideration of land within the AONB, the options for accommodating development needs sustainably are very limited and are likely to have negative social and economic implications. This view is similar to that drawn by the LPA in relation to the justification for Green Belt release noted earlier.

The Pre-Submission Plan (at paragraph 35) notes that many residents look to the Poole/ Bournemouth area, to the east of the District, for work and shopping. Paragraph 37 goes on to state that some facilities in Purbeck's towns and villages have struggled to remain open and the accessibility to facilities and services is a key issue in many parts of the District.

Given the area to the east of the district is the best located from an economic and social position, yet is the most constrained in environmental terms, it is suggested that this contributes to a case for exceptional circumstances.

Added to this, it is also our contention that the need to support the role of larger settlements, such as Wareham, and their position as centres for their wider rural hinterland (as supported by paragraphs 78 and 85 of the NPPF) further adds to the case, particularly as the Plan suggests some centres in the District have been struggling.

Directing minimal growth to the most sustainable settlements means that other, less sustainable development locations have to be selected. Not only does the allocation of such sites have potentially negative and social and economic impacts, it also increases the need to travel, increases pollution and is also less viable, given the need for significant investment in off-site infrastructure to improve their accessibility. This further adds to our view that there is a case for considering development in the AONB as part of the development strategy.

Finally, the release of a large site in the AONB, near to Wareham, has the potential to also deliver a significant area of SANGS. It is our view that this provision, which can be designed and landscaped to provide an appropriate setting for development, would limit any harm to the qualities of the AONB and enhance opportunities for recreation within the area.

In summary, our position is that there are exceptional circumstances for major development in the AONB. This is justified by:

- 1 The level of development that has to be found in the District,
- 2 The level of restriction created by AONB and Green Belt across the District,
- 3 The potential sustainability benefits of developing in the east of the District, which is largely constrained by AONB and Green Belt
- 4 The unsustainable characteristics of other locations in the district, particularly the poor relationship to services and facilities,
- 5 The costs associated with infrastructure upgrades in less sustainable locations
- 6 The NPPF focus on supporting town centres (paragraph 85); and
- 7 The impact that the proposed strategy will have on the character of smaller, lower order settlements.
- 8 The ability of major sites to provide wider benefit, including landscape enhancements, that would mitigate harm to the qualities of the AONB.

For the Council not to have carried out an assessment of this nature, we believe is a major flaw in the evidence base and means that the plan is unsound as it is not justified by a robust evidence base. The implications of not carrying out such an assessment have led to a number of options put forward for consideration, including our client's land West of Wareham, not being adequately assessed as part of the plan making process.

We would also note that the Part 2 Local Plan for Swanage allocates development on the edge of the town in the AONB. Whilst the Plan does not set out what the exceptional circumstances are for this, given that Swanage is at the same level of the settlement hierarchy as Wareham, the LPA's approach appears to be inconsistent leading us to further question the justification of the set out in the evidence.

### **Meeting full housing need**

Separate representations are made in relation to policy H1, which sets out the housing requirement of 2,688 dwellings across the district. This is a minimum requirement to meet need established through the Standard Methodology. As noted in response to policy H1, this figure may increase should the Local Plan not be submitted prior to the revised Standard Methodology being published by the Government.

Setting this point aside, it is essential that the Local Plan makes allocations that will deliver 2,688 dwellings over the plan period. To this end, the Pre-Submission Plan does not appear to include any flexibility or contingency to allow for under-delivery on individual sites.

It is normal practice for Local Plans to provide a buffer in land supply to allow for this and increase the probability of the minimum housing requirement to be met.

We would suggest that to be effective, land for a further 270 homes (10% of the requirement) needs to be identified within the Spatial Strategy set out in policy V1.

### **Implications for the Plan**

Of particular concern is the decision to allocate land at Moreton Station (covered in more detail in response to policy H4) which at 490 dwellings, makes a similar contribution in terms of housing numbers as land West of Wareham would.

This site is located near to the village of Crossways in West Dorset. Crossways is limited in terms of services and facilities with a small shop, post office and first school. It is isolated from the major source of employment to the east of the district in Poole and Bournemouth and is also 10km from both middle and secondary schools (at Puddletown and Dorchester). The site has a no physical relationship to the town, requires significant investment in offsite infrastructure and also has uncertain deliverability given the ongoing mineral extraction being undertaken on site.

Given the lack of consideration of reasonable alternatives, the flaws in the evidence base and our view that the development strategy set out in policy V1 will lead to unsustainable development, our position is that the Plan is unsound unless further work is carried out to justify the decisions made.

Once this work is carried out, it is our belief that land West of Wareham will be identified as one of the most appropriate locations for development and should be included as an allocation in a modification to policy V1.

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

A full review of the evidence base needs to be undertaken in line with our comments to properly establish the most sustainable development strategy for the District. This should expressly consider the option of additional growth at Wareham to allow comparison to the allocations currently proposed.

Notwithstanding the need for the LPA to revisit the evidence base and the justification for the strategy, land for at least a further 270 dwellings needs to be identified to ensure the effectiveness of the policy.

**If you have any supporting documents please upload them here.**

Landscape Briefing Note

Landscape Briefing Note

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?**

Yes

**If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?**

To participate a technical discussion about the various parts of the evidence base, in particular issues around the AONB.

## Comment

<b>Agent</b>	Mr Mark Harris (1188715)
<b>Email Address</b>	[REDACTED]
<b>Company / Organisation</b>	Bidwells
<b>Address</b>	John Ormond Hosue 899 Silbury Boulevard Milton Keynes MK9 3XJ
<b>Consultee</b>	(1191125)
<b>Company / Organisation</b>	Bellway Homes Ltd and A & F Baggs
<b>Address</b>	Level 36 One Canada Square London E14 5AA
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Bellway Homes Ltd and A & F Baggs ( - 1191125)
<b>Comment ID</b>	PLPP383
<b>Response Date</b>	03/12/18 14:57
<b>Consultation Point</b>	Policy H1: Local housing requirement ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Are you responding on behalf of a group?</b>	No
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	H1
<b>Do you consider that the Local Plan is legally compliant?</b>	Yes
<b>Do you consider that the Local Plan is sound?</b>	No

**Do you consider that the Local Plan complies with the duty to co-operate?** Yes

**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)**

The minimum housing requirement of 2,688 is based on the use of the Government's Standard Methodology. This methodology currently gives a requirement for 168 dwellings per year.

However, the Government is currently consulting on revisions to the Standard Methodology and we calculate that if the revised methodology were to be adopted ahead of the Local Plan being submitted for examination, the annualised requirement of the plan would be required to provide for would increase to 180 dwellings per year. Over the 16-year plan period, this would equate to an overall increase in the minimum requirement of 192 dwellings.

Given the size of the housing requirement, this represents a significant increase and should the revised Standard Methodology be adopted prior to submission of the Plan, given there is no buffer or flexibility currently built into the plan (see representation on Policy V1) modifications will need to be proposed in the form of additional land allocations otherwise the plan will be ineffective as it will not support the delivery of the minimum housing requirement.

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

Should the Plan not be submitted prior to the revised Standard Methodology being published for use, the Plan requires the addition of land for at least 192 dwellings.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?** Yes

**If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?**

To update on and discuss the current policy position with regards to establishing the housing requirement

## Comment

<b>Agent</b>	Mr Mark Harris (1188715)
<b>Email Address</b>	[REDACTED]
<b>Company / Organisation</b>	Bidwells
<b>Address</b>	John Ormond Hosue 899 Silbury Boulevard Milton Keynes MK9 3XJ
<b>Consultee</b>	(1191125)
<b>Company / Organisation</b>	Bellway Homes Ltd and A & F Baggs
<b>Address</b>	Level 36 One Canada Square London E14 5AA
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Bellway Homes Ltd and A & F Baggs ( - 1191125)
<b>Comment ID</b>	PLPP389
<b>Response Date</b>	03/12/18 15:02
<b>Consultation Point</b>	Policy H2: The housing land supply ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Are you responding on behalf of a group?</b>	No
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	Policy H2
<b>Do you consider that the Local Plan is legally compliant?</b>	Yes
<b>Do you consider that the Local Plan is sound?</b>	No

**Do you consider that the Local Plan complies with the duty to co-operate?** Yes

**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)**

Successful delivery of the plan relies upon a significant proportion of housing from windfall, consisting of:

- 1 933 units from small sites next to existing settlements and windfall within existing settlements (excluding Wareham).
- 2 100 units in the Wareham Neighbourhood Plan.

This is a total of 1033 units, or 38.4% of the total Local Plan allocation.

NPPF Section 5 Delivering a Sufficient Supply of Homes Paragraph 70 states that where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Windfall is defined as sites not specifically identified in the development plan.

The council's Housing Background Paper October 2018 Paragraph 104 states that a maximum number of 49 windfall units should be considered in the local plan. However, evidence in Figure 2 of the same document shows a clear decline in the number of windfall homes delivered in the area over the previous 10 years, and should this trend continue, it is possible that this figure may not be reached. It is noted that the LPA refers to the reduced trend of windfall since 2014 as a 'temporary dip', however 4 years is a sufficiently significant period to consider this a more permanent trend.

The plan aims to demonstrate housing delivery over a 17-year period (2018 to 2034), which means that the plan is relying on approximately 61 units per year as windfall. If the LPA's maximum suggested figure of 49 units per annum is used, this could leave them vulnerable to under-delivery of circa 200 homes by the end of the plan period.

It is noted that the LPA differentiates between 'windfall' and 'small sites'. However, it is not clear that the LPA has demonstrated the compelling evidence for 1033 windfall units, as is required by the NPPF.

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

To be effective the Plan should reduce of the quantity of predicted windfall to a maximum of 49 units per annum (833 units in total), and the shortfall (circa 200 homes) made up with sites specifically identified in the Local Plan.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?** Yes

**If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?**

To partake in any discussion around the deliverability of sites and the windfall allowance

## Comment

<b>Agent</b>	Mr Mark Harris (1188715)
<b>Email Address</b>	[REDACTED]
<b>Company / Organisation</b>	Bidwells
<b>Address</b>	John Ormond Hosue 899 Silbury Boulevard Milton Keynes MK9 3XJ
<b>Consultee</b>	(1191125)
<b>Company / Organisation</b>	Bellway Homes Ltd and A & F Baggs
<b>Address</b>	Level 36 One Canada Square London E14 5AA
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Bellway Homes Ltd and A & F Baggs ( - 1191125)
<b>Comment ID</b>	PLPP393
<b>Response Date</b>	03/12/18 15:06
<b>Consultation Point</b>	Moreton Station / Redbridge Pit - 490 homes, 65 bed care home and SANG ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Are you responding on behalf of a group?</b>	No
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	Policy H4
<b>Do you consider that the Local Plan is legally compliant?</b>	Yes



Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? Yes

**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)**

We have provided separate representations on the Spatial Strategy and policy V1 which touched upon issues with the allocation of land at Moreton Station. The comments below are specifically on the suitability of the identified land for development and should be read alongside the objections to policy H1.

The site represents the largest single allocation of housing in the Pre-Submission Plan at 490 units, or around 30% of the required land to be found by the LPA. This allocation is made despite the ranking of Moreton Station in the settlement hierarchy (a key service village – the second tier of the hierarchy below the main towns), and limited availability of local services.

Under the existing Local Plan Policy LD Settlement Hierarchy (adopted in 2012), Moreton Station is included in the category 'Other Villages with a Settlement Boundary', reflecting the current status of the settlement and access to services and facilities. The LPA are proposing to elevate the role of the village as a result of the allocation of 490 homes

However, aside from requiring payments to enhance existing offsite local facilities, which are somewhat disconnected from the site, the policy does little to enhance service provision in the area, which in our view would be essential for the site to be considered sustainable. Whilst the policy sets out that the allocation is for 490 dwellings plus community facilities and supporting infrastructure, there are no specific requirements for the site. In our view it is likely that the site will be developed with limited facilities and will become a car dependant dormitory housing estate, from where residents are bound to travel significant distances to settlements such as Dorchester, Weymouth, Poole and Bournemouth, for day to day services, including shopping and work. This is not a sustainable solution.

This allocation of the site is therefore non-compliant with NPPF Section 9 'Promoting Sustainable Transport' (Paragraph 103), which states:

*"Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health."*

Moreton Station's lack of key services, including an upper school and significant employment and leisure opportunities, means that it fails to comply with the intention of national transport planning policy guidance, which is to limit the need to travel.

While Moreton Station has a rail station, it is a minor station; for example, there is a reduced service of one train per hour each way between 8am and 8pm Monday to Friday (unlike Wareham, Dorchester and Poole stations, which have two trains per hour).

Car travel towards larger settlements (Dorchester to the West, and Wareham/Poole/Bournemouth to the East) requires residents to drive on minor roads for much of the journey, some of which include single-track sections (options include 3.4 miles via B3390 via Warmwell, 5 miles via West Stafford, or 4.9 miles via East Burton Road). Bus travel options are also limited and the policy does not require services to be enhanced, which will further exacerbate use of private cars.

The site is located within an existing area of gravel extraction, which is not due to be completed until 2022. Depending on demand, this ongoing extraction may delay start on site, making delivery of the site within the plan period questionable. The nature of the site could result in potential structural settlement, land contamination and flooding issues which may increase construction costs, which are likely to suppress the ability to provide affordable housing, and the delivery of off-site infrastructure improvements.

As covered in response to policy V1, major development would more appropriately be focused on larger, more sustainable settlements in the district, including Wareham.

By way of comparison, an alternative proposal for 500 houses on the 'West of Wareham' site (referred to previously) would provide good access to Wareham town centre, ensuring compliance with NPPF Paragraph 85; good transport links, including an accessible rail station and good access to the strategic highway network, and an abundance of key local services (e.g. lower and upper schools, supermarkets, leisure centre), ensuring compliance with NPPF Chapter 9. The site also has the ability to deliver a large area of Suitable Alternative Green Space (SANG) which would be more than sufficient to mitigate against adverse impacts of the development on European protected sites and be an asset for the wider area. Any issues with the connectivity of this site could be dealt with through detailed design.

If Moreton Station is the most sustainable option for development the LPA can find, as we have set out in response to policy V1, there is clearly a case for exceptional circumstances and the consideration of development on land which currently has not been given due consideration.

The benefits of developing in Wareham instead of Moreton Station clearly outweigh any perceived negative impacts on the qualities of the AONB, which we have shown can be mitigated.

If a proper assessment of alternatives is considered, it is our view that land West of Wareham will be viewed favourable and would replace Moreton Station as an allocation for 490 homes.

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

Deletion of policy H4 and replacement with a policy setting out the requirements and constraints on development on land West of Wareham, which is a more suitable and sustainable location for major growth.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?** Yes

**If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?**

Do discuss our comments with the Inspector and partake in any discussions regarding the merits of the site in relation to alternative options.

## Comment

<b>Agent</b>	Mr Mark Harris (1188715)
<b>Email Address</b>	[REDACTED]
<b>Company / Organisation</b>	Bidwells
<b>Address</b>	John Ormond Hosue 899 Silbury Boulevard Milton Keynes MK9 3XJ
<b>Consultee</b>	(1191125)
<b>Company / Organisation</b>	Bellway Homes Ltd and A & F Baggs
<b>Address</b>	Level 36 One Canada Square London E14 5AA
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Bellway Homes Ltd and A & F Baggs ( - 1191125)
<b>Comment ID</b>	PLPP396
<b>Response Date</b>	03/12/18 15:08
<b>Consultation Point</b>	Policy H14: Second homes ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Are you responding on behalf of a group?</b>	No
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	Policy H14
<b>Do you consider that the Local Plan is legally compliant?</b>	Yes
<b>Do you consider that the Local Plan is sound?</b>	No

**Do you consider that the Local Plan complies with the duty to co-operate?** Yes

**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)**

The LPA proposes that all new housing within the AONB will be supported only where there is a restriction in perpetuity to ensure that these homes are occupied as a principal residence. This approach is not justified by the evidence base presented by the LPA.

The justification set out in the Second Homes Evidence Paper is that second home ownership levels are between 7.3% (based on Council Tax data) and 8.69% (based on Electoral Roll Data), which is above the regional average of 6.6% and the national average of 4.4%.

It is our view that at 7.3%, the levels of second home ownership generally across Purbeck are not significantly out of kilter with the regional average (0.7% difference, or 1 additional home in every 143), so the policy is disproportionate.

Furthermore, while the policy may be justifiable for individual dwellings or small windfall development, or for particular areas such as Studland or Chaldon Herring, where the evidence shows second home levels are significantly higher, it is not justified in areas such as Wareham, where second home ownership is below the national average (Second Homes Evidence Paper, take 5) or where major development is proposed, such as that proposed West of Wareham, which is on the edge of the AONB (and would therefore be caught by the policy restraint).

The policy risks introducing unnecessary bureaucracy, and could result in making it more challenging for people who are moving from elsewhere to live in Purbeck and contribute to the local economy (for example, selling an existing home to move to this area, or someone purchasing a property to provide short-term rental accommodation for an interim period).

It is therefore recommended that the policy be deleted, or modified to focus on preventing second home ownership for smaller windfall development in those locations where second home ownership is an issue, which is likely to be those traditional villages nearest to the coast.

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

Delete the policy or amend to limit second home ownership to those locations where second home ownership is evidenced as being an issue in the District.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?** Yes

**If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?**

To discuss any possible amendments to the policy

# Landscape Briefing Note

---

Bellway Homes & A & F Baggs – Land at Worgret Manor Farm,  
Wareham

30<sup>th</sup> November 2018

---

## 1 Introduction

- 1.1. Aspect Landscape Planning Ltd have been instructed by Bellway Homes Ltd and A & F Baggs to review landscape and visual matters relating to the site at Worgret Manor Farm, Wareham as part of the submissions to the Pre-submission draft of the Purbeck Local Plan.
- 1.2. The purpose of this Briefing Note is to provide a review of landscape and visual issues relating to the site and to provide a judgement in terms of appropriateness of developing this site from a landscape perspective.

## 2 Background

- 2.1. It is noted that the site was promoted in the 2016 Purbeck District Council SHLAA. The assessment identified that the site (ref: 6/02/0170) was located within the Dorset AONB but rather than dismissing the site it concluded that further work was required to assess potential landscape issues.
- 2.2. Within the October 2018 SHLAA, the site is again assessed (ref: SHLAA/0088) but this time is dismissed on the grounds that there are no exceptional circumstances to justify major development in the AONB. This is obviously a change of position since the 2016 version of the document. It does not appear to be based on any detailed, qualitative assessment. It must be noted that within the assessment of the site, it is noted (at page 135) that the Council's Senior Landscape Architect has suggested that it might be possible to mitigate some of the potential detrimental landscape effects which suggests that the principle of development on at least part of this site could be acceptable from a landscape perspective.
- 2.3. It is noted that an AONB Background Paper was prepared in January 2018, however, this is not referenced in the 2018 SHLAA and is not currently available on the PDC website. Aspect has however seen a copy of the report and note the conclusions regarding landscape impacts. Notably, it seems that the Dorset AONB Partnership consider the site is unable to successfully accommodate development without detrimental harm to the character and views within the AONB. It is not clear how the AONB Partnership reached these conclusions and whether their assessment was based on GLVIA3 guidance.
- 2.4. Barton Willmore also prepared a technical note (dated July 2016) on behalf of the landowner which was submitted as part of the previous representations. The assessment undertakes a detailed assessment of the site and its capacity to accommodate residential development using an appropriate methodology based on GLVIA3 which is the landscape industry's best practice guidance. The Barton Willmore technical note forms a robust assessment and Aspect

concur with the conclusions that the site has the capacity to accommodate sensitively designed residential development. In particular, Aspect agree with the conclusions at 6.13 and 6.14 of the Barton Willmore Technical Note that the proposals will not “affect the outstanding environmental quality of the Dorset AONB”.

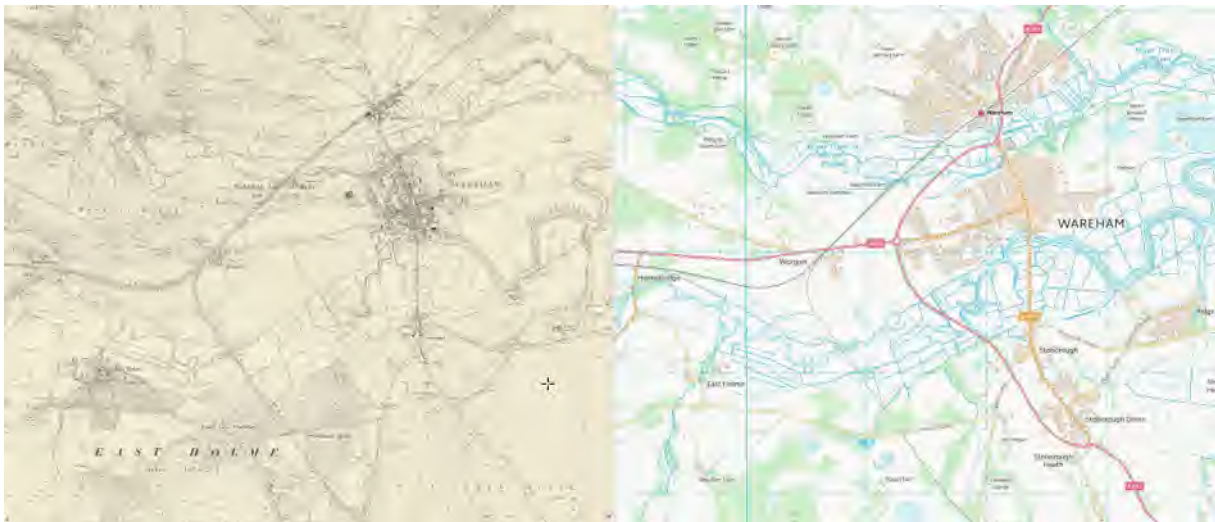
- 2.5. The AONB Background Paper also notes that the Council’s Senior Landscape Architect has commented on the site. The landscape officer comments that development within the western part of the site could be moderated by structural planting, but the eastern part of the site is more open and development could not be moderated. It is not clear whether the Council’s Senior Landscape Architect undertook a detailed assessment based on a GLVIA3 informed methodology and therefore how much weight can be attributed to their assessment.
- 2.6. The AONB Background Paper concludes at para 163 that “The detrimental landscape effects could be moderated, but this will affect the sites capacity and the level of housing need it can address”. This demonstrates that the Council considered the site to have some capacity to accommodate residential development. However, the SHLAA dismisses the site, citing that there were no exceptional circumstances to justify major development within the AONB.
- 2.7. It must be noted that the AONB designation does not preclude development, unlike Green Belt.

### 3 Review of Landscape Matters

- 3.1. The site is illustrated within its localised context on Plan ASP1. The plan illustrates the sites location just to the west of Wareham, with the Purbeck School and recent residential development associated with Baggs Lane located immediately to the east of the A351. It is noted that there is a cemetery located to the west of the A351, adjacent to the application site. This forms a suburban feature within the immediate setting of the site.
- 3.2. Road corridors characterise the northern and eastern boundaries, while a railway corridor defines the western edge of the parcel. Localised topography characterises the southern edge of the parcel, with the landforms dropping to the floodplain to the south. The main developable area located on the plateau that has formed between the river corridors of the Frome and Piddle.
- 3.3. The plan also illustrates the sites location within the wider context of the Dorset AONB. The site lies on the northern edge of the designation, which follows the A352, before diverting south around the western edge of the Purbeck School site and along the southern edge of Wareham. The site therefore lies on the northern edge of the designation but also adjacent to the settlement edge of Wareham.
- 3.4. There is little vegetation cover associated with the site and this is illustrated on Plan ASP1.
- 3.5. As noted within the AONB Background Paper and the 2018 SHLAA, the site lies within the Frome Valley Pasture LCA within the Dorset AONB Landscape Character Assessment (2008). The assessment identifies that the key characteristics of this LCA include:
  - Meandering flat river floodplain with small wet woodlands, wet winter flooded grasslands and extensive pattern of water meadows
  - Extensive reedbeds and coastal grazing marsh towards the Harbour

- Large open regular fields with dense copses of oak, hazel, holly ancient woodlands and occasional individual trees
- Linear and nucleated settlements of local stone along the river terrace margins
- Long open views with a tranquil experience
- Historic bridges, mills and ecclesiastical remains

- 3.6. These characteristics are reproduced within the SHLAA with the comment that “these elements are present to a lesser and greater extent on the site being promoted”. This is quite an ambiguous statement. Looking at the key characteristics individually, it is considered that the part of the site being promoted for development is located in an elevated position above the floodplain landscape and this is illustrated on Plan ASP1. This reflects the wider settlement of Wareham as well as the settlements of Northport and Stoborough Green which are located on elevated land above the Frome and Piddle floodplains. The proposed development site is located on the same localised ridgeline as Wareham, which extends west towards Binnegar, and which separates the neighbouring Frome and Piddle river corridors. The proposals would therefore reflect the historic settlement pattern in this local area.
- 3.7. Having reviewed historic maps of the town, it is also noted that Wareham has grown from a central nucleated core, within the town walls, with most of the recent growth extending to the west as a result of the constraints created by the rivers to the north and south and the estuary to the east. The map extracts below illustrate the growth of the town over the past 100 years.



- 3.8. Based on the constraints posed by the river corridors and estuary, the only direction Wareham can grow is to the west. This would not be at odds with the historic growth of the settlement. Northport is also constrained by watercourses to the north east, east and south, with heritage features constraining growth to the north west. Within Wareham, the most recent development at Baggs Lane extends residential built form up to the A351. Any future growth will therefore need to extend beyond this feature. The Vision within the pre-submission Local Plan identifies that new housing will be supported in the towns and key service villages. Wareham is identified as one of the three towns within the District. It is therefore considered that Wareham will be expected to take some of the residential development required within



- Purbeck to ensure housing targets can be met. The site represents an appropriate location for future growth. The site is located right on the edge of the Dorset AONB and, as set out within the detailed technical note prepared by Barton Willmore, the site has the capacity to accommodate sensitively designed development without compromising the outstanding environmental quality of the designated landscape.
- 3.9. The reference within the LCA to reedbeds and coastal grazing marsh does not apply to the parts of the site being promoted for development. These areas exist within the wider setting towards the Frome corridor and would be located within the SANG. This would ensure that these characteristic features can be retained and where necessary enhanced through appropriate management and maintenance regimes.
- 3.10. As is illustrated on Plan ASP1 the fields within the parts of the site being promoted for development adopt a geometric appearance. The key areas of vegetation are associated with this part of the site is located within the south western extents. Sections of managed hedgerow are present internally and these could be retained as part of a sensitively designed layout. Indeed, the incorporation of a sympathetic comprehensive scheme of landscaping could introduce areas of native woodland incorporating those species identified within the character assessment. This would represent a positive change within the context of this landscape setting. The proposed development of this site would not result in the loss of any woodland or key trees.
- 3.11. As noted above, it is considered that the development of this site would not harm the existing settlement pattern of Wareham, being located on the river terraces between the Frome and Piddle and forming the next logical complement to the settlement.
- 3.12. It is acknowledged that there are some views across the site from the A352 to the north which could be considered long and open. These are limited to breaks in the boundary hedgerows where field accesses are present. From these locations there are views south over the floodplains towards the Purbeck Hills. The primary receptors of these views will be motorists and as such the sensitivity of the views is reduced as these viewers will be passing through the landscape at speed and are considered transient. It is noted that there is a footway along the southern side of the road, however, the sensitivity of this route is influenced by its proximity to the road. The footway terminates at the north western corner of the site and does not extend to the west of the railway bridge. It is considered that a sensitively designed layout could incorporate vistas through the development, creating framed views of the Purbeck Hills to the south.
- 3.13. It is noted that the site is not publicly accessible and there are no public rights of way crossing the site or its immediate setting. Views over the site are therefore limited to the A352. There are opportunities to create new pedestrian and cycle routes across the site, which could incorporate feature, elevated views on the southern side of the development which provide broad panoramas over the floodplain towards the Purbeck Hills.
- 3.14. The tranquillity of this part of the LCA is reduced as a result of a number of features and detractors. These include the A351 and A352 road corridors that define the northern and eastern boundaries, including the roundabout and the junction to the north east corner of the site; the railway corridor to the west that defines the western edge and the north western corner; the settlement edge just to the east; and the presence of the farm and other built form within the western part of the site. The incorporation of a sympathetic and comprehensive landscape scheme around the southern and western boundaries would ensure that an



appropriate transition is created between the settlement and the wider floodplain landscape and ensure that the tranquillity of the wider, unsettled parts of the Frome Valley Pasture is not compromised.

- 3.15. There are no bridges, mills or ecclesiastical remains associated with the site. The development of the site would not give rise to any potential heritage effects. It is noted from a review of the OS maps that the setting of Wareham is characterised by a number of heritage features. Development elsewhere within the context of the town would need to consider the potential impacts upon such features and their settings.
- 3.16. It is concluded that sensitively designed development can and would respond positively to the localised landscape character. An initial Landscape Opportunities and Constraints Plan (ASP2) has been prepared and is included within Enclosure 2. The Plan illustrates that appropriate native planting can be incorporated around the southern and western boundaries of the site, within the proposed SANG area, with the planting not only assisting the integration of the proposed built form into the wider landscape, but also representing habitat creation within the context of the SANG.
- 3.17. A point that is given limited consideration within the assessment of the site is the significant area being put forward for the creation of a new SANG. This part of the site which extends to the banks of the River Frome extends to over 94 hectares. This is not an insignificant area and represents a substantial opportunity for the creation of publicly accessible land and ecological enhancements. There are opportunities for significant habitat creation which would not only enhance the biodiversity of the site but would also create a variety of experiences which would establish the SANG as a destination for locals and visitors alike. In addition to serving the proposed development associated Worgret Manor Farm, the SANG would be within 300m of the new development at Baggs Lane, and 1.3km from Wareham town centre. This assumes people access the SANG via Worgret Road. It is noted that a footway runs along the A352, adjacent to the northern boundary of the site, linking to Worgret Road to the east. However, as illustrated on Plans ASP1 and ASP2, the SANG land extends to the east of the A351, wrapping around the south western edge of Wareham. There may be opportunities to create an access into the SANG from Hardy Road with a link across the A351 into the wider SANG to the west. This would make the facility more accessible to existing residents of Wareham. That said, the creation of interesting and high quality spaces, which create a variety of experiences will draw the public to an area. The SANG would also be highly accessible to the Purbeck School, providing an educational resource. The scale of the SANG represents a significant opportunity to create an outstanding local recreation and biodiversity resource.

## 4 Summary and Conclusion

- 4.1. It is considered that the 2018 SHLAA does not undertake a comprehensive assessment of the landscape qualities of the site and the opportunities that the development of this site could achieve.
- 4.2. The SHLAA acknowledges comments made by the Council's Senior Landscape Architect that identify that the western part of the site could be successfully developed, but concludes that the sites location within the AONB makes it inappropriate for inclusion.
- 4.3. As set out within Section 3 of this note, Aspect consider that the proposed development would not significantly harm the key characteristics of the Frome Valley Pasture LCA and that the

opportunity to create a 94 hectare publicly accessible area of open space seems to have been disregarded by PDC.

- 4.4. The AONB designation does not preclude development. National and local policy acknowledges the special qualities of these landscapes and expects development to meet the highest standards to conserve and, where possible, enhance the special qualities of these landscapes. The purpose of the designation is not to control development.
- 4.5. As set out within Section 3 of this note, the site represents an appropriate location to accommodate sensitively designed residential development to assist the meeting of housing targets within the district without compromising local landscape character or the outstanding environmental qualities of the AONB.
- 4.6. The site is located adjacent to the settlement edge of Wareham on the edge of the AONB. Transport corridors define three of the four boundaries, reducing the perceived tranquillity of the site. Footways already line the A352 on the northern boundary providing access to Wareham, and its associated facilities to the east. Settlements located in elevated positions above the floodplain characterise the local landscape and the proposals would represent a logical complement to Wareham, reflecting the recent growth of the town in a westerly direction. The presence of the Frome and Piddle mean that the only direction of growth in Wareham is to the west.
- 4.7. The detailed assessment undertaken by Barton Willmore remains relevant and forms a robust appraisal of the existing landscape character and visual environment in which the site is set. Aspect concurs with the findings of this assessment.
- 4.8. It is therefore considered that the site and receiving environment has the capacity to accommodate the proposals. The proposals will not result in significant harm to the landscape character or visual environment of the Dorset AONB and, as such, it is considered that the site could successfully integrate residential development and is supportable from a landscape and visual perspective.

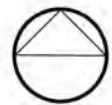
Aspect Landscape Planning Ltd

30<sup>th</sup> November 2018

Enclosure 1 – Site Location & Context Plan

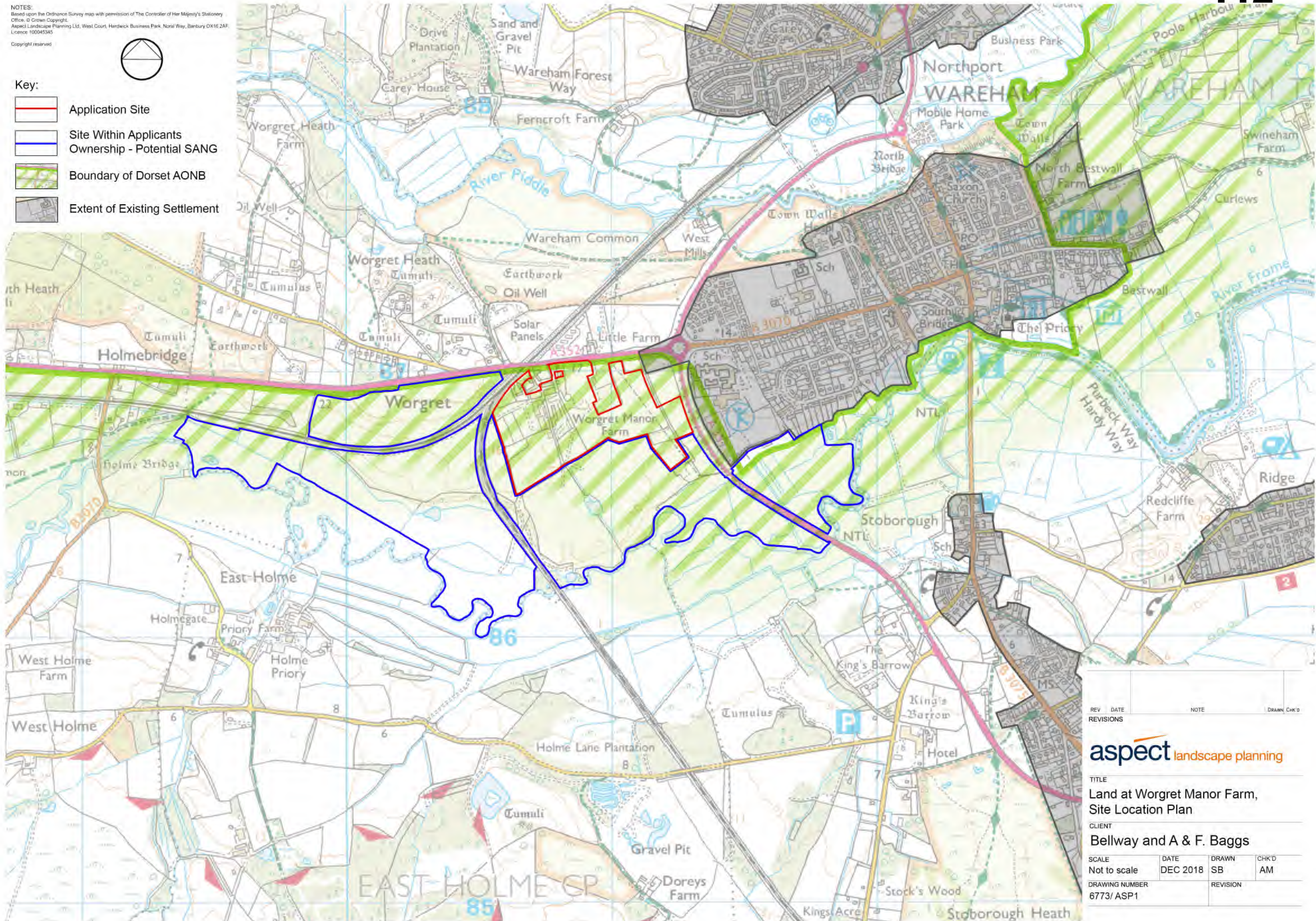


NOTES:  
Based upon the Ordnance Survey map with permission of The Controller of Her Majesty's Stationery Office. © Crown Copyright.  
Aspect Landscape Planning Ltd, West Court, Hardwick Business Park, Noral Way, Banbury OX16 2AF.  
Licence 100045345  
Copyright reserved



Key:

-  Application Site
-  Site Within Applicants Ownership - Potential SANG
-  Boundary of Dorset AONB
-  Extent of Existing Settlement



REV	DATE	NOTE	DRAWN	CHK'D
REVISIONS				

**aspect** landscape planning

TITLE  
Land at Worgret Manor Farm,  
Site Location Plan

CLIENT  
Bellway and A & F. Baggs

SCALE	DATE	DRAWN	CHK'D
Not to scale	DEC 2018	SB	AM

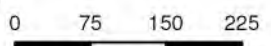
DRAWING NUMBER	REVISION
6773/ ASP1	



## Enclosure 2 – Initial Landscape Opportunities & Constraints Plan

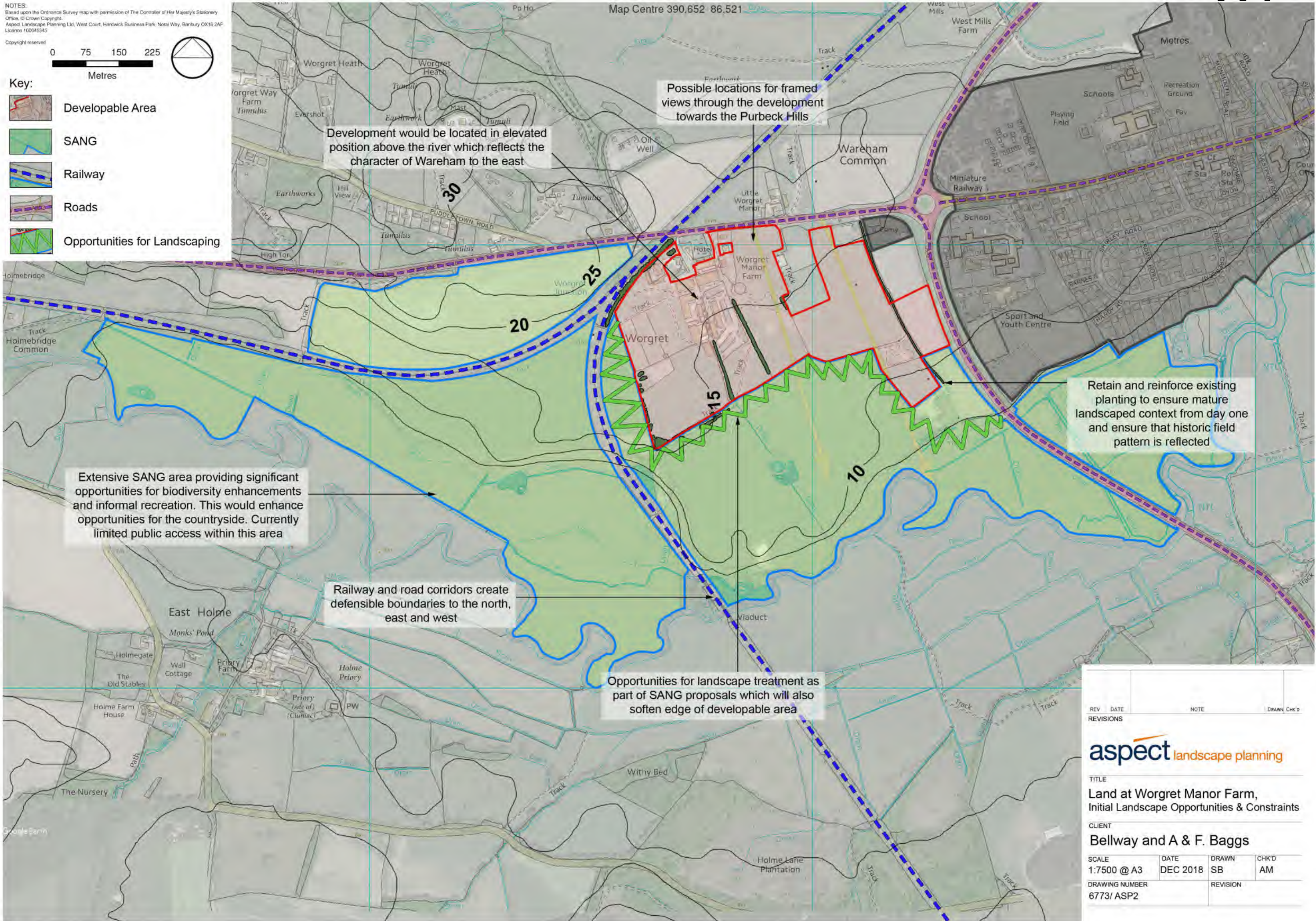


NOTES:  
 Based upon the Ordnance Survey map with permission of The Controller of Her Majesty's Stationary Office. © Crown Copyright.  
 Aspect Landscape Planning Ltd, West Court, Hardwick Business Park, Nonsay Way, Banbury OX16 2AF  
 Licence 100045345  
 Copyright reserved



Key:

- Developable Area
- SANG
- Railway
- Roads
- Opportunities for Landscaping



Development would be located in elevated position above the river which reflects the character of Wareham to the east

Possible locations for framed views through the development towards the Purbeck Hills

Retain and reinforce existing planting to ensure mature landscaped context from day one and ensure that historic field pattern is reflected

Extensive SANG area providing significant opportunities for biodiversity enhancements and informal recreation. This would enhance opportunities for the countryside. Currently limited public access within this area

Railway and road corridors create defensible boundaries to the north, east and west

Opportunities for landscape treatment as part of SANG proposals which will also soften edge of developable area

REV	DATE	NOTE	DRAWN	CHK'D
REVISIONS				

**aspect** landscape planning

TITLE  
**Land at Worgret Manor Farm, Initial Landscape Opportunities & Constraints**

CLIENT  
**Bellway and A & F. Baggs**

SCALE	DATE	DRAWN	CHK'D
1:7500 @ A3	DEC 2018	SB	AM
DRAWING NUMBER		REVISION	
6773/ ASP2			



## Comment

<b>Consultee</b>	Mrs Carole Bickerton (1189862)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Mrs Carole Bickerton (1189862)
<b>Comment ID</b>	PLPP190
<b>Response Date</b>	01/12/18 11:30
<b>Consultation Point</b>	Policy H8: Small sites next to existing settlements ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.2
<b>Are you responding on behalf of a group?</b>	No
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	H8
<b>Do you consider that the Local Plan is legally compliant?</b>	Yes
<b>Do you consider that the Local Plan is sound?</b>	No
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

Comments regarding Small Sites in West Lulworth

West Lulworth has been allocated 108 units, 24% of all the proposed Small Sites within the whole of the Purbeck area. This is all within the Dorset AONB and UNESCO Purbeck Heritage Coast zone. This is clearly disproportionate and unjustified.

Six of the eight proposed small sites in West Lulworth are adjacent or in close proximity to each other and should be considered to be a single large site of 64 units, therefore being treated under large site criteria. There should be a single map of West Lulworth showing the positions of the individual sites in relation to each other rather than separate maps that give no idea of the impact of the scale of development within the village.

This scale of development in a small village and a valuable tourist attraction on the UNESCO World Heritage Jurassic Coastline and within an area of AONB will have an adverse impact on its special character, accessibility and infrastructure. West Lulworth is the gateway to the UNESCO World Heritage Jurassic Coastline's prime sites of Lulworth Cove and Durdle Door. It already experiences extreme levels of traffic congestion and gridlock at peak times, so additional housing around this bottleneck would only exacerbate the situation.

Increasing the size of West Lulworth by 108 units will require extensive infrastructure development and upgrading. Water, sewage, power, roads and public transport all of which will have an adverse effect on the special character of the village.

There is little evidence that West Lulworth needs the extra houses and, if built, would be affordable for the young or locals. There is little local employment and roads and public transport are very restricted to this isolated village. West Lulworth is a popular seaside resort and therefore this is reflected in high property prices. Recent house sales in the village would indicate that most are sold as either second homes or more importantly a rising amount of holiday rentals which include the smaller/cheaper properties that might have suited new homeowners. Indeed the major landowner, Lulworth Estates, who also own all the proposed sites in West Lulworth has been turning many of their properties that had been previously available for locals into holiday rentals. Many freehold properties in West Lulworth also are burdened by old Lulworth Estates restrictive covenants.

Any new houses built within the village would be required to fit the character of the existing village so would not be cheap to build and therefore would make them attractive to the second home/rental properties market.

There are certain special problems with the individual sites below and should have been classed by the SHLAA as unsuitable for development:

- 1 **17 Units Allotment Gardens, Bindon Road.** This site has been turned down by PDC planners on previous occasions. It is in the conservation area, has very limited road access and is in the shadow of Bindon Hill so receives no sunlight in the winter months. It is a village amenity and the only allotments in West Lulworth so helps to realize PDC Healthy Living policy. It is adjacent to the South West Coastal Path and is a wildlife buffer zone between dwellings in the conservation area and the adjacent SSI on Bindon Hill adjacent to the World Heritage Jurassic Coastline. It has a varied and rare flora and fauna population.
- 2 **18 Units adjacent to Limberlost, Sunnyside.** This site is at a high elevation and so would be very visible from much of the village, the AONB and the World Heritage Jurassic Coastline. Access is very difficult and restricted between existing properties. The site is also on a steep hillside and would require extensive ground works and terracing.
- 3 **9 Units adjacent to Cove House, Bindon Road.** This site is adjacent and in real terms a continuation of the Allotment Gardens site with the South West Coastal Path running between



- the two sites. It is also on the 'green belt' separating the Lulworth Cove area from the rest of the village. The land again is a steep hillside and would require extensive ground works and terracing. It is on an already busy and dangerous road junction at the bottom of Bindon Road, which would also be the access point for the three sites above and so making it a congested bottle neck.
- 4 **9 Units adjacent to 1 Church Road.** This site is opposite the Cove House site above and so on the very busy junction. It is on the valley floor so may be liable to flooding in flash flood conditions.
  - 5 **55 Units - The other four sites in West Lulworth.** These sites are all highly visible and on steep hillsides which would require extensive ground works and terracing.

Finally the small sites section appears to have been tucked well away in the SHLAA document, indeed under a section headed Upton, so making it very hard to find and therefore to comment on for even computer literate people.

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

The small sites put forward and assessed in the SHLAA within West Lulworth should not have passed the first test for the above reasons. It should have been discounted due to their development having an adverse impact on the special character of the village within the AONB. Using the SHLAA methodology they should have been classified as unsuitable for development in the SHLAA.

Therefore it can be concluded that the SHLAA cannot be relied upon as an accurate assessment of the development capacity within West Lulworth to contribute to the housing growth across the district, required within the plan period. For this reason the plan is not 'sound'.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?**      No

## Comment

<b>Consultee</b>	Mr John Bickerton (1189861)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Mr John Bickerton (1189861)
<b>Comment ID</b>	PLPP189
<b>Response Date</b>	01/12/18 11:27
<b>Consultation Point</b>	Policy H8: Small sites next to existing settlements ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Are you responding on behalf of a group?</b>	No
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	H8
<b>Do you consider that the Local Plan is legally compliant?</b>	Yes
<b>Do you consider that the Local Plan is sound?</b>	No
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

Comments regarding Small Sites in West Lulworth

West Lulworth has been allocated 108 units, 24% of all the proposed Small Sites within the whole of the Purbeck area. This is all within the Dorset AONB and UNESCO Purbeck Heritage Coast zone. This is clearly disproportionate and unjustified.

Six of the eight proposed small sites in West Lulworth are adjacent or in close proximity to each other and should be considered to be a single large site of 64 units, therefore being treated under large site criteria. There should be a single map of West Lulworth showing the positions of the individual sites in relation to each other rather than separate maps that give no idea of the impact of the scale of development within the village.

This scale of development in a small village and a valuable tourist attraction on the UNESCO World Heritage Jurassic Coastline and within an area of AONB will have an adverse impact on its special character, accessibility and infrastructure. West Lulworth is the gateway to the UNESCO World Heritage Jurassic Coastline's prime sites of Lulworth Cove and Durdle Door. It already experiences extreme levels of traffic congestion and gridlock at peak times, so additional housing around this bottleneck would only exacerbate the situation.

Increasing the size of West Lulworth by 108 units will require extensive infrastructure development and upgrading. Water, sewage, power, roads and public transport all of which will have an adverse effect on the special character of the village.

There is little evidence that West Lulworth needs the extra houses and, if built, would be affordable for the young or locals. There is little local employment and roads and public transport are very restricted to this isolated village. West Lulworth is a popular seaside resort and therefore this is reflected in high property prices. Recent house sales in the village would indicate that most are sold as either second homes or more importantly a rising amount of holiday rentals which include the smaller/cheaper properties that might have suited new homeowners. Indeed the major landowner, Lulworth Estates, who also own all the proposed sites in West Lulworth has been turning many of their properties that had been previously available for locals into holiday rentals. Many freehold properties in West Lulworth also are burdened by old Lulworth Estates restrictive covenants.

Any new houses built within the village would be required to fit the character of the existing village so would not be cheap to build and therefore would make them attractive to the second home/rental properties market.

There are certain special problems with the individual sites below and should have been classed by the SHLAA as unsuitable for development:

- 1 **17 Units Allotment Gardens, Bindon Road.** This site has been turned down by PDC planners on previous occasions. It is in the conservation area, has very limited road access and is in the shadow of Bindon Hill so receives no sunlight in the winter months. It is a village amenity and the only allotments in West Lulworth so helps to realize PDC Healthy Living policy. It is adjacent to the South West Coastal Path and is a wildlife buffer zone between dwellings in the conservation area and the adjacent SSI on Bindon Hill adjacent to the World Heritage Jurassic Coastline. It has a varied and rare flora and fauna population.
- 2 **18 Units adjacent to Limberlost, Sunnyside.** This site is at a high elevation and so would be very visible from much of the village, the AONB and the World Heritage Jurassic Coastline. Access is very difficult and restricted between existing properties. The site is also on a steep hillside and would require extensive ground works and terracing.
- 3 **9 Units adjacent to Cove House, Bindon Road.** This site is adjacent and in real terms a continuation of the Allotment Gardens site with the South West Coastal Path running between

- the two sites. It is also on the 'green belt' separating the Lulworth Cove area from the rest of the village. The land again is a steep hillside and would require extensive ground works and terracing. It is on an already busy and dangerous road junction at the bottom of Bindon Road, which would also be the access point for the three sites above and so making it a congested bottle neck.
- 4 **9 Units adjacent to 1 Church Road.** This site is opposite the Cove House site above and so on the very busy junction. It is on the valley floor so may be liable to flooding in flash flood conditions.
  - 5 **55 Units - The other four sites in West Lulworth.** These sites are all highly visible and on steep hillsides which would require extensive ground works and terracing.

Finally the small sites section appears to have been tucked well away in the SHLAA document, indeed under a section headed Upton, so making it very hard to find and therefore to comment on for even computer literate people.

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

The small sites put forward and assessed in the SHLAA within West Lulworth should not have passed the first test for the above reasons. It should have been discounted due to their development having an adverse impact on the special character of the village within the AONB. Using the SHLAA methodology they should have been classified as unsuitable for development in the SHLAA.

Therefore it can be concluded that the SHLAA cannot be relied upon as an accurate assessment of the development capacity within West Lulworth to contribute to the housing growth across the district, required within the plan period. For this reason the plan is not 'sound'.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?** Yes

**If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?**

Local residents representation and comments are important to be heard.

## Comment

<b>Agent</b>	Mr Matt Holmes (1190857)
<b>Email Address</b>	[REDACTED]
<b>Company / Organisation</b>	Chapman Lily Planning Ltd
<b>Address</b>	Unit 5 Designer House Sandford Lane Wareham BH20 4DY
<b>Consultee</b>	(1190858)
<b>Company / Organisation</b>	Birchmere Ltd
<b>Address</b>	38 Sandbanks Road Poole BH14 8BX
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Birchmere Ltd ( - 1190858)
<b>Comment ID</b>	PLPP195
<b>Response Date</b>	01/12/18 14:53
<b>Consultation Point</b>	Policy EE1: Employment land supply ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Files</b>	<a href="#">Full representation letter</a>
<b>Are you responding on behalf of a group?</b>	No
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	Policy EE1
<b>Do you consider that the Local Plan is legally compliant?</b>	Yes

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

#### EMPLOYMENT LAND NEED

Draft Policy EE1 allocates 47ha of employment land across the district. The policy lists 12 strategic employment sites in the district, indicating which will grow and which will not. Of the 12 identified sites, the following seven fall within central and northeast Purbeck:

- 1 Holton Heath Trading Park
- 2 Freeland Business Park, Lytchett Matravers
- 3 Factory Road Trading Estate, Upton
- 4 Axiom Centre, Organford
- 5 Romany Works, Sandford
- 6 Sandford Lane, Wareham
- 7 Admiralty Park, Holton Heath

Only two of the above sites are noted to grow: site ES1 – Holton Heath Trading Park (5.7ha); and site ES11 – Sandford Lane (1ha). In other words, out of a plan total of 47ha employment land, the total capacity to serve more than 40% of the district's population, plus the conurbation, is just 6.7ha.

In addition, Birchmere notes that draft Policy H2 (The Housing Land Supply) identifies settlement extensions that will deliver a housing supply of 300 homes in Wareham; 150 homes at Lytchett Matravers; and 90 at Upton. This represents a total of 540 new homes, not even taking into account windfall and 'small sites next to existing settlements', which will no doubt come forward through draft Policy H8 and thus boost housing supply in central and northeast Purbeck. Demand for employment land will therefore increase. This is important in the context of paragraph 72 of the NPPF, which discusses how councils should '*identify suitable locations for such development where this can help to meet identified needs in a sustainable way. In doing so, they should: a) consider the opportunities presented by existing or planned investment in infrastructure, the area's economic potential...*'

A further vital factor to bear in mind is that the Wareham Neighbourhood Plan has reached the submission stage and identifies the loss of c.4.15ha of employment land at Westminster Road (site H5) and c.0.85ha of employment land at St Johns Road (site H6), a total of c.5ha lost and not proposed for replacement. Crucially, this loss is not recognised in either the draft local plan or the Council's Economy Background Paper (2018).

A review of the Wareham Neighbourhood Plan Consultation Statement (October 2018) shows that Purbeck District Council did not raise any objections to the Neighbourhood Plan's approach. Consequently, the prospects of Westminster Road and St John's Road are very real and the true employment allocation for central and northeast Purbeck that should be reflected in the Purbeck Local Plan Pre-submission will be more like 1.7ha (i.e. 6.7ha – 5ha).

Taken in the round, the net gain in employment provision in central and north-eastern Purbeck will be significantly less than that stated in draft Policy EE1. This, coupled with the significant additional housing proposed in central and north-eastern Purbeck, suggests that the plan as drafted does not achieve sustainable development.

Paragraph 104 of the NPPF makes clear that '*planning policies should: a) support an appropriate mix of uses across an area... to minimise the number and length of journeys needed for employment*'. Birchmere Ltd finds that the plan's failure to adequately marry housing growth with employment land supply presents a serious risk of unsustainable commuting patterns, meaning that residents in central and northeast Purbeck will need to travel further afield to locations such as Dorset Innovation Park for employment opportunities, or alternatively will commute to employment opportunities outside of the district. As is well documented in the Council's evidence base, a key issue for the district is the pressure on the A351 and A352 roads, which form the principle arterial routes through Purbeck. The Council vitally needs to be cognisant of the need to cater for both the loss of employment proposed through the Wareham Neighbourhood Plan and the significant additional new housing proposed in central and

north-eastern Purbeck. Otherwise, without significantly increasing the quantum of employment land allocated at Holton Heath, there is a very real risk that congestion on the A351 and A352 will be made worse.

As such, Birchmere Ltd believes that draft Policy EE1 is out of kilter with the plan's own vision and objectives. It is not positive because it is consistent with achieving sustainable development; not justified because it is not based on an appropriate strategy and flawed evidence; and not consistent with the goals of national policy to enable the delivery of sustainable development.

#### Recommendation

Policy EE1 should account for the loss of employment land in central Purbeck, as well as seek to achieve a better balance between additional housing growth and employment provision. This would be achieved through allocating 5.8ha of additional land at Holton Gate, as identified in the attached letter. Further information on the excellent credentials of this site is provided below.

#### **EMPLOYMENT LAND SUPPLY**

Birchmere Ltd has already set out above the discrepancies between the draft plan's vision and objectives and its employment allocations. It is clear that if the Council is to promote sustainable commuter patterns, it will need to better marry housing growth with employment provision, particularly when the quantum of housing is due to increase in central / northeast Purbeck at the same time as established employment land is decreasing.

Notwithstanding the above, Birchmere Ltd notes that the Council believes 5.7ha of land remains available at Holton Heath Trading Park within the existing site boundary. This land has been earmarked since the adoption of the Purbeck Local Plan Part 1 in 2012 and whilst consents have been granted for part of that land it has yet to fully come forward. By contrast the land at Holton Gate is wholly deliverable. As discussed below in this representation, it is available and could come forward in the immediate term, thus plugging the gap in supply.

The Council's strategy is to bring forward 40ha of land at Dorset Innovation Park, which will involve extending the existing site boundary considerably (as compared with the boundary depicted in the Purbeck Local Plan Part 1 policies map). Birchmere Ltd finds that this is a very generous quantum of land in one of the least populated areas of the district. Birchmere Ltd does accept that some employment development will help serve new housing growth in the area, but the balance is tipped way too far in this direction and does not translate into delivering sustainable development. As already set out above, it is essential that central and north-eastern Purbeck be served by sufficient employment land if the Council is to promote sustainable commuting patterns. Furthermore, a great deal of effort has been put into bringing forward land at Dorset Innovation Park in the past, but the reality is that there has been a historically poor take-up of units there. It is of further note that Dorset Innovation Park is being marketed as '*a site for advanced engineering and manufacturing businesses*' ([www.dorsetlep.co.uk](http://www.dorsetlep.co.uk)) raising questions as to whether demand for more conventional office, manufacturing and storage/distribution space will be met there.

#### Recommendation

The balance between housing and employment is such a fundamental aspect of sustainable development that it goes to the heart of the plan. Therefore, Birchmere Ltd believes that the plan is not effective because it is not deliverable as drafted. To address this, Birchmere Ltd recommends allocating 5.8ha of additional land at Holton Gate for employment purposes.

#### **OMISSION SITE AT ADMIRALTY PARK**

Land at Admiralty Park is recorded in draft Policy ES12 as an 'other identified employment site'. The Council is aware that Admiralty Park benefits from a lawful development certificate for B-class uses and it falls within Birchmere Ltd's control. A location plan is provided in the attached letter.

The Council will also be aware that the landowner has embarked upon a process of renewal of Admiralty Park, evidenced by the implementation of the recent permission for the 'demolition of the existing buildings and construction of 14 commercial units (use classes B1(b), B1(c) and B8) with associated access, parking and landscaping' at Site C, and which has recently been built. In addition, a new access road is in the process of being provided from Holton Road to facilitate improved access to the site for larger vehicles.

Given that Admiralty Park is a designated employment site and located immediately adjacent to the designated 'strategic employment site' of Holton Heath Trading Park, Birchmere Ltd sees no justification for not linking the two. There is no logic for treating Admiralty Park as an other identified employment site, when it is physically joined to Holton Heath Trading Park and its lawful use is for the same range of safeguarded uses. It would therefore be eminently sensible to include Admiralty Park within the 'strategic employment sites' designation.

Whilst Admiralty Park has some site-specific designations, such as a site wider Tree Preservation Order and contains some heritage assets, these constraints can be dealt with on an application by application basis. These should not constrain Admiralty Park from being included as a safeguarded strategic employment site.

#### Recommendation

Whilst Birchmere Ltd concedes that the omission of Admiralty Park from the safeguarded strategic employment site does not necessarily go to the heart or the soundness of the plan, there is nevertheless no reasoned justification for not including it. Including Admiralty Park within the safeguarded zone could only lead to a positive outcome, bolstering the quantum of safeguarded employment land in the district and thereby leading to an economic benefit with an inherent contribution towards achieving sustainable development.

#### **OMISSION SITE AT HOLTON GATE**

Birchmere Ltd recognises, as does the Council, how heavily constrained Purbeck is by environmental designations and the difficulties this presents in meeting development needs. The draft policies map illustrates well how designations such as heathland, AONB, heritage coast, flood zones 2 and 3, green belt and the sheer remoteness of some locations make the Council's task of achieving sustainable development a difficult one. That is why opportunities to achieve genuinely sustainable development that would not harm the district's sensitive designations should be seized.

The Land at Holton Gate is unconstrained:

- 1 It is outside of areas at risk of flooding;
- 2 It is white land outside of the green belt;
- 3 It is not covered by any landscape designations;
- 4 Power supply issues that were previously thought to exist have been resolved. Birchmere Ltd have undertaken dialogue with Southern Electric in this regard, and as part of the development of land at the former Overhill Engineering Works that is currently underway Birchmere Ltd have already taken steps to provide the power infrastructure needed to serve the part of the Holton Gate site on the western side of Blackhill Road. A contract to provide and install a power supply to the eastern side of Blackhill Road has also recently been agreed and signed with Southern Electric and payment made. Therefore, power supply is not a constraint to the development of the land.
- 5 It is extremely well placed to provide an excellent, enhanced gateway to the industrial park;
- 6 It is extremely well placed in transport terms, with excellent road links to central and northeast Purbeck and beyond to the conurbation. It is also well served by cycle lanes and a stop on the mainline railway, making it accessible by sustainable transport means. Discussions have taken place with the County Council and it is considered that appropriate access can be provided to the site.
- 7 There is clear demand for new commercial floorspace in this location. I have enclosed a letter from a local marketing agent affirming the demand for new commercial units in this location;
- 8 It is clear of the scheduled monument; and
- 9 Development would not prejudice ecology, still offering the opportunity to create linked habitats, as supported by Natural England.

Birchmere Ltd are keen to point out that the time that was taken to commence the development of land on the former Overhill Engineering site, and which borders the Holton Gate land, should not be interpreted as a lack of motivation on their part to bring the land forward. Covenants previously held over the land prevented its development without a significant overage payment clause to a previous owner, but those covenants have now been discharged and will not apply to the development of the Holton Gate land.

The case for allocating additional land at Holton Gate through an amendment to Policy EE1 has already been made above, as it makes strategic sense and promotes sustainable development. The land at Holton Gate is available and deliverable, having been promoted to the Council consistently throughout



the local plan review process. Indeed, land at Holton Gate was shown as a preferred option in the Council's 2016 Partial Review Options consultation.

A review of the 2016 Partial Review Options report shows that no relevant planning issues were raised that might lead to the removal of the site. In fact, the majority of respondents were in favour of its allocation.

Birchmere Ltd is therefore alarmed to find that the October 2018 pre-submission plan only seeks to safeguard the existing employment site (site ES1) and not allocate any new land there at all.

A review of the Purbeck Local Plan Pre-submission Sustainability Appraisal (SA) is also worrying:

*'As alternative suitable sites are not available, to not allocate [site ES1] would mean insufficient employment land would be provided to support the District's economy. This would not be a reasonable approach'.*

One of the purposes of an SA is to assess reasonable alternatives, yet land at Holton Gate is not considered in the Council's SA at all, despite its excellent credentials and clear availability. The Council did not publish an updated Strategic Economic Land Availability Assessment (SELAA) as part of its pre-submission plan evidence base, meaning that the June 2016 version is the most up-to-date published piece of evidence informing site availability. From this piece of evidence, the site is very clearly available and is recorded as an included site. The SELAA says at paragraph 52:

*'Based on the findings and conclusions of this assessment, the following sites are recommended for consideration as part of the PLP1 review (site maps included in Appendix 4). The sites are in addition to those already included in the adopted PLP1. It should be remembered that these recommendations are made in the absence of the final version of latest Workspace Strategy and should only be regarded as provisional at this stage.'*

It is therefore clear that, whilst the Council appeared supportive of allocating land at Holton Gate in 2016, this was subject to the findings of the Workspace Strategy.

The Workspace Strategy was subsequently published in October 2016, i.e. after the SELAA. It says that:

*'Holton Heath Trading Park is allocated within the current Local Plan as one of the strategic employment sites in Purbeck. Located around Poole Harbour this industrial site has approximately 5ha of vacant or underused land available in the short term and a further 5.9ha likely to be allocated by 2018' (paragraph 6.48) and 'the main focus for the industrial market in the Dorset LEP area is in Eastern Dorset and includes... Holton Heath' (paragraph 7.5).*

Given the site's inclusion in the SELAA and that it was not ruled out through the Workspace Strategy, the SA is undeniably incorrect by stating that there was a lack of alternatives.

The Council's published Economy background paper (2018) provides the sole reference to why the site at Holton Gate has been excluded from the pre-submission plan. At paragraph 63, the background paper states:

*'Whilst a majority of responses broadly supported this expansion when consulting on the local plan in 2016, at this time there is not considered to be any specific case for expansion of employment land provision in Purbeck'.*

Birchmere Ltd is wholly puzzled by this statement, not least because it states there is no case for expanding employment land provision in the district (Dorset Innovation Park is quite clearly proposed for expansion through the plan), but it appears that the Council has completely abandoned the principles of sustainable development. Surely if consideration were given to the Holton Heath's strategic importance, plus the deficit in supply highlighted above, along with the additional need for employment that will be generated through additional housing in central and north-eastern Purbeck, the site should be allocated.

Birchmere Ltd therefore finds the Council's reasoning to be lacking and unsubstantiated, particularly when the site is included in the latest published SELAA; the fact that it was specifically mentioned in the Workspace Strategy; and that no planning issue has been raised to date to justify its exclusion. These factors strongly suggest that the SA is fundamentally flawed because it fails to consider the site as a reasonable alternative and erroneously claims that there are no other alternatives to Policy EE1 as drafted.

Consequently, Birchmere Ltd believes that Policy EE1 is not sound. Moreover, as the provision of sufficient, deliverable employment land goes to the very heart of the Council's strategy and therefore the heart of the plan itself, the plan cannot be sound either. It is not justified because the Council has evidently not taken into account reasonable alternatives; and it is not consistent with national policy because the policy and the plan do not deliver sustainable development.

As already discussed above, Birchmere Ltd has reservations regarding the Council's strategy to direct so much employment growth towards Dorset Innovation Park. It is clear from the evolution of the emerging plan that the Council's original intention in 2016 was to facilitate additional growth at Holton Heath through an allocation at Holton Gate, as well as safeguarding land at Dorset Innovation Park. However, that strategy has now changed without reasoned justification.

#### Recommendation

In order to overcome this, Birchmere Ltd recommends allocating 5.8ha of additional land at Holton Gate, as identified in figure 2 above.

### **CONCLUSIONS**

There is a compelling case for the allocation of 5.8ha of land at Holton Gate for employment use. It is unconstrained, strategically well placed, available and deliverable now, and provide additional capacity in this part of the district. Importantly, it would also plug the deficit in local employment left through the de-allocation of employment land proposed by the submission version of the Wareham Neighbourhood Plan. Without the allocation of land at Holton Gate, draft Policy EE1 and the plan's strategy as a whole, are not sound. Crucially, the site has been ruled out without any justification and has not been considered through the published SA.

In addition, this representation has set out that land at Admiralty Park should form part of the Council's strategic employment site at Holton Heath Trading Park. The trading park abuts Admiralty Park and shares the same uses. Therefore, there is no compelling reason to exclude it and formally safeguarding it could only be advantageous in terms of delivering sustainable development.

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

5.8ha of land at Holton Gate, as shown in the attached letter should be included in policy EE1 as a strategic employment site. It is unconstrained, strategically well placed, available and deliverable now, and will provide additional capacity in this part of the district. Importantly, it would also plug the deficit in local employment left through the de-allocation of employment land proposed by the submission version of the Wareham Neighbourhood Plan. Without the allocation of land at Holton Gate, draft Policy EE1 and the plan's strategy as a whole, are not sound. Crucially, the site has been ruled out without any justification and has not been considered through the published SA.

In addition, the land at Admiralty Park should form part of the Council's strategic employment site at Holton Heath Trading Park. The trading park abuts Admiralty Park and shares the same uses. Therefore, there is no compelling reason to exclude it and formally safeguarding it could only be advantageous in terms of delivering sustainable development.

**If you have any supporting documents please upload them here.**

[Full representation letter](#)  
Full representation letter

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?** Yes

**If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?**

In order to further explain the benefits of the allocation of land at Holton Gate for employment purposes as a part of the Local Plan, and without which the Plan is not sound. It is considered that evidence may need to be given as to the deliverability of the Holton Gate site against others allocated under Policy EE1.

## Comment

<b>Agent</b>	Mr Matt Holmes (1190857)
<b>Email Address</b>	[REDACTED]
<b>Company / Organisation</b>	Chapman Lily Planning Ltd
<b>Address</b>	Unit 5 Designer House Sandford Lane Wareham BH20 4DY
<b>Consultee</b>	(1190858)
<b>Company / Organisation</b>	Birchmere Ltd
<b>Address</b>	38 Sandbanks Road Poole BH14 8BX
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Birchmere Ltd ( - 1190858)
<b>Comment ID</b>	PLPP196
<b>Response Date</b>	01/12/18 14:56
<b>Consultation Point</b>	Policy V2: Green belt ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Are you responding on behalf of a group?</b>	No
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	V2
<b>Do you consider that the Local Plan is legally compliant?</b>	Yes
<b>Do you consider that the Local Plan is sound?</b>	Yes

**Do you consider that the Local Plan complies with the duty to co-operate?** Yes

**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)**

Birchmere Ltd supports draft Policy V2 (Green Belt), which serves to protect the green belt, in accordance with the requirements of the NPPF. Land at Holton Gate and Admiralty Park was deliberately excluded from the green belt through the Purbeck Local Plan Part 1 in order to meet the district's longer-term employment growth needs. The land continues to be identified as 'white land' in this current pre-submission draft and therefore additional economic growth here would not impact upon the green belt.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?** No

## Comment

<b>Agent</b>	Mr Matt Holmes (1190857)
<b>Email Address</b>	[REDACTED]
<b>Company / Organisation</b>	Chapman Lily Planning Ltd
<b>Address</b>	Unit 5 Designer House Sandford Lane Wareham BH20 4DY
<b>Consultee</b>	(1190858)
<b>Company / Organisation</b>	Birchmere Ltd
<b>Address</b>	38 Sandbanks Road Poole BH14 8BX
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Birchmere Ltd ( - 1190858)
<b>Comment ID</b>	PLPP197
<b>Response Date</b>	01/12/18 14:57
<b>Consultation Point</b>	Economy ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Are you responding on behalf of a group?</b>	No
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	31
<b>Do you consider that the Local Plan is legally compliant?</b>	Yes
<b>Do you consider that the Local Plan is sound?</b>	Yes

**Do you consider that the Local Plan complies with the duty to co-operate?** Yes

**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)**

Birchmere Ltd supports the recognition in paragraph 31 of the significant contribution that manufacturing brings to the county's economy. Holton Heath is a key contributor, located strategically between Wareham and Upton, which, as acknowledged in paragraph 21 of the draft plan, are two of the largest settlements in Purbeck and account for more than 28% of the district's population. When additional settlements in central and northeast Purbeck, such as Lytchett Matravers and Sandford, are taken into consideration, the percentage increases to more than 40%. When further considered alongside the draw for Poole residents, the role played by Holton Heath in meeting employment needs is very significant indeed. The location of a stop on the mainline Weymouth to London Waterloo railway puts the employment site within reach by sustainable transport means.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?** No





- Employment land supply
- Green belt
- Omission site at Holton Heath
- Omission site at Admiralty Park

## THE APPROACH TO THE SPATIAL STRATEGY

Birchmere Ltd supports the recognition in paragraph 31 of the significant contribution that manufacturing brings to the county's economy. Holton Heath is a key contributor, located strategically between Wareham and Upton, which, as acknowledged in paragraph 21 of the draft plan, are two of the largest settlements in Purbeck and account for more than 28% of the district's population. When additional settlements in central and northeast Purbeck, such as Lytchett Matravers and Sandford, are taken into consideration, the percentage increases to more than 40%. When further considered alongside the draw for Poole residents, the role played by Holton Heath in meeting employment needs is very significant indeed. The location of a stop on the mainline Weymouth to London Waterloo railway puts the employment site within reach by sustainable transport means.

Birchmere Ltd therefore supports the vision set out on page 18 of the draft plan, which states: *'The focus for economic development will be on increasing the number and range of knowledge economy jobs, building on the District's strengths in advanced engineering and manufacturing employment. This will support high quality employment which raises wage levels and helps address housing affordability in Purbeck... this plan will support the continued development of two of Dorset's strategic employment sites at Holton Heath and the enterprise zone site – Dorset Innovation Park'.*

Birchmere Ltd also supports the 'economy' objective stated on page 19 to *'promote a prosperous and diverse local economy'*.

The Council's overall strategy culminates in draft Policy V1 (Spatial Strategy for Sustainable Communities), which Birchmere Ltd cautiously supports in principle. Partial support is given because part 3 of the policy rightly recognises that employment growth should be directed to the district's two strategic employment sites at Dorset Innovation Park and Holton Heath. However, full support cannot be given because the policy cross-refers to Policy EE1 (Employment Land Supply), which fails to allocate a sufficient quantum of employment growth at Holton Heath, thus falling out of kilter with the plan's own objectives. This is explained in more detail below.

## EMPLOYMENT LAND NEED

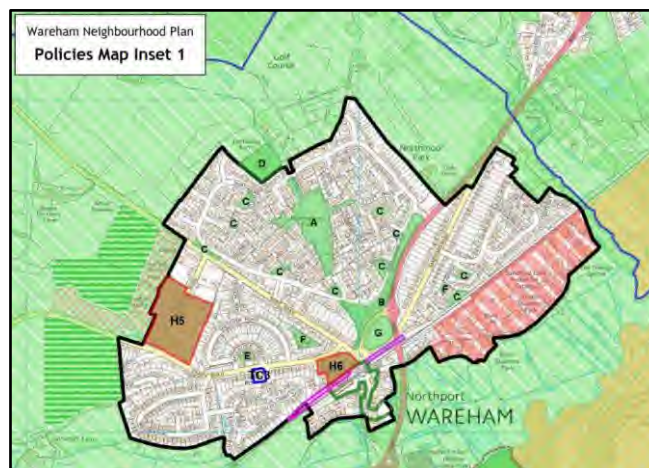
Draft Policy EE1 allocates 47ha of employment land across the district. The policy lists 12 strategic employment sites in the district, indicating which will grow and which will not. Of the 12 identified sites, the following seven fall within central and northeast Purbeck:

- Holton Heath Trading Park
- Freeland Business Park, Lytchett Matravers
- Factory Road Trading Estate, Upton
- Axiom Centre, Organford
- Romany Works, Sandford
- Sandford Lane, Wareham
- Admiralty Park, Holton Heath

Only two of the above sites are noted to grow: site ES1 – Holton Heath Trading Park (5.7ha); and site ES11 – Sandford Lane (1ha). In other words, out of a plan total of 47ha employment land, the total capacity to serve more than 40% of the district’s population, plus the conurbation, is just 6.7ha.

In addition, Birchmere notes that draft Policy H2 (The Housing Land Supply) identifies settlement extensions that will deliver a housing supply of 300 homes in Wareham; 150 homes at Lytchett Matravers; and 90 at Upton. This represents a total of 540 new homes, not even taking into account windfall and ‘small sites next to existing settlements’, which will no doubt come forward through draft Policy H8 and thus boost housing supply in central and northeast Purbeck. Demand for employment land will therefore increase. This is important in the context of paragraph 72 of the NPPF, which discusses how councils should ‘*identify suitable locations for such development where this can help to meet identified needs in a sustainable way. In doing so, they should: a) consider the opportunities presented by existing or planned investment in infrastructure, the area’s economic potential...*’

A further vital factor to bear in mind is that the Wareham Neighbourhood Plan has reached the submission stage and identifies the loss of c.4.15ha of employment land at Westminster Road (site H5) and c.0.85ha of employment land at St Johns Road (site H6), a total of c.5ha lost and not proposed for replacement. Crucially, this loss is not recognised in either the draft local plan or the Council’s Economy Background Paper (2018). An excerpt of the draft Wareham Neighbourhood Plan policies map is provided in figure 1 below.



**Figure 1: policies map excerpt from the submission draft Wareham Neighbourhood Plan, showing the identification of Westminster Road industrial estate site (H5) and St John’s Road industrial estate (site H6) for residential development**

A review of the Wareham Neighbourhood Plan Consultation Statement (October 2018) shows that Purbeck District Council did not raise any objections to the Neighbourhood Plan's approach. Consequently, the prospects of Westminster Road and St John's Road are very real and the true employment allocation for central and northeast Purbeck that should be reflected in the Purbeck Local Plan Pre-submission will be more like 1.7ha (i.e. 6.7ha – 5ha).

Taken in the round, the net gain in employment provision in central and north-eastern Purbeck will be significantly less than that stated in draft Policy EE1. This, coupled with the significant additional housing proposed in central and north-eastern Purbeck, suggests that the plan as drafted does not achieve sustainable development.

Paragraph 104 of the NPPF makes clear that *'planning policies should: a) support an appropriate mix of uses across an area... to minimise the number and length of journeys needed for employment'*. Birchmere Ltd finds that the plan's failure to adequately marry housing growth with employment land supply presents a serious risk of unsustainable commuting patterns, meaning that residents in central and northeast Purbeck will need to travel further afield to locations such as Dorset Innovation Park for employment opportunities, or alternatively will commute to employment opportunities outside of the district. As is well documented in the Council's evidence base, a key issue for the district is the pressure on the A351 and A352 roads, which form the principle arterial routes through Purbeck. The Council vitally needs to be cognisant of the need to cater for both the loss of employment proposed through the Wareham Neighbourhood Plan and the significant additional new housing proposed in central and north-eastern Purbeck. Otherwise, without significantly increasing the quantum of employment land allocated at Holton Heath, there is a very real risk that congestion on the A351 and A352 will be made worse.

As such, Birchmere Ltd believes that draft Policy EE1 is out of kilter with the plan's own vision and objectives. It is not positive because it is consistent with achieving sustainable development; not justified because it is not based on an appropriate strategy and flawed evidence; and not consistent with the goals of national policy to enable the delivery of sustainable development.

#### Recommendation

Policy EE1 should account for the loss of employment land in central Purbeck, as well as seek to achieve a better balance between additional housing growth and employment provision. This would be achieved through allocating 5.8ha of additional land at Holton Gate, as identified in figure 2 below. Further information on the excellent credentials of this site is provided below.



Figure 2: location plan identifying land at Holton Gate

## EMPLOYMENT LAND SUPPLY

Birchmere Ltd has already set out above the discrepancies between the draft plan's vision and objectives and its employment allocations. It is clear that if the Council is to promote sustainable commuter patterns, it will need to better marry housing growth with employment provision, particularly when the quantum of housing is due to increase in central / northeast Purbeck at the same time as established employment land is decreasing.

Notwithstanding the above, Birchmere Ltd notes that the Council believes 5.7ha of land remains available at Holton Heath Trading Park within the existing site boundary. This land has been earmarked since the adoption of the Purbeck Local Plan Part 1 in 2012 and whilst consents have been granted for part of that land it has yet to fully come forward.

By contrast the land at Holton Gate is wholly deliverable. As discussed below in this representation, it is available and could come forward in the immediate term, thus plugging the gap in supply.

The Council's strategy is to bring forward 40ha of land at Dorset Innovation Park, which will involve extending the existing site boundary considerably (as compared with the boundary depicted in the Purbeck Local Plan Part 1 policies map). Birchmere Ltd finds that this is a very generous quantum of land in one of the least populated areas of the district. Birchmere Ltd does accept that some employment development will help serve new housing growth in the area, but the balance is tipped

way too far in this direction and does not translate into delivering sustainable development. As already set out above, it is essential that central and north-eastern Purbeck be served by sufficient employment land if the Council is to promote sustainable commuting patterns. Furthermore, a great deal of effort has been put into bringing forward land at Dorset Innovation Park in the past, but the reality is that there has been a historically poor take-up of units there. It is of further note that Dorset Innovation Park is being marketed as '*a site for advanced engineering and manufacturing businesses*' ([www.dorsetlep.co.uk](http://www.dorsetlep.co.uk)) raising questions as to whether demand for more conventional office, manufacturing and storage\distribution space will be met there.

#### Recommendation

The balance between housing and employment is such a fundamental aspect of sustainable development that it goes to the heart of the plan. Therefore, Birchmere Ltd believes that the plan is not effective because it is not deliverable as drafted. To address this, Birchmere Ltd recommends allocating 5.8ha of additional land at Holton Gate for employment purposes, as identified in figure 2 above.

#### **GREEN BELT**

Birchmere Ltd supports draft Policy V2 (Green Belt), which serves to protect the green belt, in accordance with the requirements of the NPPF. Land at Holton Gate and Admiralty Park was deliberately excluded from the green belt through the Purbeck Local Plan Part 1 in order to meet the district's longer-term employment growth needs. The land continues to be identified as 'white land' in this current pre-submission draft and therefore additional economic growth here would not impact upon the green belt.

#### **OMISSION SITE AT ADMIRALTY PARK**

Land at Admiralty Park is recorded in draft Policy ES12 as an 'other identified employment site'. The Council is aware that Admiralty Park benefits from a lawful development certificate for B-class uses and it falls within Birchmere Ltd's control. A location plan is provided in figure 3 below.

The Council will also be aware that the landowner has embarked upon a process of renewal of Admiralty Park, evidenced by the implementation of the recent permission for the 'demolition of the existing buildings and construction of 14 commercial units (use classes B1(b), B1(c) and B8) with associated access, parking and landscaping' at Site C, and which has recently been built. In addition, a new access road is in the process of being provided from Holton Road to facilitate improved access to the site for larger vehicles.





**Figure 3: location plan showing Admiralty Park**

Given that Admiralty Park is a designated employment site and located immediately adjacent to the designated 'strategic employment site' of Holton Heath Trading Park, Birchmere Ltd sees no justification for not linking the two. There is no logic for treating Admiralty Park as an other identified employment site, when it is physically joined to Holton Heath Trading Park and its lawful use is for the same range of safeguarded uses. It would therefore be eminently sensible to include Admiralty Park within the 'strategic employment sites' designation.

Whilst Admiralty Park has some site-specific designations, such as a site wider Tree Preservation Order and contains some heritage assets, these constraints can be dealt with on an application by application basis. These should not constrain Admiralty Park from being included as a safeguarded strategic employment site.

#### Recommendation

Whilst Birchmere Ltd concedes that the omission of Admiralty Park from the safeguarded strategic employment site does not necessarily go to the heart or the soundness of the plan, there is nevertheless no reasoned justification for not including it. Including Admiralty Park within the safeguarded zone could only lead to a positive outcome, bolstering the quantum of safeguarded employment land in the district and thereby leading to an economic benefit with an inherent contribution towards achieving sustainable development. The land identified in figure 3 above should therefore be included in the allocation.

## OMISSION SITE AT HOLTON GATE

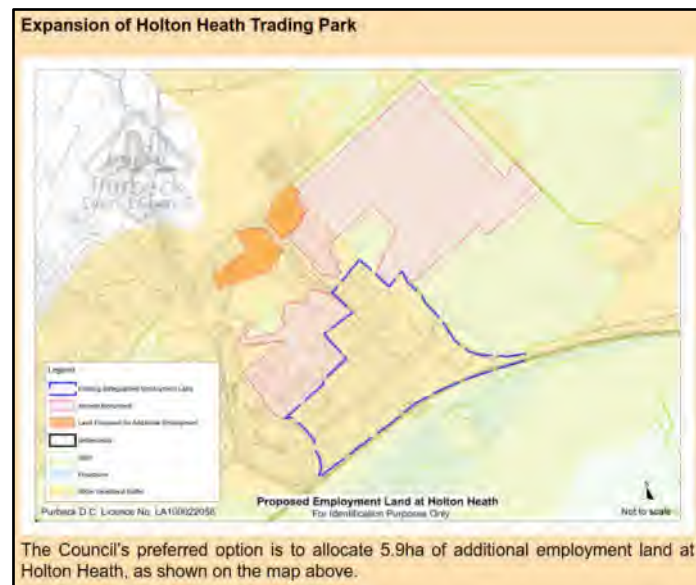
Birchmere Ltd recognises, as does the Council, how heavily constrained Purbeck is by environmental designations and the difficulties this presents in meeting development needs. The draft policies map illustrates well how designations such as heathland, AONB, heritage coast, flood zones 2 and 3, green belt and the sheer remoteness of some locations make the Council's task of achieving sustainable development a difficult one. That is why opportunities to achieve genuinely sustainable development that would not harm the district's sensitive designations should be seized.

The Land at Holton Gate as shown in figure 2 is unconstrained:

- It is outside of areas at risk of flooding;
- It is white land outside of the green belt;
- It is not covered by any landscape designations;
- Power supply issues that were previously thought to exist have been resolved. Birchmere Ltd have undertaken dialogue with Southern Electric in this regard, and as part of the development of land at the former Overhill Engineering Works that is currently underway Birchmere Ltd have already taken steps to provide the power infrastructure needed to serve the part of the Holton Gate site on the western side of Blackhill Road. A contract to provide and install a power supply to the eastern side of Blackhill Road has also recently been agreed and signed with Southern Electric and payment made. Therefore, power supply is not a constraint to the development of the land.
- It is extremely well placed to provide an excellent, enhanced gateway to the industrial park;
- It is extremely well placed in transport terms, with excellent road links to central and northeast Purbeck and beyond to the conurbation. It is also well served by cycle lanes and a stop on the mainline railway, making it accessible by sustainable transport means. Discussions have taken place with the County Council and it is considered that appropriate access can be provided to the site.
- There is clear demand for new commercial floorspace in this location. I have enclosed a letter from a local marketing agent affirming the demand for new commercial units in this location;
- It is clear of the scheduled monument; and
- Development would not prejudice ecology, still offering the opportunity to create linked habitats, as supported by Natural England.

Birchmere Ltd are keen to point out that the time that was taken to commence the development of land on the former Overhill Engineering site, and which borders the Holton Gate land, should not be interpreted as a lack of motivation on their part to bring the land forward. Covenants previously held over the land prevented its development without a significant overage payment clause to a previous owner, but those covenants have now been discharged and will not apply to the development of the Holton Gate land.

The case for allocating additional land at Holton Gate through an amendment to Policy EE1 has already been made above, as it makes strategic sense and promotes sustainable development. The land at Holton Gate is available and deliverable, having been promoted to the Council consistently throughout the local plan review process. Indeed, land at Holton Gate was shown as a preferred option in the Council's 2016 Partial Review Options consultation, an excerpt of which is provided below:



**Excerpt from page 54 of the Council's options consultation document (2016)**

A review of the 2016 Partial Review Options report shows that no relevant planning issues were raised that might lead to the removal of the site. In fact, the majority of respondents were in favour of its allocation.

Birchmere Ltd is therefore alarmed to find that the October 2018 pre-submission plan only seeks to safeguard the existing employment site (site ES1) and not allocate any new land there at all.

A review of the Purbeck Local Plan Pre-submission Sustainability Appraisal (SA) is also worrying: *'As alternative suitable sites are not available, to not allocate [site ES1] would mean insufficient employment land would be provided to support the District's economy. This would not be a reasonable approach'*.

One of the purposes of an SA is to assess reasonable alternatives, yet land at Holton Gate is not considered in the Council's SA at all, despite its excellent credentials and clear availability. The Council did not publish an updated Strategic Economic Land Availability Assessment (SELAA) as part of its pre-submission plan evidence base, meaning that the June 2016 version is the most up-to-date published piece of evidence informing site availability. From this piece of evidence, the site is very clearly available and is recorded as an included site. The SELAA says at paragraph 52:



*'Based on the findings and conclusions of this assessment, the following sites are recommended for consideration as part of the PLP1 review (site maps included in Appendix 4). The sites are in addition to those already included in the adopted PLP1. It should be remembered that these recommendations are made in the absence of the final version of latest Workspace Strategy and should only be regarded as provisional at this stage.*

Site	Proposal	Site Area (ha)	Consultation	Comments
Holton Heath Trading Park (Holton Gate)	Expansion of existing established site	5.9	Yes, at PLP1 review Issues & Options stage	Developable area reduced from 10ha to take account of Historic England designation
<i>A well-established and significant contributor to local employment provision, the site is accessible by a variety of means including sustainable transport options and is likely to continue to appeal to the market. The site is considered most appropriate for research and development industries; offices; B class uses and is available immediately.</i>				

It is therefore clear that, whilst the Council appeared supportive of allocating land at Holton Gate in 2016, this was subject to the findings of the Workspace Strategy.

The Workspace Strategy was subsequently published in October 2016, i.e. after the SELAA. It says that:

*'Holton Heath Trading Park is allocated within the current Local Plan as one of the strategic employment sites in Purbeck. Located around Poole Harbour this industrial site has approximately 5ha of vacant or underused land available in the short term and a further 5.9ha likely to be allocated by 2018' (paragraph 6.48) and 'the main focus for the industrial market in the Dorset LEP area is in Eastern Dorset and includes... Holton Heath' (paragraph 7.5).*

Given the site's inclusion in the SELAA and that it was not ruled out through the Workspace Strategy, the SA is undeniably incorrect by stating that there was a lack of alternatives.

The Council's published Economy background paper (2018) provides the sole reference to why the site at Holton Gate has been excluded from the pre-submission plan. At paragraph 63, the background paper states:

*'Whilst a majority of responses broadly supported this expansion when consulting on the local plan in 2016, at this time there is not considered to be any specific case for expansion of employment land provision in Purbeck'.*

Birchmere Ltd is wholly puzzled by this statement, not least because it states there is no case for expanding employment land provision in the district (Dorset Innovation Park is quite clearly proposed for expansion through the plan), but it appears that the Council has completely abandoned the principles of sustainable development. Surely if consideration were given to the Holton Heath's strategic importance, plus the deficit in supply highlighted above, along with the additional need for

employment that will be generated through additional housing in central and north-eastern Purbeck, the site should be allocated.

Birchmere Ltd therefore finds the Council's reasoning to be lacking and unsubstantiated, particularly when the site is included in the latest published SELAA; the fact that it was specifically mentioned in the Workspace Strategy; and that no planning issue has been raised to date to justify its exclusion. These factors strongly suggest that the SA is fundamentally flawed because it fails to consider the site as a reasonable alternative and erroneously claims that there are no other alternatives to Policy EE1 as drafted.

Consequently, Birchmere Ltd believes that Policy EE1 is not sound. Moreover, as the provision of sufficient, deliverable employment land goes to the very heart of the Council's strategy and therefore the heart of the plan itself, the plan cannot be sound either. It is not justified because the Council has evidently not taken into account reasonable alternatives; and it is not consistent with national policy because the policy and the plan do not deliver sustainable development.

As already discussed above, Birchmere Ltd has reservations regarding the Council's strategy to direct so much employment growth towards Dorset Innovation Park. It is clear from the evolution of the emerging plan that the Council's original intention in 2016 was to facilitate additional growth at Holton Heath through an allocation at Holton Gate, as well as safeguarding land at Dorset Innovation Park. However, that strategy has now changed without reasoned justification.

#### Recommendation

In order to overcome this, Birchmere Ltd recommends allocating 5.8ha of additional land at Holton Gate, as identified in figure 2 above.

#### **CONCLUSIONS**

This representation has set out a compelling case for the allocation of 5.8ha of land at Holton Gate for employment use. It is unconstrained, strategically well placed, available and deliverable now, and provide additional capacity in this part of the district. Importantly, it would also plug the deficit in local employment left through the de-allocation of employment land proposed by the submission version of the Wareham Neighbourhood Plan. Without the allocation of land at Holton Gate, draft Policy EE1 and the plan's strategy as a whole, are not sound. Crucially, the site has been ruled out without any justification and has not been considered through the published SA.

In addition, this representation has set out that land at Admiralty Park should form part of the Council's strategic employment site at Holton Heath Trading Park. The trading park abuts Admiralty Park and shares the same uses. Therefore, there is no compelling reason to exclude it and formally safeguarding it could only be advantageous in terms of delivering sustainable development.



Birchmere Ltd has proactively engaged with Purbeck District Council to bring forward the sites discussed in this representation since 2008 and is keen for it to continue. We look forward to a positive dialogue.

Yours faithfully,



Matt Holmes BA (Hons) MA MRTPI

**Director**

Our ref: JCW/KDP/W.16886  
 Please quote our reference in replying

28 November 2018

Mr P Jeffries  
 Birchmere Ltd  
 38 Sandbanks Road  
 Parkstone  
 Poole  
 Dorset BH14 8PX

**BOURNEMOUTH**

99 Holdenhurst Road  
 Bournemouth BH8 8DY

[goadsby.com](http://goadsby.com)

Dear Paul

**Holton Heath Trading Park, Poole, Dorset**

Following our recent meeting, we understand that there are two prominent parcels of land within your ownership fronting the roundabout at the entrance to Holton Heath Trading Park, and which total approximately 5.8 hectares. We understand that you would like our opinion of industrial/warehouse demand for these sites and we are pleased to respond as follows.

**POOLE**

Poole is Dorset's industrial hub and has the largest concentration of industrial estates. There is currently a severe shortage of employment land in Poole and accordingly, there are few speculative developments or sites offering design and build packages.

Many Poole based industrial/warehouse occupiers prefer to stay in Poole and whilst it is some distance from Poole town centre, they will consider Holton Heating Trading Park since it can be accessed quickly via the A35 dual carriageway.

**HOLTON HEATH TRADING PARK**

Holton Heath Trading Park is located on the edge of Poole and has witnessed improved demand over the last 10 years primarily due to the shortage of land elsewhere in Poole. This has been evidenced by the success of Plot 6 Holton Point which is a speculative scheme of 5 industrial/warehouse units ranging from 925-1,351 sq ft and which were all sold/let prior to practical completion.

A design and build development is also currently underway on the site opposite Plot 6 Holton Point.

**FRONTAGE PLOTS**

In our opinion, the 5.8 hectares in your ownership should have even greater demand due to their prominence to the A351. A number of occupiers can benefit from such prominence and we believe that there would be the following demand, particularly on a freehold basis:-

Continued/....

- a. Strong demand for new speculatively built industrial/warehouse units of between 750 and 1,500 sq ft.
- b. Good demand for a single 10,000 sq ft speculatively built industrial/warehouse unit.
- c. Reasonable demand for design and build industrial/warehouse units of between 10,000 and 30,000 sq ft.

### Specification

It is important that all of the units are built to a high specification and accordingly, we would recommend that each unit have the following:-

- Brick outer, blockwork inner wall construction.
- Micro rib composite panel cladding to upper elevations.
- An insulated mono pitch or pitched steel clad roof incorporating daylight panels supported upon a steel portal frame.
- Power floated concrete floor.
- Windows at ground and first floor levels within the front elevations (and elevations facing the A351).
- 1 No. sectional up and over loading door.
- Male and female WCs.
- 3 phase electricity, gas and telecom.
- Shell fit-out for small units.
- 10% first floor open plan carpeted offices with central heating and a suspended ceiling incorporating recessed lighting (larger speculative and design and build units).
- 6.5m internal eaves height for small units (8-10m for larger units).
- 3 No. car spaces per 1,000 sq ft upon a tarmacadam forecourt.
- Concrete loading apron.

### Phasing

We would recommend that the small speculative units be phased with 10-15 units per phase.

The larger 10,000 sq ft speculative units should be built one building at a time.

### PRICE

We would suggest the following quoting prices:-

Starter units	£150-£170 plus VAT per sq ft
Larger units	£130 plus VAT per sq ft
Design and build	£120-£130 plus VAT per sq ft

### ASSUMPTIONS

We have assumed the following:-

- The current landscaping would be capable of thinning to provide full visibility/prominence to the A351.
- Planning consent would be granted for B1 light industrial, B2 general industrial and B8 storage and distribution uses.
- The estate roads are built to adoption standard.

Continued/....

-3-

**DISCLAIMER**

The above figures and advice are for guidance purposes only and this document should not be regarded as a formal valuation nor should it be used for any mortgage, financial or security purpose. It is confidential to you and we accept no responsibility to any third party for the whole or any part of its content.

**MARKETING**

We would be delighted to market this opportunity on your behalf and we would be pleased to prepare a marketing report at an appropriate time.

**SUMMARY**

We have marketed units and land at Millers Heath Trading Park since the mid 1980's and we are finally witnessing sufficient demand to warrant speculative development on the estate, largely due to the shortage of land in Poole. The development of the 5.8 hectares heritage sites with modern, high quality industrial/warehouse units will, in our opinion, be very welcomed by a number of occupiers frustrated at not being able to purchase units elsewhere within Poole and which will allow their companies to expand.

We look forward to hearing from you if we can assist further.

Regards,

Yours sincerely



**J.C. Wilson BSc(Val), MRICS,**  
**Director**  
**Head of Agency**

Howe Street, Poole BH12 1JY  
 E-mail: [jcw@wilsonjones.com](mailto:jcw@wilsonjones.com)



**Commercial Property Agents, Building Surveyors, Valuers,  
 Construction Supervisors, Planning & Development Consultants**

Mr P Jeffries  
 Birchmere Limited  
 38 Sandbanks Road  
 Poole  
 Dorset  
 BH14 8BX

Our Ref: JGS BS18/208 AGI  
 30 November 2018

Dear Paul,

**LAND AT HOLTON HEATH**

I refer to our meetings and discussions regarding your land holding at the entrance to Holton Heath Industrial Estate, including the former Overhill Engineering site.

Your ownership extends to land on the east and west sides of the roundabout junction between Wareham Road and Blackhill Road.

In the case of the land to the west of the junction, I understand that you have instructed engineers to investigate a proposed new entrance from the existing roundabout. Egress from the land would be back onto Blackhill Road. Land on the eastern side of the junction would be served by an existing spur from Blackhill Road. The traffic leaving this site would use the same route.

Your land holding benefits from a strong commercial location in relation to the A351 Wareham Road which is a main route linking the Poole/Bournemouth conurbation with Wareham and the Purbecks beyond. The A351 connects with the A35 approx. one mile to the north-east.

We discussed the current availability of employment land and premises within the south-east Dorset area. Following the rate of take up in the last few years, the majority of employment land within the immediate Poole area is now fully developed and there are very few larger built properties available.

The last remaining consented significant employment site at Holton Heath is Holton Point where design and build opportunities have been offered to suit occupiers specific requirements on fully serviced plots. Terms have been agreed with specific occupiers for the development of the final two plots and there is therefore no further land which can be offered at Holton Point.

We are therefore now experiencing a recognised shortage of employment land within the immediate vicinity of the south-east Dorset conurbation.

Having regard to market conditions, I confirm my view that there would be active commercial interest in your land holding in the event that this comes forward for development. Having regard to the success at Holton Point, I recommended that you should consider seeking consent to install essential

infrastructure and services to enable a flexible approach to offering bespoke development opportunities to suit individual occupation requirements. This approach has been highly successful in other locations including Forest Gate Business Park at Ringwood and indeed Holton Point.

I consider that your land would be suitable for a range of mainly industrial/distribution uses although we have also seen demand for smaller scale office buildings in other locations.

I understand from our discussions that you have established that there is adequate power supply available to serve a development on both sides of the roundabout junction which would enable deliverability of development for employment use at this location.

I consider that the prominence of your land holding would be of particular benefit to good quality companies seeking to project a strong profile.

I appreciate that you already have an extant planning consent in respect of the former Overhill Engineering site but I recommended that you should consider this in relation to a potential master plan for your wider holding.

I shall be very pleased to discuss this with you further.

With kind regards.

Yours sincerely

  
**Jonathan Sibbett**  
**Sibbett Gregory**



**Matt Holmes**

---

**From:** Neil C Turner <n.c.turner@dorsetcc.gov.uk>  
**Sent:** 30 November 2018 14:00  
**To:** Ian Woolgar; Luke Barnett  
**Cc:** Oliver Nuttall; Anita Ball; Matt Holmes; Paul Jeffries  
**Subject:** RE: Blackhill Road - Holton Gate

Hi Ian,

I met with Steve Savage yesterday and discussed the Blackhill Road site.

In principle, DCC as Local Highway Authority are satisfied that the access proposals as detailed are satisfactory (two separate, opposing bell mouth junctions).

To consider the wider implications of the development and any further offsite works we would need to carry out a full pre-planning application consideration (for which a fee would be chargeable)

Hopefully this is enough to assist your current application, and I look forward to discussing further with you in due course.

Regards

Neil

**Neil Turner**  
**Development Team Leader**

**Dorset Highways**  
 Tel: 01305 225374 | [n.c.turner@dorsetcc.gov.uk](mailto:n.c.turner@dorsetcc.gov.uk)

**Dorset County Council**   
 County Hall, Colliton Park, Dorchester, DT1 1XJ

Live traffic and travel: [dorsetforyou.com/traveldorset](http://dorsetforyou.com/traveldorset) - [@TravelDorset](https://twitter.com/TravelDorset) on Twitter



**[REPORT A ROAD PROBLEM AND MAKE ENQUIRIES ONLINE](#)**

---

**From:** Ian Woolgar <Ian.Woolgar@gapltd.eu.com>  
**Sent:** 30 November 2018 08:56  
**To:** Neil C Turner <n.c.turner@dorsetcc.gov.uk>; Luke Barnett <l.barnett@dorsetcc.gov.uk>  
**Cc:** Oliver Nuttall [REDACTED] Anita Ball [REDACTED]  
 matt.holmes [REDACTED] Paul Jeffries [REDACTED]  
**Subject:** RE: Blackhill Road - Holton Gate

Morning Neil, Luke,

Are you in a position to provide any feedback on this one, now?

Regards

Ian

## Ian Woolgar

Associate  
Godsell Arnold Partnership Ltd  
**Tel:** 01202 600 900  
**Direct Line:** [REDACTED]  
**Mobile:** [REDACTED]  
[www.gapltd.eu.com](http://www.gapltd.eu.com)

---

**From:** Ian Woolgar  
**Sent:** 28 November 2018 17:33  
**To:** Neil C Turner <n.c.turner@dorsetcc.gov.uk>; Luke Barnett <l.barnett@dorsetcc.gov.uk>  
**Cc:** Oliver Nuttall <[REDACTED]>; Anita Ball [REDACTED]  
matt.holmes [REDACTED] Paul Jeffries [REDACTED]  
**Subject:** RE: Blackhill Road - Holton Gate

Afternoon Luke, Neil,

Thank you for your time at lunchtime today.

We look forward to your response after your meeting tomorrow with Colin Graham.

Regards

Ian

## Ian Woolgar

Associate  
Godsell Arnold Partnership Ltd  
**Tel:** 01202 600 900  
**Direct Line:** [REDACTED]  
**Mobile:** [REDACTED]  
[www.gapltd.eu.com](http://www.gapltd.eu.com)

---

**From:** Ian Woolgar  
**Sent:** 21 November 2018 17:05  
**To:** Neil C Turner <n.c.turner@dorsetcc.gov.uk>; Luke Barnett <l.barnett@dorsetcc.gov.uk>  
**Cc:** Oliver Nuttall [REDACTED]; Anita Ball [REDACTED]  
matt.holmes [REDACTED] Paul Jeffries [REDACTED]  
**Subject:** Blackhill Road - Holton Gate

Afternoon Neil, Luke,

As discussed, Birchmere have requested that we set up a meeting with DCC to discuss highway access options for two areas that they wish to develop (typically B1, B2, light industrial) either side of Blackhill Road, Holton Heath.

Rather than the previously discussed potential new access off the existing Blackhill Road roundabout, we are looking at bellmouth accesses off either side of the existing Blackhill Road (one exists on the east side, a new one required on the west side, possibly with traffic lights).

Birchmere are required to submit information to the planners by 3<sup>rd</sup> December 2018, therefore ideally we would like to set a meeting date for as early as possible next week – either the Wednesday or Thursday afternoon suggested in our conversation.

Please can you confirm a date and time and also if this will incur a pre-application fee?

If you need anything else at this stage, please let me know.

Regards

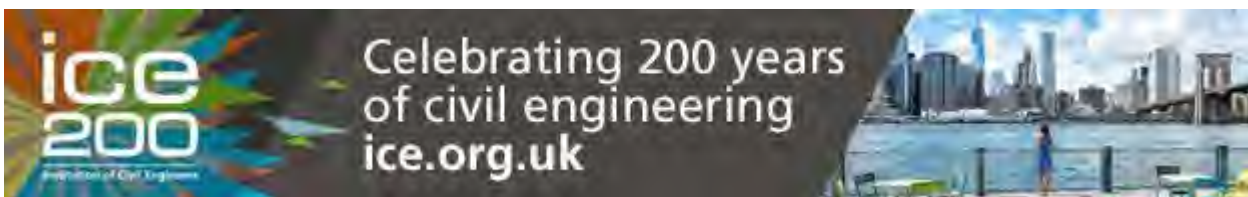
Ian



This e-mail and any attachment contains information which is private and confidential for named recipient(s) only. If you are not named then you are not authorised to read, copy or use this e-mail or any attachment.

If you have received this e-mail in error, please notify the sender by return e-mail and then destroy it.

Although the e-mail and its attachments are believed to be free from viruses, it is the responsibility of the recipient to ensure they are virus free.



"This e-mail is intended for the named addressee(s) only and may contain information about individuals or other sensitive information and should be handled accordingly. Unless you are the named addressee (or authorised to receive it for the addressee) you may not copy or use it, or disclose it to anyone else. If you have received this email

## Comment

Consultee	MR David Blackmore (1190897)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	MR David Blackmore (1190897)
Comment ID	PLPP246
Response Date	02/12/18 14:57
Consultation Point	Policies List ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.1
Files	<a href="#">Area Flooded</a>

Are you responding on behalf of a group? No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? E4

Do you consider that the Local Plan is legally compliant? Yes

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

I do not consider the proposed plans for development in the field Giddy Green, East Burton area to be sound. As you can see from the evidential photos that I have provided, this area annually and

regularly floods during the winter/wet months. The whole area is saturated with water coming from the fields behind Purbeck Gate and beyond.

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

I feel that before this plan can be legally sound, there needs to be appropriate action taken to stop the flooding of this area and to also make sure that the water from this field does not just get moved along on to the East Burton Road area without disturbance to the local residents and the wildlife as this is an area of outstanding beauty.

**If you have any supporting documents please upload them here.** [Area Flooded](#)  
[Area Flooded](#)

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?** No







## Comment

<b>Consultee</b>	Miss Emily Blake (1190554)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Miss Emily Blake (1190554)
<b>Comment ID</b>	PLPP563
<b>Response Date</b>	03/12/18 23:44
<b>Consultation Point</b>	Infrastructure ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Are you responding on behalf of a group?</b>	No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

**Which policy / paragraph number / policies map does your comment relate to?** Housing

**Do you consider that the Local Plan is legally compliant?** Yes

**Do you consider that the Local Plan is sound?** No

**Do you consider that the Local Plan complies with the duty to co-operate?** Yes

**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)**

Housing

- 1 The Plan does not adequately address the local need for housing.

- 2 This details the large gap between income and house prices and the demand for second homes. Local people need genuinely affordable housing or social housing to buy or rent and this has not been adequately addressed in the Local Plan. The Purbeck housing register shows a need for 500 homes but many of these are desirable rather than necessary. Purbeck Council should have assessed the actual housing register requirement and determined housing numbers from that. There is no need to provide additional housing for second homes as this is adequately provided with current market housing.

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

Identify the actual housing need for local people and how that can be addressed with genuinely affordable housing provision.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?** No



## Comment

<b>Consultee</b>	Miss Emily Blake (1190554)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Miss Emily Blake (1190554)
<b>Comment ID</b>	PLPP565
<b>Response Date</b>	03/12/18 23:52
<b>Consultation Point</b>	Moreton Station / Redbridge Pit - 490 homes, 65 bed care home and SANG ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Are you responding on behalf of a group?</b>	No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

**Which policy / paragraph number / policies map does your comment relate to?** Economy

**Do you consider that the Local Plan is legally compliant?** No

**Do you consider that the Local Plan is sound?** No

**Do you consider that the Local Plan complies with the duty to co-operate?** Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

Economy

The Dorset LEP provided projected calculations of future employment numbers but there was a conflict of interest in that one of the LEP members was a land owner who has subsequently put forward land sites for possible development.

This can surely not be legally compliant?

- 1 The Dorset Innovation Park has had an obscene amount of funding to make it a top employment zone and minimalism of the planning process - yet there has been little take up. This would indicate that employment forecasts are massively overstated and therefore the housing requirement calculations should be greatly reduced.
- 2 Agricultural employment is reduced could be due to the difficulty of agricultural workers being able to access affordable housing close to their work place. Agricultural workers tend to work unsocial hours and long hours and so there is a need to have accommodation close to the place of work. Purbeck farm workers struggle to afford to live in the Purbeck area and so genuinely, affordable housing or social rented housing is needed.

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

Obtain an independent, unbiased view of the projected employment figures and then determine the actual need for housing. Calculate the average income level for future employees and correctly determine the housing affordability and provide homes that match this affordability.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?**      No

## Comment

<b>Consultee</b>	Miss Emily Blake (1190554)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Miss Emily Blake (1190554)
<b>Comment ID</b>	PLPP566
<b>Response Date</b>	03/12/18 23:54
<b>Consultation Point</b>	Moreton Station / Redbridge Pit - 490 homes, 65 bed care home and SANG ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1

Please tick the box(es) if you would like to be notified at an address/email address of the following:

**Which policy / paragraph number / policies map does your comment relate to?** Infrastructure

**Do you consider that the Local Plan is legally compliant?** No

**Do you consider that the Local Plan is sound?** No

**Do you consider that the Local Plan complies with the duty to co-operate?** Yes

**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)**

Infrastructure

37 "Accessibility to facilities and services is a key issue" is very pertinent to rural parishes in the west and yet the west is targeted for housing location sites. There are only a few subsidised bus routes in Dorset and many areas have little or no access to adequate public transport. 38 states the resources available for infrastructure are limited and therefore it is reasonable to question why housing sites are

being targeted in rural areas. Infrastructure provision should be prioritised BEFORE any development sites can be considered in a rural area.

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

Determine infrastructure need prior to any development proposal.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?**      No

## Comment

<b>Agent</b>	Mr Andrew Elliott (996174)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	Everdene House Bournemouth BH7 7DU
<b>Consultee</b>	(1190247)
<b>Company / Organisation</b>	Bloor Homes Southern
<b>Address</b>	River View House First Avenue, Newbury Business Park Newbury RG14 2PS
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Bloor Homes Southern ( - 1190247)
<b>Comment ID</b>	PLPP87
<b>Response Date</b>	29/11/18 12:09
<b>Consultation Point</b>	Policy V1: Spatial strategy for sustainable communities ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Are you responding on behalf of a group?</b>	No
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	V1
<b>Do you consider that the Local Plan is legally compliant?</b>	Yes
<b>Do you consider that the Local Plan is sound?</b>	No

**Do you consider that the Local Plan complies with the duty to co-operate?** No

**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)**

Bloor Homes' principal concern is that the overall housing requirement will not support a step change in delivery. In terms of the spatial strategy of Policy V1 it is noted that a very high proportion of the allocated homes are distributed to settlements in the west of the district.

There is a risk of market demand in the western areas being lower (due to their rurality), and viability more challenging, resulting in development delivery being much slower than anticipated by Purbeck District Council. This will further constrain the ability of the plan to achieve a step change in delivery.

More sites are needed in the plan both to meet higher housing requirements but also to safeguard against slow delivery.

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

To meet a higher housing requirement and/or safeguard against slow delivery of other allocations there is a need for the spatial strategy to allocate additional development land. Bloor Homes suggests that a strategic development option in the Lytchett Minster area (as previously identified by earlier consultation stages of the Purbeck plan review) is the most sustainable and deliverable development option.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?** Yes

**If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?**

To expand upon comments raised here.

## Comment

<b>Agent</b>	Mr Andrew Elliott (996174)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	Everdene House Bournemouth BH7 7DU
<b>Consultee</b>	(1190247)
<b>Company / Organisation</b>	Bloor Homes Southern
<b>Address</b>	River View House First Avenue, Newbury Business Park Newbury RG14 2PS
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Bloor Homes Southern ( - 1190247)
<b>Comment ID</b>	PLPP90
<b>Response Date</b>	29/11/18 12:18
<b>Consultation Point</b>	Policy V2: Green belt ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.2
<b>Are you responding on behalf of a group?</b>	No
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	V2
<b>Do you consider that the Local Plan is legally compliant?</b>	Yes
<b>Do you consider that the Local Plan is sound?</b>	No



**Do you consider that the Local Plan complies with the duty to co-operate?** No

**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)**

The statement of common ground between local planning authorities in Dorset, October 2018, correctly identifies a range of strategic planning matters, notably that:

- 1 Recent housing delivery rates across Dorset as a whole have fallen significantly short of the local plan figures.
- 2 It is likely that there will be an increase in the requirements for the area, compared with the combined current adopted local plan targets
- 3 There is need for a step change in housing delivery rates if the housing needs resulting from the new standard methodology are to be met
- 4 There is a key requirement for the local planning authorities to work together to set out a strategic approach to the provision of additional homes in Dorset. This will need to be informed by an appraisal of all reasonable options for the distribution of growth
- 5 Green belt boundaries have been reviewed in the emerging local plan reviews, on an individual local authority basis, but a Strategic Green Belt Review will be required
- 6 There are some more remote parts of the county where development could result in less sustainable commuting patterns and an increase in congestion.
- 7 There is also the risk of market demand in these areas being lower, so that development might be less likely to be implemented.

We further note the requirement of national policy that:

- 1 Strategic policies 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

It is considered that Policy V2 is short-sighted in that a green belt review has not been undertaken in the context of the above issues.

Bloor Homes is convinced that a major allocation in the eastern half of the district, close to Poole, is required. Such an allocation was previously identified as an option in the Lytchett Minster area as part of earlier consultation stages of the Purbeck plan review, which considered higher levels of growth.

Notwithstanding the above, the policy as worded does not comply with national guidance and is inconsistent with the stated five purposes that green belt serves.

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

Green belt review should be undertaken in the context of an increased housing requirement.

Local policy should not seek to amend or adapt national guidance, which already sets out the purposes that green belt serves. The latter part of the policy should be deleted.

An additional strategic allocation is needed in the plan both to meet higher housing requirements but also to safeguard against slow delivery from other allocated sites, particularly those in the more rural western part of the district. Bloor Homes suggests that a strategic development option within green belt in the Lytchett Minster area (as previously identified by earlier consultation stages of the Purbeck plan review) is the most sustainable and deliverable development option.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?** Yes

**If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?**

To expand upon the points made here

## Comment

<b>Agent</b>	Mr Andrew Elliott (996174)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	Everdene House Bournemouth BH7 7DU
<b>Consultee</b>	(1190247)
<b>Company / Organisation</b>	Bloor Homes Southern
<b>Address</b>	River View House First Avenue, Newbury Business Park Newbury RG14 2PS
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Bloor Homes Southern ( - 1190247)
<b>Comment ID</b>	PLPP91
<b>Response Date</b>	29/11/18 12:21
<b>Consultation Point</b>	Policy H1: Local housing requirement ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Are you responding on behalf of a group?</b>	No
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	H1
<b>Do you consider that the Local Plan is legally compliant?</b>	Yes
<b>Do you consider that the Local Plan is sound?</b>	No

**Do you consider that the Local Plan complies with the duty to co-operate?** No

**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)**

Bloor Homes does not consider that the housing requirement for Purbeck will achieve the step change in delivery of housing that is required.

There is an ongoing history in Purbeck of not preparing local plans to meet full need, and then not delivering on the artificially low targets that have then been set by policy. This continuing underprovision in Purbeck is failing to 'significantly boost' the supply of housing' in accordance with the NPPF (2012 and 2018 versions).

The 2012 adopted local plan figure for Purbeck (of 120 homes per annum) was *only* accepted subject to an early partial review of the plan to fully meet OAN. The full OAN at the time was confirmed as 170 homes per annum. In other words, the figure in the adopted plan is artificially low.

The spreadsheet published in September 2017 (to illustrate the application of the proposed national formula for assessing housing need) applies a 40% cap on the increase to the 'artificially low' figure of 120 homes per annum (i.e. 168 homes per annum).

If the 40% 'cap' / uplift is applied to the 2012 Purbeck OAN figure of 170 dwellings per annum, the district requirement would be 238 homes per annum. This matches the annual average requirement of the 2016 SHMA for Purbeck and is considered by Bloor Homes to be a more appropriate target to plan to if the supply of housing is to be boosted significantly.

Purbeck DC has used the September 2017 figure to support and verify the 2018 SHMA total, however as demonstrated by the above calculation the September 2017 figure is artificially low. Furthermore, at time of writing in November 2018 government intends to shortly consult on revisions to the standard methodology.

Bloor Homes also considers that many of the homes allocated in the plan will be slow to deliver. A very high proportion of the allocated homes are distributed to settlements in the west of the district.

There is a risk of market demand in the western areas being lower (due to their rurality), and viability more challenging, resulting in development delivery being much slower than anticipated by Purbeck District Council. This will further constrain the ability of the plan to achieve a step change in delivery.

An additional strategic allocation is needed in the plan both to meet higher housing requirements but also to safeguard against slow delivery.

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

The local plan housing requirement should be increased to at least 238 homes per annum (which is a 40% uplift on the OAN figure supporting the adopted plan).

An increased housing requirement would justify further consideration of a strategic development option in the Lytchett Minster area (as previously identified by earlier consultation stages of the Purbeck plan review).

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?**      Yes

**If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?**

To expand upon the points made here

## Comment

<b>Agent</b>	Mr Andrew Elliott (996174)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	Everdene House Bournemouth BH7 7DU
<b>Consultee</b>	(1190247)
<b>Company / Organisation</b>	Bloor Homes Southern
<b>Address</b>	River View House First Avenue, Newbury Business Park Newbury RG14 2PS
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Bloor Homes Southern ( - 1190247)
<b>Comment ID</b>	PLPP94
<b>Response Date</b>	29/11/18 12:23
<b>Consultation Point</b>	Policy H2: The housing land supply ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Are you responding on behalf of a group?</b>	No
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	H2
<b>Do you consider that the Local Plan is legally compliant?</b>	Yes
<b>Do you consider that the Local Plan is sound?</b>	No
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	No

**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)**

Bloor Homes' principal concern is that the plan's overall housing requirement is insufficient, failing to provide the necessary step change to significantly boost housing delivery in Purbeck. This concern is set out in Bloor Homes' Policy H1 representation.

Bloor Homes also considers that many of the homes allocated in the plan will be slow to deliver. A very high proportion of the allocated homes are distributed to settlements in the west of the district.

There is a risk of market demand in the western areas being lower (due to their rurality), and viability more challenging, resulting in development delivery being much slower than anticipated by Purbeck District Council. This will further constrain the ability of the plan to achieve a step change in delivery.

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

The local plan housing requirement should be increased to at least 238 homes per annum.

An increased housing requirement would justify further consideration of a strategic development option in the Lytchett Minster area (as previously identified by earlier consultation stages of the Purbeck plan review).

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?** Yes

**If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?**

To further expand upon the points made here



## Comment

<b>Agent</b>	Mr Andrew Elliott (996174)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	Everdene House Bournemouth BH7 7DU
<b>Consultee</b>	(1190247)
<b>Company / Organisation</b>	Bloor Homes Southern
<b>Address</b>	River View House First Avenue, Newbury Business Park Newbury RG14 2PS
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Bloor Homes Southern ( - 1190247)
<b>Comment ID</b>	PLPP96
<b>Response Date</b>	29/11/18 12:24
<b>Consultation Point</b>	Policy H3: New housing development requirements ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.2
<b>Are you responding on behalf of a group?</b>	No
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	H3
<b>Do you consider that the Local Plan is legally compliant?</b>	Yes
<b>Do you consider that the Local Plan is sound?</b>	No

**Do you consider that the Local Plan complies with the duty to co-operate?** No

**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)**

The policy appears rather jumbled and unfocused, and most of the content may well be superfluous in the context of the rest of the plan. The level of cross-referencing between policies is unnecessary and could be moved to supporting text.

The final paragraph on viability appraisal is confusing and can't possibly apply to the full list of requirements set out in the policy.

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

The level of cross-referencing between policies is unnecessary and could be moved to supporting text.

If and where application stage viability appraisal is necessary, there is a need to clarify what elements of provision are essential, and what may be 'negotiable' in the light of viability appraisal work.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?** Yes

**If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?**

To expand upon the points made here

## Comment

<b>Agent</b>	Mr Andrew Elliott (996174)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	Everdene House Bournemouth BH7 7DU
<b>Consultee</b>	(1190247)
<b>Company / Organisation</b>	Bloor Homes Southern
<b>Address</b>	River View House First Avenue, Newbury Business Park Newbury RG14 2PS
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Bloor Homes Southern ( - 1190247)
<b>Comment ID</b>	PLPP98
<b>Response Date</b>	29/11/18 12:27
<b>Consultation Point</b>	Policy I1: Developer contributions to deliver Purbeck's infrastructure ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Are you responding on behalf of a group?</b>	No
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	I1
<b>Do you consider that the Local Plan is legally compliant?</b>	Yes
<b>Do you consider that the Local Plan is sound?</b>	No

**Do you consider that the Local Plan complies with the duty to co-operate?** No

**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)**

There is confusion in this policy about the differing role of S106 and CIL associated with large/strategic developments and non-strategic/small developments in Purbeck.

The contribution sum rates for GP facilities and education provision referenced at elements c. and e. of this policy are not substantiated by evidence and the blanket application of a tariff may well fail the statutory planning obligation tests in practice if not fairly and reasonably justified by the nature and scale of proposal and infrastructure requirement in a specific location.

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

The policy should clarify that strategic allocations are to be exempt from CIL (as confirmed by the current charging levy consultation). It is recommended that bespoke policies are developed for each of the allocations that clarify necessary infrastructure requirements.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)


Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?** Yes

**If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?**

To expand upon the points made here.

## Comment

<b>Consultee</b>	Borough of Poole Council (1021364)
<b>Email Address</b>	
<b>Company / Organisation</b>	Borough of Poole Council
<b>Address</b>	Planning & Regeneration Services Civic Centre Poole BH15 2RU
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Borough of Poole Council ( Borough of Poole Council - 1021364)
<b>Comment ID</b>	PLPP745
<b>Response Date</b>	03/12/18 11:38
<b>Consultation Point</b>	Policy V1: Spatial strategy for sustainable communities ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Letter
<b>Version</b>	0.1
<b>Files</b>	<a href="#">borough-of-poole-council-1021364-PLPP642.pdf</a>

**Please tick the box(es) if you would like to be notified at an address/email address of the following:**

**Which policy / paragraph number / policies map does your comment relate to?** All

## Comment

<b>Consultee</b>	Borough of Poole Council (1021364)
<b>Email Address</b>	
<b>Company / Organisation</b>	Borough of Poole Council
<b>Address</b>	Planning & Regeneration Services Civic Centre Poole BH15 2RU
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Borough of Poole Council ( Borough of Poole Council - 1021364)
<b>Comment ID</b>	PLPP746
<b>Response Date</b>	03/12/18 11:38
<b>Consultation Point</b>	Policy V2: Green belt ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Letter
<b>Version</b>	0.1
<b>Files</b>	<a href="#">borough-of-poole-council-1021364-PLPP642.pdf</a>

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? All

---

**From:** Mark Axford [mailto:Mark.Axford@Bournemouth.gov.uk]  
**Sent:** 03 December 2018 15:25  
**To:** email-LocalPlan  
**Cc:** Nick Perrins ; Ken Bean ; Anna Lee  
**Subject:** BBC and BoP Rep on Purbeck Local Plan

Dear Purbeck Local Plan Team,

Please find below a joint representation from Bournemouth and Poole Councils on the Pre-Submission Purbeck Local Plan. Please note this is submitted on behalf of Officers and later this week we will resubmit with a formal representation signed by our respective Portfolio Holders.

Dear Sirs

Thank you for inviting Borough of Poole (BoP) and Bournemouth Borough Council (BBC) to comment on the Pre-submission draft Purbeck Local Plan. Officers from both BoP and BBC (henceforth referred as 'the Councils') have reviewed the document and provide a joint response on behalf of both Councils.

As an overriding comment, having reviewed the draft plan and supporting documentation, we support the Pre-submission draft plan and consider it is capable of being found sound. We suggest only one change in our response to ensure draft Policy V1 accords with national planning policy, but other than that the draft plan meets the statutory requirements and test of soundness in our view. In particular, we welcome Purbeck District Council (PDC) seeking to meet its objectively assessed needs within its boundaries and we will continue to support PDC's position in this regard as the plan progresses.

Having reviewed the document we make the following comments on the plan:

**Duty to cooperate (paragraphs 12 to 15)**

The Councils confirm that PDC has during the preparation of the draft plan, worked constructively on cross-boundary strategic planning issues between our administrative areas in accordance with the Duty to Cooperate. The Councils now look forward to working further with PDC and other relevant bodies to sign the inaugural Dorset Statement of Common Ground as part of the Duty to Cooperate process.

**Policy V1: Spatial Strategy for sustainable communities**

**Policy H1: Local Housing Requirement**

**Policy H2: The Housing land supply**



The Councils support PDC's spatial strategy in so far as it will ensure the district's objectively assessed housing needs will be met over the plan period in a sustainable way across the area's main settlements. This approach is positive and ensures, based on current evidence, that there will not be any unmet need arising from Purbeck for adjoining areas to accommodate.

In this regard, we also highlight that there remain significant challenges for accommodating wider housing growth across Dorset and, in particular, the Eastern Dorset Housing Market Area. We recognise, however, that at this stage of the plan's preparation the overall Dorset position on housing needs is not known due to Government still reviewing their approach to the standard housing methodology.

Once there is clarity on strategic housing needs, the Councils look forward to working collaboratively with PDC and other authorities to address the strategic housing challenges through future plans including determining the most appropriate locations to accommodate strategic needs in the longer term. In this regard, we are encouraged that the Council's supporting evidence indicates that there could remain some longer term potential within the PDC area to accommodate future growth needs across the housing market area. We understand that this is not a matter for this Local Plan but one that the Council (and the successor Dorset Council unitary authority) will need to consider and be resolved with joint working including further iterations of the Dorset Statement of Common Ground and future Local Plans.

## Policy V2: Green Belt

The Councils consider that Policy V2 as drafted does not accord with national Green Belt policy as set out in the National Planning Policy Framework (NPPF) and needs to be amended. The NPPF states that one of the Green Belt five purposes is to "check the unrestricted sprawl of large built-up areas". The NPPF also allows for Green Belt boundaries to be altered in exceptional circumstances, and inappropriate development to be permitted where there are very special circumstances. It therefore follows that the NPPF can allow for carefully planned development (i.e. the opposite of "unrestricted sprawl") in the Green Belt where exceptional or very special circumstances exist. It is noted that PDC applies the exceptional circumstances test in proposing carefully planned Green Belt release within the District in accordance with national policy.

However, Policy V2 as drafted inadvertently seeks to embed in local policy an approach where the Council (and successor Dorset Council) appears as first principle to "prevent the spread of the Poole, Bournemouth and Christchurch conurbation", without regard to the exceptional or very special circumstances provisions in national policy. We also note that there are other parts of the wider conurbation that are not referenced in the policy (such as Wimborne and Ferndown) so request that the policy refers to the 'south east Dorset built-up area' to be consistent with the NPPF and also the name of the Green Belt locally.

Overall, the Councils consider that Policy V2 is likely not needed given the strong national policy on Green Belt set out in the NPPF. However, if the Council do wish to continue with its inclusion to provide a more localised approach, the following amendment is required to ensure Policy V2 is consistent with national policy:

**Subject to the provisions of national planning policy**, the Council will protect the green belt, as designated on the policies map, to:

- a. **Check the unrestricted sprawl** ~~prevent the spread of the~~ **south east Dorset built-up area** ~~Poole, Bournemouth and Christchurch conurbation;~~

The above change will ensure that Policy V2 is consistent with national planning policy as required by Paragraph 35 (d) of the NPPF tests of soundness.  
Policies E7, E8 and E9

The Councils supports PDC's approach to the protection of internationally protected sites. BoP looks forward to finalise the joint Recreation in Poole Harbour SPD to support implementation of the plan.

## Rest of plan

The Councils supports the policies in the rest of the plan and makes no further comments at this stage as they cover matters that we will continue to work jointly on through the Dorset Statement of Common Ground.

I trust these comments will be helpful to the successful progression of the plan.

Yours Faithfully

Mark Axford Head of Planning Bournemouth and Nick Perrins Policy Manager Poole

Mark Axford  
Head of Planning  
Planning Service,  
Development Services Directorate



Telephone: [REDACTED]

e-mail: [REDACTED]

VISIT OUR WEBSITE: [www.bournemouth.gov.uk](http://www.bournemouth.gov.uk)

Please save paper and only print out what is necessary

\*\*\*\*\* This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the system manager. This footnote also confirms that this email message has been checked for the presence of computer viruses.

\*\*\*\*\*


## Comment

<b>Consultee</b>	Bournemouth Borough Council (1051470)
<b>Email Address</b>	[REDACTED]
<b>Company / Organisation</b>	Bournemouth Borough Council
<b>Address</b>	St. Stephens Road Bournemouth BH2 6EB
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Bournemouth Borough Council (Bournemouth Borough Council - 1051470)
<b>Comment ID</b>	PLPP747
<b>Response Date</b>	03/12/18 11:32
<b>Consultation Point</b>	Policy V1: Spatial strategy for sustainable communities ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Letter
<b>Version</b>	0.1
<b>Files</b>	<a href="#">bournemouth-borough-council-1051470-PLPP640.pdf</a>

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? All

## Comment

<b>Consultee</b>	Bournemouth Borough Council (1051470)
<b>Email Address</b>	
<b>Company / Organisation</b>	Bournemouth Borough Council
<b>Address</b>	St. Stephens Road Bournemouth BH2 6EB
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Bournemouth Borough Council (Bournemouth Borough Council - 1051470)
<b>Comment ID</b>	PLPP748
<b>Response Date</b>	03/12/18 11:32
<b>Consultation Point</b>	Policy V2: Green belt ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Letter
<b>Version</b>	0.1
<b>Files</b>	<a href="#">bournemouth-borough-council-1051470-PLPP640.pdf</a>

**Please tick the box(es) if you would like to be notified at an address/email address of the following:**

**Which policy / paragraph number / policies map does your comment relate to?** All

---

**From:** Mark Axford [mailto:Mark.Axford@Bournemouth.gov.uk]  
**Sent:** 03 December 2018 15:25  
**To:** email-LocalPlan  
**Cc:** Nick Perrins ; Ken Bean ; Anna Lee  
**Subject:** BBC and BoP Rep on Purbeck Local Plan

Dear Purbeck Local Plan Team,

Please find below a joint representation from Bournemouth and Poole Councils on the Pre-Submission Purbeck Local Plan. Please note this is submitted on behalf of Officers and later this week we will resubmit with a formal representation signed by our respective Portfolio Holders.

Dear Sirs

Thank you for inviting Borough of Poole (BoP) and Bournemouth Borough Council (BBC) to comment on the Pre-submission draft Purbeck Local Plan. Officers from both BoP and BBC (henceforth referred as 'the Councils') have reviewed the document and provide a joint response on behalf of both Councils.

As an overriding comment, having reviewed the draft plan and supporting documentation, we support the Pre-submission draft plan and consider it is capable of being found sound. We suggest only one change in our response to ensure draft Policy V1 accords with national planning policy, but other than that the draft plan meets the statutory requirements and test of soundness in our view. In particular, we welcome Purbeck District Council (PDC) seeking to meet its objectively assessed needs within its boundaries and we will continue to support PDC's position in this regard as the plan progresses.

Having reviewed the document we make the following comments on the plan:

**Duty to cooperate (paragraphs 12 to 15)**

The Councils confirm that PDC has during the preparation of the draft plan, worked constructively on cross-boundary strategic planning issues between our administrative areas in accordance with the Duty to Cooperate. The Councils now look forward to working further with PDC and other relevant bodies to sign the inaugural Dorset Statement of Common Ground as part of the Duty to Cooperate process.

**Policy V1: Spatial Strategy for sustainable communities**

**Policy H1: Local Housing Requirement**

**Policy H2: The Housing land supply**

The Councils support PDC's spatial strategy in so far as it will ensure the district's objectively assessed housing needs will be met over the plan period in a sustainable way across the area's main settlements. This approach is positive and ensures, based on current evidence, that there will not be any unmet need arising from Purbeck for adjoining areas to accommodate.

In this regard, we also highlight that there remain significant challenges for accommodating wider housing growth across Dorset and, in particular, the Eastern Dorset Housing Market Area. We recognise, however, that at this stage of the plan's preparation the overall Dorset position on housing needs is not known due to Government still reviewing their approach to the standard housing methodology.

Once there is clarity on strategic housing needs, the Councils look forward to working collaboratively with PDC and other authorities to address the strategic housing challenges through future plans including determining the most appropriate locations to accommodate strategic needs in the longer term. In this regard, we are encouraged that the Council's supporting evidence indicates that there could remain some longer term potential within the PDC area to accommodate future growth needs across the housing market area. We understand that this is not a matter for this Local Plan but one that the Council (and the successor Dorset Council unitary authority) will need to consider and be resolved with joint working including further iterations of the Dorset Statement of Common Ground and future Local Plans.

### **Policy V2: Green Belt**

The Councils consider that Policy V2 as drafted does not accord with national Green Belt policy as set out in the National Planning Policy Framework (NPPF) and needs to be amended. The NPPF states that one of the Green Belt five purposes is to "check the unrestricted sprawl of large built-up areas". The NPPF also allows for Green Belt boundaries to be altered in exceptional circumstances, and inappropriate development to be permitted where there are very special circumstances. It therefore follows that the NPPF can allow for carefully planned development (i.e. the opposite of "unrestricted sprawl") in the Green Belt where exceptional or very special circumstances exist. It is noted that PDC applies the exceptional circumstances test in proposing carefully planned Green Belt release within the District in accordance with national policy.

However, Policy V2 as drafted inadvertently seeks to embed in local policy an approach where the Council (and successor Dorset Council) appears as first principle to "prevent the spread of the Poole, Bournemouth and Christchurch conurbation", without regard to the exceptional or very special circumstances provisions in national policy. We also note that there are other parts of the wider conurbation that are not referenced in the policy (such as Wimborne and Ferndown) so request that the policy refers to the 'south east Dorset built-up area' to be consistent with the NPPF and also the name of the Green Belt locally.

Overall, the Councils consider that Policy V2 is likely not needed given the strong national policy on Green Belt set out in the NPPF. However, if the Council do wish to continue with its inclusion to provide a more localised approach, the following amendment is required to ensure Policy V2 is consistent with national policy:

**Subject to the provisions of national planning policy**, the Council will protect the green belt, as designated on the policies map, to:

- a. **Check the unrestricted sprawl** ~~prevent the spread of the~~ **south east Dorset built-up area** ~~Poole, Bournemouth and Christchurch conurbation;~~

The above change will ensure that Policy V2 is consistent with national planning policy as required by Paragraph 35 (d) of the NPPF tests of soundness.  
Policies E7, E8 and E9

The Councils supports PDC's approach to the protection of internationally protected sites. BoP looks forward to finalise the joint Recreation in Poole Harbour SPD to support implementation of the plan.

### **Rest of plan**

The Councils supports the policies in the rest of the plan and makes no further comments at this stage as they cover matters that we will continue to work jointly on through the Dorset Statement of Common Ground.

I trust these comments will be helpful to the successful progression of the plan.

Yours Faithfully

Mark Axford Head of Planning Bournemouth and Nick Perrins Policy Manager Poole

Mark Axford  
Head of Planning  
Planning Service,  
Development Services Directorate



Telephone: [REDACTED]

e-mail: [REDACTED]

VISIT OUR WEBSITE: [www.bournemouth.gov.uk](http://www.bournemouth.gov.uk)

Please save paper and only print out what is necessary

\*\*\*\*\* This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the system manager. This footnote also confirms that this email message has been checked for the presence of computer viruses.

\*\*\*\*\*

## Comment

<b>Consultee</b>	Mr Toby Branston (1188631)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Mr Toby Branston (1188631)
<b>Comment ID</b>	PLPP564
<b>Response Date</b>	03/12/18 23:49
<b>Consultation Point</b>	Conserve and enhance Purbeck's natural habitat, biodiversity and geodiversity ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Are you responding on behalf of a group?</b>	No
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	85
<b>Do you consider that the Local Plan is legally compliant?</b>	No
<b>Do you consider that the Local Plan is sound?</b>	No
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	No

**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)**

Suitable Alternative Natural Greenspace (SANG)

provide new areas of public open space that are convenient and dog friendly providing



an alternative to heathland. The overarching aim of the provision of SANGs is to divert visitor pressure to ensure that there is no net increase in recreation pressure on internationally protected heathland.

Although using a site such as Coombe Wool nr Wool as a SANG may help to alleviate pressure on heathland it will not help biodiversity as a whole as this particular high quality wildlife site will be degraded by conversion to a convenient to access, dog friendly public space.

In Purbeck District Councils Pre-submission document, it clearly sets out the parameters by which development plans should be assessed on with regard to biodiversity. Under **Local biodiversity and geodiversity**, sections 96 and 97 it states that 'The Council has a specific duty set out in the Natural Environment and Rural

Communities Act 2006 to conserve biodiversity' and this includes all high value wildlife sites such as SSSI's but also LNR's and even undesignated sites such as hedgerows and semi natural deciduous woodland.

It is widely acknowledged and is indeed the root principle backing the Dorset Heaths Planning Framework under which all developments within 5km are considered that increased recreational access especially for dog walking (D. Liley H. Fernley 2012; Banks & Bryant 2007) is a known cause for bird population declines. Therefore, the above two principles add great weight that Coombe Wood should be ruled out as a venue for the proposed SANG for the Wool development to prevent deterioration of its rich bird assemblage. In a recent visit to the Wood R Palmer, Trees for Dorset and I Alexander, Natural England disturbed woodcock, a red listed now scarce breeding resident species. (pers. com.)

I myself compiled the following list of species which were holding territory in the wood and probably breeding on 3 visits in spring 2017 from listening and observation points along the approx. 500m long public right of way that crosses the wood;

### **Species**

#### **Comment**

Blackbird

numerous

Blackcap

numerous

Blue Tit

present

Bullfinch

present

Carrion Crow

present

Chaffinch

numerous

Chiffchaff

numerous

Coal Tit

numerous

Cuckoo

present

Garden Warbler

present  
Goldcrest  
numerous  
Goldfinch  
numerous  
Great Spotted Woodpecker  
present  
Great Tit  
numerous  
Green Woodpecker  
present  
Jackdaw  
present  
Long-tailed Tit  
present  
Marsh Tit  
present  
Nightingale  
present on 1 occasion  
Nuthatch  
present  
Pheasant  
present  
Robin  
numerous  
Siskin  
present  
Song Thrush  
present  
Tawny Owl  
present  
Treetreeper  
present  
Woodpigeon  
numerous  
Wren  
numerous

If PDC wanted to follow the convention of trying to actually improve biodiversity why not turn another adjacent maize field into an open, well landscaped parkland with circular walks of a variety of distances

that would be attractive to local dog walkers. This if well managed under nature conservation principle, ie allowing hedges to obtain their optimum size and diversity and only cut on long rotation and planting / replacing the wildflowers meadows that are vanishing from the countryside then biodiversity could actually be enhanced.

Surely PDC reputation could be made for wildlife conservation if local woodlands were actually enhanced to provide for breeding sites for turtle dove which are still known in the parish albeit from a low number of sites and also biodiverse organic farmland was maintained alongside these woods in a habitat mosaic to provide feeding habitat, how fantastic would that be!

In fact as Coombe Wood has been in a Woodland Grant Scheme for some years then the landowners / manager has been receiving grant aid to actually enhance this wood for wildlife (Natural England online mapping service at; <https://magic.defra.gov.uk/MagicMap.aspx>)

Ongoing enhancement to benefit our declining species could be the primary aim which can be achieved alongside more sympathetically managed farmland including organic arable and pasture and a maize field converted to a SANG. Stewardship grant funding alongside sustainable woodland management should give income enough to ensure its long term survival to benefit wildlife and achieve our biodiversity targets.

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

If PDC wanted to follow the convention of trying to actually improve biodiversity why not turn another adjacent maize field into an open, well landscaped parkland with circular walks of a variety of distances that would be attractive to local dog walkers. This if well managed under nature conservation principle, ie allowing hedges to obtain their optimum size and diversity and only cut on long rotation and planting / replacing the wildflowers meadows that are vanishing from the countryside then biodiversity could actually be enhanced.

Surely PDC reputation could be made for wildlife conservation if local woodlands were actually enhanced to provide for breeding sites for turtle dove which are still known in the parish albeit from a low number of sites and also biodiverse organic farmland was maintained alongside these woods in a habitat mosaic to provide feeding habitat, how fantastic would that be!

In fact as Coombe Wood has been in a Woodland Grant Scheme for some years then the landowners / manager has been receiving grant aid to actually enhance this wood for wildlife (Natural England online mapping service at; <https://magic.defra.gov.uk/MagicMap.aspx>)

Ongoing enhancement to benefit our declining species could be the primary aim which can be achieved alongside more sympathetically managed farmland including organic arable and pasture and a maize field converted to a SANG. Stewardship grant funding alongside sustainable woodland management should give income enough to ensure its long term survival to benefit wildlife and achieve our biodiversity targets.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?**      Yes

**If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?**

To ensure that these important issues at this time of heightened environmental alarm worldwide are fully considered

## Comment

Consultee	Mr Alf Bush (1189744)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Alf Bush (1189744)
Comment ID	PLPP37
Response Date	26/11/18 17:20
Consultation Point	Policies List ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.2
Are you responding on behalf of a group?	No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? Chapter 2

Do you consider that the Local Plan is legally compliant? No

Do you consider that the Local Plan is sound? No

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

Clause 45 states that 'the Purbeck Local Plan proposes to remove land from the green belt to support its strategic policy of spreading housing development across the District. NPPF requires a Local Plan to show that 'if councils wish to allow development on green belt land there needs to be 'very special circumstances' (Green Belt Study clause 11). There is no reference to these vary special circumstances and therefore the plan is not compliant with NPPF regulations.

Clause 47 states that 'the Council has considered alternative strategies for delivering homes'. There is no record or explanation of what these alternate strategies are'.

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

The Local Plan has to set out what are the very special circumstances required by NPPF regulations.

The Local Plan has to set out what alternate strategies were used. In particular, it has to set out why those areas of Purbeck District that are neither AONB nor Green belt were not considered first before deciding to release Green belt.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?** No

## Comment

Consultee	Mr Alf Bush (1189744)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Alf Bush (1189744)
Comment ID	PLPP38
Response Date	26/11/18 18:20
Consultation Point	Policies List ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.3
Are you responding on behalf of a group?	No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? Chapter 4/Clause 148/Policy H8

Do you consider that the Local Plan is legally compliant? No

Do you consider that the Local Plan is sound? No

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

Clause 148 states that 'the Council's strategies for addressing the District's development needs focus strategic and larger scale allocations on land with the least environmental or amenity value, in the most sustainable locations. The Council's strategy helps to consolidate on and improve existing infrastructure, while supporting and enhancing existing services and facilities in its towns and larger villages. Outside these areas the Council's strategy also recognises that high quality small scale development, which respects its surroundings, can have an important role in enhancing and maintaining the vitality of rural communities'.

Policy H8 fails to define those areas identified in clause 148 as 'towns and larger villages' as being outside the scope of this policy.

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

Lytchett Matravers is identified as a larger village and must therefore be exempt from Policy H8. This needs to be specifically stated for Lytchett Matravers and all other towns and larger villages to ensure clarity on the applicability of this policy.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?**      No



## Comment

Consultee	Mr Alf Bush (1189744)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Alf Bush (1189744)
Comment ID	PLPP56
Response Date	28/11/18 08:58
Consultation Point	Policies List ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to?	Policy H8
Do you consider that the Local Plan is legally compliant?	No
Do you consider that the Local Plan is sound?	No

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

Clause 148 states that 'the Council's strategies for addressing the District's development needs focus strategic and larger scale allocations on land with the least environmental or amenity value, in the most sustainable locations. The Council's strategy helps to consolidate on and improve existing infrastructure, while supporting and enhancing existing services and facilities in its towns and larger villages. Outside these areas the Council's strategy also recognises that high quality small scale development, which respects its surroundings, can have an important role in enhancing and maintaining

the vitality of rural communities'. Policy H8 fails to define those areas identified in clause 148 as 'towns and larger villages' as being outside the scope of this policy.

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

Lytchett Matravers is identified as a larger village and must therefore be exempt from Policy H8. This needs to be specifically stated for Lytchett Matravers and all other towns and larger villages to ensure clarity on the applicability of this policy.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?** No

## Comment

Consultee	Mr Alf Bush (1189744)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Alf Bush (1189744)
Comment ID	PLPP57
Response Date	28/11/18 09:13
Consultation Point	Policies List ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to?	Policy H12
Do you consider that the Local Plan is legally compliant?	No
Do you consider that the Local Plan is sound?	No

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

Policy H12 states that all Purbeck excepting for Swanage, Wareham and Upton are rural. This is clearly incorrect since development has been concentrated in the towns and large villages. Any location that is being required to accept new housing on this scale cannot be considered rural.

The 3,000 limit that was applicable and has been removed by PDC due to a technicality needs to be re-established. That limit was set as a guideline and the spirit of that limit should be recognised. Over 3,000 residents is no longer rural.

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

Due to the planned house building in Lytchett Matravers, Wool and Moreton all three locations will be significantly above the 3,000 limit and cannot be considered rural.

The first line of the policy should read 'In order to meet local community needs in rural areas, except in the parishes of Swanage, Wareham, Upton, Lytchett Matravers, Wool and Moreton affordable housing will be permitted in and around existing settlements where:

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?** No

## Comment

<b>Consultee</b>	Ms Lynne Campbell (1192532)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Ms Lynne Campbell (1192532)
<b>Comment ID</b>	PLPP644
<b>Response Date</b>	03/12/18 11:50
<b>Consultation Point</b>	Policies List ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Letter
<b>Version</b>	0.3
<b>Files</b>	<a href="#">Campbell-PLPP644-redacted.pdf</a>
<b>Are you responding on behalf of a group?</b>	No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? All



## For Office Use Only

Requester ID: 019

Consultee ID: 1192532

Comment ID's: PLPP644

**PART B**

1. Which part of the Purbeck Local Plan does your representation relate to? Separate forms must be completed for each separate policy or paragraph you wish to comment on.

Policy number	
Policies map	
Paragraph number	

2. Do you consider that the Local Plan is:

- |   |     |                          |    |                          |
|---|-----|--------------------------|----|--------------------------|
| • Legally compliant                     | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> |
| • Sound                                 | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> |
| • Complies with the duty to co-operate. | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> |

If your representation relates to how the Council has prepared the Local Plan it is likely to relate to legal compliance. The Plan must:

- comply with Section 20 of the Planning and Compulsory Purchase Act 2004 and other related legislation;
- be in accordance with the Council's Local Development Scheme and Statement of Community Involvement;
- comply with the Town and Country Planning (Local Planning) (England) Regulations 2012, national planning policy and the duty to co-operate in relation to planning of sustainable development (section 110 of Localism Act 2011).

If your representation relates to the content of the Local Plan, it is likely to relate to its soundness. To be considered sound the plan must be:

- positively prepared - providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- 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.

**If your representation relates to how the Council has consulted with other relevant bodies during the plan making process, it is likely to relate to how the plan process has complied with the duty to co-operate in relation to the planning of sustainable development.**

**3. Please give details of why you consider the policy, policies map or paragraph number of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (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 Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text 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)



5. If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions of the examination, although all members of the public may observe the proceedings. Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

Yes

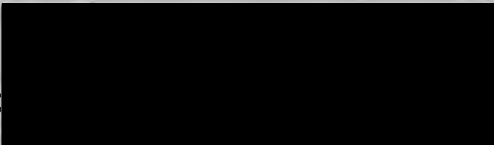
No

6. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary?

no dont need to attend.

(Please continue on a separate sheet if necessary)

Please sign and date this form:

Signature: 

Date: 2/12/18

Dear Planning & Community Services  
Libby Todd.

Thank you for your kind letter..... I didn't understand any of the forms so you can fill in or take into account the encloses in my letter (over) that would be great. I just wondered as my land is opp Bere Farm where I believe housing development will be and wondered if my land would be suitable to sell as a retail park. I just walk my dogs there and its too much for me to look after.

Any way perhaps you could fill in the form and see how it all goes. Obviously if nothing comes of it, I will continue going here twice a day walking my dogs and wouldn't dream of objecting to housing opposite or wherever.

Many thanks.

Sincerely,





# PAPUSHKA

Papushka District Council

STANDARD POODLES

23 NOV 2018

FILE REF

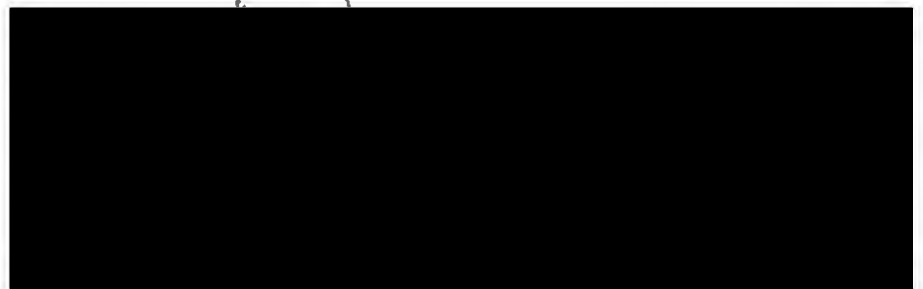


SITKAA Planning

7 Acres land at  
Dorchester Rd. Orqanford Btt16 6EU  
(Right next to Axion Centre)

handowner asking for permission to be  
sold as Retail Park, utility, Gypsy/travellers  
No Timescale, just am getting too old to  
look after, at present laid to lawn and trees  
planted and Copse, used to walk my dogs.  
If large housing estates going up, mine  
would be ideal for petrol, super market,  
chemist etc.

Thank you.



*Home Of Papushka Champion Standard Poodles*

*Top Standard Poodle Bitch Crufts 2001, 2005*

*Best Of Breed Standard Poodle Crufts 2005*

*Standard Poodle Club Breeder Of The Year 2001, 2005, 2009*

*International Judge*

## Comment

<b>Consultee</b>	Miss Dawn Adams (1191253)
<b>Email Address</b>	[REDACTED]
<b>Company / Organisation</b>	Catesby Estates Ltd
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Catesby Estates Ltd (Miss Dawn Adams - 1191253)
<b>Comment ID</b>	PLPP509
<b>Response Date</b>	03/12/18 18:23
<b>Consultation Point</b>	Chapter 2: Vision and objectives ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Files</b>	<a href="#">Catesby Estate Representations</a>
<b>Are you responding on behalf of a group?</b>	Yes
<b>If yes, how many people do you represent?</b>	16
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	Vision
<b>Do you consider that the Local Plan is legally compliant?</b>	No
<b>Do you consider that the Local Plan is sound?</b>	No
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	No

**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)**

Please see attached letter

**If you have any supporting documents please upload them here.** [Catesby Estate Representations](#)  
[Catesby Estate Representations](#)

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?** Yes

**If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?**

To ensure the plan is made sound

Purbeck District Council  
Westport House  
Worgret Road  
Wareham  
Dorset  
BH20 4PP

30<sup>th</sup> November 2018

Dear Sir/Madam

**LOCAL PLAN CONSULTATION: REGULATION 19 – PRE-SUBMISSION LOCAL PLAN CONSULTATION  
LAND EAST OF FOXHILLS ROAD, LYTCHETT MATRAVERS**

We write in respect of the current public consultation for the pre-submission version of the Purbeck Local Plan. This representation relates to land that Catesby Estates Ltd are promoting at Land East of Foxhills Road, Lytchett Matravers.

Please find below detailed comments regarding development in Lytchett Matravers, our concerns regarding the submission version of the Local Plan which are in summary;

- a) Higher housing requirement for Purbeck necessary;
- b) Duty to cooperate with the HMA authorises to ensure all unmet needs are met;
- c) Alignment of economic aspirations with higher housing delivery;
- d) Additional allocations required as a buffer to allow for flexibility in the land supply;
- e) The Council's reliance of 30% of the housing delivery coming through windfall sites requires compelling evidence; and
- f) Lack of information on the housing trajectory and infrastructure required;

Site Background

Catesby confirms that the land east of Foxhills Road is available for development and the enclosed Illustrative Masterplan demonstrates how the site could be developed to deliver up to 130 new homes, 40% of which (up to 52) would be affordable in line with the Council's policy. This should be considered by the Council as an alternative to the sites promoted to date and as a means to deliver new homes on a single, larger site with the associated benefits that this brings in terms of the potential to deliver new and improved infrastructure for the village and a higher proportion of affordable homes.

The land east of Foxhills Road relates well to the existing edge of the village. It benefits from well-established and mature trees to the southern and eastern boundaries to provide natural screening from views from the east and a strong and defensible boundary for any revision to the Green Belt boundary. It is located within walking and cycling distance of the existing services and facilities in the village, including the primary school, doctor's surgery and shops. In addition, there are opportunities to provide safe and convenient pedestrian and cycle links to these facilities.

The enclosed Illustrative Masterplan demonstrates that the site can be developed in a form which reflects the existing pattern of development in the village. It also retains the existing trees and

hedgerows on site, incorporating them in to the development and enhancing opportunities for public access with a network of new footpaths and publicly accessible open space.

### **Unmet Need across the HMA**

Purbeck forms part of the Eastern Dorset Housing Market Area (HMA). The Eastern Dorset Strategic Housing Market Assessment (SHMA) 2015 was jointly commissioned with the five other Local Authorities within the HMA of Bournemouth, Christchurch, East Dorset, North Dorset, Poole and Purbeck. All five authorities have individual constraints and issues in delivering their housing need. The SoCG dated October 2018 indicates a high likelihood of this need not being met and it is evident from the Purbeck Council Housing Background Paper that no effective communication has taken place regarding Purbeck Council meeting the neighbouring council's unmet need to ensure the HMA's housing need is met in full. Unless further evidence can be provided on this strategic matter, the plan does not satisfy the NPPF and is unsound on account of it being ineffective in dealing with housing need.

### **Housing Need**

The Pre-Submission Local Plan seeks to deliver at least 2,688 homes between 2018-2034 (168 homes per year). This is derived from the application of the 2014 household projections on the Government's emerging standardised methodology for calculating housing need.

The PPG requires the latest household projections are used to form the starting point of any assessment of FOAN. However, this lowest figure is applied in the Local Plan and no additional factors are added, such as; economic growth, affordable housing, housing shortfall and unmet need from elsewhere in the HMA. To achieve the government's ambition of significantly boosting housing supply, it is important housing need is not underestimated.

It is recognised with the Pre-Submission Local Plan the District that the ratio between median house prices and workplace earnings in Purbeck in 2017 stood at 11.1 (para 110). The Local Plan is insufficiently ambitious in seeking to boost housing delivery thereby creating more opportunities for those seeking an affordable home. The PPG establishes that consideration must be given to market signals and that this may necessitate an uplift to the demographic starting point figure (ID 2a-019). Given the worsening housing affordability in Purbeck, it seems counter-intuitive that there is not an increase in the total housing figures included in the Local Plan where it could help deliver the required number of affordable homes.

### **Spatial Strategy**

The Local Plan spatial strategy is to spread new development over the plan period across the District, directing the majority of housing growth to less constrained areas, in particular Wool and Moreton in the west of the District, and to the existing towns and key service villages.

The delivery of the housing need is comprised largely of allocations with 65% of sites being brought through sites ranging from 30-490 units. The remainder of housing is largely projected to be brought forward through windfall (784 dwellings) representing nearly 30% of housing delivery and 6% on small sites. This latter is below the required 10% that is sought by NPPF 2018 but the significant portion of delivery through windfall requires compelling evidence to justify such a high proportion. In Green Belt authorities such as Purbeck, this seems remarkably high given the very special circumstances necessary to justify new dwellings in rural districts such as Purbeck.

---



The Council's overall housing land supply seeks to deliver exactly 2,688 dwellings which is the same as the underestimated housing need. There is therefore no flexibility to respond to changing circumstances, lapse rate or non-implementation. To account for this, most authorities apply a buffer of 5% or 20% however, no such buffer is applied. The Council currently cannot demonstrate a 5YLS therefore it would seem appropriate to apply a 20% buffer.

The Local Plan currently contains no trajectory therefore it is unclear how the Council envisage maintaining a five year housing land supply over the life of the plan. On larger allocation, much of the required infrastructure will need to be in place even for the early phases of such schemes if they are to be considered deliverable. The IDP does not appear to have been published therefore it is unclear how deliverable some of the allocations are and the impact that infrastructure has on viability of those sites.

### **Economic Aspirations**

The Local Plan Vision states;

*"The focus for economic development will be on increasing the number and range of knowledge economy jobs, building on the District's strengths in advanced engineering and manufacturing employment. This will support high quality employment which raises wage levels and helps address housing affordability in Purbeck."*

It is recognised that Purbeck is home to Dorset's only enterprise zone - Dorset Innovation Park at Winfrith, which is an advanced engineering cluster of excellence for the South West, building on strengths in marine, defence and energy. And yet despite this, the housing requirement makes no allowance for economic aspirations and increasing housing delivery to encourage a younger work force to drive the economic prosperity of this ageing District and wider area. This would seem to contradict the earlier versions of the Local Plan and be a missed opportunity. This is in conflict with the NPPF as it is not positively prepared.

### Conclusion

Catesby objects to the Plan in its current form as the Plan as it is not considered to be positively prepared, justified, effective and is not consistent with national planning policy.

The housing requirement should be increased on the basis that the Council have underestimated their housing need. The standardised formulae for calculating housing need is a starting point. It is also disappointing that the economic aspirations of the District (which contains the only enterprise zone in the County) are not reflected in the housing requirement, which is set at the bare minimum.

In addition, the housing distribution contains only sufficient houses to deliver this underestimated housing need. There is no flexibility in the housing supply to respond to changing circumstances, lapse rate or non-implementation. To offset against this considerable risk, we would suggest that the Council allocates additional sites to deliver homes early in the Plan period. This will also help the Council establish and maintain a five year housing land supply through the Plan period. As recognised in the Housing White Paper; Fixing Our Broken Housing Market, it is recognised that;

---



*“Our broken housing market is one of the greatest barriers to progress in Britain today. Whether buying or renting, the fact is that housing is increasingly unaffordable – particularly for ordinary working class people who are struggling to get by.”*

In addition, the White Paper and revised NPPF place a new emphasis on policies in plans allowing a good mix of sites to come forward for development, so that there is choice for consumers, places can grow in ways that are sustainable, and there are opportunities for a diverse construction sector;

*“Small sites create particular opportunities for custom builders and smaller developers. They can also help to meet rural housing needs in ways that are sensitive to their setting while allowing villages to thrive.”* (para 1.29)

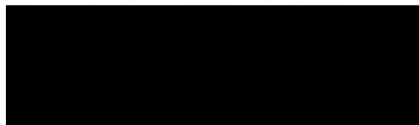
In light of the above points, it is considered that the site at Foxhills Road, Lytchett Matravers could be allocated within the Plan for residential development as it represents a logical extension to the village in a sustainable location that would make a positive and meaningful contribution towards Purbeck housing need which is likely to increase significantly moving forward.

There are no technical or environmental constraints that would prevent this taking place or which could not be considered through the development management process and as such overall the site should be considered as suitable for allocation within the Local Plan. The site can be delivered within the early part of the Plan contributing to the Council achieving a five year land supply.

We hope these representations are of assistance in taking the plan forward to the next stage of plan preparation and examination. Catesby would also like to express our interest in attending any relevant hearing sessions at the Examination in Public.

Should you have any queries, please do not hesitate to contact me.

Yours faithfully



**Dawn Adams**  
Planning Manager



## Comment

<b>Consultee</b>	Miss Dawn Adams (1191253)
<b>Email Address</b>	[REDACTED]
<b>Company / Organisation</b>	Catesby Estates Ltd
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Catesby Estates Ltd (Miss Dawn Adams - 1191253)
<b>Comment ID</b>	PLPP510
<b>Response Date</b>	03/12/18 18:25
<b>Consultation Point</b>	Chapter 4: Housing ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Files</b>	<a href="#">Catesby Estates representations</a>
<b>Are you responding on behalf of a group?</b>	Yes
<b>If yes, how many people do you represent?</b>	20
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	Housing requirement, housing allocations and dispersal
<b>Do you consider that the Local Plan is legally compliant?</b>	No
<b>Do you consider that the Local Plan is sound?</b>	No
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	No

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

Please see attached letter

**If you have any supporting documents please upload them here.** [Catesby Estates representations](#)  
[Catesby Estates representations](#)

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?** Yes

**If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?**

To make the plan sound

Purbeck District Council  
Westport House  
Worgret Road  
Wareham  
Dorset  
BH20 4PP

30<sup>th</sup> November 2018

Dear Sir/Madam

**LOCAL PLAN CONSULTATION: REGULATION 19 – PRE-SUBMISSION LOCAL PLAN CONSULTATION  
LAND EAST OF FOXHILLS ROAD, LYTCHETT MATRAVERS**

We write in respect of the current public consultation for the pre-submission version of the Purbeck Local Plan. This representation relates to land that Catesby Estates Ltd are promoting at Land East of Foxhills Road, Lytchett Matravers.

Please find below detailed comments regarding development in Lytchett Matravers, our concerns regarding the submission version of the Local Plan which are in summary;

- a) Higher housing requirement for Purbeck necessary;
- b) Duty to cooperate with the HMA authorises to ensure all unmet needs are met;
- c) Alignment of economic aspirations with higher housing delivery;
- d) Additional allocations required as a buffer to allow for flexibility in the land supply;
- e) The Council's reliance of 30% of the housing delivery coming through windfall sites requires compelling evidence; and
- f) Lack of information on the housing trajectory and infrastructure required;

Site Background

Catesby confirms that the land east of Foxhills Road is available for development and the enclosed Illustrative Masterplan demonstrates how the site could be developed to deliver up to 130 new homes, 40% of which (up to 52) would be affordable in line with the Council's policy. This should be considered by the Council as an alternative to the sites promoted to date and as a means to deliver new homes on a single, larger site with the associated benefits that this brings in terms of the potential to deliver new and improved infrastructure for the village and a higher proportion of affordable homes.

The land east of Foxhills Road relates well to the existing edge of the village. It benefits from well-established and mature trees to the southern and eastern boundaries to provide natural screening from views from the east and a strong and defensible boundary for any revision to the Green Belt boundary. It is located within walking and cycling distance of the existing services and facilities in the village, including the primary school, doctor's surgery and shops. In addition, there are opportunities to provide safe and convenient pedestrian and cycle links to these facilities.

The enclosed Illustrative Masterplan demonstrates that the site can be developed in a form which reflects the existing pattern of development in the village. It also retains the existing trees and

hedgerows on site, incorporating them in to the development and enhancing opportunities for public access with a network of new footpaths and publicly accessible open space.

### **Unmet Need across the HMA**

Purbeck forms part of the Eastern Dorset Housing Market Area (HMA). The Eastern Dorset Strategic Housing Market Assessment (SHMA) 2015 was jointly commissioned with the five other Local Authorities within the HMA of Bournemouth, Christchurch, East Dorset, North Dorset, Poole and Purbeck. All five authorities have individual constraints and issues in delivering their housing need. The SoCG dated October 2018 indicates a high likelihood of this need not being met and it is evident from the Purbeck Council Housing Background Paper that no effective communication has taken place regarding Purbeck Council meeting the neighbouring council's unmet need to ensure the HMA's housing need is met in full. Unless further evidence can be provided on this strategic matter, the plan does not satisfy the NPPF and is unsound on account of it being ineffective in dealing with housing need.

### **Housing Need**

The Pre-Submission Local Plan seeks to deliver at least 2,688 homes between 2018-2034 (168 homes per year). This is derived from the application of the 2014 household projections on the Government's emerging standardised methodology for calculating housing need.

The PPG requires the latest household projections are used to form the starting point of any assessment of FOAN. However, this lowest figure is applied in the Local Plan and no additional factors are added, such as; economic growth, affordable housing, housing shortfall and unmet need from elsewhere in the HMA. To achieve the government's ambition of significantly boosting housing supply, it is important housing need is not underestimated.

It is recognised with the Pre-Submission Local Plan the District that the ratio between median house prices and workplace earnings in Purbeck in 2017 stood at 11.1 (para 110). The Local Plan is insufficiently ambitious in seeking to boost housing delivery thereby creating more opportunities for those seeking an affordable home. The PPG establishes that consideration must be given to market signals and that this may necessitate an uplift to the demographic starting point figure (ID 2a-019). Given the worsening housing affordability in Purbeck, it seems counter-intuitive that there is not an increase in the total housing figures included in the Local Plan where it could help deliver the required number of affordable homes.

### **Spatial Strategy**

The Local Plan spatial strategy is to spread new development over the plan period across the District, directing the majority of housing growth to less constrained areas, in particular Wool and Moreton in the west of the District, and to the existing towns and key service villages.

The delivery of the housing need is comprised largely of allocations with 65% of sites being brought through sites ranging from 30-490 units. The remainder of housing is largely projected to be brought forward through windfall (784 dwellings) representing nearly 30% of housing delivery and 6% on small sites. This latter is below the required 10% that is sought by NPPF 2018 but the significant portion of delivery through windfall requires compelling evidence to justify such a high proportion. In Green Belt authorities such as Purbeck, this seems remarkably high given the very special circumstances necessary to justify new dwellings in rural districts such as Purbeck.

The Council's overall housing land supply seeks to deliver exactly 2,688 dwellings which is the same as the underestimated housing need. There is therefore no flexibility to respond to changing circumstances, lapse rate or non-implementation. To account for this, most authorities apply a buffer of 5% or 20% however, no such buffer is applied. The Council currently cannot demonstrate a 5YLS therefore it would seem appropriate to apply a 20% buffer.

The Local Plan currently contains no trajectory therefore it is unclear how the Council envisage maintaining a five year housing land supply over the life of the plan. On larger allocation, much of the required infrastructure will need to be in place even for the early phases of such schemes if they are to be considered deliverable. The IDP does not appear to have been published therefore it is unclear how deliverable some of the allocations are and the impact that infrastructure has on viability of those sites.

### **Economic Aspirations**

The Local Plan Vision states;

*"The focus for economic development will be on increasing the number and range of knowledge economy jobs, building on the District's strengths in advanced engineering and manufacturing employment. This will support high quality employment which raises wage levels and helps address housing affordability in Purbeck."*

It is recognised that Purbeck is home to Dorset's only enterprise zone - Dorset Innovation Park at Winfrith, which is an advanced engineering cluster of excellence for the South West, building on strengths in marine, defence and energy. And yet despite this, the housing requirement makes no allowance for economic aspirations and increasing housing delivery to encourage a younger work force to drive the economic prosperity of this ageing District and wider area. This would seem to contradict the earlier versions of the Local Plan and be a missed opportunity. This is in conflict with the NPPF as it is not positively prepared.

### Conclusion

Catesby objects to the Plan in its current form as the Plan as it is not considered to be positively prepared, justified, effective and is not consistent with national planning policy.

The housing requirement should be increased on the basis that the Council have underestimated their housing need. The standardised formulae for calculating housing need is a starting point. It is also disappointing that the economic aspirations of the District (which contains the only enterprise zone in the County) are not reflected in the housing requirement, which is set at the bare minimum.

In addition, the housing distribution contains only sufficient houses to deliver this underestimated housing need. There is no flexibility in the housing supply to respond to changing circumstances, lapse rate or non-implementation. To offset against this considerable risk, we would suggest that the Council allocates additional sites to deliver homes early in the Plan period. This will also help the Council establish and maintain a five year housing land supply through the Plan period. As recognised in the Housing White Paper; Fixing Our Broken Housing Market, it is recognised that;

*“Our broken housing market is one of the greatest barriers to progress in Britain today. Whether buying or renting, the fact is that housing is increasingly unaffordable – particularly for ordinary working class people who are struggling to get by.”*

In addition, the White Paper and revised NPPF place a new emphasis on policies in plans allowing a good mix of sites to come forward for development, so that there is choice for consumers, places can grow in ways that are sustainable, and there are opportunities for a diverse construction sector;

*“Small sites create particular opportunities for custom builders and smaller developers. They can also help to meet rural housing needs in ways that are sensitive to their setting while allowing villages to thrive.” (para 1.29)*

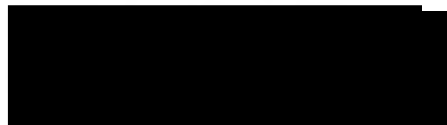
In light of the above points, it is considered that the site at Foxhills Road, Lytchett Matravers could be allocated within the Plan for residential development as it represents a logical extension to the village in a sustainable location that would make a positive and meaningful contribution towards Purbeck housing need which is likely to increase significantly moving forward.

There are no technical or environmental constraints that would prevent this taking place or which could not be considered through the development management process and as such overall the site should be considered as suitable for allocation within the Local Plan. The site can be delivered within the early part of the Plan contributing to the Council achieving a five year land supply.

We hope these representations are of assistance in taking the plan forward to the next stage of plan preparation and examination. Catesby would also like to express our interest in attending any relevant hearing sessions at the Examination in Public.

Should you have any queries, please do not hesitate to contact me.

Yours faithfully



**Dawn Adams**  
Planning Manager



## Comment

<b>Consultee</b>	Miss Dawn Adams (1191253)
<b>Email Address</b>	[REDACTED]
<b>Company / Organisation</b>	Catesby Estates Ltd
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Catesby Estates Ltd (Miss Dawn Adams - 1191253)
<b>Comment ID</b>	PLPP511
<b>Response Date</b>	03/12/18 18:29
<b>Consultation Point</b>	Chapter 2: Vision and objectives ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Files</b>	<a href="#">Catesby representations</a>
<b>Are you responding on behalf of a group?</b>	Yes
<b>If yes, how many people do you represent?</b>	20
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	Vision
<b>Do you consider that the Local Plan is legally compliant?</b>	No
<b>Do you consider that the Local Plan is sound?</b>	No
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	No



**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)**

Please see attached letter

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

Please see attached letter

**If you have any supporting documents please upload them here.** [Catesby representations](#)  
Catesby representations

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?** Yes

**If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?**

To make the plan sound

Purbeck District Council  
Westport House  
Worgret Road  
Wareham  
Dorset  
BH20 4PP

30<sup>th</sup> November 2018

Dear Sir/Madam

**LOCAL PLAN CONSULTATION: REGULATION 19 – PRE-SUBMISSION LOCAL PLAN CONSULTATION  
LAND EAST OF FOXHILLS ROAD, LYTCHETT MATRAVERS**

We write in respect of the current public consultation for the pre-submission version of the Purbeck Local Plan. This representation relates to land that Catesby Estates Ltd are promoting at Land East of Foxhills Road, Lytchett Matravers.

Please find below detailed comments regarding development in Lytchett Matravers, our concerns regarding the submission version of the Local Plan which are in summary;

- a) Higher housing requirement for Purbeck necessary;
- b) Duty to cooperate with the HMA authorises to ensure all unmet needs are met;
- c) Alignment of economic aspirations with higher housing delivery;
- d) Additional allocations required as a buffer to allow for flexibility in the land supply;
- e) The Council's reliance of 30% of the housing delivery coming through windfall sites requires compelling evidence; and
- f) Lack of information on the housing trajectory and infrastructure required;

Site Background

Catesby confirms that the land east of Foxhills Road is available for development and the enclosed Illustrative Masterplan demonstrates how the site could be developed to deliver up to 130 new homes, 40% of which (up to 52) would be affordable in line with the Council's policy. This should be considered by the Council as an alternative to the sites promoted to date and as a means to deliver new homes on a single, larger site with the associated benefits that this brings in terms of the potential to deliver new and improved infrastructure for the village and a higher proportion of affordable homes.

The land east of Foxhills Road relates well to the existing edge of the village. It benefits from well-established and mature trees to the southern and eastern boundaries to provide natural screening from views from the east and a strong and defensible boundary for any revision to the Green Belt boundary. It is located within walking and cycling distance of the existing services and facilities in the village, including the primary school, doctor's surgery and shops. In addition, there are opportunities to provide safe and convenient pedestrian and cycle links to these facilities.

The enclosed Illustrative Masterplan demonstrates that the site can be developed in a form which reflects the existing pattern of development in the village. It also retains the existing trees and

hedgerows on site, incorporating them in to the development and enhancing opportunities for public access with a network of new footpaths and publicly accessible open space.

### **Unmet Need across the HMA**

Purbeck forms part of the Eastern Dorset Housing Market Area (HMA). The Eastern Dorset Strategic Housing Market Assessment (SHMA) 2015 was jointly commissioned with the five other Local Authorities within the HMA of Bournemouth, Christchurch, East Dorset, North Dorset, Poole and Purbeck. All five authorities have individual constraints and issues in delivering their housing need. The SoCG dated October 2018 indicates a high likelihood of this need not being met and it is evident from the Purbeck Council Housing Background Paper that no effective communication has taken place regarding Purbeck Council meeting the neighbouring council's unmet need to ensure the HMA's housing need is met in full. Unless further evidence can be provided on this strategic matter, the plan does not satisfy the NPPF and is unsound on account of it being ineffective in dealing with housing need.

### **Housing Need**

The Pre-Submission Local Plan seeks to deliver at least 2,688 homes between 2018-2034 (168 homes per year). This is derived from the application of the 2014 household projections on the Government's emerging standardised methodology for calculating housing need.

The PPG requires the latest household projections are used to form the starting point of any assessment of FOAN. However, this lowest figure is applied in the Local Plan and no additional factors are added, such as; economic growth, affordable housing, housing shortfall and unmet need from elsewhere in the HMA. To achieve the government's ambition of significantly boosting housing supply, it is important housing need is not underestimated.

It is recognised with the Pre-Submission Local Plan the District that the ratio between median house prices and workplace earnings in Purbeck in 2017 stood at 11.1 (para 110). The Local Plan is insufficiently ambitious in seeking to boost housing delivery thereby creating more opportunities for those seeking an affordable home. The PPG establishes that consideration must be given to market signals and that this may necessitate an uplift to the demographic starting point figure (ID 2a-019). Given the worsening housing affordability in Purbeck, it seems counter-intuitive that there is not an increase in the total housing figures included in the Local Plan where it could help deliver the required number of affordable homes.

### **Spatial Strategy**

The Local Plan spatial strategy is to spread new development over the plan period across the District, directing the majority of housing growth to less constrained areas, in particular Wool and Moreton in the west of the District, and to the existing towns and key service villages.

The delivery of the housing need is comprised largely of allocations with 65% of sites being brought through sites ranging from 30-490 units. The remainder of housing is largely projected to be brought forward through windfall (784 dwellings) representing nearly 30% of housing delivery and 6% on small sites. This latter is below the required 10% that is sought by NPPF 2018 but the significant portion of delivery through windfall requires compelling evidence to justify such a high proportion. In Green Belt authorities such as Purbeck, this seems remarkably high given the very special circumstances necessary to justify new dwellings in rural districts such as Purbeck.

---

The Council's overall housing land supply seeks to deliver exactly 2,688 dwellings which is the same as the underestimated housing need. There is therefore no flexibility to respond to changing circumstances, lapse rate or non-implementation. To account for this, most authorities apply a buffer of 5% or 20% however, no such buffer is applied. The Council currently cannot demonstrate a 5YLS therefore it would seem appropriate to apply a 20% buffer.

The Local Plan currently contains no trajectory therefore it is unclear how the Council envisage maintaining a five year housing land supply over the life of the plan. On larger allocation, much of the required infrastructure will need to be in place even for the early phases of such schemes if they are to be considered deliverable. The IDP does not appear to have been published therefore it is unclear how deliverable some of the allocations are and the impact that infrastructure has on viability of those sites.

### **Economic Aspirations**

The Local Plan Vision states;

*"The focus for economic development will be on increasing the number and range of knowledge economy jobs, building on the District's strengths in advanced engineering and manufacturing employment. This will support high quality employment which raises wage levels and helps address housing affordability in Purbeck."*

It is recognised that Purbeck is home to Dorset's only enterprise zone - Dorset Innovation Park at Winfrith, which is an advanced engineering cluster of excellence for the South West, building on strengths in marine, defence and energy. And yet despite this, the housing requirement makes no allowance for economic aspirations and increasing housing delivery to encourage a younger work force to drive the economic prosperity of this ageing District and wider area. This would seem to contradict the earlier versions of the Local Plan and be a missed opportunity. This is in conflict with the NPPF as it is not positively prepared.

### Conclusion

Catesby objects to the Plan in its current form as the Plan as it is not considered to be positively prepared, justified, effective and is not consistent with national planning policy.

The housing requirement should be increased on the basis that the Council have underestimated their housing need. The standardised formulae for calculating housing need is a starting point. It is also disappointing that the economic aspirations of the District (which contains the only enterprise zone in the County) are not reflected in the housing requirement, which is set at the bare minimum.

In addition, the housing distribution contains only sufficient houses to deliver this underestimated housing need. There is no flexibility in the housing supply to respond to changing circumstances, lapse rate or non-implementation. To offset against this considerable risk, we would suggest that the Council allocates additional sites to deliver homes early in the Plan period. This will also help the Council establish and maintain a five year housing land supply through the Plan period. As recognised in the Housing White Paper; Fixing Our Broken Housing Market, it is recognised that;

*“Our broken housing market is one of the greatest barriers to progress in Britain today. Whether buying or renting, the fact is that housing is increasingly unaffordable – particularly for ordinary working class people who are struggling to get by.”*

In addition, the White Paper and revised NPPF place a new emphasis on policies in plans allowing a good mix of sites to come forward for development, so that there is choice for consumers, places can grow in ways that are sustainable, and there are opportunities for a diverse construction sector;

*“Small sites create particular opportunities for custom builders and smaller developers. They can also help to meet rural housing needs in ways that are sensitive to their setting while allowing villages to thrive.” (para 1.29)*

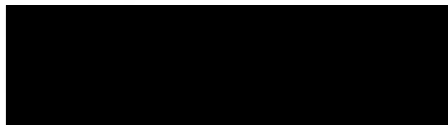
In light of the above points, it is considered that the site at Foxhills Road, Lytchett Matravers could be allocated within the Plan for residential development as it represents a logical extension to the village in a sustainable location that would make a positive and meaningful contribution towards Purbeck housing need which is likely to increase significantly moving forward.

There are no technical or environmental constraints that would prevent this taking place or which could not be considered through the development management process and as such overall the site should be considered as suitable for allocation within the Local Plan. The site can be delivered within the early part of the Plan contributing to the Council achieving a five year land supply.

We hope these representations are of assistance in taking the plan forward to the next stage of plan preparation and examination. Catesby would also like to express our interest in attending any relevant hearing sessions at the Examination in Public.

Should you have any queries, please do not hesitate to contact me.

Yours faithfully



**Dawn Adams**  
Planning Manager



## Comment

<b>Consultee</b>	Miss Dawn Adams (1191253)
<b>Email Address</b>	[REDACTED]
<b>Company / Organisation</b>	Catesby Estates Ltd
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Catesby Estates Ltd (Miss Dawn Adams - 1191253)
<b>Comment ID</b>	PLPP514
<b>Response Date</b>	03/12/18 18:43
<b>Consultation Point</b>	Chapter 4: Housing ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Files</b>	<a href="#">Catesby Representations</a>

**Please tick the box(es) if you would like to be notified at an address/email address of the following:**

<b>Which policy / paragraph number / policies map does your comment relate to?</b>	Housing requirement, housing allocations and dispersal
<b>If you have any supporting documents please upload them here.</b>	<a href="#">Catesby Representations</a> Catesby Representations

Purbeck District Council  
Westport House  
Worgret Road  
Wareham  
Dorset  
BH20 4PP

30<sup>th</sup> November 2018

Dear Sir/Madam

**LOCAL PLAN CONSULTATION: REGULATION 19 – PRE-SUBMISSION LOCAL PLAN CONSULTATION  
LAND EAST OF FOXHILLS ROAD, LYTCHETT MATRAVERS**

We write in respect of the current public consultation for the pre-submission version of the Purbeck Local Plan. This representation relates to land that Catesby Estates Ltd are promoting at Land East of Foxhills Road, Lytchett Matravers.

Please find below detailed comments regarding development in Lytchett Matravers, our concerns regarding the submission version of the Local Plan which are in summary;

- a) Higher housing requirement for Purbeck necessary;
- b) Duty to cooperate with the HMA authorises to ensure all unmet needs are met;
- c) Alignment of economic aspirations with higher housing delivery;
- d) Additional allocations required as a buffer to allow for flexibility in the land supply;
- e) The Council's reliance of 30% of the housing delivery coming through windfall sites requires compelling evidence; and
- f) Lack of information on the housing trajectory and infrastructure required;

Site Background

Catesby confirms that the land east of Foxhills Road is available for development and the enclosed Illustrative Masterplan demonstrates how the site could be developed to deliver up to 130 new homes, 40% of which (up to 52) would be affordable in line with the Council's policy. This should be considered by the Council as an alternative to the sites promoted to date and as a means to deliver new homes on a single, larger site with the associated benefits that this brings in terms of the potential to deliver new and improved infrastructure for the village and a higher proportion of affordable homes.

The land east of Foxhills Road relates well to the existing edge of the village. It benefits from well-established and mature trees to the southern and eastern boundaries to provide natural screening from views from the east and a strong and defensible boundary for any revision to the Green Belt boundary. It is located within walking and cycling distance of the existing services and facilities in the village, including the primary school, doctor's surgery and shops. In addition, there are opportunities to provide safe and convenient pedestrian and cycle links to these facilities.

The enclosed Illustrative Masterplan demonstrates that the site can be developed in a form which reflects the existing pattern of development in the village. It also retains the existing trees and

hedgerows on site, incorporating them in to the development and enhancing opportunities for public access with a network of new footpaths and publicly accessible open space.

### **Unmet Need across the HMA**

Purbeck forms part of the Eastern Dorset Housing Market Area (HMA). The Eastern Dorset Strategic Housing Market Assessment (SHMA) 2015 was jointly commissioned with the five other Local Authorities within the HMA of Bournemouth, Christchurch, East Dorset, North Dorset, Poole and Purbeck. All five authorities have individual constraints and issues in delivering their housing need. The SoCG dated October 2018 indicates a high likelihood of this need not being met and it is evident from the Purbeck Council Housing Background Paper that no effective communication has taken place regarding Purbeck Council meeting the neighbouring council's unmet need to ensure the HMA's housing need is met in full. Unless further evidence can be provided on this strategic matter, the plan does not satisfy the NPPF and is unsound on account of it being ineffective in dealing with housing need.

### **Housing Need**

The Pre-Submission Local Plan seeks to deliver at least 2,688 homes between 2018-2034 (168 homes per year). This is derived from the application of the 2014 household projections on the Government's emerging standardised methodology for calculating housing need.

The PPG requires the latest household projections are used to form the starting point of any assessment of FOAN. However, this lowest figure is applied in the Local Plan and no additional factors are added, such as; economic growth, affordable housing, housing shortfall and unmet need from elsewhere in the HMA. To achieve the government's ambition of significantly boosting housing supply, it is important housing need is not underestimated.

It is recognised with the Pre-Submission Local Plan the District that the ratio between median house prices and workplace earnings in Purbeck in 2017 stood at 11.1 (para 110). The Local Plan is insufficiently ambitious in seeking to boost housing delivery thereby creating more opportunities for those seeking an affordable home. The PPG establishes that consideration must be given to market signals and that this may necessitate an uplift to the demographic starting point figure (ID 2a-019). Given the worsening housing affordability in Purbeck, it seems counter-intuitive that there is not an increase in the total housing figures included in the Local Plan where it could help deliver the required number of affordable homes.

### **Spatial Strategy**

The Local Plan spatial strategy is to spread new development over the plan period across the District, directing the majority of housing growth to less constrained areas, in particular Wool and Moreton in the west of the District, and to the existing towns and key service villages.

The delivery of the housing need is comprised largely of allocations with 65% of sites being brought through sites ranging from 30-490 units. The remainder of housing is largely projected to be brought forward through windfall (784 dwellings) representing nearly 30% of housing delivery and 6% on small sites. This latter is below the required 10% that is sought by NPPF 2018 but the significant portion of delivery through windfall requires compelling evidence to justify such a high proportion. In Green Belt authorities such as Purbeck, this seems remarkably high given the very special circumstances necessary to justify new dwellings in rural districts such as Purbeck.

---



The Council's overall housing land supply seeks to deliver exactly 2,688 dwellings which is the same as the underestimated housing need. There is therefore no flexibility to respond to changing circumstances, lapse rate or non-implementation. To account for this, most authorities apply a buffer of 5% or 20% however, no such buffer is applied. The Council currently cannot demonstrate a 5YLS therefore it would seem appropriate to apply a 20% buffer.

The Local Plan currently contains no trajectory therefore it is unclear how the Council envisage maintaining a five year housing land supply over the life of the plan. On larger allocation, much of the required infrastructure will need to be in place even for the early phases of such schemes if they are to be considered deliverable. The IDP does not appear to have been published therefore it is unclear how deliverable some of the allocations are and the impact that infrastructure has on viability of those sites.

### **Economic Aspirations**

The Local Plan Vision states;

*"The focus for economic development will be on increasing the number and range of knowledge economy jobs, building on the District's strengths in advanced engineering and manufacturing employment. This will support high quality employment which raises wage levels and helps address housing affordability in Purbeck."*

It is recognised that Purbeck is home to Dorset's only enterprise zone - Dorset Innovation Park at Winfrith, which is an advanced engineering cluster of excellence for the South West, building on strengths in marine, defence and energy. And yet despite this, the housing requirement makes no allowance for economic aspirations and increasing housing delivery to encourage a younger work force to drive the economic prosperity of this ageing District and wider area. This would seem to contradict the earlier versions of the Local Plan and be a missed opportunity. This is in conflict with the NPPF as it is not positively prepared.

### Conclusion

Catesby objects to the Plan in its current form as the Plan as it is not considered to be positively prepared, justified, effective and is not consistent with national planning policy.

The housing requirement should be increased on the basis that the Council have underestimated their housing need. The standardised formulae for calculating housing need is a starting point. It is also disappointing that the economic aspirations of the District (which contains the only enterprise zone in the County) are not reflected in the housing requirement, which is set at the bare minimum.

In addition, the housing distribution contains only sufficient houses to deliver this underestimated housing need. There is no flexibility in the housing supply to respond to changing circumstances, lapse rate or non-implementation. To offset against this considerable risk, we would suggest that the Council allocates additional sites to deliver homes early in the Plan period. This will also help the Council establish and maintain a five year housing land supply through the Plan period. As recognised in the Housing White Paper; Fixing Our Broken Housing Market, it is recognised that;

*“Our broken housing market is one of the greatest barriers to progress in Britain today. Whether buying or renting, the fact is that housing is increasingly unaffordable – particularly for ordinary working class people who are struggling to get by.”*

In addition, the White Paper and revised NPPF place a new emphasis on policies in plans allowing a good mix of sites to come forward for development, so that there is choice for consumers, places can grow in ways that are sustainable, and there are opportunities for a diverse construction sector;

*“Small sites create particular opportunities for custom builders and smaller developers. They can also help to meet rural housing needs in ways that are sensitive to their setting while allowing villages to thrive.” (para 1.29)*

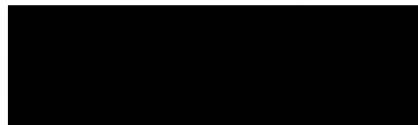
In light of the above points, it is considered that the site at Foxhills Road, Lytchett Matravers could be allocated within the Plan for residential development as it represents a logical extension to the village in a sustainable location that would make a positive and meaningful contribution towards Purbeck housing need which is likely to increase significantly moving forward.

There are no technical or environmental constraints that would prevent this taking place or which could not be considered through the development management process and as such overall the site should be considered as suitable for allocation within the Local Plan. The site can be delivered within the early part of the Plan contributing to the Council achieving a five year land supply.

We hope these representations are of assistance in taking the plan forward to the next stage of plan preparation and examination. Catesby would also like to express our interest in attending any relevant hearing sessions at the Examination in Public.

Should you have any queries, please do not hesitate to contact me.

Yours faithfully



**Dawn Adams**  
Planning Manager



## Comment

<b>Consultee</b>	Mr Robin Caudell (1190127)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Mr Robin Caudell (1190127)
<b>Comment ID</b>	PLPP73
<b>Response Date</b>	28/11/18 17:40
<b>Consultation Point</b>	Policies List ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.2

**Are you responding on behalf of a group?** No

**Please tick the box(es) if you would like to be notified at an address/email address of the following:**

**Which policy / paragraph number / policies map does your comment relate to?** h1

**Do you consider that the Local Plan is legally compliant?** No

**Do you consider that the Local Plan is sound?** No

**Do you consider that the Local Plan complies with the duty to co-operate?** No

**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)**

The consultation document did not provide the range of possible alternatives.

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

It did not include the possibilities of:

- 1 Organic growth
- 2 Development to fulfil local housing need eg affordable only for sale or rent for young families.
- 3 Protected housing for the elderly.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?** Yes

**If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?**

Very few people are able to see the BIG picture rather than the small disputes. eg Schools / Health are not a problem but traffic / sewage is.

## Comment

<b>Consultee</b>	Mr Robin Caudell (1190127)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Mr Robin Caudell (1190127)
<b>Comment ID</b>	PLPP108
<b>Response Date</b>	29/11/18 16:36
<b>Consultation Point</b>	Policies List ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1

**Are you responding on behalf of a group?** No

**Please tick the box(es) if you would like to be notified at an address/email address of the following:**

**Which policy / paragraph number / policies map does your comment relate to?** V2

**Do you consider that the Local Plan is legally compliant?** No

**Do you consider that the Local Plan is sound?** No

**Do you consider that the Local Plan complies with the duty to co-operate?** No

**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)**

The overall plan does not include any ref to previous settlement boundaries or green spaces between settlements.

Why have two 65 bed care homes been included, when not originally. and the need is for protected housing, as per recent social care directives, ie care in one's own home.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?** Yes

**If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?**

Very few of the local population have the facility or the expertise to respond to this.

## Comment

<b>Consultee</b>	Mr Robin Caudell (1190127)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Mr Robin Caudell (1190127)
<b>Comment ID</b>	PLPP109
<b>Response Date</b>	29/11/18 16:44
<b>Consultation Point</b>	Policies List ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1

**Are you responding on behalf of a group?** No

**Please tick the box(es) if you would like to be notified at an address/email address of the following:**

**Which policy / paragraph number / policies map does your comment relate to?** V2

**Do you consider that the Local Plan is legally compliant?** No

**Do you consider that the Local Plan is sound?** No

**Do you consider that the Local Plan complies with the duty to co-operate?** No

**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)**

Green belt does not apply to the Wool area, but previous planning directives have included -- settlement boundaries and green spaces between settlement. These proposals fill in between Wool and East Burton/Giddy Green.

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

To maintain historical planning restrictions.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?** Yes

**If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?**

Many are unable to respond!



## Comment

<b>Consultee</b>	Mr Robin Caudell (1190127)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Mr Robin Caudell (1190127)
<b>Comment ID</b>	PLPP110
<b>Response Date</b>	29/11/18 16:54
<b>Consultation Point</b>	Policies List ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Are you responding on behalf of a group?</b>	No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

<b>Which policy / paragraph number / policies map does your comment relate to?</b>	E1
<b>Do you consider that the Local Plan is legally compliant?</b>	No
<b>Do you consider that the Local Plan is sound?</b>	No
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	No

**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)**

The open (low horizon) landscape would be lost to many on the west of Wool.

Wool would not be, as it is at the moment 'lost' in the limited tree scape of the Frome valley.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?** Yes

**If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?**

Very limited response due to the technology/skills required.

## Comment

<b>Consultee</b>	Mr Robin Caudell (1190127)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Mr Robin Caudell (1190127)
<b>Comment ID</b>	PLPP112
<b>Response Date</b>	29/11/18 17:04
<b>Consultation Point</b>	Policies List ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1

**Are you responding on behalf of a group?** No

**Please tick the box(es) if you would like to be notified at an address/email address of the following:**

**Which policy / paragraph number / policies map does your comment relate to?** E4

**Do you consider that the Local Plan is legally compliant?** No

**Do you consider that the Local Plan is sound?** No

**Do you consider that the Local Plan complies with the duty to co-operate?** No

**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)**

4.129 This area appears on the Environment flood risk map for surface flooding!

Therefore why build?

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

Flood risk. Environment Agency Flood risk map

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?** Yes

**If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?**

Very few will be able to respond in this format.

## Comment

Consultee	Mr Robin Caudell (1190127)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Robin Caudell (1190127)
Comment ID	PLPP113
Response Date	29/11/18 17:10
Consultation Point	Policies List ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.1

Are you responding on behalf of a group? No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? E5

Do you consider that the Local Plan is legally compliant? No

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? No

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

Major investment will be required which will have negative effects upon the ground involved and the Frome valley water meadows etc.

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

No alteration of current drainage.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?** Yes

**If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?**

Lack of accessibility of local population to this sort of response.

## Comment

Consultee	Mr Robin Caudell (1190127)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Robin Caudell (1190127)
Comment ID	PLPP114
Response Date	29/11/18 17:22
Consultation Point	Policies List ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.1

Are you responding on behalf of a group? No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? E10

Do you consider that the Local Plan is legally compliant? No

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? No

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

Much good work has been done over the past decades by local and national conservation bodies to establish and protect the local bio and geo diversity.

This includes -- Heathland-Bovington, Various SSSIs , The Frome River and valley, the are of outstanding natural beauty (Wool) to the coast and the Jurassic Coast.

This urbanisation of Wool will be detrimental to all of these efforts.

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

No further development of housing except LOCAL housing need.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?** Yes

**If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?**

Who has the big picture. Purbeck D C do not.



## Comment

Consultee	Mr Robin Caudell (1190127)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Robin Caudell (1190127)
Comment ID	PLPP115
Response Date	29/11/18 17:29
Consultation Point	Policies List ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.1

Are you responding on behalf of a group? No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? E12

Do you consider that the Local Plan is legally compliant? No

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? No

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

I have lived in this Parish for 15 years and visited for the previous 40.

Planning has been rather ineffectual. Local materials etc have not been used/prescribed until recently. Wool is a hotch potch!

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

Any new housing must be Green/renewable, Local design.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?** Yes

**If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?**

Very few are aware of what is possible eg early Poundbury.

## Comment

<b>Consultee</b>	Mr Robin Caudell (1190127)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Mr Robin Caudell (1190127)
<b>Comment ID</b>	PLPP117
<b>Response Date</b>	29/11/18 17:45
<b>Consultation Point</b>	Policies List ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1

**Are you responding on behalf of a group?** No

**Please tick the box(es) if you would like to be notified at an address/email address of the following:**

**Which policy / paragraph number / policies map does your comment relate to?** H1

**Do you consider that the Local Plan is legally compliant?** No

**Do you consider that the Local Plan is sound?** No

**Do you consider that the Local Plan complies with the duty to co-operate?** No

**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)**

I believe that the local housing need is less than 50 (to rent/to buy/affordable).

Wool over the years has had small developments of housing for:-

Railway workers; Nuclear scientists/engineers; Retiring agricultural estate workers; Speculative dev. re local employment; and MOD staff.

These have been accepted and form part of what Wool is.

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

To provide housing for the Local Need only NOT for second homes or for rural commuter housing.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?** Yes

**If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?**

My response will be only one of few due to the many technological hurdles.

## Comment

<b>Consultee</b>	Mr Robin Caudell (1190127)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Mr Robin Caudell (1190127)
<b>Comment ID</b>	PLPP118
<b>Response Date</b>	29/11/18 17:53
<b>Consultation Point</b>	Policies List ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1

**Are you responding on behalf of a group?** No

**Please tick the box(es) if you would like to be notified at an address/email address of the following:**

**Which policy / paragraph number / policies map does your comment relate to?** H2

**Do you consider that the Local Plan is legally compliant?** No

**Do you consider that the Local Plan is sound?** No

**Do you consider that the Local Plan complies with the duty to co-operate?** No

**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)**

Land supply is fine. Owners are far too willing!

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

Compulsory purchase would be preferable where need is established rather than speculative development.

Many of the Purbeck Gate development were unsold and then bought to local housing association. This was a good thing for those housed, but I believe less than 10 households are employed at the Winfrith Technology site it was built for!

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?** Yes

**If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?**

I hope that I have a realistic picture of what is required and is acceptable to the local population.

## Comment

<b>Consultee</b>	Mr Robin Caudell (1190127)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Mr Robin Caudell (1190127)
<b>Comment ID</b>	PLPP120
<b>Response Date</b>	29/11/18 18:01
<b>Consultation Point</b>	Policies List ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1

**Are you responding on behalf of a group?** No

**Please tick the box(es) if you would like to be notified at an address/email address of the following:**

**Which policy / paragraph number / policies map does your comment relate to?** H3

**Do you consider that the Local Plan is legally compliant?** No

**Do you consider that the Local Plan is sound?** No

**Do you consider that the Local Plan complies with the duty to co-operate?** No

**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)**

Why are the National housing requirements being applied to a rural area such as Purbeck?

If it is for local employment then fine, but is not.

The main local employment is MOD and Tourism.

All promises of Green/Technology/? have not come to fruition over the past 10yrs.

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

Accept that the local employment prospects are not going to change dramatically over the next 10 yrs.  
There is no top rank University within 50 miles.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?** Yes

**If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?**

I hope my views illustrate this.



## Comment

<b>Consultee</b>	Mr Robin Caudell (1190127)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Mr Robin Caudell (1190127)
<b>Comment ID</b>	PLPP124
<b>Response Date</b>	29/11/18 19:35
<b>Consultation Point</b>	Policies List ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1

**Are you responding on behalf of a group?** No

**Please tick the box(es) if you would like to be notified at an address/email address of the following:**

**Which policy / paragraph number / policies map does your comment relate to?** H5

**Do you consider that the Local Plan is legally compliant?** No

**Do you consider that the Local Plan is sound?** No

**Do you consider that the Local Plan complies with the duty to co-operate?** No

**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)**

- Already done from dev. proceeds from Purbeck Gate.
- Not done, but additional car parking was included in Purbeck Gate permissions.
- Current queues are up to 0.5 miles in each direction in Winter!

Many collisions due to priorities/patience etc at road junction between A351 and Lulworth Road.

d Do not direct traffic from A31 A35 along A351 OR C6 to Weymouth!!!!

h The village already has Four 'hubs' , Lulworth Road- Spar, Black Bear, Bakers, Hair Dressers; Colliers Lane- Durbeville Centre/ Library/Kids of Wool/Recreation ground/Playing field/Doctors Surgery,School, RC church,The Ship. Dorchester Road- Garage,Boots, Hairdressers, Central,Sandwich/Coffee/Deli, Amber Hardware, Butchers; Station-- Garage, Tyres,Body Shop, Chippy, Cafe, Car Wash, Railway Station.

Another Hub would Duplicate, possibly reducing the use/ profitability of the others?

i Where and what is this scheduled monument?

j+o Only necessary if over sensitive new comer/second home/holiday home,owners might complain, or not buy near a modern electric (quiet) railway.

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

Enhancement of the current 'Hubs' would be beneficial.

Maintenance and improvement of the current footpaths eg Braytown to Giddy Green; and Darkies Lane to Back Lane, East Burton; Colliers Lane to New Buildings;

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?** Yes

**If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?**

A detailed knowledge of the local geography and footpaths is essential.

## Comment

<b>Consultee</b>	Mr Robin Caudell (1190127)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Mr Robin Caudell (1190127)
<b>Comment ID</b>	PLPP125
<b>Response Date</b>	29/11/18 19:45
<b>Consultation Point</b>	Policies List ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1

**Are you responding on behalf of a group?** No

**Please tick the box(es) if you would like to be notified at an address/email address of the following:**

**Which policy / paragraph number / policies map does your comment relate to?** H8

**Do you consider that the Local Plan is legally compliant?** Yes

**Do you consider that the Local Plan is sound?** No

**Do you consider that the Local Plan complies with the duty to co-operate?** No

**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)**

The proposal for 65 bed care home goes against H8 153 Specialist accomodation for the elderly, especially that social care policies now emphasise the socially and economically beneficial aspects of the elderly remaining their own/appropriate accomodation ie protected housing schemes, releasing larger properties to larger families.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?** Yes

**If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?**

I hope my comments above are realistic.

## Comment

Consultee	Mr Robin Caudell (1190127)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Robin Caudell (1190127)
Comment ID	PLPP127
Response Date	29/11/18 19:53
Consultation Point	Policies List ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.1

Are you responding on behalf of a group? No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? H9

Do you consider that the Local Plan is legally compliant? No

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? No

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

H9 Housing mix. a +b Self build and single storey, both of these would be welcomed locally. 5 and 10% are totally insufficient.

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

NO large scale development is necessary . Especially if it is going to be holiday/second homes/commuter.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?** Yes

**If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?**

I have lived and worked her for 15 years, running a small business employing 6 people and also a 5 bed B&B for 10 years serving Monkey World and The Tank Museum guests.

## Comment

<b>Consultee</b>	Mr Robin Caudell (1190127)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Mr Robin Caudell (1190127)
<b>Comment ID</b>	PLPP129
<b>Response Date</b>	29/11/18 20:08
<b>Consultation Point</b>	Policies List ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Are you responding on behalf of a group?</b>	No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

**Which policy / paragraph number / policies map does your comment relate to?** H11

**Do you consider that the Local Plan is legally compliant?** No

**Do you consider that the Local Plan is sound?** No

**Do you consider that the Local Plan complies with the duty to co-operate?** No

**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)**

p70 161-169

If the national av household income is £25-30k then the local income is lower than this.

The local av house price is £250-300k ie 10x

The only affordable housing is housing association to rent or 'park homes' ie mobile homes.

Therefore the local current housing need ref H1 can only be fulfilled by these!

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

We have recently had to sell our property and move into affordable rented accommodation and only through the bank of our children.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?** Yes

**If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?**

Personal experience of ourselves and one of our less professionally qualified children.



## Comment

<b>Consultee</b>	Mr Robin Caudell (1190127)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Mr Robin Caudell (1190127)
<b>Comment ID</b>	PLPP131
<b>Response Date</b>	29/11/18 20:16
<b>Consultation Point</b>	Arrangements for commenting on the Presubmission Purbeck Local Plan timings and next steps ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Are you responding on behalf of a group?</b>	No
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	H14
<b>Do you consider that the Local Plan is legally compliant?</b>	No
<b>Do you consider that the Local Plan is sound?</b>	No
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	No

**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)**

H14 Second Homes

The policy for AONB , small sites and rural exemptions will put even greater pressure on areas such as Wool which is not covered by AONB.

Therefore houses for sale at market prices in any new developments will be second homes/holiday homes. These do not benefit the local permanent communities.

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

No new holiday/second homes in Wool.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?** Yes

**If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?**

To maintain our vibrant permanent local community.

## Comment

<b>Consultee</b>	Mr Robin Caudell (1190127)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Mr Robin Caudell (1190127)
<b>Comment ID</b>	PLPP132
<b>Response Date</b>	29/11/18 20:43
<b>Consultation Point</b>	Arrangements for commenting on the Presubmission Purbeck Local Plan timings and next steps ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Are you responding on behalf of a group?</b>	No
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	EE2
<b>Do you consider that the Local Plan is legally compliant?</b>	No
<b>Do you consider that the Local Plan is sound?</b>	No
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	Yes

**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)**

There is large amount of available employment land.

Dorset Innovation Park , Holton Heath and in Wareham.

Currently the majority of employees at DIP commute from Weymouth, Dorchester, Wareham and Poole.

The expansion of employment opportunities on this site appears to be very small.

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

DIP is too far from any large centres of population.

That is why the Winfrith nuclear site was established there in the first place.

The local land owner (Hyde) was also promised that the land would be returned to them.

This is now definitely NOT the case.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?** Yes

**If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?**

The local planners / Landowners have no real connection to this small area. Many locals feel that Wool has frequently been 'dumped' on! eg Winfrith Nuclear, MOD, Bestival!

## Comment

<b>Consultee</b>	Mr Robin Caudell (1190127)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Mr Robin Caudell (1190127)
<b>Comment ID</b>	PLPP134
<b>Response Date</b>	29/11/18 20:58
<b>Consultation Point</b>	Arrangements for commenting on the Presubmission Purbeck Local Plan timings and next steps ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Are you responding on behalf of a group?</b>	No
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	IM1
<b>Do you consider that the Local Plan is legally compliant?</b>	No
<b>Do you consider that the Local Plan is sound?</b>	No
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	No

**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)**

The OPTIONS CONSULTATION summer 2018 questionnaire to all households did NOT obviously give the option to support any thing else other than the large scale developments across the District. This

was to enable the local authority to fulfil its imagined requirement to provide certain numbers of new housing according to National demands. This does NOT take into account local need or appropriateness for our communities or landscape.

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

Areas of outstanding natural beauty should not be under the same pressures for development as others.

Areas in or near large conurbations / brown field sites should be a priority.

Why do the planners think this is a very attractive tourism destination?

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?** Yes

**If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?**

I hope my comments are deemed to be fair and accurate.

## Comment

<b>Consultee</b>	Mr Robin Caudell (1190127)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Mr Robin Caudell (1190127)
<b>Comment ID</b>	PLPP156
<b>Response Date</b>	30/11/18 17:00
<b>Consultation Point</b>	Arrangements for commenting on the Presubmission Purbeck Local Plan timings and next steps ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Are you responding on behalf of a group?</b>	No
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	V1
<b>Do you consider that the Local Plan is legally compliant?</b>	No
<b>Do you consider that the Local Plan is sound?</b>	No
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	No

**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)**

This does not align with local needs.

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

What are the local needs.

The Wool local needs are less than 50 homes, the majority 'affordable'.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?** Yes

**If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?**

Why are these needs being hidden/financed by speculative development?



## Comment

Consultee	Mr Robin Caudell (1190127)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Robin Caudell (1190127)
Comment ID	PLPP164
Response Date	30/11/18 17:13
Consultation Point	Policies List ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.1

Are you responding on behalf of a group? No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? V1

Do you consider that the Local Plan is legally compliant? No

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? No

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

The local housing need (approx) 50 houses .

This inappropriately subsidised by speculative second/holiday/commuter homes.

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

Local housing need only. NOT based upon some national formula which allows speculative development by local land owners.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?** Yes

**If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?**

The big picture is needed to be expounded.

## Comment

Consultee	Mr Robin Caudell (1190127)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Robin Caudell (1190127)
Comment ID	PLPP167
Response Date	30/11/18 17:19
Consultation Point	Policies List ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.1

Are you responding on behalf of a group? No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? H14

Do you consider that the Local Plan is legally compliant? No

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? No

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

Due to the ANOB policy on second homes the pressure upon Wool is extreme.

AS many other more picturesque villages have found to their cost SECOND HOMES kill the local community. eg Worth Matravers 80% second homes/holiday homes.

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

NO new development of second/holiday homes.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?** Yes

**If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?**

Very few people have the BIG picture.

## Comment

Consultee	Mr Robin Caudell (1190127)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Robin Caudell (1190127)
Comment ID	PLPP173
Response Date	30/11/18 17:44
Consultation Point	Policies List ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? IM1

Do you consider that the Local Plan is legally compliant? No

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? No

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

The 'Options Consultation' 2016 and new homes for Purbeck were both totally mis-named.

Both included 100s of houses required by Central Government which have NO reflection on the need , NOW or in the FUTURE in a rural area such as Purbeck.

Why is it that 1000s of people find the attractive enough to holiday here?

Urbanisation is not one of them!

Including all the ANOBs, SSSIs, Nature reserves, World Heritage Coast, etc in a new NATIONAL PARK would be a good outcome from all of the protest and turmoil this housing development 'plan' has produced.

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

Accept that this area is :

Rural

Beautiful

Irreplaceable

Home to many

An escape for many more.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?** Yes

**If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?**

See above.

## Comment

<b>Consultee</b>	Frances Chapman (1191324)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Frances Chapman (1191324)
<b>Comment ID</b>	PLPP569
<b>Response Date</b>	03/12/18 10:50
<b>Consultation Point</b>	Policy H5: Wool ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Letter
<b>Version</b>	0.3
<b>Files</b>	<a href="#">H5-Chapman-PLPP569-redacted.pdf</a>

**Please tick the box(es) if you would like to be notified at an address/email address of the following:**

The submission of Local Plan to the Secretary of State for Public Examination  
 The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report)  
 The adoption of the Purbeck Local Plan

**Which policy / paragraph number / policies map does your comment relate to?** H5

**Do you consider that the Local Plan is sound?** No

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?** No



## For Office Use Only

Requester ID: 011

Consultee ID: 1191324

Comment ID's: PLPPS69

## PART B

1. Which part of the Purbeck Local Plan does your representation relate to? Separate forms must be completed for each separate policy or paragraph you wish to comment on.

Policy number	H5
Policies map	
Paragraph number	

2. Do you consider that the Local Plan is:

- |   |     |                          |    |                                     |
|---|-----|--------------------------|----|-------------------------------------|
| • Legally compliant                     | Yes | <input type="checkbox"/> | No | <input type="checkbox"/>            |
| • Sound                                 | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> |
| • Complies with the duty to co-operate. | Yes | <input type="checkbox"/> | No | <input type="checkbox"/>            |

If your representation relates to how the Council has prepared the Local Plan it is likely to relate to legal compliance. The Plan must:

- comply with Section 20 of the Planning and Compulsory Purchase Act 2004 and other related legislation;
- be in accordance with the Council's Local Development Scheme and Statement of Community Involvement;
- comply with the Town and Country Planning (Local Planning) (England) Regulations 2012, national planning policy and the duty to co-operate in relation to planning of sustainable development (section 110 of Localism Act 2011).

If your representation relates to the content of the Local Plan, it is likely to relate to its soundness. To be considered sound the plan must be:

- positively prepared - providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- 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.



If your representation relates to how the Council has consulted with other relevant bodies during the plan making process, it is likely to relate to how the plan process has complied with the duty to co-operate in relation to the planning of sustainable development.

3. Please give details of why you consider the policy, policies map or paragraph number of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible).

**Policy number H5, Chapter 4 Housing for Wool**

**Para 127:** The building of 470 homes is not a sound decision for the village of Wool which has already been extended by a large development, Purbeck Gate, of circa 200 properties which, when built, were not in keeping with the surrounding properties, and has been detrimental to the street scene of Wool. Some years ago the residents were asked whether they wanted large development or small sites. Small sites was the preference so most of the rear gardens on the west side of the village have been built upon with the loss of green space, mature trees and nature. Now the plan is for at least 470 extra properties to be erected with a 65 Bed care home and a hub which will lead to the urbanisation of Wool, which is not what the residents want. Villagers remained in Wool because it is a village and people have settled in Wool for the same reason.

**Para 128:** 320 houses, a 65 bed care home shops and a Hub to be built on the three most majestic fields left in Wool is a regrettable decision for the village of Wool. These fields have been organically certified and farmed by a sheep farmer for many years, there is an abundance of wild life in them and there is a designated heritage Romano British Settlement (scheduled monument) to the south of the site. If properties are built in the area below the site, in time it will become eroded. Wool is a historic village and we must maintain our historic monuments. There are alternative sites in the village on which to build which will not lead to the street scene being compromised and which will not cause a corridor of hundreds of properties on entering or exiting the village. The development of this scale and content will divide the village.

**Infrastructure:** The 2018 Purbeck Local Plan is unsound as it offers no serious, definitive guarantees on the infrastructure required to support the extra numbers of homes to be built in Wool.

We are given vague ideas to assume that the current schools can be expanded despite the lack of space. This is purely Vision.

No mention is made of the overloaded sewage works.

No consideration given to the already overloaded Medical Surgery In Wool by the addition of several hundred extra residents and the

(Please continue on a separate sheet if necessary)

**Policy number H5, Housing for Wool continued**

sudden inclusion of a 65 bed Care Home which will be unaffordable for local residents.

There is acknowledgement from the Council that there will be increased traffic but no consideration has been given to the already overloaded road network on main roads, which are not fit for purpose, and to the delays on the level crossing in Wool. The only suggestion given to residents who have to commute is to encourage motorists to seek alternative routes (ie to use the C6 road) but there are none that are suitable.

**Affordability:** The plan is unsound and lacks clarity. We know that more than 470 unnecessary properties are to be built in Wool. They will not be affordable for local people especially the most vulnerable in in our society. Purbeck District Council states that the average cost of a house in Purbeck is £250,000. This figure is seventeen times the average salary in Purbeck and, to be realistically affordable to rent or purchase in this area, a house should cost **£150,000**. The plan presents no evidence to suggest that building **470+** new homes in Wool will cause house prices to drop by circa **40%**. Furthermore, Purbeck District Council has said they will not be building council homes.

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

**Policy number H5 Wool**

I consider the Purbeck Local Plan Pre-submission 2018 to be unsound as it is based on the findings of an incomplete and flawed New Homes for Purbeck 2018 consultation which lacked clarity as thorough consideration had not been given to providing the electorate with guarantees on the additional infrastructure required to accommodate hundreds of extra homes, thousands of extra people and vehicles in an area which is already stretched on all the existing infrastructure, in particular the village in Wool. Misleading and vague information was given out on infrastructure and the impression given was that between 40% and 50% of all homes to be built being affordable which is not the case for the people of Wool.

Also, I consider the format of Options given to be unfair as we, in Wool, know for a fact that the residents of other villages/towns chose the option to build the large numbers of homes in Wool and not in their areas as they realised that Wool was Purbeck District Councils preferred locality for hundreds of extra and unnecessary homes to be erected in Wool. On paper, the Consultation states the most favoured option was Option A and 35% of respondents throughout Purbeck chose Option A and 28% chose None. Whereas in Wool 30% of respondents chose Option A and 60% of respondents chose NONE. Therefore for Wool, the democratic wishes of the community have been ignored.

When residents are asked to make life changing decisions for their village they should be made aware of:-

- a. Why so many extra homes are needed when there are less than 50 families/people on the Housing Register in Wool.
- b. What guarantees are in place to provide the extra infrastructure required to accommodate the influx of people and traffic.
- c. The National criteria of "Affordability" is not applicable to Wool and Purbeck. This problem should be acknowledged and dealt with. We should be given guarantees to provide truly affordable accommodation to purchase or rent with a mix of council/social homes. Also, guarantees that the land provided will not have leasehold restrictions on it.

*cont'd*

(Please continue on a separate sheet if necessary)

5. If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions of the examination, although all members of the public may observe the proceedings. Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

Yes

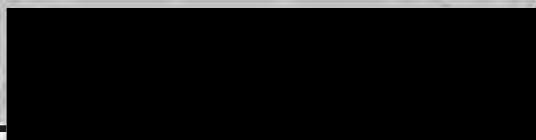
No

6. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary?

(Please continue on a separate sheet if necessary)

Please sign and date this form:

Signature:



Date: 02/12/2018

- 2 -

d. Reports provided by professional people on the biodiversity, geodiversity and nature should be acknowledged and not ignored or deemed invalid.

e. Residents should be made aware of the names of developers or builders who have been chosen to develop the proposed sites in order to mitigate the problems experienced on previous sites.

f. It is the duty of a Council to listen to its electorate. Villages need open spaces in order to thrive and to understand what has made our land so special. It would seem that the plan for the future is to destroy our precious agricultural land for large concrete development which is totally out of keeping with rural England. What happened to sustainability.

## Comment

<b>Consultee</b>	Michael Chapman (1191391)
<b>Address</b>	[REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Michael Chapman (1191391)
<b>Comment ID</b>	PLPP570 PLPP721 PLPP722 PLPP723

<b>Files</b>	<a href="#">H5-Chapman-PLPP570-redacted.pdf</a>
--------------	---



## For Office Use Only

Requester ID: 012  
 Consultee ID: 1191391  
 Comment ID's: PLPP570

**PART B**

**1. Which part of the Purbeck Local Plan does your representation relate to?** Separate forms must be completed for each separate policy or paragraph you wish to comment on.

Policy number	H5
Policies map	
Paragraph number	

**2. Do you consider that the Local Plan is:**

- |   |     |                          |    |                                     |
|---|-----|--------------------------|----|-------------------------------------|
| • Legally compliant                     | Yes | <input type="checkbox"/> | No | <input type="checkbox"/>            |
| • Sound                                 | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> |
| • Complies with the duty to co-operate. | Yes | <input type="checkbox"/> | No | <input type="checkbox"/>            |

**If your representation relates to how the Council has prepared the Local Plan it is likely to relate to legal compliance. The Plan must:**

- comply with Section 20 of the Planning and Compulsory Purchase Act 2004 and other related legislation;
- be in accordance with the Council's Local Development Scheme and Statement of Community Involvement;
- comply with the Town and Country Planning (Local Planning) (England) Regulations 2012, national planning policy and the duty to co-operate in relation to planning of sustainable development (section 110 of Localism Act 2011).

**If your representation relates to the content of the Local Plan, it is likely to relate to its soundness. To be considered sound the plan must be:**

- positively prepared - providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- 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.

If your representation relates to how the Council has consulted with other relevant bodies during the plan making process, it is likely to relate to how the plan process has complied with the duty to co-operate in relation to the planning of sustainable development.

3. Please give details of why you consider the policy, policies map or paragraph number of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible).

**Policy number H5, Chapter 4 Housing for Wool**

**Para 127:** The building of 470 homes is not a sound decision for the village of Wool which has already been extended by a large development, Purbeck Gate, of circa 200 properties which, when built, were not in keeping with the surrounding properties, and has been detrimental to the street scene of Wool. Now, the plan is for at least 470 extra properties to be erected with a 65 Bed care home shops, and a hub which will lead to the urbanisation of Wool, which is not what the residents want. Villagers remained in Wool because it is a village and people have settled in Wool for the same reason.

**Para 128:** 320 houses, a 65 bed care home shops and a Hub to be built on the three most majestic organically farmed fields left in Wool is a regrettable decision for the village of Wool. There is a designated heritage Romano British Settlement (scheduled monument) to the south of the site. If properties are built in the area below the site, in time it will become eroded. A development of this scale and content will divide and ruin our village.

**Infrastructure:** The 2018 Purbeck Local Plan is unsound as it offers no serious, definitive guarantees on the infrastructure required to support the extra numbers of homes to be built in Wool.

We are given vague ideas to assume that the current schools can be expanded despite the lack of space.

No mention is made of the overloaded sewage works.

No consideration was given to the already overloaded Medical Surgery In Wool by the addition of several hundred extra residents and the sudden inclusion of a 65 bed Care Home, which will be unaffordable for local residents.

There is acknowledgement from the Council that there will be increased traffic but no consideration has been given to the already overloaded road network on main roads, which are not fit for purpose, and to the delays on the level crossing in Wool. There are no suitable alternative routes for drivers to take

(Please continue on a separate sheet if necessary)



- 2 -

**Affordability:** The plan is unsound and lacks clarity. The homes to be built in Wool will not be affordable for local people especially the most vulnerable in our society. Purbeck District Council states that the average cost of a house in Purbeck is £250,000. This figure is seventeen times the average salary in Purbeck and, to be realistically affordable to rent or purchase in this area, a house should cost **£150,000**. The plan presents no evidence to suggest that building **470+** new homes in Wool will cause house prices to drop by circa **40%**. Furthermore, Purbeck District Council has said they will not be building council homes.

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

***Policy number H5 Wool***

I consider the Purbeck Local Plan Pre-submission 2018 to be unsound as it is based on the findings of an incomplete and flawed New Homes for Purbeck 2018 consultation which lacked clarity as consideration had not been given to providing the electorate with guarantees on the additional infrastructure required to accommodate hundreds of extra homes, thousands of extra people and vehicles in an area which is already stretched on all the existing infrastructure, in particular the village in Wool.

Also, I consider the format of Options given in the document to be unfair for the residents of Wool. On paper, the Consultation states the most favoured option was Option A and 35% of respondents throughout Purbeck chose Option A and 28% chose None. Whereas in **Wool** 30% of respondents chose Option A and 60% of respondents chose NONE. Therefore for Wool, the democratic wishes of the community have been ignored.

Residents should be made aware of:-

- a. Why so many extra homes are needed when there are less than 50 families/people on the Housing Register in Wool.
- b. What guarantees are in place to provide the extra infrastructure required to accommodate the influx of people and traffic.
- c. The National criteria of "Affordability" is not applicable to Wool. This problem should be acknowledged and dealt with. We should be given guarantees to provide truly affordable accommodation to purchase or rent with a mix of council/social homes. Also, guarantees that the land provided will not have leasehold restrictions on it. Misleading and vague information was given out on infrastructure and the impression given was that between 40% and 50% of all homes to be built would be affordable, which is not the case for the people of Wool.
- d. Reports provided by professional people on the biodiversity, geodiversity and nature should be taken seriously.
- e. It is the duty of a Council to listen to its electorate. We do not want our village to become an urban new town.

(Please continue on a separate sheet if necessary)

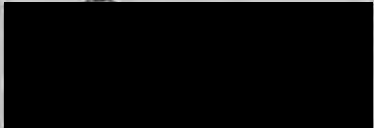
5. If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions of the examination, although all members of the public may observe the proceedings. Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

Yes  No

6. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary?

(Please continue on a separate sheet if necessary)

Please sign and date this form:

Signature: 

Date: 3/12/18

## Comment

<b>Consultee</b>	Ms Clare Clare Lees (1189887)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Ms Clare Clare Lees (1189887)
<b>Comment ID</b>	PLPP40
<b>Response Date</b>	27/11/18 13:36
<b>Consultation Point</b>	Chapter 1: Introduction ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Are you responding on behalf of a group?</b>	No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

**Which policy / paragraph number / policies map does your comment relate to?** 6

**Do you consider that the Local Plan is legally compliant?** No

**Do you consider that the Local Plan is sound?** No

**Do you consider that the Local Plan complies with the duty to co-operate?** Yes

**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)**

I do not believe Purbeck District Council can make the undertaking this policy will last until 2034. With the introduction of the new rural Dorset authority in 2019 there must be a fresh housing review which will include Purbeck. paragraph 6 is therefore untrue and misleading.

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

It must be made clear in the introduction that the policies determined by Purbeck DC cannot bind the new rural authority.

## Comment

Consultee	Ms Clare Clare Lees (1189887)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Ms Clare Clare Lees (1189887)
Comment ID	PLPP41
Response Date	27/11/18 13:44
Consultation Point	Characteristics of Purbeck ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? 21

Do you consider that the Local Plan is legally compliant? No

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

I believe Lytchett Minster, as the host to the Lytchett Minster Secondary School with associated facilities including sports centre, the Food Assembly, 2 pubs, a church, the Rugby Club, CJs community club, a pre-school and various offices, should be included as a large village with facilities.

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

Lytchett Minster should be considered a large village.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?** Yes

**If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?**

I live in the village of Lytchett Minster and know about the facilities. I believe it is overlooked by those who do not realise how much happens in the village especially in relation to the secondary school.

## Comment

<b>Consultee</b>	Ms Clare Clare Lees (1189887)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Ms Clare Clare Lees (1189887)
<b>Comment ID</b>	PLPP43
<b>Response Date</b>	27/11/18 13:46
<b>Consultation Point</b>	Housing ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1

**Are you responding on behalf of a group?** No

**Please tick the box(es) if you would like to be notified at an address/email address of the following:**

**Which policy / paragraph number / policies map does your comment relate to?** 30

**Do you consider that the Local Plan is legally compliant?** No

**Do you consider that the Local Plan is sound?** No

**Do you consider that the Local Plan complies with the duty to co-operate?** Yes

**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)**

The bouyant second homes market is limited to specific parts of Purbeck



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

The paragraph should be amended to say: There is a buoyant second homes market in parts of Purbeck.

## Comment

<b>Consultee</b>	Ms Clare Clare Lees (1189887)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Ms Clare Clare Lees (1189887)
<b>Comment ID</b>	PLPP44
<b>Response Date</b>	27/11/18 14:01
<b>Consultation Point</b>	Policy V2: Green belt ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.2

**Are you responding on behalf of a group?** No

**Please tick the box(es) if you would like to be notified at an address/email address of the following:**

**Which policy / paragraph number / policies map does your comment relate to?** 48

**Do you consider that the Local Plan is legally compliant?** No

**Do you consider that the Local Plan is sound?** No

**Do you consider that the Local Plan complies with the duty to co-operate?** Yes

**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)**

By not removing land from the green belt near the conurbations of Poole and Bournemouth the council are committing themselves to building on green fields at Moreton and Wool. This results in loss of green fields and increased traffic and therefore degradation of the green belt.

## Comment

**Consultee** Ms Clare Clare Lees (1189887)  
**Email Address** [REDACTED]  
**Address** [REDACTED]  
**Event Name** Purbeck Local Plan Pre-submission Draft  
**Comment by** Ms Clare Clare Lees (1189887)  
**Comment ID** PLPP45  
**Response Date** 27/11/18 14:23  
**Consultation Point** Policy H7: Upton ([View](#))  
**Status** Processed  
**Submission Type** Web  
**Version** 0.2

**Are you responding on behalf of a group?** No

**Please tick the box(es) if you would like to be notified at an address/email address of the following:**

**Which policy / paragraph number / policies map does your comment relate to?** H7

**Do you consider that the Local Plan is legally compliant?** No

**Do you consider that the Local Plan is sound?** No

**Do you consider that the Local Plan complies with the duty to co-operate?** Yes

**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)**

At Frenches Farm there is a redundant farm yard and two houses. An application was made to Purbeck District Council to have the farm yard included in the provision for employment land to allow for a holistic development of the Frenches Farm site at Upton. This would have allowed for local employment provision to have been made adjacent to the housing and the SANGS. Purbeck District Council have

not included this suggestion in their plans saying there is enough employment provision within their plan and within Purbeck. This fails to take account of:

- \* The benefit of having employment land adjacent to the new development at Policeman's Lane and in Upton.
- \* The negative impact of a redundant farmyard within Upton. There is already flytipping and there has been an arson attack on the farm house.

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

The redundant farmyard at Frenches Farm and the adjacent paddock should be removed from the greenbelt and allocated for employment use.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?** Yes

**If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?**

I have helped organise a local public meeting involving the Town Council and various interested members of the community and have received overwhelming public support for a holistic development of Frenches Farm to include housing, recreational facilities and employment. Originally the adjacent paddock to the yard was to have been allocated as a new site for a primary school however DCC have definitively rejected this plan. I have been involved in trying to achieve a whole farm plan for Frenches for many years and I feel no one knows the site or the history better than I do and therefore no one will speak for the best possible future for this site and for the community than I will. The failure of PDC to plan for a holistic development of this site was more than disappointing. It displays a complete lack of local understanding and a lack of vision which does this community a great disservice.

## Comment

**Consultee** Ms Clare Clare Lees (1189887)  
**Email Address** [REDACTED]  
**Address** [REDACTED]  
**Event Name** Purbeck Local Plan Pre-submission Draft  
**Comment by** Ms Clare Clare Lees (1189887)  
**Comment ID** PLPP46  
**Response Date** 27/11/18 14:29  
**Consultation Point** Policy E4: Assessing flood risk ([View](#))  
**Status** Processed  
**Submission Type** Web  
**Version** 0.1

**Are you responding on behalf of a group?** No

**Please tick the box(es) if you would like to be notified at an address/email address of the following:**

**Which policy / paragraph number / policies map does your comment relate to?** 71

**Do you consider that the Local Plan is legally compliant?** No

**Do you consider that the Local Plan is sound?** No

**Do you consider that the Local Plan complies with the duty to co-operate?** Yes

**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)**

There is a new report completed this autumn by DCC which updates the Jacobs Report into flooding in Lytchett Minster. The flood report needs updating to include this evidence.

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

The flood report in relation to Lytchett Minster needs updating to include new evidence and conclusions made by DCC to ensure best evidence is used.

## Comment

Consultee	Ms Clare Clare Lees (1189887)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Ms Clare Clare Lees (1189887)
Comment ID	PLPP47
Response Date	27/11/18 14:40
Consultation Point	Policy I2: Improving accessibility and transport ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? 237

Do you consider that the Local Plan is legally compliant? No

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

There are no transport statistics to justify a policy allocating substantial housing allocations at Wool and Moreton based on sustainable transport. Despite my best endeavours I was unable to obtain statistics for train use from either station from PDC or from South West Trains. Without such statistics

the railways cannot be included as offering sustainable alternative transport as there is no evidence to justify this statement.

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

Delete railways as a provider of sustainable transport alternatives.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?** No



## Comment

<b>Consultee</b>	Ms Clare Clare Lees (1189887)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Ms Clare Clare Lees (1189887)
<b>Comment ID</b>	PLPP48
<b>Response Date</b>	27/11/18 14:50
<b>Consultation Point</b>	Policy H6: Lytchett Matravers ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.2
<b>Are you responding on behalf of a group?</b>	No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

<b>Which policy / paragraph number / policies map does your comment relate to?</b>	135
<b>Do you consider that the Local Plan is legally compliant?</b>	No
<b>Do you consider that the Local Plan is sound?</b>	No
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	Yes

**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)**

I understand the provision for a SANGS is to be adjacent to the housing allocation at Blaney's Corner and Flowers Drove. As the farmer of land adjacent to Lytchett Matravers I believe this land is too far away from the provision of housing to be attractive to the residents of the 90 new homes proposed.

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

Reduce the allocation of housing on this land to allow for part of the land to be allocated as a SANGS,

## Comment

Consultee	Ms Clare Clare Lees (1189887)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Ms Clare Clare Lees (1189887)
Comment ID	PLPP49
Response Date	27/11/18 15:01
Consultation Point	Improving accessibility and transport ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.2
Are you responding on behalf of a group?	No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? 241

Do you consider that the Local Plan is legally compliant? No

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? Yes

Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

Sustainable transport to Lytchett Minster Secondary School is inadequate. Children come to this school from three directions: Upton, Lytchett Matravers and Sandford. Many children walk and cycle from Upton which proves a willingness. However the roads are too dangerous or paths too frightening for children from Lytchett Matravers or Sandford to walk or cycle. As these villages are all proximate

to the school the children are not eligible for a free bus service. The result is there are 600+ cars every morning between 8am and 8.45am bringing children to school.

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

An adequate cycle path from Sandford and a road widening scheme from Lytchett Matravers to include a cycle path along the Huntick Road.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?** Yes

**If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?**

I am the farmer and neighbour of Lytchett Minster School and I don't feel any other person has taken such a close interest in this problem and therefore I don't feel anyone else will speak to the problem or its possible solutions.

## Comment

<b>Consultee</b>	Ms Clare Clare Lees (1189887)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Ms Clare Clare Lees (1189887)
<b>Comment ID</b>	PLPP141
<b>Response Date</b>	30/11/18 15:03
<b>Consultation Point</b>	Constraints and requirements for delivery of site allocations ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Are you responding on behalf of a group?</b>	No
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	106 onwards
<b>Do you consider that the Local Plan is legally compliant?</b>	No
<b>Do you consider that the Local Plan is sound?</b>	No
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	Yes

**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)**

The local plan is failing to provide housing in the right places.

Mobile homes are appearing everywhere around my village of Lytchett Minster and Purbeck District Council appear powerless to prevent them. People are voting with their feet and moving into the worst kind of housing poverty trap. I counted up the number of residential mobile homes within a two mile radius of Lytchett Minster last week and reached over 800. Many are within 400m of heathland, none provide SANGS, none provide community contributions and all are in Green Belt. The reason these homes are in Lytchett Minster is the proximity to Poole and Bournemouth, the motor which drives the economy of Purbeck. People are voting with their feet. Unless homes are put in the correct places, mobile homes will continue to proliferate, people will be condemned to live in exploitative housing and these homes will have a negative impact on both the environment and the infrastructure of the area.

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

Housing needs to be built where there is the demand and close to facilities and employment.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?** Yes

**If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?**

I am a local landowner near Lytchett Minster. I see the Green Belt being degraded by a refusal of Purbeck to build in the Green Belt. Sensible planning could negate the need for mobile homes, ensure proper community planning and open the Green Belt to the public through the provision of SANGS. My local knowledge of the mobile home market, which is not mentioned by the planning authorities, will mean I can give evidence which will otherwise remain unstated.

## Comment

<b>Consultee</b>	David John Clark (1187487)
<b>Address</b>	[REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	David John Clark (1187487)
<b>Comment ID</b>	PLPP2
<b>Response Date</b>	02/11/18 10:47
<b>Consultation Point</b>	Policy H6: Lytchett Matravers ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Letter
<b>Version</b>	0.6
<b>Files</b>	<a href="#">H6-Clark-PLPP2-redacted.pdf (1)</a>
<b>Are you responding on behalf of a group?</b>	No
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	H6
<b>Do you consider that the Local Plan is legally compliant?</b>	Yes
<b>Do you consider that the Local Plan is sound?</b>	Yes
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	No

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?** No





## For Office Use Only

Requester ID: 001  
 Consultee ID: 1187487  
 Comment ID's: PL PP2

## PART B

1. Which part of the Purbeck Local Plan does your representation relate to? Separate forms must be completed for each separate policy or paragraph you wish to comment on.

Policy number	Lytchett Matravers H6 <sup>85</sup> 2/11/18
Policies map	—
Paragraph number	—

2. Do you consider that the Local Plan is:

- |   |     |                                     |    |                                     |
|---|-----|-------------------------------------|----|-------------------------------------|
| • Legally compliant                     | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/>            |
| • Sound                                 | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/>            |
| • Complies with the duty to co-operate. | Yes | <input type="checkbox"/>            | No | <input checked="" type="checkbox"/> |

If your representation relates to how the Council has prepared the Local Plan it is likely to relate to legal compliance. The Plan must:

- comply with Section 20 of the Planning and Compulsory Purchase Act 2004 and other related legislation;
- be in accordance with the Council's Local Development Scheme and Statement of Community Involvement;
- comply with the Town and Country Planning (Local Planning) (England) Regulations 2012, national planning policy and the duty to co-operate in relation to planning of sustainable development (section 110 of Localism Act 2011).

If your representation relates to the content of the Local Plan, it is likely to relate to its soundness. To be considered sound the plan must be:

- positively prepared - providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- 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.

If your representation relates to how the Council has consulted with other relevant bodies during the plan making process, it is likely to relate to how the plan process has complied with the duty to co-operate in relation to the planning of sustainable development.

3. Please give details of why you consider the policy, policies map or paragraph number of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible).

Having been originally asked by Purbeck District Council to actively promote my land, which I have been doing for the last six or seven years now, I am extremely disappointed to note that after all this time and a lot of hard work on my part, the Council has not seen fit to include my land in their proposals for the next local plan. I have a number of interested parties since promoting my land, as requested, and so I would ask, please that you now include my land in your proposals, I have been assured this would happen many times over the last couple of years and your current proposal is extremely disappointing & not at all what I have been lead to believe. I enclose a copy of your proposed plan with my land outlined and hatched in black (land to the South, immediately above your proposed inclusion to the next Local Plan).

Many thanks for your ongoing attention to this matter.

(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 Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text 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)

5. If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions of the examination, although all members of the public may observe the proceedings. Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

Yes

No

6. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary?

(Please continue on a separate sheet if necessary)

**Please sign and date this form:**

Signature:



Date: 2<sup>nd</sup> - Nov - 2018



Scale 1:7500

© Crown copyright and database rights 2018  
Ordnance Survey LA100022058

Purbeck  
District Council

Purbeck Local Plan 2018  
Inset Map - Lytshett Matravers

For Identification Purposes Only



## Comment

<b>Consultee</b>	Mr Nicholas Cole (1190122)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Mr Nicholas Cole (1190122)
<b>Comment ID</b>	PLPP319
<b>Response Date</b>	03/12/18 12:10
<b>Consultation Point</b>	Policy H8: Small sites next to existing settlements ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Are you responding on behalf of a group?</b>	No
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	H8
<b>Do you consider that the Local Plan is legally compliant?</b>	Yes
<b>Do you consider that the Local Plan is sound?</b>	No
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	Yes

**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)**

The plan does not appear to be cognisant of the village environment. It fails to take into account the value of the village to Dorset as a major tourism hub and it grossly underestimates the impact that

development of all or most of these small sites would have on West Lulworth. Nor does it appear to recognise the impact on the already failing infrastructure.

We are very concerned about the impact on West Lulworth of the small site developments identified in the SHLAA. While the principle of delivering some housing to local communities through small site developments has merit, identifying nine sites and 107 houses in one small village is ridiculous. That equates to 26 per cent of all the small sites identified in the SHLAA. There appears to be no consistency in how sites across the district have been identified. The proposals negate what was supposed to be achieved and alienates villagers. In addition, many of the sites proposed are completely unsuitable for development. Indeed the proposed site on School Lane behind the old school site has already been rejected by the County Council as too steep and unsuitable to build the new school! Any decision to develop must be taken on the basis of its suitability to the wider environment - not just the number of houses that can be squeezed onto one site. West Lulworth sits in the midst of an Area of Outstanding Natural Beauty and is one of the jewels in Dorset's crown - it deserves special consideration. There is a dichotomy with providing affordable housing. While it is needed in West Lulworth, most of the proposed sites are too small to require developers to include affordable housing. If there is one thing that West Lulworth does not need, it is more holiday homes and holiday lets. There is also a major problem already with infrastructure. The road system cannot cope with the influx of visitors at peak times; the drains are overloaded and often flood after persistent rain; and the electricity substations have a record of regularly breaking down at times of peak demand. No responsible Council could countenance putting more pressure on an already creaking infrastructure without committing large sums to upgrade all systems.

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

Any proposals for development must provide sufficient protection for the character of West Lulworth, the unique landscape of the village and the amenity of existing properties. The plan is not sound without such assurances.

## Comment

<b>Consultee</b>	D Colledge (1184796)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	D Colledge (1184796)
<b>Comment ID</b>	PLPP157
<b>Response Date</b>	30/11/18 17:04
<b>Consultation Point</b>	Policies List ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Are you responding on behalf of a group?</b>	No
<b>If yes, how many people do you represent?</b>	1
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	E10
<b>Do you consider that the Local Plan is legally compliant?</b>	Yes
<b>Do you consider that the Local Plan is sound?</b>	No
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	Yes

**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)**



Most of Poole Harbour and the adjacent land to the West comes under the jurisdiction of Purbeck District Council (PDC) and therefore its local plan. This is nationally and internationally sensitive habitat, including Heathland, providing breeding and feeding areas for both THRIVING and THREATENED species of birds, mammals, butterflies, insects, reptiles and flora. The importance of this area is recognised by the RAMSAR designation and **the extended** Poole Harbour Special Protection Area status.

The Environment element of PDC's Environmental and Infrastructure Capacity Study is unsound for the following reasons:

- 1 PDC initially promised Local Forums that interested persons could volunteer to join and have their local knowledge of an area put forward into the Local Plan. PDC then procrastinated on dates, and finally withdrew this element of the consultation process all together.
- 2 PDC Planning Department was approached via email on 23rd February 2017, expressing a wish to contribute local data to such a hugely important study for the whole of Purbeck's wildlife, and their response on 24th February 2017 was "I will pass on your message....to make sure that Land Use Consultants (LUC)are aware that you have shared ornithological details....." Neither they, nor Land Use Consultants accepted this offer of local input.
- 3 No survey work is known to have been carried out by LUC in the area that I am concerned needs adequate input, namely around Lytchett Matravers, and the land fringes bordering Poole Harbour around Lytchett Minster. Indeed between the time LUC were appointed and the issuing of their final report was insufficient time to do so. Any reputable ecological study needs at least a year timeframe.

Developers/Landowners have apparently been commissioning their own ecological surveys covering the 2016 and 2017 seasons. Certainly the Lytchett Matravers/Lytchett Minster area has had a very substantial field survey carried out on their behalf which included bat audio recordings and harp traps (for species identification), ornithology, reptiles, and most probably flora. The PDC Environment and Infrastructure Capacity Study has none of this depth of knowledge within it and merely reiterates the known designated areas of Heathland, SSSI, RAMSAR, etc, etc that we all already know of.

Unfortunately, birds and wildlife do not stick to areas given designations. Just two examples: Little Egrets covered by an EU Habitats Directive, a thriving species, and Lapwings, a species so under threat that it is on the British Trust for Ornithology Red List, both consistently using the damp fields around Lytchett Minster village for winter feeding -**not a mention in PDC's Environmental and Infrastructure Capacity Study of either**, because PDC, and/or the Contractor, or both, could not be bothered to engage with local knowledge.

Using the Environment and Infrastructure Capacity Study to form part of the evidence for the PDC Pre Submission Local Plan is totally inadequate for the purpose and not a robust defence of this area, nor, no doubt for the whole of Purbeck.

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

A thorough ecological survey should be carried out for the whole of Purbeck. Surely, prior to planning to destroy the fragile wildlife habitat that is left within Purbeck there should be a duty of care on PDC's part to actually know what they are about to obliterate, and in which areas.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?**      No

## Comment

<b>Consultee</b>	D Colledge (1184796)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	D Colledge (1184796)
<b>Comment ID</b>	PLPP242
<b>Response Date</b>	02/12/18 14:24
<b>Consultation Point</b>	Policies List ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1

**Are you responding on behalf of a group?** No

**Please tick the box(es) if you would like to be notified at an address/email address of the following:**

**Which policy / paragraph number / policies map does your comment relate to?** H14 Second Homes

**Do you consider that the Local Plan is legally compliant?** No

**Do you consider that the Local Plan is sound?** No

**Do you consider that the Local Plan complies with the duty to co-operate?** Yes

**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)**

Policy H14 Second Homes is not robust enough to tackle this problem, nor to protect new builds for local people.

The policy needs to be following closely the upheld 'St Ives' full time principal residency policy and be applicable throughout the whole of Purbeck. It should also NOT exclude holiday lets which contribute very little to the local community spirit or economy.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?** No

## Comment

<b>Agent</b>	mr chris edge (1187891)
<b>Email Address</b>	[REDACTED]
<b>Company / Organisation</b>	Co-op Group Property
<b>Address</b>	Co-op Group Property Manchester M60 0AG
<b>Consultee</b>	Mr Chris Edge (1187892)
<b>Email Address</b>	[REDACTED]
<b>Company / Organisation</b>	Coop Group Property
<b>Address</b>	1 Angel Square Manchester M60 0AG
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Coop Group Property (Mr Chris Edge - 1187892)
<b>Comment ID</b>	PLPP4
<b>Response Date</b>	12/11/18 16:37
<b>Consultation Point</b>	Policy EE3:Vibrant town and local centres ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Are you responding on behalf of a group?</b>	Yes
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	Policy EE3 / Purbeck Local Plan Policies Map 2018
<b>Do you consider that the Local Plan is legally compliant?</b>	No
<b>Do you consider that the Local Plan is sound?</b>	No

**Do you consider that the Local Plan complies with the duty to co-operate?** Yes

**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)**

Within the Pre-submission Purbeck Local Plan Policies Map and the accompanying Swanage Inset Map, the Council has incorrectly identified the Site identified as the Kings Court Development (KCD) Site within the Swanage Local Plan (SLP) as the Site allocated as the Town Centre Redevelopment (TCR) Site. The red line at Map 12 (p.63) of the SLP refers. This has been confirmed as a drafting error during discussions prior to this representation and requires a simple amendment to the Policies Map and Swanage Inset Map.

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

The drafting changes to the Maps as set out above.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?** No

## Comment

<b>Consultee</b>	Marc Couling-Easton (1192374)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Marc Couling-Easton (1192374)
<b>Comment ID</b>	PLPP620
<b>Response Date</b>	30/11/18 11:41
<b>Consultation Point</b>	Policy H8: Small sites next to existing settlements ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Letter
<b>Version</b>	0.5
<b>Files</b>	<a href="#">H8-Couling-Easton-PLPP620.pdf</a>
<b>Are you responding on behalf of a group?</b>	Yes
<b>If yes, how many people do you represent?</b>	2
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	<input type="checkbox"/> The submission of Local Plan to the Secretary of State for Public Examination <input type="checkbox"/> The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report) <input type="checkbox"/> The adoption of the Purbeck Local Plan
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	H8
<b>Do you consider that the Local Plan is legally compliant?</b>	No
<b>Do you consider that the Local Plan is sound?</b>	No

**Do you consider that the Local Plan complies with the duty to co-operate?** No

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?** No



## For Office Use Only

Requester ID: 007  
 Consultee ID: 119 2374  
 Comment ID's: PLPP620

**PART B**

1. Which part of the Purbeck Local Plan does your representation relate to? Separate forms must be completed for each separate policy or paragraph you wish to comment on.

Policy number	HB
Policies map	
Paragraph number	

2. Do you consider that the Local Plan is:

- |   |     |                          |    |                                     |
|---|-----|--------------------------|----|-------------------------------------|
| • Legally compliant                     | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> |
| • Sound                                 | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> |
| • Complies with the duty to co-operate. | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> |

If your representation relates to how the Council has prepared the Local Plan it is likely to relate to legal compliance. The Plan must:

- comply with Section 20 of the Planning and Compulsory Purchase Act 2004 and other related legislation;
- be in accordance with the Council's Local Development Scheme and Statement of Community Involvement;
- comply with the Town and Country Planning (Local Planning) (England) Regulations 2012, national planning policy and the duty to co-operate in relation to planning of sustainable development (section 110 of Localism Act 2011).

If your representation relates to the content of the Local Plan, it is likely to relate to its soundness. To be considered sound the plan must be:

- positively prepared - providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- 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.



If your representation relates to how the Council has consulted with other relevant bodies during the plan making process, it is likely to relate to how the plan process has complied with the duty to co-operate in relation to the planning of sustainable development.

3. Please give details of why you consider the policy, policies map or paragraph number of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible).

PLEASE SEE CONTINUED ON SEPARATE  
SHEETS ATTACHED . . .

(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 Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support/justify the representation. (Please be as precise as possible)

PLEASE SEE CONTINUED ON  
SEPARATE SHEETS ATTACHED.

(Please continue on a separate sheet if necessary)

5. If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions of the examination, although all members of the public may observe the proceedings. Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

Yes

No

6. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary?

(Please continue on a separate sheet if necessary)

Please sign and date this form:

Signature:

[Redacted Signature]

Date: 29<sup>th</sup> NOVEMBER 2018

**Purbeck Local Plan Pre-Submission Consultation Form Part B  
Regarding Policy H8 Question 3. Continued...**

Requester ID: 007

Consultee ID:

Comment ID's:

Name: Marc Couling-Easton

**3. Please give details of why you consider the policy, policies map or paragraph number of The Local Plan is / is not legally compliant, sound or falls to comply with the duty to co-operate. (Please be as precise as possible).**

The Purbeck Local Plan pre-submission draft (2018-2034) containing Policy H8 for small sites is to be submitted along with The Purbeck Local Plan; Strategic housing land availability assessment (SHLAA) October 2018 evidence base, the latter of which has thus far identified 31 small sites which are claimed to be 'suitable' for potential development and these are included in the relevant small sites section of the SHLAA pages 227-246.

**We consider that Purbeck Local Plan pre-submission draft (2018-2034) Policy H8 is not legally compliant; in part this is because we also consider that Purbeck Local Plan; Strategic housing land availability assessment (SHLAA) October 2018 evidence base used to inform it and to be submitted with it is not legally compliant.**

Purbeck Local Plan pre-submission draft Policy H8 is ambiguous.

The National Planning Policy Framework 2018 states:

**'16. Plans should: d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;'**

Purbeck Local Plan; Strategic housing land availability assessment (SHLAA) October 2018 evidence base significantly contributes to the above ambiguity by providing a list of 31 small sites in Purbeck which have not been properly assessed as being legally and realistically 'suitable' for potential development to support Policy H8.

The National Planning Policy Framework 2018 states:

**67. Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and**

likely economic viability. Planning policies should identify a supply of:

- a) specific, deliverable sites for years one to five of the plan period; and
- b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.

The list falls foul of The National Planning Policy Framework 2018 15. Conserving and enhancing the natural environment: paragraphs 170-173 and also; 16. Conserving and enhancing the historic environment: paragraphs 184 and 194 in particular.

For example the 31 sites listed as 'suitable' for potential development include land 'adjacent to The Lilacs, West Road, West Lulworth' (showing 17 for dwellings; SHLAA page 231).

This is an in use agricultural green field site adjacent a listed heritage building in a Heritage Coast Conservation Area within an AONB, is clearly viewable from the SW Coast Path and many Jurassic Coast World Heritage Site viewpoints and is a green open space specifically mentioned ('paddock south of Brownhill') in the recent West Lulworth Conservation Area Appraisal October 2015:

#### **Green and open spaces**

58. **Open green space** plays an **important** role in providing the wider landscape setting of the village and conservation area, and given the nature of topography views across and into open space are frequently of note. This includes where **breaks in the continuity of development such as seen in the paddock south of Brownhill** allow glimpses of the surrounding landscape.

Rather than protecting such sites, the ambiguous Purbeck Local Plan pre-submission draft (2018-2034) Policy H8 and its underlying Purbeck Local Plan; Strategic housing land availability assessment (SHLAA) October 2018 evidence base currently threatens such sites and effectively encourages speculative planning applications by not properly assessing the sites before listing them as 'suitable' for potential major development.

The National Planning Policy Framework 2018 paragraphs 170-173:

170. Planning **policies** and decisions should contribute to and enhance the natural and local environment by:

- a) **protecting** and enhancing **valued landscapes**, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
- b) **recognising the intrinsic character and beauty of the countryside**, and the wider benefits from natural capital and ecosystem services – including the economic and **other benefits of the best and most versatile agricultural land**, and of trees

and woodland;

c) **maintaining the character of the undeveloped coast**, while improving public access to it where appropriate;

d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;

e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and

f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

171. Plans should: distinguish between the hierarchy of **International, national and locally designated sites**; allocate land with the **least** environmental or amenity value, where consistent with other policies in this Framework; take a **strategic approach to maintaining** and enhancing networks of habitats and **green infrastructure**; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.

172. Great weight should be given to **conserving** and enhancing landscape and scenic beauty in National Parks, the Broads and **Areas of Outstanding Natural Beauty**, which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and **cultural heritage** are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within these designated areas should be limited.

**Planning permission should be refused for major development other than in exceptional circumstances**, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:

a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;

b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and

c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

173. Within areas defined as Heritage Coast (and that do not already fall within one of the designated areas mentioned in paragraph 172), planning policies and decisions should be consistent with the special character of the area and the importance of its conservation. **Major development within a**

**Heritage Coast is unlikely to be appropriate, unless it is compatible with its special character.**

The National Planning Policy Framework 2018 paragraphs 184 and 194:

184. Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as **World Heritage Sites** which are internationally recognised to be of **Outstanding Universal Value**. These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.

194. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, **or from development within its setting**), should require clear and convincing justification. Substantial harm to or loss of:

- a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;
- b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II\* listed buildings, grade I and II\* registered parks and gardens, and **World Heritage Sites, should be wholly exceptional.**

The National Planning Policy Framework 2018 Glossary:

**Setting of a heritage asset:** The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.

The Town and Country Planning (Development Management Procedure) (England) Order 2015 No. 595 states that developments of more than ten dwellings are considered to be '**major development**'. Therefore per-hectare development density for many of the 'suitable' small sites within Purbeck Local Plan; Strategic housing land availability assessment (SHLAA) October 2018 is entirely inappropriate and this evidence base document has also not properly assessed the 31 small sites sufficiently well as set against the NPPR to begin with regardless of potential dwelling numbers.

The NPPR is quite clear that it is also not necessary (for Purbeck District Council or any other) to agree to arbitrary central government percentages for small sites or to set them itself as part of the whole if not suitable for the area. The Local Plan must make this very clear, as currently the evidence base includes wholly inappropriate sites such as the one we have specifically mentioned.

## National Planning Policy Framework:

11. Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:
- a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;
  - b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:
    - i. **the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or**
    - ii. **any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.**

**We consider that Purbeck Local Plan pre-submission draft (2018-2034) Policy H8 is not sound because The Purbeck Local Plan; Strategic housing land availability assessment (SHLAA) evidence base is not sound.**

The Purbeck Local Plan; Strategic housing land availability assessment (SHLAA) October 2018 evidence base has identified 31 small sites which are claimed to be 'suitable' for potential development; however a disproportionate number 8 (26%) of these are in the very unsuitable location of West Lulworth. These sites have not been subjected to a proper assessment and it is clear that listing some of them in the assessment to support Policy H8 is entirely inappropriate at best.

### **West Lulworth:**

Is highly desirable for: main homes and retirement homes for the wealthy; second homes and investment holiday lets for the likely even more wealthy; and has prices which are commensurate. Previous 'affordable housing' has turned out to be a nonsense for the village. Case in point the new builds circa. 2009 at Shirley Close, Main Road, West Lulworth showing sale prices from 2009 onwards starting at £295,000 up to £610,00. There is nothing affordable about West Lulworth at market rates.

Has very few jobs available locally and those that do exist are mainly seasonal and employ young transient workers.

Has very poor public transport with the nearest train station being in Wool (5 miles) via a road system that often comes to a standstill during an increasingly busy tourist season and around local



festival times; bus services are infrequent and not practicable. Therefore a car is generally required for West Lulworth living and suitable parking must be available for all new dwellings; likely one space per habitant which makes small sites in the village highly problematic and would encourage further extensive environmentally damaging personal car use.

Would be better served where more permanent seasonal workers could travel in so as they can use public transport from lower cost housing locations i.e. Wool etc. to enable them to access other work out of season rather than have them languishing without full employment in Lulworth for months on end each year with inadequate public transport making these workers perpetually stuck going on and coming off benefits seasonally.

Has just one small grocery store with relatively high prices and which closes November to March.

Has issues with impassable roads out of the village during bad winters due to steep incline.

Has no piped mains natural gas meaning that dwellings must rely upon electricity, or on-site tanked gas and oil, all of which are very significantly more expensive than mains gas; the latter two of which also require more space around dwellings for expensive tank storage and so are an inefficient use of land in addition to requiring lorry tanker deliveries i.e suitable road access. This is all terribly expensive for affordable housing/people on low incomes and bulk buy fuels require up front purchase and excellent financial planning further exacerbating the situation.

Is some 13 miles (23 mins) from Dorchester Hospital, and 18 miles from Poole Hospital but 26 (44 mins) miles from Bournemouth Hospital when planned A&E changes take place. Those times are with minimal to no traffic.

One of the sites is very well known to us and is listed as land 'Adjoining Lilac Cottage, West Road, West Lulworth' with 17 listed for number of dwellings, as previously mentioned.

**'Adjoining Lilac Cottage, West Road, West Lulworth':**

Is a livestock supporting agricultural field with no existing buildings.

Is within an Area of Outstanding Natural Beauty.

Is within West Lulworth's Conservation Area.

Is just across the road from two of West Lulworth's most important heritage buildings; the listed Holy Trinity Church and The Old Vicarage, as well as providing the foreground to a cottage of

exceptional character Brownhill Cottage, all three of which are named specifically within the West Lulworth Conservation Area Appraisal 2015.

Is passed by the peacefully marched processions of the yearly Remembrance Day Parade which progresses from the War Memorial at the bottom of West Road to the Holy Trinity Church, and many visitors. Views from the road are specifically indicated on West Lulworth Conservation Area Appraisal Quality Map 3 2015 as denoted by arrows.

Is on a valley facing hillside and is clearly seen as an aesthetically highly pleasing and appropriate agricultural green village space mentioned as important in the West Lulworth Conservation Area Appraisal 2015.

It appropriately supports livestock (sheep for the last three decades).

As such it is a green space backdrop to the listed Holy Trinity Church from the Jurassic World Heritage Site (including South West Coast Path Hight Tide Route as permanently diverted due to Lulworth Cove cliff erosion) from:\*

Hambury Tout  
Lulworth Cove Car Park  
Stair Hole  
Bindon Hill  
Main Road and its associated public footpath

Additionally:

Public right of way footpath which runs to the northeast of the field behind 'The Lynches'

\*Please find attached photographs of the field taken the weekend of 17 November 2018 including from Church Road, and of West Road.

The photographs of views from Hambury Tout, Lulworth Cove Car Park, Stair Hole, Bindon Hill, Main Road and Right of Way path to NE past The Lynches match size as seen by naked eye to through a full range camera viewfinder and are presented as such i.e. no telephoto manipulation.

Is agricultural land which has already been subject to planning proposal/s for domestic use for just a few dwellings or other extension type matters and refused; indeed one such proposal was subject to a petition of hundreds of villagers and tourists who did not want to see any domestic development whatsoever.\*\*

\*\* This can easily be arranged again. Hundreds were out walking in the locations from where the field can be seen when the attached photographs were taken.

Is on a fairly substantial slope which would create very significantly expansive and expensive earthworks, as well as building design and drainage considerations notwithstanding parking space issues, energy expense and space issues (see below); plus potentially doubling the width of the current access lane to Brownhill Cottage and making significant and very ugly changes to the current rural conservation area appropriate 'dual narrow single lane ramp up access' from West Road.

Is serviced entirely by West Road which in many places is only passable by one vehicle at a time and would offer no extra parking spaces; indeed all nearby areas become a car-park at clement weekends and throughout the summer months. West Road remains a pretty lane of character as extant, but will not suffer widening and an ugly massive ramp up to a small housing estate. There are already considerations for double yellow lines etc as when enforcement of parking in other areas is in place during peak visitor times the road becomes a one lane car park as much as visitors dare. Widening of the road would require retaining walls and the West Lulworth Conservation Area Appraisal 2015 specifically states what an inappropriate blight such things are.

Is clearly a location which does not pass Local Plan Policy E1 since domestic housing on this very much overlooked site would result in massive groundworks and would not:

'Conserve and enhance designated and non-designated landscapes.'

Is clearly a location which does not pass Local Plan Policy E2 since heritage assets such as the The Holy Trinity Church and Old Vicarage clearly cannot be conserved and enhanced by building a small housing estate (major development) next to them that can be seen for miles around:

'Conserve and enhance heritage assets'

Does not pass/is contradictory to SHLAA's own 'desktop' site assessment (SHLAA page 7) which has not been completed for the 31 small sites:

'15. Where a site is not ruled out by an absolute constraint, officers undertake a desktop assessment and record other constraints. These other constraints are not necessarily reasons to rule out a site, unless in the particular circumstances it is likely that they significantly and demonstrably outweigh the benefit of development. The

Council considers that 'other constraints' include the presence of any of the following either on site or adjacent:

green belt;  
**Area of Outstanding Natural Beauty (AONB);**  
 tree preservation orders;  
**conservation areas;**  
**listed buildings;**  
 registered parks and gardens;  
 scheduled monuments; groundwater source zone;  
**Purbeck Heritage Coast;**  
 local nature reserves;  
 Sites of Nature Conservation Interest (SNCI); and  
 regionally Important Geological Sites.

**The Purbeck Local Plan Policy H8 does not comply with the duty to co-operate because The Purbeck Local Plan; Strategic housing land availability assessment (SHLAA) evidence base has not satisfactorily complied with the duty to co-operate.**

The specific locations of the small sites were not made available to the community for scrutiny regarding the initial consultation earlier in 2018 as they should have been and this is unacceptable.

In the words of West Lulworth Parish Council:

'The small site locations have not been identified in the consultation and it is therefore impossible to comment upon the impact of them. Identification of these sites should have been transparent in the consultation.'

WLPC go on to say

'The provision of social or genuinely affordable housing is minimal in small development sites. Providing such sites could give hope value to land that may be otherwise used for providing for local need e.g. community land trusts. Allowing exception sites would increase the value of agricultural outside of the settlement boundary by giving it potential for housing development and this should be avoided. West Lulworth Parish Council would prefer a Policy that provides for social housing or genuinely affordable housing for local need.'

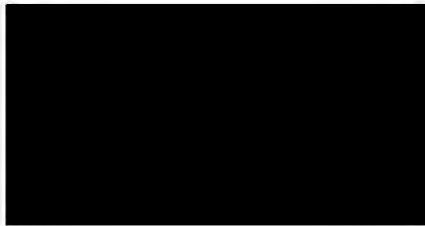
Purbeck District Council have indeed of course very recently opened this pre-submission consultation and revealed the specific small sites information, however it is disappointingly late in the day and to list them as 'suitable' without proper assessment and community involvement is not acceptable.

**Conclusion**

Due to the very clear and very significant problems with The Purbeck Local Plan pre-submission draft (2018-2034) Policy H8 for small sites, and its supporting Purbeck Local Plan; Strategic housing land availability assessment (SHLAA) October 2018 evidence base, in addition to this response to the consultation a formal complaint regarding these matters is to be presented to Dorset County Council.

This is to ensure critical oversight of what has happened, and ensure that Purbeck District Council apply re-consideration to Purbeck Local Plan pre-submission draft (2018-2034) Policy H8 and update its supporting Purbeck Local Plan; Strategic housing land availability assessment (SHLAA) October 2018 evidence base following a realistic assessment of the 31 small sites currently inappropriately listed without proper assessment.

This will ensure the proper protection of unsuitable small sites from arbitrary number chasing policies and/or aggressive speculative planning applications from land owners and developers that could be problematic for the Purbeck District Council planning department and cause further concern and distress to affected local residents and the many others that care for the conservation and sustainable development in the important areas concerned.



29/11/18

**Purbeck Local Plan Pre-Submission Consultation Form Part B  
Regarding Policy H8 Question 4. Continued...**

Requester ID: 007

Consultee ID:

Comment ID's:

Name: Marc Couling-Easton

**4. Having regard to your comments in question 3, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence to support/justify the representation. (Please be as precise as possible).**

We consider that it is absolutely essential now that Purbeck District Council revisit Purbeck Local Plan; Strategic housing land availability assessment (SHLAA) October 2018 evidence base for The Purbeck Local Plan pre-submission draft (2018-2034) at the earliest available opportunity and before submission.

This is so that it can properly assess the 31 small sites listed as 'suitable' for potential development for actual i.e. realistic suitability for potential development or remove them completely until it has had time to do so. PDC will also need to consult the local communities concerned properly regarding this matter and with particular regard to West Lulworth where there has long been significant pressure of land being put forward for inappropriate development and which features disproportionately on the list despite its abundance of designated landscapes and world heritage aspects etc.

The current document incorrectly states that the sites listed as available and 'suitable' for potential development have nothing to stop development 'that could not be overcome' which is not correct, is inappropriate, and comes across as ill-considered and overtly pre-emptive to the point of being threatening/bullying.

Indeed this list is now of significant concern and even distress to local resident stakeholders and all those who care for the conservation of some of the most nationally and internationally important and sensitive parts of the Purbeck landscape.

In future the SHLAA should be much more carefully considered so as to not list sites so inconsiderately.

Purbeck District Council should also use its power to stand up to protect

the region and its communities from the pressures of arbitrary small sites policy percentages hailing from central government or otherwise that may well be unrealistic in practise.

There are strong reasons for example why many small sites will not actually be 'suitable' for potential development upon proper assessment set against planning laws/guidance and once having also consulted the local communities properly regarding the specific sites.

We hope that Purbeck District Council will realise the deep concerns that its ambiguous small sites policy and poorly considered list of 31 'suitable' potential small sites has created; that it will take prompt action to correct the situation; and that no community/visitor petition campaigning against such an unrealistic list will be likely necessary going forward.

Our reply to question 3. provides the evidence/justification for all of the above.

Purbeck District Council planning department should note however that it will receive very strong positive support indeed from the community and visitors to Purbeck if it finds itself unable to actually meet arbitrary central government small site percentages that would be entirely inappropriate in practise for the area.

It certainly shouldn't feel that it needs to kowtow to such inconsiderate pressures. Current planning laws would also agree.

Policy H8 needs to warn that the small sites policy for Purbeck will not suffer inappropriate pressures of an arbitrary nature that would otherwise damage its nationally and internationally recognised standing.

Once again National Planning Policy Framework states:

11. Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:
  - a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;
  - b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas<sup>5</sup>, unless:
    - i. **the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or**
    - ii. **any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against**

**the policies in this Framework taken as a whole.**

It is unfortunate that such significant issues with the Local Plan re: Policy H8 and the SHLAA evidence base 31 small sites 'suitable' for potential development list have come to light at this late stage.

However we appreciate the very considerable work that Purbeck District Council has put into these plans over recent years, with some outstandingly presented consultation circulars.

We hope that the issues we have highlighted are only the result of a lack of time set against perceived pressures from central government, and look forward to the department correcting the problems we have highlighted with a bit more time going forward before submission.



29/11/18

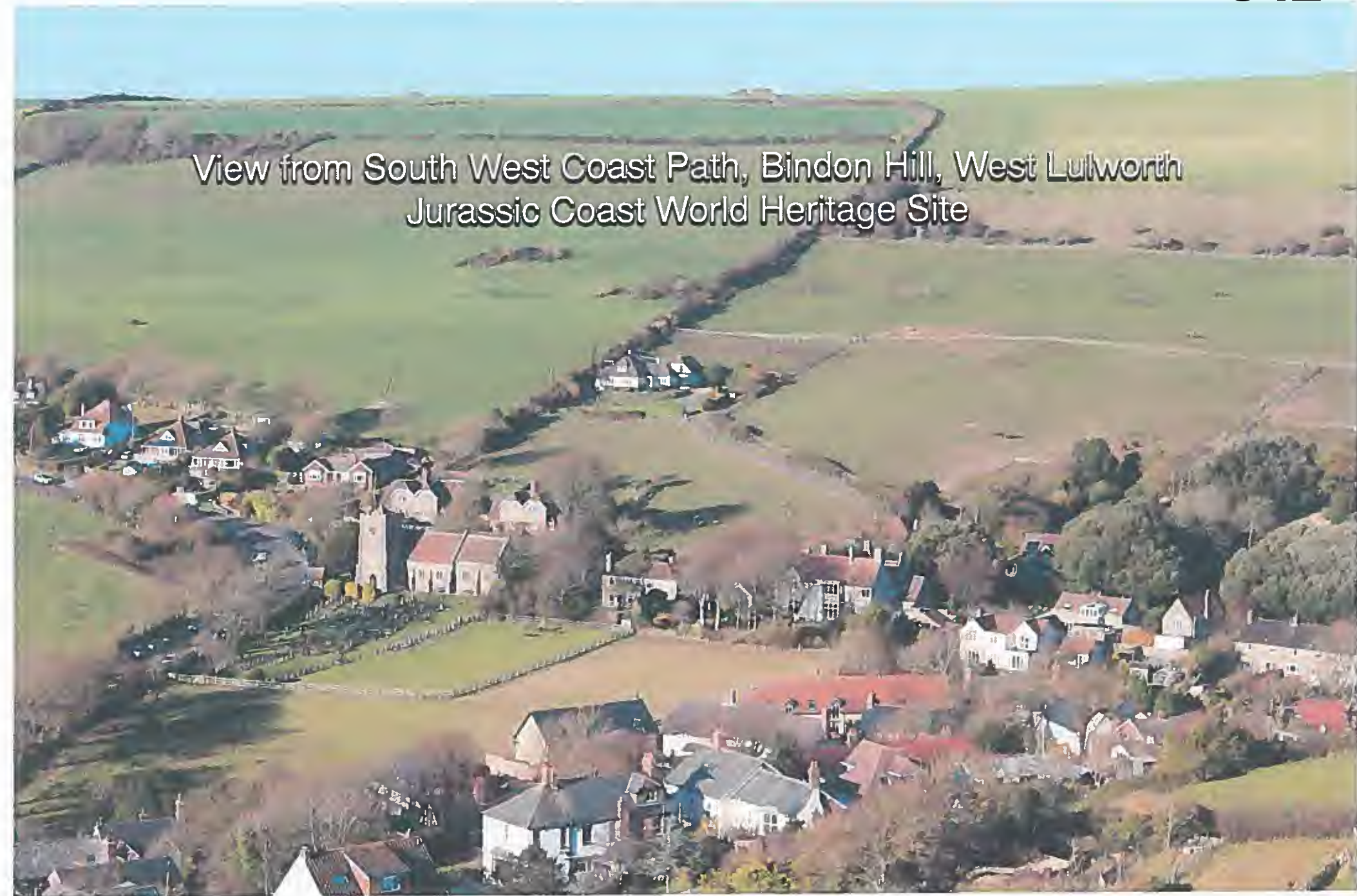


**View from West Road, West Lulworth; a Conservation Area  
within an Area of Outstanding Natural Beauty**





View from South West Coast Path, Bindon Hill, West Lulworth  
Jurassic Coast World Heritage Site







View of the agricultural field and Holy Trinity Church, West Lulworth;  
Conservation Area within an Area of  
Outstanding Natural Beauty







View from path between Ancient Burial Mound, Hambury Tout,  
and Lulworth Cove via South West Coast Path,  
Jurassic Coast World Heritage Site



View to Main Road, West  
Lulworth from same  
viewpoint





View from path to Ancient Burial Mound, Hambury Tout  
from Lulworth Cove nr. South West Coast Path, West Lulworth,  
Jurassic Coast World Heritage Site



View to Lulworth Cove  
from same viewpoint:





View from South West Coast Path (High Tide Route via Bindon Hill), Main Road, West Lulworth



View from South West Coast Path, Lulworth Cove Car Park,  
West Lulworth



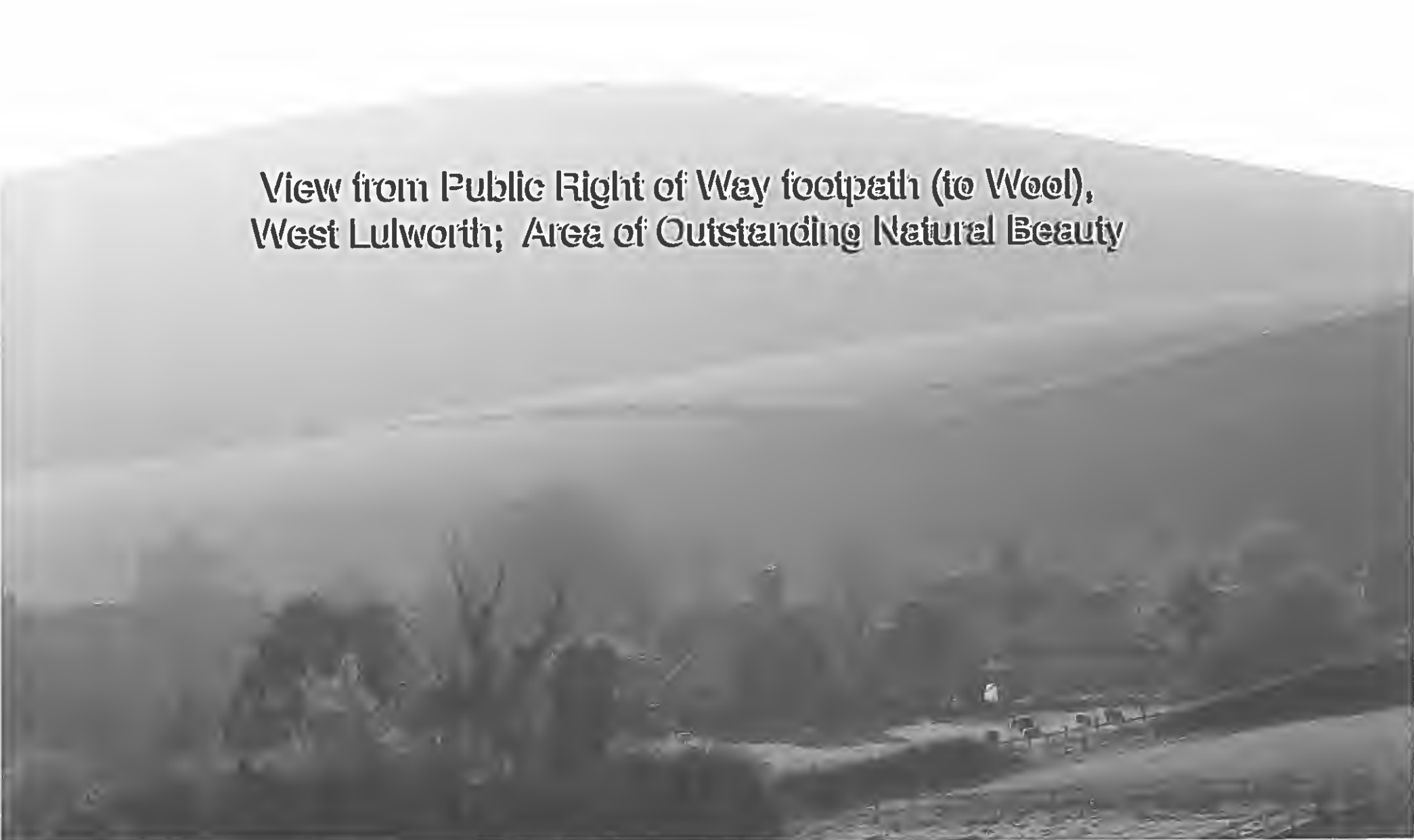




View from Church Road, West Lulworth;  
Conservation Area within an Area of  
Outstanding Natural Beauty

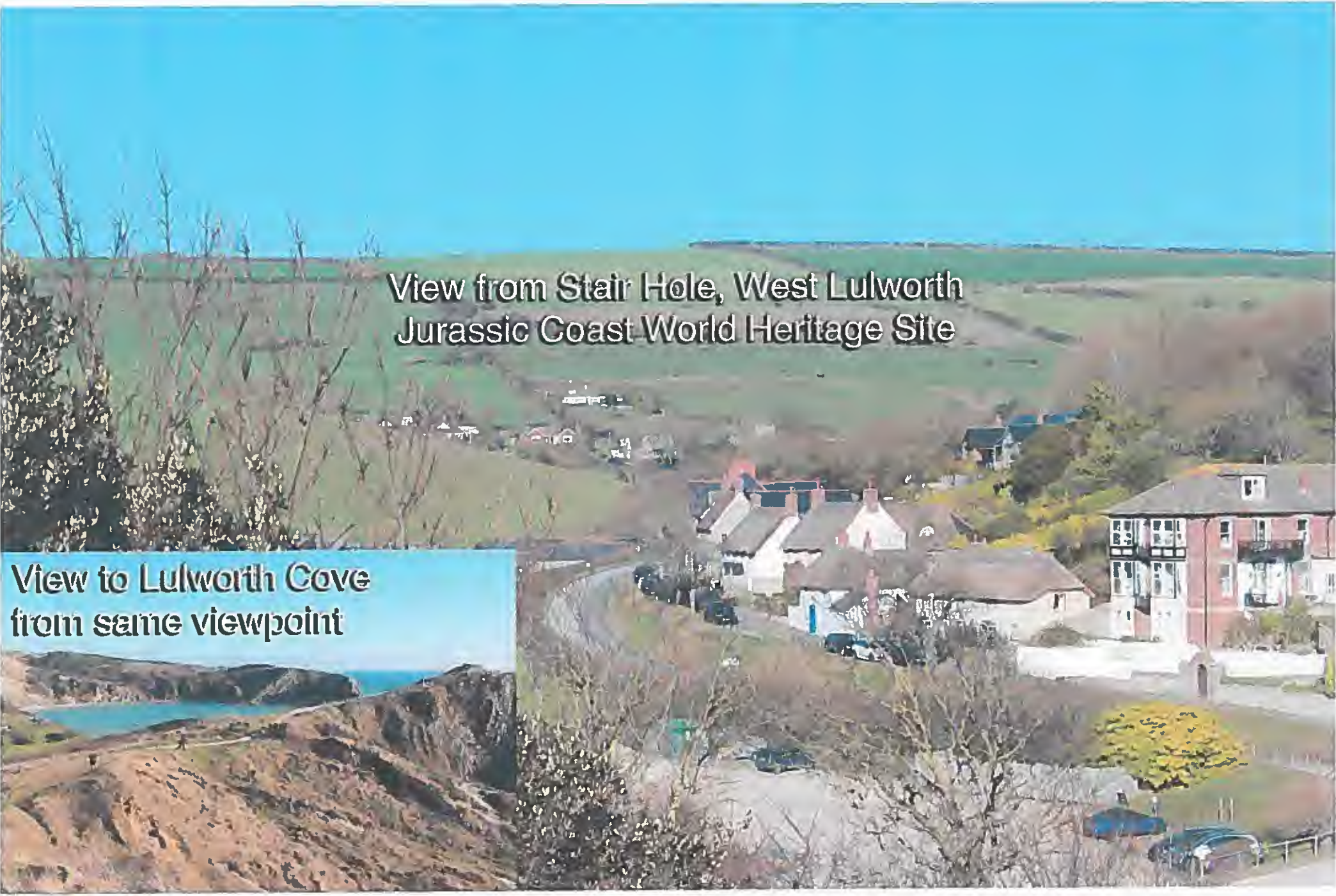


*View from Public Right of Way footpath (to Wool),  
West Lulworth; Area of Outstanding Natural Beauty*



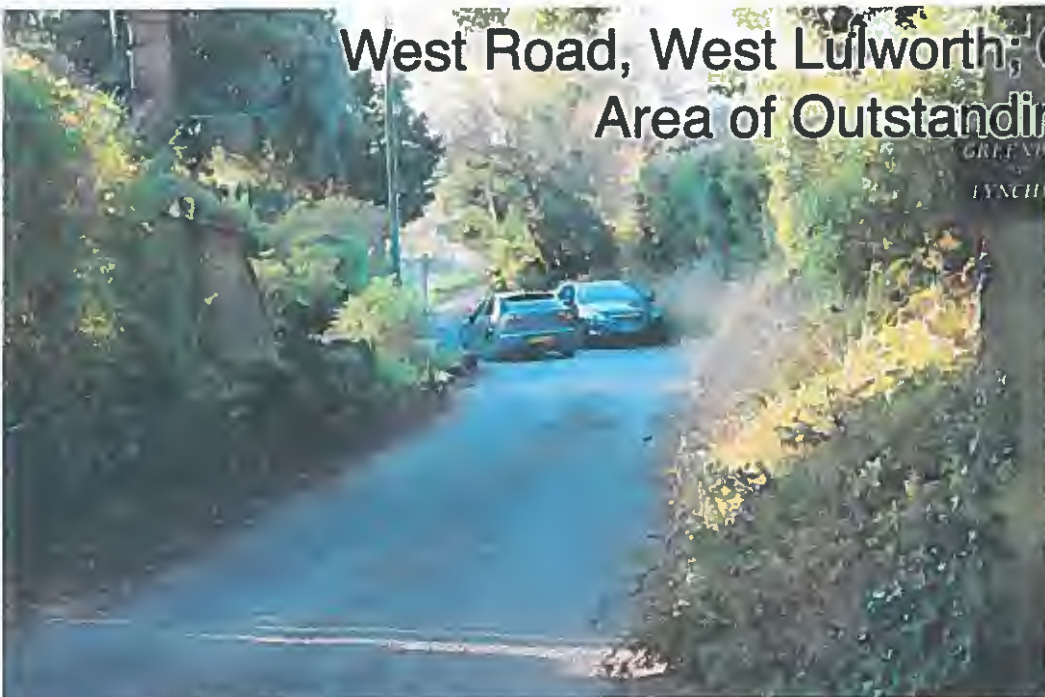
View from Stair Hole, West Lulworth  
Jurassic Coast World Heritage Site

View to Lulworth Cove  
from same viewpoint





West Road, West Lulworth; Conservation Area within an  
Area of Outstanding Natural Beauty



## Comment

<b>Consultee</b>	Mrs Rachel Crennell (1190156)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Mrs Rachel Crennell (1190156)
<b>Comment ID</b>	PLPP273
<b>Response Date</b>	02/12/18 21:40
<b>Consultation Point</b>	Policies List ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1

**Are you responding on behalf of a group?** No

**Please tick the box(es) if you would like to be notified at an address/email address of the following:**

**Which policy / paragraph number / policies map does your comment relate to?** V2

**Do you consider that the Local Plan is legally compliant?** Yes

**Do you consider that the Local Plan is sound?** Yes

**Do you consider that the Local Plan complies with the duty to co-operate?** Yes

**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)**

The draft plan acknowledges the importance of the Green Belt in the east of Purbeck to protect against the urban sprawl of Christchurch/Bournemouth/Poole.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?**    No

## Comment

<b>Consultee</b>	Ms Helen Crow (1190751)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	Unknown Unknown Unknown
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Ms Helen Crow (1190751)
<b>Comment ID</b>	PLPP253
<b>Response Date</b>	02/12/18 18:16
<b>Consultation Point</b>	Arrangements for commenting on the Presubmission Purbeck Local Plan timings and next steps ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.2

**Please tick the box(es) if you would like to be notified at an address/email address of the following:**

<b>Which policy / paragraph number / policies map does your comment relate to?</b>	Arrangements for commenting on the Purbeck Local Plan
<b>Do you consider that the Local Plan is legally compliant?</b>	No
<b>Do you consider that the Local Plan is sound?</b>	No
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	No

**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)**

Consultation with the community.

The Plan makes a number of statements about the results of the [January 2018 consultation](#) and concluded that 'the most favoured option' was Option A.

Technically this is correct; but when asked what was their preferred option, 35% of respondents chose option A, 28% chose None. And in Wool, whilst 30% chose Option A, 60% said None. That is far from a ringing endorsement for this Plan by any measure. In terms of Wool therefore, the process has been legally and morally questionable because it has repeatedly denied the very clearly stated democratic wishes of the community.

This Consultation (on the Purbeck Local Plan).

Like all the previous “consultations”, there is evidence which supports the view that it too has been designed to prevent large numbers of the community from responding easily and fully.

The first consultation, for example, contained the erroneous and deceptive comment that “there was significant support for 1000 houses in Wool”; the second consultation persisted with the apparent impression that there would be between 40% and 50% of all houses built being affordable; all the consultations and attendant publicity have been deliberately vague – and therefore potentially misleading – over infrastructure (for example continuing to state that “a bypass could be considered”); the insistence on an ‘online’ response to this part of the consultation process, is discriminatory and disenfranchising.

The whole “consultation” has been extremely difficult to respond to and unnecessarily technical, in particular the final stages where we are expected to respond online but given no guidance on how to access and use the fiendishly complex online “consultation” portal.

At literally the eleventh hour, PDC agreed to provide an assistance session at The D’Urbeville Hall, to help people respond, but this was on the Friday before the response deadline which was on the following Monday and as far as I am aware, they did not advertise this session.

As far as I am aware, no other such technical advice sessions were held anywhere else in Purbeck.

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

The consultation needs to be less difficult to respond to and be challenge by ordinary people. Unfortunately I (as well as many others), suspect that it was deliberately designed this way in order to exclude and disempower our local communities.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?**      No



## Comment

<b>Consultee</b>	Ms Helen Crow (1190751)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	Unknown Unknown Unknown
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Ms Helen Crow (1190751)
<b>Comment ID</b>	PLPP314
<b>Response Date</b>	03/12/18 11:30
<b>Consultation Point</b>	Policy E10: Biodiversity and geodiversity ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.2
<b>Are you responding on behalf of a group?</b>	No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

<b>Which policy / paragraph number / policies map does your comment relate to?</b>	Local biodiversity and geodiversity
--	-------------------------------------

<b>Do you consider that the Local Plan is legally compliant?</b>	No
--	----

<b>Do you consider that the Local Plan is sound?</b>	No
--	----

<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	No
--	----

**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)**

Biodiversity and wildlife protection has only been covered in very general terms in this plan, mainly citing Government regulations but not addressing specific issues raised by the building of large numbers of houses on previously agricultural land or uncultivated areas.



In Wool, one of the main sites earmarked for development, including a 65 bed care home, is currently organic farmland.

Organically farmed agricultural land provides a haven for wildlife and insects which conventional farming destroys through the use of insecticides and herbicides, damaging soil structure with chemical fertilisers and removing hedgerows and trees which provided habitats for our birds and mammals.

Intensive farming has caused a massive decline in farmland dependent species. And now industrial scale house building is threatening to add to this devastation. Virtually all species are negatively affected by such indiscriminate development. Wildlife inhabitants of lowland areas have suffered most – lapwings and curlews, for instance, have disappeared from ordinary farmland.

Turtle doves are now on the brink of being wiped out. The numbers of grey partridges, corn buntings and tree sparrows have dropped by at least 90 per cent in 40 years, leaving them all at risk of vanishing from Britain.

In the past 50 years in Britain, through intensification of agriculture has destroyed well over half of our biodiversity, and the populations of birds, butterflies and wild flowers that once gave the landscape such animation and extraordinary life have been utterly devastated – these depressing statistics are made clear in every single study.

Most shocking however, is the case of farmland birds, which by the government's own admission, has declined by 56% between 1970 and 2015; it is estimated this represents a loss of at least 44 million birds.

Once beloved species, such as the lapwing, the spotted flycatcher, the cuckoo and the turtle dove, as well as many once common butterflies such as the pearl-bordered fritillary and once common blooms such as cornflowers, have simply vanished.

Another species, the barn owl – which has been voted the UK's favourite farmland bird – has suffered a drop of two-thirds in its population since the 1930s because modern agricultural practices have wiped out huge numbers of their prey – mice and voles. By the 1990s, numbers were down to an estimated 4,000 from about 12,000 pairs in the 1930s.

The head of conservation at the Barn Owl Trust stated in a newspaper article earlier this year, that the industrialisation of farming has been a disaster for British wildlife, and has called for urgent action to tackle the causes of the devastation and has called for moves to organic farming and a return to traditional farming where crops are mixed and rotated to stem the decline in habitats.

Barn owls used to be a common sight over fields and farm buildings. Most farms had a pair. Now, just one farm in 75 has a nesting pair of barn owls.

Our fields may still look green in spring, but it is mostly lifeless scenery, apart from the pesticide-saturated crops: it is green concrete. Now we are about to use real concrete and on an equally destructive scale.

In Wool, there are a number of technical and legal designations which have been ignored, deliberately or otherwise. These concern the following;

Site of Nature Conservation Interest (SNCI), Site of Importance for Nature Conservation (SINC) are designations used by local authorities in the United Kingdom for sites of substantive local nature conservation value. They make a vital contribution to delivering the UK and Local Biodiversity action plans, as well as maintaining local natural character and distinctiveness.

Site of Special Scientific Interest (SSSIs) and local nature reserves (LNRs) have statutory protection, and Local Sites should provide comprehensive coverage of sites of nature conservation value and local authorities are required to take account of the need to protect them in deciding their planning and development policies.

Wool has 29 statutory sites of wildlife importance. Almost one third of Wool is covered by some level of conservation status. Within the the parish there are 1 SPA(international) and 2 SSI s (national), 9 SNCIs(county) 2 WNRs and 13 Ancient woodlands. Also there are more than 15 veteran trees.

Government planning policy states that development should not occur if it directly impacts diversity.

Large, virtually town size developments such as the one proposed for Wool, will result in a loss of wildlife and biodiversity both locally and across the whole of Purbeck.

In the past, I could walk around Wool and see and hear skylarks above the farmlands. I have occasionally been even lucky enough to spot redwings and lapwings around the area. However, since the new Purbeck Gate housing estate was built, these birds (all of which are Red Listed), have gone because this large housing development has destroyed their habitat.

Around Wool there has been a noticeable decline in the number of already rare, water voles in the stream that runs through the village and into the Frome, as more and more people walk their dogs along the riversides. The numbers of such walkers will double if this PDC local plan for housing development is implemented which in turn, will lead to further biodiversity loss of this iconic mammal.

Having visited Coombe Wood on a number of occasions, I am appalled to learn that this woodland has been earmarked as a SANG (Suitable Alternative Natural Greenspace). Why!??? It is already a public space. How can it be "Alternative"? Also it is nowhere near the proposed development (most people would have to drive to get there).

This SANG earmarked woodland contains ground nesting woodcock (on the international Red List of endangered species). The noise generated by people and their dogs walking will have a devastating impact on such wildlife. Dormice have also been spotted there. This is another species which would be severely threatened or wiped out completely if this plan is implemented.

This woodland contains veteran Maple Ash and Oak trees, and tragically, there is already evidence of damage to these trees where climbing bars have killed 2 ancient Oak trees in an 8 acre coppice. Veteran trees are protected by law and such laws have to be upheld if we are to preserve biodiversity of the woodland.

According to the RSPB, losing species doesn't only diminish the richness of our world. It has a profound effect on the environment we live in and the essential resources we need to survive. For example, as numbers of insects decrease, so will our ability to grow the fruit and vegetables that require pollination. The more we endanger the natural balance of our environment, the greater the impact will be on our own lives and those of the next generation.

This plan fails to comply with national and international legal requirements associated with development which impact upon important habitats and is therefore breaking planning rules relating to conservation and is therefore unsound.

If Wool expands to the size of a town, as proposed by this plan, key species will be negatively impacted if not entirely lost to this area. The Plan does not contain any measures whereby losses can be mitigated and because of this, is not fit for purpose.

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

The number of houses proposed should be reduced to a figure which reflects the real housing need in Wool, not that which is dictated by a Government and lobbyists from the construction industry, whose sole objective appears to be to concrete over the countryside and provide 3 dimensional investment opportunities for people who do not even live in the area or contribute to our community.

House building should not be permitted on organic agricultural land.

SANGs should be created near to developments and have recreational facilities which attract people of all ages and dog owners. Parks, dog bins, play parks, a decent skate park, outdoor gym equipment. Whatever is put in place should be carefully considered and not just dumped on our precious woodland.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?** No

## Comment

<b>Consultee</b>	Ms Helen Crow (1190751)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	Unknown Unknown Unknown
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Ms Helen Crow (1190751)
<b>Comment ID</b>	PLPP315
<b>Response Date</b>	03/12/18 11:32
<b>Consultation Point</b>	Chapter 6: Infrastructure ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Are you responding on behalf of a group?</b>	No

**Please tick the box(es) if you would like to be notified at an address/email address of the following:**

<b>Which policy / paragraph number / policies map does your comment relate to?</b>	Infrastructure
<b>Do you consider that the Local Plan is legally compliant?</b>	No
<b>Do you consider that the Local Plan is sound?</b>	No
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	No

**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)**

The "plan" fails to offer any definitive guarantees in terms of infrastructure that will be required to support the number of houses being proposed for Wool (which does not include any 'add-ons' that could well appear on 'smaller sites'). The plan merely assumes that the current schools can be adequately expanded; no mention is made of the ability (or otherwise) to expand the already overloaded sewage works.

There is at last, acknowledgement that there will be increased traffic, noting previous surveys and pressure on the level crossing given that many new residents will commute to the Poole/Bournemouth conurbation, the only mitigation suggested is to encourage motorists to seek alternative routes of which none whatsoever have been identified in the plan.

Dorset County Council have stated quite clearly that no significant road improvements are envisaged for the area in the future. Any enhancement of public transport would require investment unlikely to be obtained from developers or provided by the Local Authority (District or future County Councils). So actually, there is no "plan" just a free pass for developers.

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

Build the required infrastructure before any development is allowed to take place. This is the only way to prevent uncontrollable development which will make life Hell On Earth for residents and those who visit this beautiful area.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?** No

## Comment

Consultee	Ms Helen Crow (1190751)
Email Address	[REDACTED]
Address	Unknown Unknown Unknown
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Ms Helen Crow (1190751)
Comment ID	PLPP316
Response Date	03/12/18 11:44
Consultation Point	Policy H5: Wool ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No

Please tick the box(es) if you would like to be notified at an address/email address of the following:

Which policy / paragraph number / policies map does your comment relate to? 65 bed care home/community hub

Do you consider that the Local Plan is legally compliant? No

Do you consider that the Local Plan is sound? No

Do you consider that the Local Plan complies with the duty to co-operate? No

**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)**

The sudden inclusion in the plans for Wool of a 65 bed care home(and so called community hub) in the Purbeck Local Plan is completely unacceptable. There is no reference to, or mention of the proposal to build such a facility in Wool in any of the previous consultation documents.

In addition, the legality of its inclusion should be questioned on the grounds that it would appear that none of Social Services, the local Surgery, NHS Dorset or the CCG were involved in any form of discussion or consultation, leading one to conclude that it has been added as a purely speculative commercial venture by the would-be developer.

It would be the largest building in Wool, which directly contravenes the planning principle found elsewhere in the Pre-Submission Policy Document that any development should be sympathetic and in keeping with local architecture and scale of building.

This latter day inclusion of a Care home for Wool in this plan also directly contravenes Government policy relating to housing for the elderly which is as follows:

This Governments Care and Support Statutory Guidance updated in February 2018 makes clear the need to include housing on the integration agenda and in strategic planning.

Additionally, Sustainability and Transformation Partnerships are required to configure their local system around the holistic needs of the local population, and all Sustainability and Transformation Partnerships include ambitions to strengthen prevention and early intervention. The suitability of housing options should be considered as part of this.

Additionally, the official guidelines state "We have been clear about the vital role that suitable housing provision can and should play in helping people to stay independent and healthy for as long as possible"

None of the above Government policy is addressed by the Care home proposal, and is in fact contrary to the requirements laid out by Government. This is particularly relevant, given the much higher numbers of elderly people living in Purbeck compared to other parts of the UK, most of whom do not have the means to afford the £1000+ per week costs of such a facility, even if they were to sell their homes.

Also there is plenty of evidence that such care homes are not economic in Purbeck generally, with one having closed down at Winfrith recently and where another, in Sandford, is struggling to fill its accommodation, despite being told by a councillor at a public meeting that the local council (thus council tax payers)funding some of the residents who live at this home, which currently charges £1500 per week for its full care package.

Also we do not need a new "community hub" as Wool already has one (The D'urbeville). Such a building would split our community in half, undermining the basic concept what a community is supposed to be.

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

Do not allow this care home development. Make proper arrangements for elderly people in our community which are in line with government policy, following the legal protocols of consultation with the local community.

Funding for a SANG and community hub should be for the D'Urbeville Hall and improvements to the recreation ground, such as expansion of the skate park and provision of outdoor gym equipment.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?** Yes

**If you wish to participate in the oral part of the examination, please outline why you consider it to be necessary?**

Because this aspect of the plan is completely speculative, introduced as it was after the public consultation had been carried out and because it provides no value to the community of Wool or indeed Purbeck as a whole and therefore needs to be challenged.



## Comment

<b>Consultee</b>	Ms Helen Crow (1190751)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	Unknown Unknown Unknown
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Ms Helen Crow (1190751)
<b>Comment ID</b>	PLPP325
<b>Response Date</b>	03/12/18 13:01
<b>Consultation Point</b>	Provide a mix of housing, to include affordable options, that meets the needs of local people ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Are you responding on behalf of a group?</b>	No
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	Wool
<b>Do you consider that the Local Plan is legally compliant?</b>	No
<b>Do you consider that the Local Plan is sound?</b>	No
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	No

**Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)**

This Plan is unsound as it perpetuates the myth that building 470 homes in Wool will somehow provide houses that local people can afford. The January 2018 consultation said: "The average cost of a house in Purbeck is £250,000". That's seventeen times the average salary in Purbeck.

To be genuinely affordable (for rent or purchase) a house needs to cost £150,000. The Plan presents no evidence that building 470 houses in Wool will cause house prices to drop by 40%.

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

The council must adopt a second homes policy to reduce speculative purchases. Also change the calculation for so called affordability criteria which as it currently stands, is not affordable at all for the vast majority in Purbeck.