

Comment

Consultee	Mrs A Dale (1190149)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mrs A Dale (1190149)
Comment ID	PLPP193
Response Date	01/12/18 14:27
Consultation Point	Policies List (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? 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)

A disproportionate number of small site housing has been allocated to West Lulworth compared to the Purbeck area as a whole (24%)

6 of the 8 sites suggested within West Lulworth village are very close to each other and the closeness of these sites is not represented by the individual site maps provided as supporting information within the Purbeck Plan. The sites should be shown on 1 map to show the extreme impact to the village.

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 believe that the suggested developments within West Lulworth are in such close proximity to each other they should be considered as 1 larger site development.

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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 Jon Davey (1189766)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Jon Davey (1189766)
Comment ID	PLPP343
Response Date	03/12/18 13:38
Consultation Point	Foreword (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? Forward

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

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ConsultationThe council has failed to consult effectively with Parish and Town Councils ruling out many communities in Purbeck. The concentration on those councils that have the resources to produce a neighbourhood plan rules out many of the smaller parishes and skews the response towards the larger councils. This consultation is further skewed by the insistence of an online response excluding all except

the most computer literate. Many of these are also those who are unable to travel to PDC to see the plan or collect the forms needed to respond. Therefore the council has failed to consult effectively with the community. Geography

The focus of developing housing in the west of the district does not make sense. Many villages in the west are the most remote in the area, they do not have the infrastructure to cope with new homes. Many do not have easy access to an A road and certainly there is insufficient public transport for residents to access employment, shops, or medical facilities. Policy The changes to planning policies will have a devastating effect on many Purbeck villages. Allowing development in and around conservation areas, ignoring settlement boundaries, allowing multiple small sites around villages, ignoring the views of local communities and parish and town councils, and allowing uncontrolled development in the AONB will change Purbeck in the long term.

I do not believe that the Purbeck Local Plan is robust, effective and deliverable.

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In order to deliver Purbeck or its successor will have to work with parish and town councils.

Changes
 1 Consult with Parish and Town councils as well as neighbourhood plans and the local communities.
 2 Provide consultation that is accessible to all.
 3 Seek planning policies that ensure that new developments are spread evenly across the district, as is the demand.
 4 Ensure that the infrastructure is in place including public transport.
 5 Respect the AONB and Green Belt.

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

To express my views

Comment

Consultee	Mr Jon Davey (1189766)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Jon Davey (1189766)
Comment ID	PLPP344
Response Date	03/12/18 13:39
Consultation Point	Arrangements for commenting on the Presubmission Purbeck Local Plan timings and next steps (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?	Arrangements for commenting
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 flow chart does not indicate that there are 55 documents inputting the Pre-submission many without consultation with the local community, or parish or town councils. A lot of the documentation has only been released in the last month.

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Include a list of the documents indicating those that have been consulted upon.

To meet with NPPF 16 c) Plans should:be shaped by early, proportionate and effective engagement between plan-makers and communities. All elements of the plan and its supporting documentation should be subject to consultation with Parish and Town councils as representatives of the local communities.

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

To express my views

Comment

Consultee	Mr Jon Davey (1189766)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Jon Davey (1189766)
Comment ID	PLPP345
Response Date	03/12/18 13:42
Consultation Point	Policy H8: Small sites next to existing settlements (View)
Status	Processed
Submission Type	Web
Version	0.1
Files	Lulworth Sites
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

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This policy allows multiple small sites to be identified of a disproportionate size to the existing settlement and focused in the west of the district .

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Policy H8: Small sites next to existing settlements (Amendments underlined)

These provide an opportunity to spread developments across the District where larger developments would be unacceptable.

Applications for small sites will be permitted where adjacent to existing homes in the closest town or village (as defined in the settlement hierarchy in the glossary of this plan), and not appear isolated in the countryside, provided the following apply:

a) the scale of proposed development is proportionate to the size and character of the existing settlement, up to a maximum of 30 homes; up to a maximum of two sites per settlement over the period of the plan; and not exceeding 10% of the existing settlement.

b) individually and cumulatively, the size, appearance and layout of proposed homes must not harm the character and value of any landscape or settlements potentially affected by the proposals; and

c) the development would contribute to the provision of a mix of different types and sizes of homes to reflect the Council's expectations in Policy H9 or, where expressed in a neighbourhood plan, those of the relevant local community.

d) the development would be identified in consultation with the appropriate Parish or Town Council.

Where proposals would be within the green belt, only limited infilling, on sites positioned in-between existing buildings, within and around the edges of towns and villages will be permitted. Existing towns and villages are listed under 'settlement hierarchy' in the glossary of the Purbeck Local Plan.

If you have any supporting documents please upload them here. [Lulworth Sites](#)
Lulworth Sites

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

To express my view and answer any queries.

Comment

Consultee	Mr Jon Davey (1189766)
Email Address	[REDACTED]
Address	[REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Jon Davey (1189766)
Comment ID	PLPP348
Response Date	03/12/18 13:46
Consultation Point	Ensuring a sufficient supply of homes (View)
Status	Processed
Submission Type	Web
Version	0.4
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?	Para115
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 for the SHLAA did not identify the small sites later published in the SHLAA (Oct18) Parish Councils were not consulted on the identified sites. The local plan suggests that the small sites

should be spread across the district whereas 24% of the identified sites are in one village, West Lulworth. A further 22% are in Winfrith.

SHLAA Comments

The evidence base (namely the SHLAA) is not sufficiently robust to deliver the housing numbers set out in Policy H2.

The Strategic Housing Land Availability Assessment (SHLAA) 2018 underpins the approach to delivering the required housing across the district in the plan period. By indicating those sites which are 'suitable' and those which are 'unsuitable' for consideration the SHLAA identifies and assesses the potential for development at specific sites.

West Lulworth small sites

The conclusion to the site (SHLAA/0065) - land to the east of Farm Lane and Shepherds Way, is that it is *"unsuitable because of potential adverse impact on the Dorset Area of Outstanding Natural Beauty (AONB) and because not clear how adverse effects on European sites could be avoided or mitigated"*. An assessment of the eight additional small sites within or adjacent to West Lulworth should also be drawn that they are unsuitable for the same reasons.

Further the Allotment Gardens, Bindon Road, West Lulworth, suggests building on allotments contrary to NPPF Policy 91c :

Planning policies and decisions should aim to achieve healthy, inclusive and safe places which enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.

Some of these sites are unsuitable for development because of the adverse impact on the surrounding village character; on the setting of the AONB; and because the necessary infrastructure improvements to allow them to be developed would have an adverse impact on the special character of the village. An example of this is that private roads which would be necessary to service some of these developments are not capable of being upgraded, and any such upgrades would harm the character of the village. The proposed capacity of these sites cannot be met without changing the character of the Village.

In conclusion that the sites put forward and assessed in the SHLAA within West Lulworth should not have passed the first test and should also have been discounted due to their development having an adverse impact on the special character of the village within the AONB. Therefore (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'.

This could have been avoided had PDC consulted with West Lulworth parish council on the SHLAA prior to publication.

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Review the small sites selection and consult with parish and town councils. There should be a maximum number of small sites considered for one settlement. We would suggest two, for the period of the plan. Proportionality should be specified ie 10% of the existing settlement.

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To express my views

Comment

Consultee	Mr Jon Davey (1189766)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Jon Davey (1189766)
Comment ID	PLPP349
Response Date	03/12/18 13:47
Consultation Point	Small sites development (View)
Status	Processed
Submission Type	Web
Version	0.1
Files	Traffic around West Lulworth

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? Para 145

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 small sites allocation allocate 107 homes to West Lulworth, a remote village with poor infrastructure, no services and no facilities. The nearest A road is 5 miles away and the roads around the village are

often blocked by visitor traffic. There is very limited public transport which means residents need cars to travel. Extra homes will lead to more cars and more jams on the narrow roads.

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Restrict the number of developments per settlement.

If you have any supporting documents please upload them here. [Traffic around West Lulworth](#)
[Traffic around West Lulworth](#)

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

to express my views

Comment

Consultee	Mr Jon Davey (1189766)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Jon Davey (1189766)
Comment ID	PLPP350
Response Date	03/12/18 13:49
Consultation Point	Ensuring a sufficient supply of homes (View)
Status	Processed
Submission Type	Web
Version	0.1
Files	Settlement Hierarchy 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?	Para 113
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)

113 Distribution of housing is one of the most significant issues that the Purbeck Local Plan must address through the appropriate allocation of land and establishing robust policy to guide development.

The allocation of small sites across the district is not balanced with the largest percentage falling on West Lulworth at 24% of the Purbeck allocation. (see Settlement Hierarchy 3 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)

Limited developments that are sympathetic to their surroundings will also be supported elsewhere across the District, but limited to one site per settlement for the duration of the plan for all except towns and key service villages.

If you have any supporting documents please upload them here. [Settlement Hierarchy 3](#)
[Settlement Hierarchy 3](#)

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To express my views

Comment

Consultee	Mr Jon Davey (1189766)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Jon Davey (1189766)
Comment ID	PLPP351
Response Date	03/12/18 13:49
Consultation Point	Chapter 3: Environment (View)
Status	Processed
Submission Type	Web
Version	0.1
Files	West Lulworth Parish Plan

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? Para50

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

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50a states that it is essential to conserve the outstanding character and distinctiveness of Purbeck's settlements. I agree and spent some time working on the West Lulworth Parish Plan to that end. This process does not appear to recognise parish's or parish plans.

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)

Parish plans should be referenced.

If you have any supporting documents please upload them here. [West Lulworth Parish Plan](#)
West Lulworth Parish Plan

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

To express my views

Comment

Consultee	Mr Jon Davey (1189766)
Email Address	[REDACTED]
Address	[REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Jon Davey (1189766)
Comment ID	PLPP352
Response Date	03/12/18 13:52
Consultation Point	Policy E2: Historic environment (View)
Status	Processed
Submission Type	Web
Version	0.1
Files	Village Trail

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? E2

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

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measures to avoid or minimise harm to the heritage asset's significance must be supported and not damaged by excessive intrusive developments. The small sites policy ignores this.

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 include west lulworth village trail to indicate how the village is and should remain. Developments in or around conservation areas should be limited and only carried out in consultation with the parish council and local community

If you have any supporting documents please upload them here. [Village Trail](#)
[Village Trail](#)

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To express my views

Comment

Consultee	Mr Jon Davey (1189766)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Jon Davey (1189766)
Comment ID	PLPP353
Response Date	03/12/18 13:53
Consultation Point	Policy E2: Historic environment (View)
Status	Processed
Submission Type	Web
Version	0.1
Files	Village Trail (1)

Are you responding on behalf of a group? Yes

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? E2

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

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measures to avoid or minimise harm to the heritage asset's significance must be supported and not damaged by excessive intrusive developments.

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If you have any supporting documents please upload them here. [Village Trail \(1\)](#)
Village Trail

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To express my views

Comment

Consultee	Mr Jon Davey (1189766)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Jon Davey (1189766)
Comment ID	PLPP354
Response Date	03/12/18 13:54
Consultation Point	Policy H1: Local housing requirement (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:	<input type="checkbox"/> The adoption of the Purbeck Local Plan
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?	No
Do you consider that the Local Plan complies with the duty to co-operate?	No

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The council is limiting who it will work with to determine need.

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Add to Policy H1:

The council will also work with Parish and Town Councils to determine housing need in their area.

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To express my views

Comment

Consultee	Mr Jon Davey (1189766)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Jon Davey (1189766)
Comment ID	PLPP355
Response Date	03/12/18 13:54
Consultation Point	Second homes (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? H14

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)

2nd Homes Policy

The second homes policy was a welcomed addition to the plan and was included after PDC received complaints in the 2015 and 16 consultations that the plan did not address the problems associated by high numbers of second homes and holiday lets. However, whilst the policy appears to address the issue of second homes, it does not go far enough to protect us against the impact of holiday lets on our communities. Indeed, the council is contradicting itself by consistently telling us that we 'need new homes' but equally is not willing to ensure that new homes are not taken out of the local availability because they become empty due to being used as holiday lets. However, in 3.10 [second homes policy evidence paper] the council states that '*the Council will further explore its options in ensuring that all homes, both market and affordable are restricted to permanent residents*'. This statement is more akin to the initial second homes evidence paper 2017 which promoted a full residency policy but unfortunately the council have ignored this advice and settled for this half hearted attempt.

It should be noted that in general, the public do not differentiate between second homes and holiday lets. They see a property that is not in full residency and understand the impact of that in their community.

The council have stated that holiday lets offer some economic benefit to our local area, however, despite asking officers to produce evidence which supports that claim, none has been forthcoming to date. In fact, the anecdotal evidence from residents supports a full residency policy and the benefits of this far outweighs the councils claim of any economic benefit. In contradiction to item 5, [bullet point 3, second home evidence paper], small businesses currently qualify to receive full small business rate relief meaning that they don't contribute in any way to our local taxes and services and therefore don't contribute to the police, ambulance and fire brigade etc even though they have full use of the facilities.

All holiday lets are someone's second home but run as a business by individuals, who live outside of our area and predominantly out of county. This means that the majority of money earned, leaves our area to be spent elsewhere or even, in some cases, abroad. There is a small amount of money paid out for cleaners but generally repair, heating, gardening services appear to be coming in from other areas and most often from large towns. There is no proof that holiday lets provide more than a marginal benefit to any community. I have heard it said that they are of equal benefit to other holiday makers. This is not true. We see that holiday lets have deliveries of food from major supermarkets and are, therefore, not dependant on local pubs and restaurants as is the case with holiday makers staying in hotels and B&Bs.

PDC have stated that other businesses claim that having holiday lets benefits their business all year round. We have asked to see the evidence which supports that claim. In reality, how can a property occupied between 20 – 35 weeks per year be more economically beneficial than somebody in permanent residency who may be away on holiday approx. 4 weeks per year?

Holiday lets and second homes do NOT contribute in any way to the sustainability of smaller communities as they damage social fabric and community cohesion of our settlements, including their contribution to a changing population profile. They are not here to contribute to the upkeep of the churches and graveyards, help with other jobs like cutting grass, war memorial maintenance, running the village hall, taking part in fetes, community events, support the school, shop or pub. The owners are not here to support the parish council or more importantly stand for election! Their absence means that an ever dwindling number of people are responsible for a lot of work and this is set to increase with forthcoming devolution plans!

It is ridiculous for the council to exclude holiday lets from this policy as per item 3.9 in the evidence background paper. 2nd homes and holiday lets 'behave' in the same way. Both are empty for significant and unpredictable periods during the year, both have absent owners, both cause the cost of housing to inflate because of potential earning possibilities and both have an impact on social cohesion. Not addressing the effect of holiday lets by making a full residency policy Purbeck wide, contributes to making our villages even more unsustainable than they already are and, of course, contributes further

to an affordability issue because of potential earning capacity regardless of whether they're within or out of the AONB.

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 the housing crisis is as the government claims then the only way to ensure sustainable development is to ensure that properties are subject to a full residency policy by disallowing the use of new houses as 2nd homes and holiday lets. Every step should be taken by the council to facilitate this and they should follow the example set by other councils, [eg St Ives H2 Full Time Principal Residency Policy] who have put the needs of their communities before profit of developers and land owners.

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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 Jon Davey (1189766)
Email Address [REDACTED]
Address [REDACTED]
Event Name Purbeck Local Plan Pre-submission Draft
Comment by Mr Jon Davey (1189766)
Comment ID PLPP356
Response Date 03/12/18 13:55
Consultation Point Policy H11: Affordable housing ([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? Para 162

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)

Affordable Housing

The real housing crisis is for genuinely affordable housing for rent and to buy. Item 164 [plan pre submission] indicates that 'almost 90% of the identified housing requirement' is for affordable housing.

Unfortunately, that item goes on to say that the maximum proportion of affordable housing that's achievable is only 40%. This means that a huge number of people will not be served by this plan, and a significant amount of development in our district will be inaccessible to local people and therefore pointless so who is it being built for.

The government definition of affordable housing is 80% of market value but there are many references throughout the plan document, housing background paper, second homes evidence paper and an LEP report 2017 that the government's definition of what's affordable is not affordable to the demographic expected to access it. The council knows [and have admitted] that the 'affordable' housing provision throughout Purbeck is for the most part unaffordable to the relevant demographic.

We're told that the average income in Purbeck stands at £22,500.00 pa. Even with a deposit, an individual would require a mortgage of approx. 12 times their income for a two bed AFFORDABLE dwelling. As mortgage providers generally only offer 3.5 times a household income, the demographic most in need will gain nothing from the plan.

The affordable rental market isn't much better. Depending on the landlord, a prospective renter is required to have 6 weeks deposit and undergo a number of credit checks, which cost the individual money and have to provide references. At 80% of market value, significant numbers of people find the alleged 'affordable' rental market is sufficiently out of reach as to make it impossible for them to consider moving to their own home.

The LEP published a document in 2017 [5.22, Dorset-Future Housing Provision] which stated that '*In terms of absolute affordability, the standard measure is the income required for an 80% mortgage to a maximum of 3.5 times annual wage. By this measure none of the median priced new build dwellings are affordable even in the least expensive parts of Dorset*'. With a median income of £30,727 pa ALL new build housing in Purbeck is unaffordable! In order to afford an 'affordable' flat there would need to be an income of approx. £59,886pa.

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 is very important that all developments meet the needs of local people in real terms to ensure the sustainability and longevity of vibrant communities within our villages and towns without destroying our precious and economically important environment. This plan cannot deliver what is actually needed.

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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 Jon Davey (1189766)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Jon Davey (1189766)
Comment ID	PLPP357
Response Date	03/12/18 13:55
Consultation Point	Policy H12: Rural exceptions sites (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? H12

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)

There should be one site per settlement no greater than 5% in proportion and agreed with the relevant parish council

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)

add section e. there is one site per settlement no greater than 5% in proportion and agreed with the relevant parish council

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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 express my views

Comment

Consultee	Mr Jon Davey (1189766)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Jon Davey (1189766)
Comment ID	PLPP358
Response Date	03/12/18 13:56
Consultation Point	Policy V1: Spatial strategy for sustainable communities (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 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)

Policy V1 omits reference to small sites and windfall (933 new 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)

Add section c. Small sites and windfall-933 homes spread evenly across the district and agreed by parish and town councils

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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 express my views

Comment

Consultee	Mr William Dechow (1191249)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr William Dechow (1191249)
Comment ID	PLPP470
Response Date	03/12/18 17:03
Consultation Point	Policies List (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? 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)

This Plan does not take into account the reality in Lytchett Matravers.

The plan for 150 extra houses without any supporting infrastructure does not deal with the extra c.590 houses already in the Plan nor the 84 houses that have been built/are being built in the village since

2012. While I understand that this 'windfall' does not get included in the previous Plan - this level of additional housing in the village, which also needs to consider the 11 currently in the planning process, need to be acknowledged and sued against any further development.

The current infrastructure of Lytchett Matravers is only just adequate, not only in the provision of schooling and doctors, but also in traffic levels. The village has a minimum public transport system - which does not currently offer any villagers an option to get to Poole at 9.00am. There are no alternative travel options beyond using cars.

The additional housing since 2012 has meant that the exits onto the A35 and A350 at peak hours are already difficult. The Plan does not acknowledge these problems nor choose sites with better public transport options over the ones in Lytchett Matravers. The traffic impact has not been considered in light of the public transport provisions in the area and this is a serious lack of consideration of an important aspect of housing need and provision.

The housing options for this village are unsustainable and will increase a reliance on car travel making traffic problems for the entire local area. These sites are unsuitable for that reason.

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)

Develop a funded plan for enhanced sustainable infrastructure first; this would serve to convince communities that the Council is not just wedging in houses where ever this can be achieved.

Until then, remove these sites from the Plan - as they do not offer sustainable transport options and increase a reliance on car travel across the District.

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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 reiterate the above comments.

Comment

Consultee	Mr William Dechow (1191249)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr William Dechow (1191249)
Comment ID	PLPP471
Response Date	03/12/18 17:05
Consultation Point	Policies List (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 V2
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Do you consider that the Local Plan is legally compliant?	No
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Do you consider that the Local Plan is sound?	No
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Do you consider that the Local Plan complies with the duty to co-operate?	No
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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 proposes to remove land from Green Belt protection but the NPPF states that this can only be done if there are VERY SPECIAL CIRCUMSTANCES (Green Study Clause 11) - these are not demonstrated in this document.

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)

These sites need to be withdrawn under these circumstances as the VERY SPECIAL CIRCUMSTANCES have not been demonstrated - and therefore the Plan is non compliant with NPPF.

This is backed up by Purbeck District Council's OWN assessment of the Green Belt parcels 18 and 20 which score these sites as HIGH in their openness, value to the countryside and role in safeguarding the countryside. Truncating these for development is a direct contradiction in the Plan and they therefore need to be removed.

(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)

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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 reiterate the above comments.

Comment

Consultee	Mrs Paula Dilks (1190362)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mrs Paula Dilks (1190362)
Comment ID	PLPP137
Response Date	30/11/18 10:02
Consultation Point	Chapter 4: Housing (View)
Status	Processed
Submission Type	Web
Version	0.5
Files	West Lulworth 8 Small Sites (002).png West Lulworth Village Map Showing 8 Proposed Small Sites

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? 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 this part of the plan to be unsound in that the information (maps) of proposed sites are misleading - I attach a copy of a whole map of the village (West Lulworth) which puts into perspective the impact on a small area - as opposed to the individual site maps which do not clearly illustrate this.

The SHLAA (pages 227 to 238) indicates that there are 8 sites proposed as suitable for development. The small individual site maps are misleading as some of the sites are adjacent to each other and thus would have a much more significant adverse impact on the village as a whole than would appear at first inspection. I have made a map of the whole village showing this point which I will attempt to attach to this comment.

It seems totally unsound that out of a provisional 486 homes to potentially be provided on small sites for the whole plan - 108 of these are proposed in a small village like West Lulworth.

The policy also states that "*the scale of proposed development is proportionate to the size and character of the existing settlement*". This is certainly not the case in West Lulworth the number of proposed potential new dwellings would increase the population by approximately 50%.

H8: 150 (b): this point "*... Proposed homes must not harm the character and value of any landscape or settlements potentially affected by the proposals.*" This is certainly unsound in the case of West Lulworth which relies on the attractiveness of its buildings, its history and quaintness, not to mention the environment/landscape which attracts thousands of visitors year round.

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 consider that with respect to the prospective developments in West Lulworth these should be drastically reconsidered given the proposed number of houses in proportion to the population of the village and the existing issues. Please see attached map of village showing the proportion of proposed small sites.

If you have any supporting documents please upload [West Lulworth 8 Small Sites \(002\).png](#) them here.

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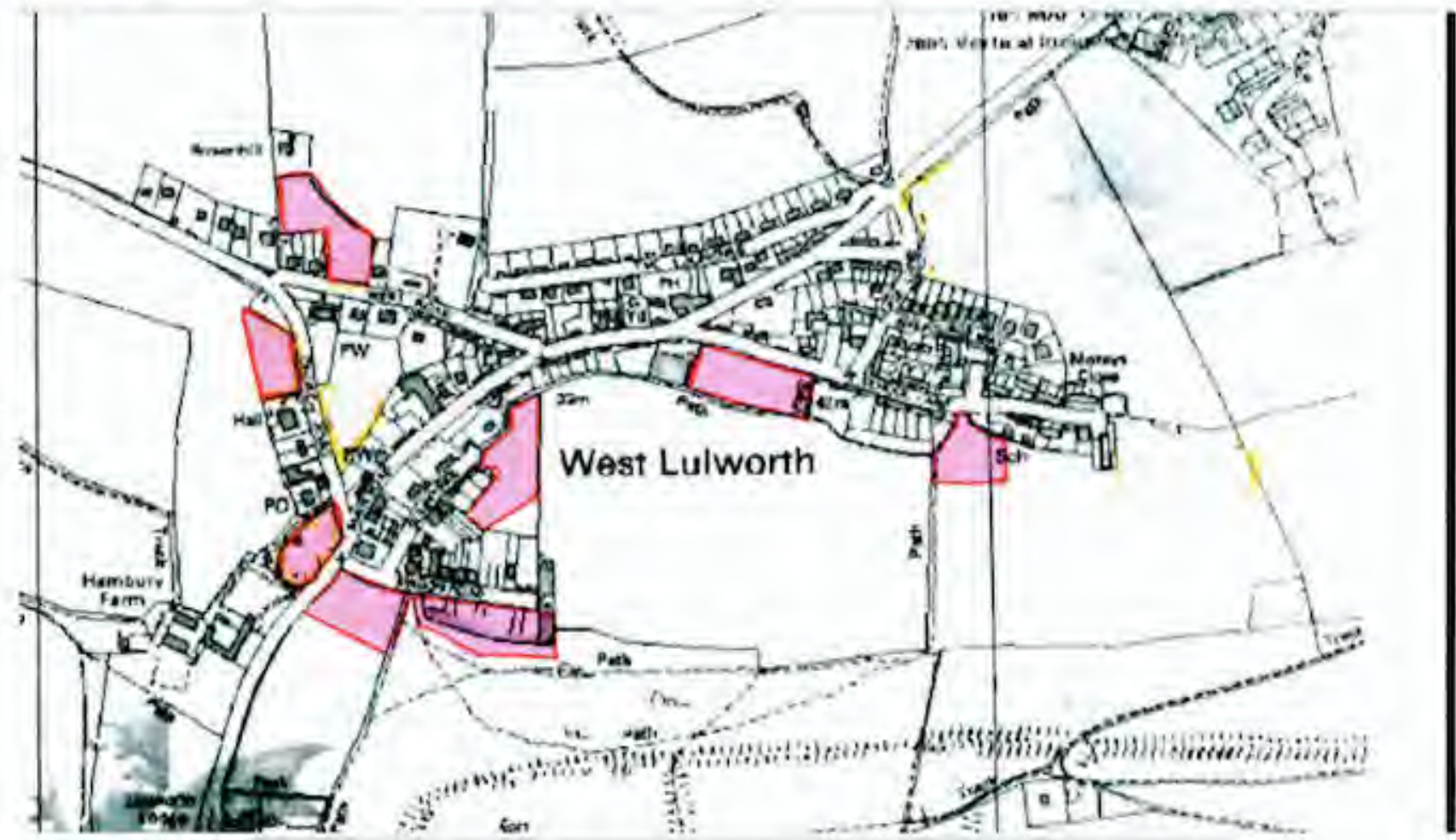
If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Yes

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

As a Purbeck (West Lulworth) resident I feel it is important to be represented at such an examination.

West Lulworth Sites map 30th Nov 2018.jpg — Edible

■ = WEST LULWORTH SMALL SITES



Comment

Consultee	Mr Mark Dodds (1191274)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Mark Dodds (1191274)
Comment ID	PLPP560
Response Date	03/12/18 23:29
Consultation Point	Policy H7: Upton (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? 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)

This has taken into account all the previous comments regarding Lytchett Minster and Upton and is probably the best outcome that the community can hope for. We cannot expect that development simply avoids the area just because we deem anymore development inappropriate. More work does need to be worked on elevating flooding due to the models that have been created previously, however it is likely to have less of an impact on the wider area and any flooding issues are likely to be felt on

the properties themselves rather than impacting existing dwellings. However this is the most sustainable and sensible option that I have seen for Lytchett Minster and Upton over the last few years.

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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 Mark Dodds (1191274)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Mark Dodds (1191274)
Comment ID	PLPP562
Response Date	03/12/18 23:35
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:

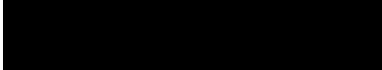
Which policy / paragraph number / policies map does your comment relate to?	H6
Do you consider that the Local Plan is legally compliant?	Yes
Do you consider that the Local Plan is sound?	No
Do you consider that the Local Plan complies with the duty to co-operate?	Yes

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)

The aforementioned "improve accessibility between Lytchett Matravers and Lytchett Minster by forming or improving defined walking and cycling routes between the villages" Needs doing no matter whether there was development or not. Not sure why it is getting tied in with this. The development at Wareham Road, due to being on a hill, will result in problems at the bottom in Lytchett Minster and no sound solution has been brought forward to elevate the issues that we see here. I do not see how this positively

impacts Lytchett Minster or is effective over the life time of the plan due to drainage not being thought through properly.

Comment

Consultee	Mr Richard Brown (1188577)
Email Address	
Company / Organisation	Dorset AONB Team
Address	County Hall Colliton Park Dorchester DT1 1XJ
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dorset AONB Team (Mr Richard Brown - 1188577)
Comment ID	PLPP14
Response Date	20/11/18 13:35
Consultation Point	Policy H5: Wool (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 H5: Wool
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

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 draft plan avoids major new allocations within Dorset AONB. Of the allocations proposed, the proposed site at Wool is of greatest relevance to the AONB. It is proposed that land be allocated for 470 homes, 65 bed care home, SANG, community hub and recreational space. The allocation of land for development includes land in relatively close proximity to Dorset AONB (at closest approximately 200m) and would require a SANGS located within the AONB. As I have stated previously, although that the proposed growth in Wool is substantial, the potential landscape and visual effect arising within the AONB are foreseeably limited, if an appropriate design is achieved. With regard to the proposed SANGS, it is noted that improved access between housing at Wool and the site will be required in order to support the purpose of the SANGS, which will require a sensitive approach. Furthermore, it should be recognised that the SANGS site is a Plantation on Ancient Woodland Site (PAWS) and the recommendation for the management of the site will include its restoration to native woodland.

Comment

Consultee	Mr Richard Brown (1188577)
Email Address	
Company / Organisation	Dorset AONB Team
Address	County Hall Colliton Park Dorchester DT1 1XJ
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dorset AONB Team (Mr Richard Brown - 1188577)
Comment ID	PLPP15
Response Date	20/11/18 13:37
Consultation Point	Policy H14: Second homes (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 H14: Second homes

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

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)

As I have stated in previous correspondence, the AONB Team supports this policy. It should be noted that the draft AONB Management Plan 2019-24 contains a new Policy providing direct support for the approach, this being draft policy C4i: "Discourage growth in the number of second homes within the AONB."

Comment

Consultee	Mr Richard Brown (1188577)
Email Address	[REDACTED]
Company / Organisation	Dorset AONB Team
Address	County Hall Colliton Park Dorchester DT1 1XJ
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dorset AONB Team (Mr Richard Brown - 1188577)
Comment ID	PLPP16
Response Date	20/11/18 13:45
Consultation Point	Policy H8: Small sites next to existing settlements (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 H8: Small sites next to existing settlements
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 have concerns about the implementation of the policy. The Plan aims to deliver 933 new homes through the development of small sites next to existing settlements and windfall within existing settlements. The policy permits new homes that are closely related to towns and villages, and states that the number of homes on each small site will reflect the specific context, including the size and character of the nearest town or village, with an upper limit of 30 dwellings being supported. Notwithstanding the policy's attempts to moderate the potential effects of development, through the statement that the developments "must not harm the character and value of any landscape or settlements potentially affected", it is foreseeable that the implementation of the policy will be difficult and quite possibly lead to numerous speculative applications that seek to test the limits of the protective clauses.

Summarising the foreseeably difficulties in the implementation of the policy, I would highlight the following points:

- 1 The policy does not clearly reflect the position that development coming forward may be considered 'major development' in the context of NPPF 172 and therefore require a major development test to be successfully met for planning permission to be granted. I am aware of case law for proposals of fewer than 30 dwellings in other AONBs that have been regarded as 'major'. Furthermore, I note that the Council adopted an approach within its earlier paper on potential allocations within AONBs that considered a number of potential allocations for less than 30 homes as 'major'.
- 2 It is foreseeable that developers will seek to maximise the value of their land and therefore pursue developments toward the ceiling figure of 30 homes. The full implications of this cannot presently be foreseen. It may be that larger towns and villages will see multiple sites come forward, seeking the maximum growth allowed by the policy, either simultaneously or in succession. Managing multiple proposals around settlements is potentially difficult and risks the erosion of existing landscape and built character over the life of the Plan.
- 3 Although I note that the policy refers to the consideration of cumulative effects, which it is right to do, I am concerned about the effectiveness of this caveat. The assessment of cumulative effects is often complex and, in my experience, the rejection of housing proposals on cumulative impact grounds tends to also require the individual effect of an application being significantly detrimental in its own right. Opposing applications on cumulative impact grounds when effects are comparable to that of existing housing development is often difficult to justify and is a source of professional disagreement. Landscape assessments commonly argue that previous unsympathetic development lessens landscape and visual sensitivity, making further growth of a similar nature less harmful. There is a risk that relying on assessment of cumulative effects to control the amount of growth allowed would prove difficult in practice, with the potential for a series of moderately harmful proposals to be approved due to lack of certainty as to what constitutes a cumulative impact of such significance to justify a defensible refusal.
- 4 There are likely to be proposals affecting smaller villages that propose growth that is considered excessive, but where developers will argue that this is 'proportionate'. The word 'proportionate' is open to interpretation and although I assume the Council's definition is intended to mean that proposals should be suitable in size, when considered in relation to something else, an alternative definition of the word is having the same relationship of size or amount to something else. Under the second definition, a theoretical example of proportionality could be that adding 30 homes to an existing settlement of 30 home would be proportionate, as the growth would be directly 'proportionate'.
- 5 The number of applications that could come forward for small sites could result in considerable pressure being placed upon planning officers and advisors.

Comment

Consultee	Mr Richard Brown (1188577)
Email Address	[REDACTED]
Company / Organisation	Dorset AONB Team
Address	County Hall Colliton Park Dorchester DT1 1XJ
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dorset AONB Team (Mr Richard Brown - 1188577)
Comment ID	PLPP17
Response Date	20/11/18 13:50
Consultation Point	Policy E1: Landscape (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 E1: Landscape

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

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 note the policy and am broadly supportive. The AONB Management Plan is presently being reviewed and there appears to be a good relationship between Local Plan Policy E1 and draft AONB Management Plan 2019-24 Policy C1a: "Support development that conserves and enhances the AONB, ensuring sensitive siting and design respects local character. Development that does not conserve and enhance the AONB will only be supported if it is necessary and in the public interest. Major development decisions need to include detailed consideration of relevant exceptional circumstances."

Comment

Consultee	Mr Richard Dodson (996349)
Email Address	[REDACTED]
Company / Organisation	Dorset County Council
Address	County Hall Dorchester DT1 1XJ
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dorset County Council (Mr Richard Dodson - 996349)
Comment ID	PLPP281
Response Date	03/12/18 09:15
Consultation Point	Policy I1: Developer contributions to deliver Purbeck's infrastructure (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	Yes

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? 11

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)

Policy I1 identifies the requirement for development to contribute towards infrastructure through either CIL or S106. The CIL Regulations prevent a development paying CIL and s106 for the same infrastructure.

The policy confuses the differing role of S106 and CIL associated with large/strategic developments and non-strategic/small developments.

sub section d is incorrect. This would only apply if CIL wasn't applicable. We would expect the default to be CIL - for which the education cost needed is as set out. On the strategic sites (not paying CIL) we would expect the requisite contributions through s106

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) - ie zero rated. Policies would be developed for each of the allocations that clarify necessary infrastructure requirements via s106 . CIL would then be chargeable on the non exempt sites for infrastructure not required by the exempted sites

The breakdown between the 2 mechanisms - ie site specific s106 pre requisites and CIL infrastructure would be articulated on the r123 list

The emerging Bournemouth, Dorset and Poole Waste Plan identifies the need for a waste transfer facility and depot to serve Wareham and surrounding areas, with a site allocated at Holton Heath Industrial Estate (Inset 4 of the Plan). Further development in the district would add to this need and we would therefore seek developer contributions.

Various Policies within the plan rely on I1 - there will obviously be consequential modification to policy and site specific requirement s106 / CIL balance as a result of necessary alterations to I1

(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?

for avoidance of doubt

Comment

Consultee	Mr Richard Dodson (996349)
Email Address	
Company / Organisation	Dorset County Council
Address	County Hall Dorchester DT1 1XJ
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dorset County Council (Mr Richard Dodson - 996349)
Comment ID	PLPP282
Response Date	03/12/18 09:16
Consultation Point	Policy H4: Moreton Station / Redbridge Pit (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	Yes
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?	H4
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)

Comments from Minerals and Waste Planning Authority. We have reviewed the consultation document having regard to the Bournemouth, Dorset and Poole Minerals Strategy (2014) and the emerging Mineral Sites Plan and Waste Plan. The emerging Plans have reached an advanced stage in their preparation; both are currently undergoing examination. We have set out our comments below.

Mineral Safeguarding Area

-

The Bournemouth, Dorset & Poole Minerals Strategy (2014) identifies a Mineral Safeguarding Area (MSA). Policy SG1 of the Minerals Strategy applies to relevant proposals within the MSA. Policy SG1 of the Minerals Strategy states:

Policy SG1 – Mineral Safeguarding Area

'The Mineral Planning Authority will resist proposals for non-mineral development within the Mineral Safeguarding Area, as shown on the Policies Map, unless it can be demonstrated that the sterilisation of proven mineral resources will not occur as a result of the development, and that the development would not pose a serious hindrance to future mineral development in the vicinity.

'Where this cannot be demonstrated, and where there is a clear and demonstrable need for the non-minerals development, prior extraction will be sought where practicable and where it would not leave the site incapable of non-mineral use'.

The intention of the Minerals Safeguarding Area is to prevent unnecessary sterilisation of important mineral resources. Its consideration at the plan making stage is therefore important and it is considered that where development options coincide with the Mineral Safeguarding Area, this should be flagged up within the Plan.

The Mineral Safeguarding Area covers two main types of mineral resources: sand and gravel and building stone. Where sand and gravel is present, the Mineral Planning Authority would expect an assessment of the mineral resource on the site. Depending on the outcome of this assessment, the Mineral Planning Authority may seek an agreed level of prior extraction of this resource before the site is developed. Where relevant, this requirement should be referred to within the local plan. The Mineral Planning Authority would be happy to discuss this further in relation to each of the relevant development options – see below.

The following potential conflicts have been identified:

Chapter 4 – Housing

Moreton Station/Redbridge Pit

As acknowledged in the Plan, the site is within the boundary of a permitted quarry and inert landfill site (Redbridge Road Quarry). Recycling of inert waste also takes place on this site. Extraction of minerals is to cease by 31/12/18 (Condition 1 ROMP Notice 6/2016/0273) and restoration is to be completed by 31/12/22 (Condition 2 of Planning permission 6/2013/0577 and Condition 23 of ROMP Notice 6/2016/0273). Waste importation and processing can continue until restoration is complete. Restoration is to a mixture of agriculture, woodlands and nature conservation use. Historically, mineral working and landfilling has also taken place immediately south of Redbridge Road.

The emerging Mineral Sites Plan allocates a site for sand and gravel extraction (AS25 Station Road) c.270m to the north-east of the proposed housing site.

The Mineral Planning Authority has no objection in principle to the proposed housing allocation as it is not considered that it would compromise the existing safeguarded quarry and waste recycling facility at Redbridge Road Quarry (subject to any development being post 2022) or the proposed mineral allocation at AS25 Station Road.

Transport Planning DCC comments

Policy H4: Moreton Station / Redbridge Pit

No further comments to make other than to reiterate our previous response to the options consultation.

We have no significant concerns with the deliverability of this site in transport terms. The location and scale of this site has been looked at previously (2016) by the DCC Transport Modelling Team to assess the impact on the highway network and concluded that these housing options would not have a severe impact on the highway network. This housing location is close to the train station, employment at Dorset Innovation Park and Dorchester and existing local services and facilities. We will need to work with WDDC and PDC to ensure that development at Crossways and Moreton Station / Redbridge Pit are considered together in terms of transport mitigation.

Moreton:

Education Authority

Developments in the **Moreton area** will impact the Dorchester Pyramid as there are overlaps. 490 homes would impact on the capacity of Frome Valley, St Mary's Middle School and Thomas Hardy School and financial contributions will be sought.

DCC Planning continues to work with West Dorset DC to ensure that Frome Valley First has the capacity to extend to 3 Forms of Entry (450 places) from its current 150 place capacity. This is a response to both PDC proposals and West Dorset proposals in the Crossways area.

Eligible developments are expected to be subject to CIL or individual S106 to ensure that the schools in the area are able to contain the increase in pupil numbers across the 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	Mr Richard Dodson (996349)
Email Address	[REDACTED]
Company / Organisation	Dorset County Council
Address	County Hall Dorchester DT1 1XJ
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dorset County Council (Mr Richard Dodson - 996349)
Comment ID	PLPP283
Response Date	03/12/18 09:17
Consultation Point	Moreton Station / Redbridge Pit - 490 homes, 65 bed care home and SANG (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	Yes
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?	H4
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)

Moreton:

Developments in the **Moreton area** will impact the Dorchester Pyramid as there are overlaps. 490 homes would impact on the capacity of Frome Valley, St Mary's Middle School and Thomas Hardy School and financial contributions will be sought. DCC Planning continues to work with West Dorset DC to ensure that Frome Valley First has the capacity to extend to 3 Forms of Entry (450 places) from its current 150 place capacity. This is a response to both PDC proposals and West Dorset proposals in the Crossways area. - this will be in accordance with I1 as recommended for modifications

Moreton Station/Redbridge Pit

As acknowledged in the Plan, the site is within the boundary of a permitted quarry and inert landfill site (Redbridge Road Quarry). Recycling of inert waste also takes place on this site. Extraction of minerals is to cease by 31/12/18 (Condition 1 ROMP Notice 6/2016/0273) and restoration is to be completed by 31/12/22 (Condition 2 of Planning permission 6/2013/0577 and Condition 23 of ROMP Notice 6/2016/0273). Waste importation and processing can continue until restoration is complete. Restoration is to a mixture of agriculture, woodlands and nature conservation use. Historically, mineral working and landfilling has also taken place immediately south of Redbridge Road.

The emerging Mineral Sites Plan allocates a site for sand and gravel extraction (AS25 Station Road) c.270m to the north-east of the proposed housing site.

The Mineral Planning Authority has no objection in principle to the proposed housing allocation as it is not considered that it would compromise the existing safeguarded quarry and waste recycling facility at Redbridge Road Quarry (subject to any development being post 2022) or the proposed mineral allocation at AS25 Station Road.

Comment

Consultee	Mr Richard Dodson (996349)
Email Address	[REDACTED]
Company / Organisation	Dorset County Council
Address	County Hall Dorchester DT1 1XJ
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dorset County Council (Mr Richard Dodson - 996349)
Comment ID	PLPP284
Response Date	03/12/18 09:18
Consultation Point	Policy IM1: Tools for delivery - the Purbeck Local Plan implementation strategy (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	Yes
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 7
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)

Response from the Minerals and Waste Planning Authority (DCC)

Thank you for consulting the Minerals and Waste Planning Authority. We have reviewed the consultation document having regard to the Bournemouth, Dorset and Poole Minerals Strategy (2014) and the emerging Mineral Sites Plan and Waste Plan. The emerging Plans have reached an advanced stage in their preparation; both are currently undergoing examination. We have set out our comments below.

Mineral Safeguarding Area

-

The Bournemouth, Dorset & Poole Minerals Strategy (2014) identifies a Mineral Safeguarding Area (MSA). Policy SG1 of the Minerals Strategy applies to relevant proposals within the MSA. Policy SG1 of the Minerals Strategy states:

Policy SG1 – Mineral Safeguarding Area

'The Mineral Planning Authority will resist proposals for non-mineral development within the Mineral Safeguarding Area, as shown on the Policies Map, unless it can be demonstrated that the sterilisation of proven mineral resources will not occur as a result of the development, and that the development would not pose a serious hindrance to future mineral development in the vicinity.

'Where this cannot be demonstrated, and where there is a clear and demonstrable need for the non-minerals development, prior extraction will be sought where practicable and where it would not leave the site incapable of non-mineral use'.

The intention of the Minerals Safeguarding Area is to prevent unnecessary sterilisation of important mineral resources. Its consideration at the plan making stage is therefore important and it is considered that where development options coincide with the Mineral Safeguarding Area, this should be flagged up within the Plan.

The Mineral Safeguarding Area covers two main types of mineral resources: sand and gravel and building stone. Where sand and gravel is present, the Mineral Planning Authority would expect an assessment of the mineral resource on the site. Depending on the outcome of this assessment, the Mineral Planning Authority may seek an agreed level of prior extraction of this resource before the site is developed. Where relevant, this requirement should be referred to within the local plan. The Mineral Planning Authority would be happy to discuss this further in relation to each of the relevant development options

Safeguarded waste facilities and employment sites

Policy 24 of the emerging Bournemouth, Dorset & Poole Waste Plan safeguards existing and permitted waste management facilities meeting certain criteria, as well as sites allocated in that Plan. The purpose of this policy is to protect against the loss of important waste management infrastructure, through redevelopment or encroachment from other forms of development.

Comment

Consultee	Mr Richard Dodson (996349)
Email Address	[REDACTED]
Company / Organisation	Dorset County Council
Address	County Hall Dorchester DT1 1XJ
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dorset County Council (Mr Richard Dodson - 996349)
Comment ID	PLPP285
Response Date	03/12/18 09:18
Consultation Point	Policy EE2: Planning for employment (View)
Status	Processed
Submission Type	Web
Version	0.1

Are you responding on behalf of a group? Yes

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? EE2

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)

Minerals Planning Authority

Chapter 5 – Economy

-

There is an existing waste facility (household recycling centre) located on Prospect Business Park, Swanage, identified as an employment site. There is also a site allocated in the Waste Plan for a new waste transfer facility/vehicle depot at Holton Heath Industrial Estate (Inset 4 of the Waste Plan), identified as a strategic employment site. Both of these sites are identified as safeguarded waste facilities and are safeguarded by Policy 24 of the emerging Bournemouth, Dorset & Poole Waste Plan. Following adoption, Policy 24 will apply to relevant proposals within 250m of the safeguarded waste facilities.

Such waste facilities may be defined under B2 or B8 use classes as industrial processes, or may be defined as sui generis uses. It should be noted that 'waste uses' are appropriate on employment land, as set out in the National Planning Policy for Waste (2014). It is suggested that reference to waste facilities and specifically Inset 4 of the Waste Plan is made in the supporting text and that a modification is made to Policy EE2 to reference waste facilities as follows:

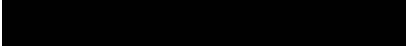
...Proposals for development in use classes other than B1, B2 or B8 uses may be permitted where they are appropriate to the location and the proposal:

- 1 would not result in an excessive reduction in the supply of employment land for B1, B2 and B8 uses, taking into account;
 - 1 the overall amount;
 - 2 range; and
 - 3 choice of available employment land for the remainder of the plan period; and,
- 2 would not have an adverse impact upon the amenity and operation of neighbouring properties and businesses; and,
- 3 demonstrates that the current use has been realistically marketed for a period of at least 9 months in the 12 months prior to the application, to demonstrate that there is no longer a reasonable prospect of the site being used for the existing employment use.
- 4 or meets an identified need for waste management infrastructure.

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 above

Comment

Consultee	Mr Richard Dodson (996349)
Email Address	
Company / Organisation	Dorset County Council
Address	County Hall Dorchester DT1 1XJ
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dorset County Council (Mr Richard Dodson - 996349)
Comment ID	PLPP286
Response Date	03/12/18 09:20
Consultation Point	Policy H5: Wool (View)
Status	Processed
Submission Type	Web
Version	0.1

Are you responding on behalf of a group? Yes

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? 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)

Minerals Authority comments;

Wool

The land allocated for housing that falls north of the A352 is within the Mineral Safeguarding Area. The Mineral Planning Authority would expect assessment and, subject to the outcome of the assessment, prior extraction of this resource. Reference should be made to this in the text and within the criteria of Policy H5.

Transport Planning

Policy H5: Wool

No further comments to make other than to reiterate our previous response to the options consultation.

We have no significant concerns with the deliverability of this site in transport terms. The location and scale of this site has been looked at previously (2016) by the DCC Transport Modelling Team to assess the impact on the highway network and concluded that this housing option would not have a severe impact on the highway network. This location is close to the train station, employment at Dorset Innovation Park and existing local services and facilities. We are still liaising with Network Rail on options and likely costs for reducing barrier downtime at the level crossing. We have asked for Network Rail's views on the possibility of either relocating the station, or providing a new station at Dorset Innovation Park (possibly utilising the existing siding) and the impact this would have on barrier downtime. We have yet to receive a detailed response from Network Rail.

Library Service

Wool Library

The proposed development at Wool may present some implications for the local library in this community. The library is significantly undersized (according to national guidelines) for the current population and any further increase in population will create pressure on use of resources and space. Appropriate mitigation will be sought in accordance with 11

Education

Wool:

Based on 470 units and on the assumption that any capital works to contain the additional 0.5 form of entry can be delivered within the existing institutions then DCC would not be looking for a new school site. Though it should be noted that any variation upwards of housing units in the Wool and Bovington area would require a revisit of this position. Financial contributions will be sort for both Primary and Secondary. Secondary provision is delivered through the Purbeck School.

(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?

For avoidance of doubt

Comment

Consultee	Mr Richard Dodson (996349)
Email Address	[REDACTED]
Company / Organisation	Dorset County Council
Address	County Hall Dorchester DT1 1XJ
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dorset County Council (Mr Richard Dodson - 996349)
Comment ID	PLPP287
Response Date	03/12/18 09:20
Consultation Point	Policy H2: The housing land supply (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	Yes

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?	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)

DCC Transport, Planning & Highways response, November 2018

Policy H2 – Housing land supply

We fully support the principles of the spatial strategy. The best locations for new housing are those close to and with a variety of travel options for people to gain access to employment opportunities, services, shops and facilities. Development will mitigate its impact on the network by paying towards or delivering transport schemes to increase network capacity where possible and encourage people not to use their cars for every trip.

As all of the sites (Wool, Moreton, Lytchett Matravers and Upton) have already been included in the previous consultation in 2016 and have been modelled, there is no need to re-run the model for these options. The Purbeck Spatial Model report from April 2016 concluded that even in the worst-case scenario (high growth forecast), with increased traffic levels, this would be unlikely to result in a severe residual (NPPF) impact on the highway network

Comment

Consultee	Mr Richard Dodson (996349)
Email Address	[REDACTED]
Company / Organisation	Dorset County Council
Address	County Hall Dorchester DT1 1XJ
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dorset County Council (Mr Richard Dodson - 996349)
Comment ID	PLPP288
Response Date	03/12/18 09:21
Consultation Point	Policy EE2: Planning for employment (View)
Status	Processed
Submission Type	Web
Version	0.1

Are you responding on behalf of a group? Yes

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? EE2

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)

Minerals Planning Policy :

Chapter 5 – Economy

-

There is an existing waste facility (household recycling centre) located on Prospect Business Park, Swanage, identified as an employment site. There is also a site allocated in the Waste Plan for a new waste transfer facility/vehicle depot at Holton Heath Industrial Estate (Inset 4 of the Waste Plan), identified as a strategic employment site. Both of these sites are identified as safeguarded waste facilities and are safeguarded by Policy 24 of the emerging Bournemouth, Dorset & Poole Waste Plan. Following adoption, Policy 24 will apply to relevant proposals within 250m of the safeguarded waste facilities.

Such waste facilities may be defined under B2 or B8 use classes as industrial processes, or may be defined as sui generis uses. It should be noted that 'waste uses' are appropriate on employment land, as set out in the National Planning Policy for Waste (2014). It is suggested that reference to waste facilities and specifically Inset 4 of the Waste Plan is made in the supporting text and that a modification is made to Policy EE2 to reference waste facilities as follows:

...Proposals for development in use classes other than B1, B2 or B8 uses may be permitted where they are appropriate to the location and the proposal:

- 1 would not result in an excessive reduction in the supply of employment land for B1, B2 and B8 uses, taking into account;
 - 1 the overall amount;
 - 2 range; and
 - 3 choice of available employment land for the remainder of the plan period; and,
- 2 would not have an adverse impact upon the amenity and operation of neighbouring properties and businesses; and,
- 3 demonstrates that the current use has been realistically marketed for a period of at least 9 months in the 12 months prior to the application, to demonstrate that there is no longer a reasonable prospect of the site being used for the existing employment use.
- 4 or meets an identified need for waste management infrastructure.

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 above #4

Comment

Consultee	Mr Richard Dodson (996349)
Email Address	[REDACTED]
Company / Organisation	Dorset County Council
Address	County Hall Dorchester DT1 1XJ
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dorset County Council (Mr Richard Dodson - 996349)
Comment ID	PLPP289
Response Date	03/12/18 09:21
Consultation Point	Policy H7: Upton (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	Yes

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

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)

Upton

The land allocated for housing is within the Mineral Safeguarding Area. The Mineral Planning Authority would expect assessment and, subject to the outcome of the assessment, prior extraction of this resource. Reference should be made to this in the text and within the criteria of Policy H7.

Comment

Consultee	Mr Richard Dodson (996349)
Email Address	[REDACTED]
Company / Organisation	Dorset County Council
Address	County Hall Dorchester DT1 1XJ
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dorset County Council (Mr Richard Dodson - 996349)
Comment ID	PLPP290
Response Date	03/12/18 09:22
Consultation Point	Policy H6: Lytchett Matravers (View)
Status	Processed
Submission Type	Web
Version	0.1

Are you responding on behalf of a group? Yes

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? H6

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)

Policy H6: Lytchett Matravers

No further comments to make other than to reiterate our previous response to the options consultation.

Transport Planning comments

The sites at Lytchett Matravers have been previously looked at in the Purbeck Spatial Model (up to 300) and are not considered to have a severe impact on the highway network. Development in this area would not put additional pressure on the A351 and is close to the conurbation for employment. The village also has established local services and facilities.

(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?

For avoidance of doubt

Comment

Consultee	Mr Gerald Rigler (1191922)
Email Address	[REDACTED]
Company / Organisation	Dorset CPRE
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dorset CPRE (Mr Gerald Rigler - 1191922)
Comment ID	PLPP679 PLPP680 PLPP681 PLPP682 PLPP683 PLPP684 PLPP685 PLPP686 PLPP687 PLPP688
Files	Rigler-CPRE-PLPP588.pdf

**REPRESENTATIONS to help ensure SOUNDNESS in
THE PROPOSED LOCAL PLAN for PURBECK**

A : REPRESENTATIONS concerning CHAPTER 1 - INTRODUCTION

1 : Consistency with the government's National Planning Policy Framework is alleged. Sound planning requires effective consultation with those affected and the existence of any 'statement of common ground' (relating to this plan) is not considered to have arisen from any open and transparent consultation that promotes the concept of effective consultation with those affected. The key Statement of Common Ground is understood to have been compiled by employed planners at closed meetings without authority to make decisions and which have not released minutes for public consumption. Also other consultations have been limited in their effectiveness by the use of suspect techniques designed to steer or limit responses (eg - questions set up to contain bias and reflect the results wanted by those initiating the consultation).

2 : The evidence base is expected to be credible. The evidence in respect of the basic local priority (ie the evidence for a credible number of **"truly affordable dwellings that local people may wish to rent or buy from earned income"**) is missing. The use of an illusory target for housing (based on patently flawed governmental 'guidance') fails to identify a suitable target for such an important priority in an area full of constraints (both those formally recognised and those not so recognised) and for an area that is a renowned desirable location for those able to pay the high prices for the location. It is stressed that the unqualified adoption of a 42% increase in the calculation of the proposed target for housing numbers will do nothing for reducing house prices (notwithstanding governmental expectations) in Purbeck and could easily have the reverse effect : an unsound strategy for Purbeck, even if it is considered to be legal.

B : REPRESENTATIONS concerning CHAPTER 2 – VISION and OBJECTIVES

1 : Whilst employment opportunities in Purbeck are important, we have objections to prioritizing planning matters concerning the use of a site for employment at Winfrith since it is important to ensure all aspects (including housing and infrastructure issues) are considered for every planning application concerning employment : to fragment criteria for planning decisions would be unsound.

**REPRESENTATIONS to help ensure SOUNDNESS in
THE PROPOSED LOCAL PLAN for PURBECK (Cont'd)**

B : REPRESENTATIONS concerning CHAPTER 2 Cont'd

2 : Whilst the aspirations of local people could be for developments to be spread across the District it is unsound to propose the majority of new homes could be in places like Wool and Moreton. It is stressed that such places have environmental constraints (eg see attached recent booklet [comprising pages 230 to 275] entitled "The natural environment of Wool") which are real living constraints. Such constraints stem from a habitat that prompted the suggestion in the 1930s for such parts of Dorset to be given National Park status : a suggestion that has recently been recognised by many. Consequently destruction of any such habitat (and their 'settings') would be unsound and probably illegal in the light of the emerging Habitat Regulations - Coombe Wood seemed particularly vulnerable prior to the refinements of the NPPF requirements.

3 : The suggestion that land should be removed from the Green Belt is unsound since "exceptional circumstances" do not really exist. Perhaps it can be said that if no attempt is made to reconfigure brownfield land (*ie derelict, unused and misused property including accommodation over shops and the possibility of remodelling the use of quite so much Swanage land space for car-parking by introducing one or two-storey carparking structures*) then 'usual consequences' occur (land shortages) but they are hardly exceptional circumstances.

4 : It is surprising that some 300 extra houses are required in Wareham in view of the current difficulties being experienced in selling existing houses to local people. It is interesting to note that Members of Dorset CPRE (living outside Purbeck) are frequently being asked to "raise our expectations and move to superior living in the heart of Wareham" by those trying to find occupants for the existing newly built housing stock : sample of mailed 'blurb' enclosed as relevant evidence . Representation A2 above refers.



**REPRESENTATIONS to help ensure SOUNDNESS in
THE PROPOSED LOCAL PLAN for PURBECK (Cont'd)**

B : REPRESENTATIONS concerning CHAPTER 2 Cont'd

5 : Item 'd' of Policy V2 is fully supported : neighbouring settlements should not merge. In this connection it is understood that attempts have been made to classify the quality of green belt land by dividing such land into 'parcels' and then in some unjustifiable / whimsical manner imply that some of such land is less useful. Notwithstanding any such implication it would be unsound to allow any such land to be used for 'windfall' housing since the Green Belt Zone is the primary means of preventing settlements from merging.

6 : It is agreed that limited brownfield land is available but it is suggested that there would be enough if, as mentioned above, the use of Swanage land for car-parking was remodelled and if the brownfield register recognised a more realistic (denser !) housing density than that understood to have been adopted in preparing the proposed Local Plan.

C : REPRESENTATIONS concerning CHAPTER 3 - ENVIRONMENT

1 : The description of the environment in the District is welcomed since it endorses the view that much of Dorset (including Purbeck) should have National Park status.

2 : The use, in paragraph 54, of the expression "exceptional circumstances" is unjustified since the presence of so many constraints (both in terms of infrastructure services and facilities and in terms of environment) merely justifies the use of the words "usual consequences" : the usual consequence of a constraint is to create pressure – hardly an exceptional circumstance. In other words : the proposed housing target is too high for adoption by Purbeck, unless, of course, all the various brownfield opportunities have not been exhausted, so as to suit a credible target.

3 : The concept of assessing the risk of flooding in other areas away from any development is welcomed. This matter would be more welcome if the references to the requirements of any planning applicant were 'must assess' rather than 'should assess' and 'must be designed' rather than 'should be designed'.



**REPRESENTATIONS to help ensure SOUNDNESS in
THE PROPOSED LOCAL PLAN for PURBECK (Cont'd)**

D : REPRESENTATIONS concerning CHAPTER 4 – HOUSING

1 : Paragraph 106 refers to the function of the proposed Local Plan as being related to the provision of new homes to meet identified need in the District and to support the Government’s objective of boosting the supply of homes. It is noted that no recognition is given to the acceptance by Government that local constraints could (and should ?) reduce the relevant numbers so as to just meet ‘identified need in the District’ - thereby respecting the natural environment and the associated limitations on the provision of infrastructure facilities (eg the provision of damaging motorways).

2 : It seems relevant to state that an essential part of the infrastructure required to support life and living in any of the Purbeck homes is relevant planning for adequate health services and facilities (a matter of current concern as these representations are prepared) as well as the other aspects – ie not just roads.

3 : Good planning should avoid / minimize the risk of waste. In this respect the proposed Local Plan is unsound since it is unclear how the plan will foster the full use (occupation) of any new dwellings. The current existence of largely unoccupied dwellings (that are not up for sale) is a major challenge for the required Local Plan serving Purbeck : assuming the objective is to produce a Local Plan that will serve local needs for flourishing and balanced communities. In this connection it is disturbing to see no specific plans for fostering Community Land Trusts – local organisations dedicated to ensuring balanced communities by addressing the key priority of Purbeck : the provision of truly affordable housing in a highly desirable area.

4 : Paragraph 123 states that “Occupants of new homes at Moreton Station / Redbridge Pit are likely to make use of existing infrastructure, services and facilities in Crossways as well as that in Purbeck”. All such existing infrastructure services and facilities are already very poor and will be rendered totally inadequate by the scale of developments being proposed by both West Dorset District Council and Purbeck District Council : assuming the environmental constraints are not respected. The statement in paragraph 123 is therefore unsound.



**REPRESENTATIONS to help ensure SOUNDNESS in
THE PROPOSED LOCAL PLAN for PURBECK (Cont'd)**

E : REPRESENTATIONS concerning CHAPTER 5 – ECONOMY

1 : Item ‘a’ of Policy EE4 is welcomed since it states that the Council would permit particular developments provided “it would not result in an adverse impact, particularly in accumulation, upon designated and non-designated landscapes and local sites of biodiversity importance”. We welcome this statement since much of Purbeck is a site of biodiversity importance – as illustrated by the booklet associated with ‘B2’ above.

2 : Whilst it is obvious that encouraging new businesses into Purbeck is expensive (expensive inducements proving necessary) it is unclear whether any such new businesses will stay once the inducements reduce or cease. In view of such uncertainty (bordering on unsoundness) it is suggested that the welcome statement at ‘E1’ above should be used to maximize the potential of the existing businesses that can flourish within existing constraints that have protected Purbeck from urbanisation.

F : REPRESENTATIONS concerning CHAPTER 6 – INFRASTRUCTURE

1 : It is noted that much of this chapter is descriptive of the current situation but plans for the relevant period are missing - particularly those co-ordination plans for infrastructure services and facilities needed to support the new dwellings that may be built. This matter is of some significance in the current circumstances being promoted by government that push for construction activity in building new dwellings (via the Housing Delivery Test) but simultaneously cutting budgets for infrastructure services and facilities – representation ‘D2’ above refers.

2 : It is specifically regretted that no plans appear to be envisaged for fostering the potential railway link into Purbeck from Poole, Bournemouth and further points East : the residual issues with Network Rail do need to be resolved satisfactorily to reduce the reliance on cars by visitors.



**REPRESENTATIONS to help ensure SOUNDNESS in
THE PROPOSED LOCAL PLAN for PURBECK (Cont'd)**

**G : REPRESENTATIONS concerning CHAPTER 7 – IMPLEMENTATION,
DELIVERY and MONITORING**

1 : It is noted that paragraph 270 refers to how the Council will deliver the strategy set out in the proposed plan by various proposed methods and thereby ignores the need for a sound / workable plan since the Council is not expected to exist during the relevant period. Such a stance is therefore considered to be unsound.

2 : To deal with the issue at 'G1' above, it is suggested (since the residents of Purbeck are primary drivers of the Local Plan) that proposals should be incorporated for the various Purbeck parish and town councils to have a significant role in the matters described by Chapter 7.

3 : It is confirmed that monitoring performance of the eventual Local Plan for Purbeck would be more effective if consultation with local residents were improved to their satisfaction.

Purbeck & Poole Group of Dorset CPRE / 30th November 2018

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WOOL FLORA & FAUNA GROUP
woolwildlife.org.uk

THE NATURAL
ENVIRONMENT OF
WOOL

BY
RACHEL PALMER & TONY WARNE

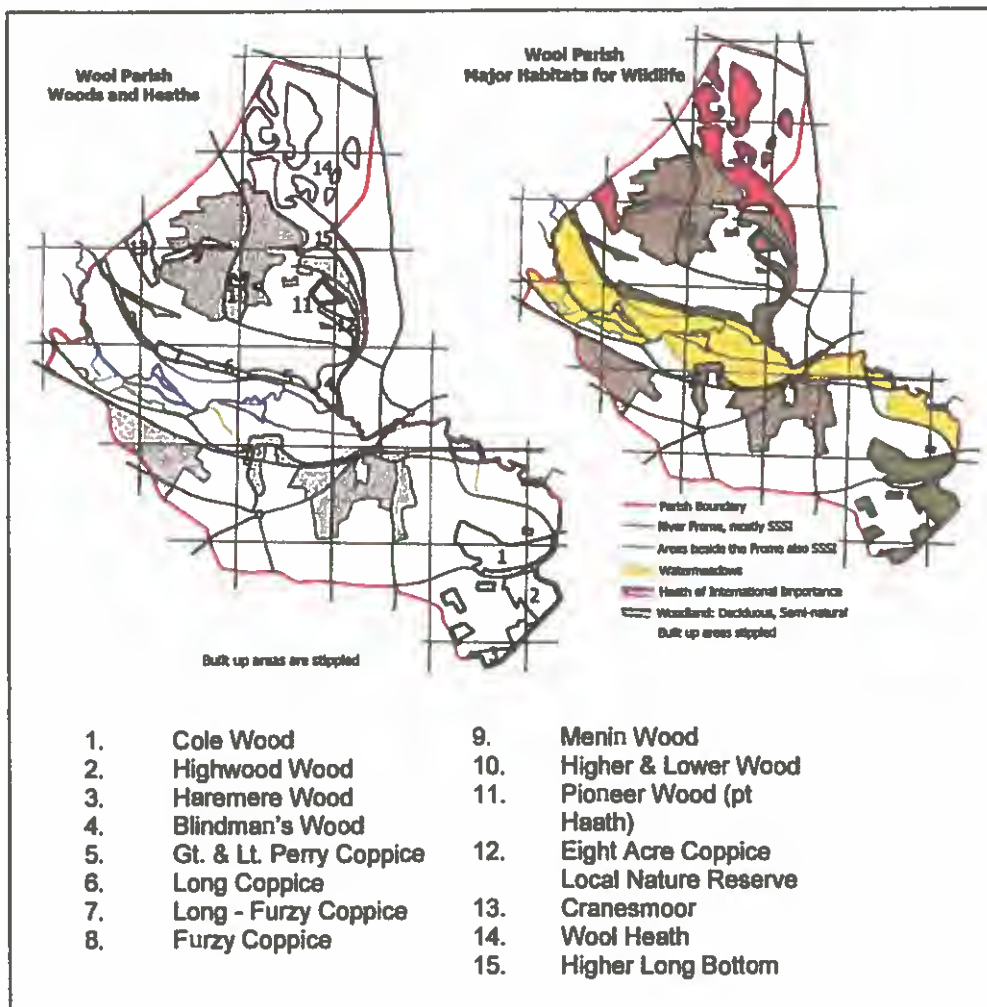
This extract is taken from
"MORE MEMORIES OF WOOL"
by ALAN BROWN

The Natural Environment

The following chapter on the Natural Environment around Wool is written by and is the sole copyright of Rachel Palmer and Dr Tony Warne.

Editors note. The following articles are an in-depth account of the environment in which the village of Wool is situated. I am sure that after reading the details of our woodlands, water meadows, heathlands, trees, hedges etc. a greater understanding of the unique area in which we live will be appreciated. Most of the woods and copses with the exception of 8 Acre Copse is private property.

Introduction



About one third of Wool Parish is covered by some level of conservation status. The variety of habitats and wildlife in Wool is a complex product of many factors. Wool has a wide range of soil types and underlying rocks. There is also a wide range hydrologically from bogland and seepage in catchment areas north of the Parish to streams such as Bovington stream and small rivers such as the River Win, all flowing into the River Frome which meanders through the middle of the Parish on its flood plain. "Wele" is the Anglo-saxon word for spring and of course we have a natural spring rising above the watercress beds and running down through the conservation area of the village itself.

Nothing in the Parish of Wool has escaped the hand of man so that a large part of the wildlife we see around us is a product of the history of human occupation and activity. However, there is an unusually high proportion of semi-natural vegetation because the slow modification of land here can mainly be attributed to systems set up in past centuries, indeed, well over 1,000 years ago as in the case of heathland. The abrupt change, so damaging to wildlife, of the last 50 years has so far been of limited extent.

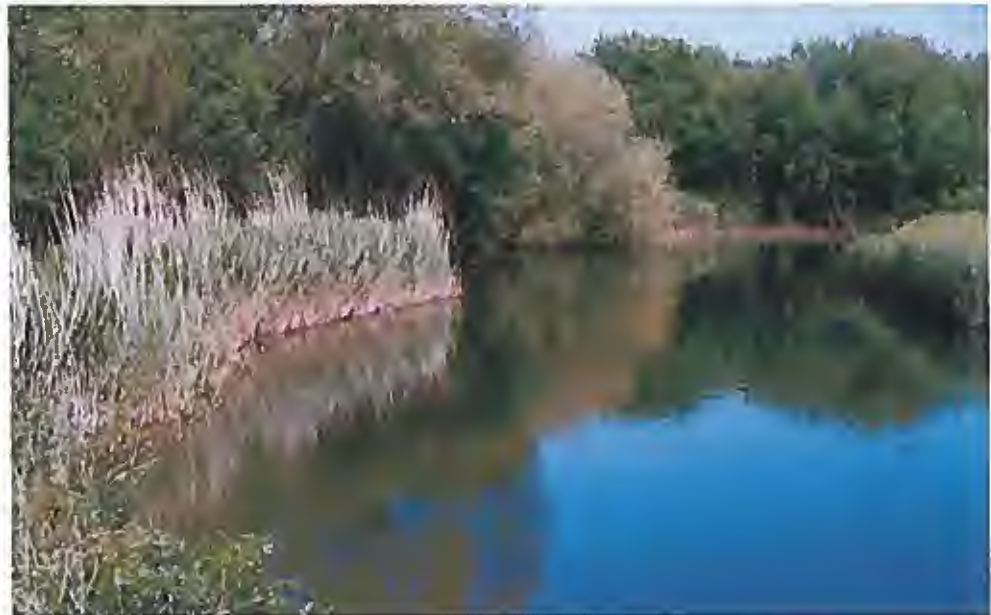
A Variety of Landscapes



Organic Farmland with Corn Marigolds south of Wool.



Woolbridge Heath with Silver Birches looking west towards Pioneer Wood.



The River Frome - the banks are lined with Common Reed.



View of Woodstreet Farm from Cole Wood taken from under the spreading boughs of the Oak which is about 250 years old.

Woodlands of Wool

Wool Parish is outstanding in the numbers of, albeit small, ancient woodlands. Ancient woods are those that have been in existence over 400 years. If they qualify then it is likely they have existed very much longer than this. There are 14 woods in Wool. However, some are under 2 hectares (approximately 5 acres) and so are not included on the Ancient Woodland Inventory. The woods of Wool vary considerably from very acid woods containing Climbing Corydalis and Wood Sorrel, eg Highwood and Dorset Wood, to ones that are more neutral soils derived from London Clay. This may occur in patches and gives rise to plants such as Sanicle. However, one wood alone may include many different areas depending on changes in soil type, for example, pockets of clay. It is the nature of ancient woodlands to show diversity of soil type because soils have not been disturbed by deep ploughing. 8 Acre Coppice is a prime example where bracken, an acid lover, is found at the northern end whereas in other parts there are damper areas with Primrose and wild Currant and yet other more alkaline areas with Pig Nut, Sanicle and Bluebell in the drier areas. There are no truly alkaline soils supporting ancient woodland. Vicarage and Eweyards coppices lying just on the edge of the Parish boundary are on clay

overlying chalk and here Maple and Oak woodland exists with Harts Tongue ferns abundant everywhere. Our woods are in the main then Oak and Hazel woods with an understorey of Holly. In these woods Ash is found in the wetter and more alkaline areas and in the latter Hawthorn may be present in the shrub layer. Ash is regenerating better than the Oak. If our woods become wetter, as a result of climate change, we may see an increase of these species, with it becoming more common than Oak.



Little Perry Copse showing Bluebells and Stitchwort and some of the Army's new plantings.

The ancient woods are found in two main areas. Those on the south east include Cole Wood, Highwood, Dorset Wood, Haremare Wood and Barn Coppice. Cole Wood and Highwood have public access and Barn Coppice lies on the edge of the trackway running south towards Coombe Keynes. All these woods lie on sandstone and gravel caps of the Bagshot Beds. Another sweep of woods runs in a chain along the northern edge above the River Frome flood plain starting with Little Perry Coppice, Great Perry Coppice and Long Coppice followed by Furzey Coppice. The stepping stones of Menin Wood leading up to Bovington followed by Higher Wood and Lays Coppice to the east and Eight Acre Coppice running south east followed by Blindman's Wood which leads down to the river, makes a complete circle of woodland south of Bovington. In Spring these ancient woodlands are full of flowers, some of which are usually found only in soils that have never been disturbed and

are therefore a feature of ancient woodlands, so much so that they may be referred to as indicator plants.



Butcher's Broom – a constant feature of our ancient woods with berries on leaf-like stems.



Lilac Mycena (actually pink) which occurs in 8 Acre Copse.

Bluebells are found in profusion in these woods or given their Dorset name "greygle". Bluebells are a speciality of English woods, rare in Europe generally. Even more reliable indicators such as Wood Anemones occur in most of these woods. Their large star-like flowers give them the name Windflower. White is a common colour for woodland flowers – easily seen in the shade. Other examples are small, dainty white bells of Wood Sorrel with its Shamrock-like leaves and the tiny white stars of Sweet Woodruff with leaves rather like those of Goose Grass, but if you crush them they give off a sweet hay smell and were once used to stuff ladies' pillows. In drier areas, Woodland Violets and strange lime green flowers of Wood Spurge can be found and in damper areas Primroses and early Purple Orchids. Blindman's Wood has these in profusion, as does Highwood to a lesser extent. Another flower in the wetter areas of these woods and Cole Wood is the Yellow Pimpernel. Yellow Archangel occurs in Cole Wood, but it should not be confused with a garden escape which has silver variegated leaves. It occurs in 8 Acre Coppice but as an alien it is likely to take over and should be eradicated. In Spring the sight of Wool's ancient woods is as striking as that of Swiss meadow.

Another group of plants associated with ancient woodlands are less obvious. These include the flowerless plants. These include many lichens (plants which

produce by spores and are a grey-green colour due to being a part algae and in part fungus!). The rare Tree Lungwort, looking like a small leaf of a Savoy cabbage, has been found in Long Perry Coppice. Many lichens need a hand lens to reveal a colourful rich variety of spore producing discs, for example the red wine gum-like one called *Pachyphialae carneola*. Other species characteristic of old woodland include *Dimerella lutea* whose spore-producing discs look like apricot tarts, *Leptogium teretiusculum*, *Lecanographa lyncea*, *Opergrapha zerica*, *Opergrapha corticola*^o, *Parmelia reddenda*^o, *Thelopsis rubella* and *Rhinodina roboris*^o. This has black discs with an irregular light margin, unlike the margin of a similar lichen *Cresponea premnea*. The quite rare *Schismatomma niveum*^o is also found – a speciality of old Oaks at least 250 years old. In a recent field meeting of the Local Nature Reserve in 8 Acre Coppice, 37 different species were recorded in two hours! Five were veteran tree or old forest species, including those asterisked above and *Lecanactis subabietina*. *Usnea ceratina* (an Old Man's Beard lichen) was also found, but it is in the very humid sites of the valley woods of the River Frome, such as Blindman's that it hangs in festoons from the trunks. Interest is not confined to living trees. Rotting logs and stumps providing a habitat for the uncommon *Cladonia parasitica*.

The presence of these lichens is very important as it tells us that woodlands have a long history and that there has been a continuity of veteran trees. Mosses, like other plants, reflect the neutral or acid, drier or wetter, nature of the soils. *Polytricum formosum* and *Polytricum juniperum* with their hard, stiff leaves, are suited to drier, sandy soils. St Catherine's moss, with its see-through thin leaves, occurs on wet clay banks. Both *Mnium hornum* and St Catherine's moss have star-like arranged leaves. St Catherine's moss is called this because the whorl of leaves looks a bit like the spokes of a wheel. St Catherine died on a wheel of torture. *Thuidium tamriscinum* has tiny leaves covering branches, looking like a miniature fern. Soft green cushions of *Leucobryum glausum*, sometimes referred to as pin cushion moss, can give a woodland floor the appearance of having an Axminster carpet. *Hypnum cupressiforme* and *Isothecium myosuroides* gives the bases of trees a covering like a dog's coat!

Lichens are fed on by moth caterpillars, for example the Footman moths, recorded in local garden moth-trapping sessions and is a fine hiding place for others during the day time, eg *Meuville du Jour*, which is well camouflaged against it. Long-tailed tits use it for nesting material. So, although small and often overlooked, lichens are important in the woodland ecology. Most only thrive in damp conditions and pure air. We will know Wool has become a town when the lichens disappear! Highwood is spectacular for its show of ferns and sedges. The Giant Pendulous

sedge with its long hanging inflorescences is found here and in other woods where there are wet areas. It is an ancient woodland indicator and was often dug up by Victorians for their gardens. However, the other Giant also collected, the Royal Fern, has only been found in woodland just outside the Parish. In Autumn our woods again become a place for the exciting and colourful finds of fungal fruiting bodies. Eight Acre Coppice is particularly rich in these, including dramatic ones such as the olive green deadly poisonous Deathcap and foul-smelling Stinkhorn. A ring of the uncommon creamy-coloured sweet-smelling Giant Clitocybe (up to 30 cms (12ins) across!) is also found there. In Spring, appearing regularly on about 23 April. The St Georges Mushroom occurs in the verge between the wood and Cologne Road. More colourful and abundant in Autumn are Purple Deceivers and Lilac Mycenae. A board has been erected in 8 Acre Coppice showing some of these non-flowering plants.

Big old trees with cavities are ideal places for Hornets nests and interesting insects recorded for our woodlands include the False Click beetle, a Fungus beetle *Licoperdina bovistae*, *Dirhagus pygmaeus* and *Hylis cariniceps* which are all Red Data Book species. More individuals have been found of the latter than in anywhere in Britain.

The Holly Blue is one of the earliest butterflies to flit along the woodland edges looking for Holly or Ivy on which to lay eggs. Big old Oak trees, when hollow, provide nesting sites for Tawny Owls, Greater Spotted Woodpecker and the rarer Lesser Spotted Woodpecker also recorded in Bovington. The adults and larvae of Long-horned beetles living in the dead wood also provide valuable food for woodpeckers and the Ash Bark beetle is another favourite food found in dead trees. The Tree Creeper is frequently seen running up massive branches of old Oaks looking for tiny insects in the crevices. They often use loose Silver Birch bark to nest under. Actually most of the birches widespread in Wool woodlands are hybrids between Silver and Downy Birch. In ancient woodlands birch only occurs where there are clearings or openings, as in 8 Acre Coppice. It needs light and is fast-growing pioneer species, so is more frequently found forming a large part of our more recent woods or woodland belts. Its light branches acting often as a favourite swinging and feeding place for groups of Long-tailed tits.

Mammals and birds, being mobile, are not usually restricted to ancient woods and the more recent semi-natural woodlands can be just as rich in these. The planted portion of Highwood has the finest display of Foxgloves in June for miles around. Foxgloves like newly cleared areas on acid soils. All except purely planted woodlands provide the most natural habitats, unmodified by man. As a result, they

all show great biodiversity. Two-thirds of our breeding birds, half of our moths and butterflies and one-sixth of our flowering plants are dependent on woodland.

Many of our British mammals find in them a place of retreat. Nearly all our Parish woods have populations of Sika deer. They emerge at night to feed on grassland and garden roses! They also feed in the woods, being browsers and bark strippers and therefore play an important role in the woodland ecosystem, destroying young trees and preventing regeneration of trees and regrowth of Hazel coppice. Sika are the most frequent deer in the Parish – easily distinguishable as males with multi-forked antlers, unlike the smaller Roe deer which only have three points. Both males and females have white rump patches with a dark edge.

The huge mounds of earth excavated by badgers when forming their extensive setts, are found in many woods. They are also nocturnal, emerging at night to forage for earthworms and bulbs which form their staple diet. However badgers feed on a wide range of animal and vegetable materials, being omnivores. They are not found



Dormice – fast asleep. Found in some of our ancient woods.

in 8 Acre Coppice and deer are infrequent here. This is because it provides less security from disturbance being a long thin strip with houses lining the adjoining road. However, another factor for badgers is that they prefer dry sandy soils for their setts and this is borne out with their frequency in woods south of the village – particularly Vicarage Coppice lying just outside our Parish in Coombe Keynes, which houses a veritable badger city. Voles are vegetarian, feeding on shoots, seeds and nuts. Hedgehogs, Woodmice, Yellow-necked mice, Common shrew and the tiny Pygmy shrew are all to be found in good numbers in our woodlands, feeding on insects, worms and spiders, now less common in some of our manicured gardens.

The smallest bat, the Pipistrelle, the Brown Long-eared bat, the Whiskered bat and the Common Noctule bat are all found in the Parish and associated with trees and woods for roosts or feeding areas. The Brown Long-eared bat feeds in woodland amongst the branches, taking food from the leaves. It roosts in lofts and is therefore ideally suited to the environs of Cologne Road, Bovington. The rare Leislars bat is also recorded for Wool.

A more recent wood is one at the north end of Cologne Road, Bovington, Pioneer Wood. It is aptly named as it is a stronghold for another fast-growing tree, the Alder Buckthorn which, with other trees, encroaches onto heathland areas. The Alder Buckthorn is the food plant for the lovely yellow early spring butterfly, the Brimstone. Conifers in this wood, as well as those planted in Cole Wood and Highwood, provide a good habitat for the tiniest British bird, the Goldcrest. Long-eared Owls have been seen resting in the Conifers planted on Ministry of Defence land in Bovington. These owls prefer coniferous woodlands, as do woodlarks recorded for the same Woolbridge Heath area. Mention must now be made of three very young woodlands. One is a natural Ash woodland which has sprung up in an old chalk pit, Pug Pit, in the centre of the Parish. This is our nearest thing to an alkaline wood, But hundreds of years will be needed before it is clothed in truly alkaline woodland flora, such as Dog's Mercury and Harts Tongue ferns. However, the mammals and birds have already arrived. Blackcap and Chiff Chaff visit it from Africa each year. Two other woodlands are those planted by the Ministry of Defence under the expertise of their South West Woodland Officer, Rory Gogan. One is north of Long Coppice and broadens out the wood. Twenty two thousand five hundred trees were planted in 2000. Most are native trees, but include some apples which are already providing apples for Thrushes and Blackbirds. When in bud they supported Bullfinches. These have declined partly due to the loss of old orchards and apple trees. They are already fruiting! The other is a small woodland strip connecting 8 Acre Coppice with Leys Coppice, another very small

ancient woodland. This was a joint project with the Ministry of Defence, the local community, the International Tree Foundation and pupils from Wool St Mary's First Catholic School. This will help counteract the negative effect of isolation on ancient woodland populations.

One mystery wood is Menin Wood, running down from the Military Hospital to Cranesmoor. The name is recent, redolent of the First World War and part was used for cement bases for wooden huts in the early years of the Camp. This has now been covered by secondary woodland. However, the wood is 1st Edition on the OS map – a good hallmark for ancient woodland. It has a mixture of Beech, Yew, Holly and Oak, with some Birch and plantings of Pine. Its ground flora is not indicative of ancient woodland, apart from extensive patches of Butcher's Broom. However it is certainly semi-natural and the massive growth of Holly as an understorey may have shaded out other plants. There is almost no Hazel. It has not been managed as Hazel Coppice, another possibility for poor flowering component, but as high forest. It is possible that some of the old Beeches were not planted. Certainly, Beech is native to Dorset, more or less at the limit of its most south westerly range. The Yew is not planted and it is of varying ages. Have we in fact got an element of a Beech Hanger such as occur in Hampshire? "Hangr" is the old English word meaning wooded slope. The topography is right and the composition of sandy gravels over chalk and clay is similar. It may have developed from scrub on chalk or neutral grassland. Certainly, chalk loving plants occur nearby on an area of the adjoining "Heathland"!

Threats to our woodlands are many. Man is the worst threat and even seemingly natural threats are man-created in the first instance. Perhaps the worst "natural" threats are Grey Squirrels and Sika deer, both introduced by man. Sika deer were produced for deer parks in the 18th Century, but got into the wild in the 19th Century. Now numbers have gone beyond carrying capacity of the woods. Lovely as it is to see large and graceful wild mammals on our doorstep, unless controls are carried out, the effect of no regeneration because of their browsing will result in the non-replacement of old trees as they die. Some trees such as Oak are more vulnerable than others. Grey Squirrels, introduced in the early 19th Century, ring bark older trees and remove buds, besides raiding birds' nests for eggs and young. Over 25 years ago Cole Wood had its old Oaks poisoned and removed and replanting of Lodge Pole Pine occurs. Conifers cast deep shade and drop needles creating acid soils unacceptable to much of woodland flora, so biodiversity was lost and now it is the fringe alone of this ancient woodland which shows the indicator flowers that would have been widespread throughout the wood.

Plant introductions are also a problem, for example *Rhododendron*, an alien introduced in the 18th Century. None of our native wildlife feeds on it and it can totally overgrow the ground layer with its flowers, the shrub layer and even smother the tree canopy. *Rhododendron* likes acid soils and is mainly a nuisance in woods on the sandstone caps south of the village, such as Dorset Wood and Haremare Coppice.

Knopper galls caused by larvae of Knopper Gall wasps share their life cycles between Turkey Oaks and our Common Oak. Turkey Oaks were introduced in 1735 and survive the attacks. Our native Oaks mainly the Pedunculate Oak, here in Wool have their regeneration threatened, as sometimes over 90% of the acorns are distorted into weird shapes looking like rabbit vertebrae and thereby usually totally unviable. Some of these evils can be reversed if something is done soon enough. Maybe the Lodge Pole Pines will be removed from Cole Wood and it will be allowed to revert, given time, to something of its former glory. Sometime a squirrel anti-fertility drug which is host specific may be introduced.

Where woodland abuts urban style development, as in parts of Cologne Road, fly tipping of garden rubbish, mattresses, televisions, old fridges and bicycles occurs. This is of course illegal and can result in a fine. On one occasion a whole sackful of unwanted decaying fish was dumped. In this case the smell alerted people to its presence far and wide! How often are the perpetrators spotted and reported though? Even garden rubbish enriches the soil. It smothers delicate woodland flowers and replaces them by more aggressive species such as goose grass and nettles. However, if a wood is clear felled or damaged through vandalism, recovery may be impossible. Vandalism has occurred in 8 Acre Coppice and a tree with a Greater Spotted Woodpecker's nest in it was knocked down. Road extensions and replacements with housing developments are the greatest threats.

To date some successes are recorded at keeping these threats from removing our exceptional heritage. A tip-off to Dorset County Council Highways planners rerouted the very beneficial cycle path along Bovington Lane to the south, keeping it clear of a small grove of Aspen trees in natural woodland north of the road. Suggestions to build in Pug Pit, our new natural woodland, have been turned down by the Parish Council. Some years back there were even rumours of houses being built on 8 Acre Coppice. This is now protected by the Ministry of Defence and Dorset County Council agreeing to it becoming a Local Nature Reserve. There is a double protection, both statutory and by the formation of a Friends Group involving the local community. Together with the owners, a Management Committee has been set up and a plan evolved with its aim to maintain and improve the biodiversity of this wood.

Work in Local Nature Reserve – 8 Acre Copse

Various management strategies have been employed including re-coppicing parts of the wood to encourage Bluebells, restricting some paths, removing Holly at the north end of the wood to improve light conditions for the lichens. Part of the wood has been left with little intervention allowing it to become more natural so that fallen trees and ivy provide good cover for nesting birds. There is a volunteer patrol of the wood in the birds' nesting season and there are two display boards educating users about its value. Perhaps this book itself will alert people to how precious and fragile Wool's natural environment is.



*Senior and junior members
of Friends Group lay overstood hazel.
February 2008.*



*Hand made Bat boxes placed by
"Friends" in an Oak tree.*

Wool Heathlands

The heaths within Wool Parish lie mostly on infertile Bagshot Beds, as do the other heaths of the Poole Basin. These also underlie the New Forest so the Poole Basin might be regarded as a western extension of the New Forest but where one comes to an area such as Wool the landscape is on a smaller scale and the heath forms a more intimate mosaic with other habitats. The Wool Heaths lie on the southern slope of the ridge between the Rivers Frome and Piddle making it a particularly hot sunny area.

Heathlands are always associated with the purple of the heather although it is only purple for about 2 months of the year. The colours of heathland in autumn can be very striking and views in the evening sunlight over the heaths can be extremely attractive.

The Purbeck heathlands are strongly associated with the novels of Thomas Hardy that include descriptions of a time when heath stretched from Bockhampton, where he was brought up, to Poole Harbour. Curiously, the Dorset Area of Outstanding Natural Beauty stops short of "Hardy's Heaths" despite the fact that they are one of the most colourful and evocative landscapes of Dorset. Hardy was mistaken about the primeval nature of the heaths, they were man made, starting with Mesolithic man clearing the trees for early agriculture about 7000 years ago, but he clearly recognised the changes to the heaths being made by man that have resulted in only 15% of the original area remaining.



Heathlands in summer: Cross Leaved Heath, Bell Heather, Ling and Dwarf Furze.

Broadly the heaths consist of three types of vegetation, dry heath, wet heath and mire. Common Heather, Bell Heather, Dwarf Gorse and Bristle Bent dominate the dry heath. Dwarf Gorse is at about its western limit on the Dorset heaths with a few locations further west where Western Gorse takes over. Among the dominant dwarf shrubs and grass are smaller herbs such as Heath Speedwell and Lousewort. Damaged areas of dry heath can be invaded by Bracken. Cross-leaved heath progressively replaces the two heathers as heathland becomes wetter and on bare patches of damp peat oblong leaved Sundew can occur. Purple Moor Grass can dominate the wet heath particularly if there have been fires or attempts at drainage, grazing is being reintroduced to restore the balance.

On the very wettest heath Purple Moor Grass grows as tall tussocks with wet runnels between making it very difficult terrain to walk over. The wettest heath or mire still has Cross-leaved Heath and Purple Moor Grass but where there is water, Bog Moss or Sphagnum occurs. Some areas have Bog Myrtle a shrub whose crushed leaves have a strong aromatic rather resinous perfume. Pools of mire can be entirely covered by bog mosses and on this mat Bog Asphodel and Round Leaved Sundew can be common. The Sundews are insectivorous plants; because nutrients for growth are low on heaths these plants catch insects with their sticky finger fringed leaves and obtain nutrients from these. The bright blue trumpets of Marsh Gentian did occur on or close to the parish boundary on Woolbridge Heath but may have been wiped out by trespassing motorcycles.



Round leaved Sundew. Found in boggy areas, these plants make up for lack of nitrogen by trapping insects in its sticky hairs and digesting them.

The complex Bagshot Beds have contrasting layers of very coarse gravel, sand and fine silt and clay. The fine layers may impede drainage that can also be impeded by minerals in the upper soil layers leaching down and forming concreted layers known as iron pans. The perched water tables created by impermeable layers are important as they create seepages that support species such as White Beaked Sedge and Bog Mosses. Elsewhere vehicles have compacted the silts and clays to create areas that hold surface water, particularly in winter and are characterised by the occurrence of short bristly Toad Rush, Shoreweed that forms a short grass like sward but is Small Plantain and the silvery leaves and yellow flowers of Marsh St John's Wort. Occasionally, where there are very wet areas over clean sand or silt colonies of the uncommon Coral Necklace occur, a plant that lies on the surface of moist sand but floats upright when it is flooded, it has very buoyant seeds that disperse locally by floating on water. Some pools in the wet heath are home to one of Britain's largest spiders, the Raft spider, which detects its prey by vibrations picked up by its front legs resting on the surface of the water and is reputedly able to catch small fish.

Remarkably, there are some areas on Wool Heath where there are typical chalk grassland plants such as Stemless Thistle, Rockrose, Restharrow and Salad Burnet. These may occur because the gravels and sands are very shallow over the underlying chalk.

Scattered across the heath around its edges are patches of Common Gorse an essential component of the habitat requirements of the Dartford Warbler, a nationally important heathland bird. Until recent mild winters, the Dartford Warbler was the only warbler to regularly stay in Britain for the winter, but they had difficulty surviving hard winters such as 1962-3 that nearly wiped out the UK population. Since then it has steadily increased so that the population of Wool Heath alone is more than the total UK population in 1963. Another bird, more often seen perching on gorse is the Stonechat, instantly recognisable from its call that sounds like two stones banged together. Gorse encroachment onto the heath has to be managed to prevent it becoming over abundant as its roots fix nitrogen and enrich the soil encouraging other invaders.

The Nightjar is perhaps one of the best known but rarely seen heathland birds. During the day it lies motionless on the ground, its mottled brown colouring making it almost invisible. It flies at dusk catching moths in its gaping bill. When displaying, it has a very characteristic flight with its wings held high. At dusk it is easily detected by its very characteristic "churring".

The heaths are not only of national importance for their birds but also for reptiles. The Smooth Snake and Sand Lizard are two of the rarest reptiles in Britain. Reptiles and amphibians are vulnerable because they cannot adapt to rapid changes imposed on the environment by humans. Bare ground in small patches amongst the heather is very important for Sand Lizards and Smooth Snakes to sunbathe on early in the day and as egg laying sites. Smooth Snakes feed on the large population of Palmate Newts and Toads that breed in pools on and around the heath.

Bare banks of firm sand are particularly important for solitary bees and wasps (ones that are not colonial) that dig burrows then stock them with pollen in the case of bees or caterpillars, flies or beetles in the case of wasps, then they lay an egg and seal the burrow. With the 85% reduction in heaths many of these and their parasites such as the Heath Bee fly have become very rare. However, the Bee Wolf an uncommon solitary wasp that preys on honeybees has become more common in the last 15 years especially on Wool Heath, perhaps as a result of recent mild winters.

The heaths abut the rich alluvial soils of the Frome watermeadows. This transition from the very fertile river meadows to the infertile gravelly soils takes place along the ancient woodland that runs in an arc from Blindman's Wood to Cranesmoor. This juxtaposition of dry sandy and gravelly soils with rich woodland and meadows forms an ideal combination for badgers, providing suitable well drained sites for setts close to rich feeding areas.

Most of the heath in Wool lies within the MoD's Bovington Training Area the remainder lies around the Winfrith site. The areas of Wool heathland that have been used for military training are often covered by disturbed raw sand and gravel soils. There are many areas where this raw soil that has been recolonised by Heather and Bell Heather, but in others plants are slow to re-grow on the fertile soil and this is often as sparse acidic grassland with lichens giving a crunchy texture underfoot. Within this grassland are patches of Heath Speedwell, Heath and Knotted Pearlwort, Common Centaury, Blue Fleabane and square stemmed St John's Wort. Some plants such as Pearlworts occur where rabbits have disturbed and enriched, the soil and where there is even more enrichment Scarlet Pimpernel occurs. These areas are frequently the preferred feeding areas for the Woodlark another of the important birds of the heaths.

The heathlands need management to maintain them and prevent their reverting to woodland but the infertile soils prevent this happening quickly. In dryer areas invasion is by Birch and Oak and in the wetter areas by Grey Willow. The natural vegetation cover of the area 7000 years ago would have been acid Oak – Birch

woodland and a few examples of this still occur on the edges of the heath, such as at the west end of 8 Acre Coppice. The planted pines also seed onto the heath and pine seedlings are now one of the most common invaders. Rhododendron also thrives in these poor acid soils and while it can be spectacularly attractive in flower it is very damaging to areas it invades smothering other vegetation and providing little benefit to our native wildlife. Conifer plantations have been established for over 50 years on nearly 90 ha (approximately 220 acres) of the heathland in Wool. This has suppressed the ground flora, however some heathland plants have survived beneath conifers and following felling, without replanting, the flora can revert to heathland but regular removal of pine seedlings is then essential management. There has been considerable clearance of trees and scrub on Wool Heath and other sites in Dorset recently under the Tomorrows Heathland Heritage project which aims to put heaths back into good condition after which less intensive management should be needed to keep them in good condition.

Fire on heathland is a constant threat especially where Common Gorse has developed a dense cover but even the wetter areas covered by Purple Moor Grass are vulnerable as at Cranesmoor in Spring 2007. Fire is very destructive to all wildlife, not only in the nesting season but at any time, as many species are incapable of escaping. Recovery from very superficial fires can be fairly quick but many fires burn into the litter layer and these can take many years to recover. Fires release nutrients that can stimulate a dense regrowth of Purple Moor Grass that can swamp the heather. Fires may also encourage increases in bracken that has deep underground rhizomes that are not killed by fires and re-grow new fronds quickly. Fire can however, stimulate the germination of heather seed so occasionally controlled burning can be used very carefully to restore very degraded heathland.

The use of the area for military training for 100 years has inevitably caused some damage though without military use the area could have been completely planted with conifers and in the absence of agriculture it is an area unaffected by agrochemicals, something unusual today. Military training has also created new or enhanced existing habitats such as the temporary and permanent ponds that have increased the biodiversity of the area and the MoD have taken care to restore many damaged areas by reseeding with heather or transplanting heather turfs. The Herpetological Conservation Trust in conjunction with the Army manages several areas of heath to create optimum conditions for the Smooth snake and Sand lizard. The Army's Bovington Conservation Committee enables conservationists to advise about any sensitive areas and species and devise practical management.

The Frome and Wool Watermeadows

England has the largest chalk river resource in Europe and the Frome is the most westerly of the larger British chalk rivers. As the Frome flows from the chalk lands of West Dorset to Purbeck and on to Poole Harbour its character changes as acid water from the heaths drains into it. The section through Wool is not only a significant area where this change takes place but it is also at the junction of the waters frequented by estuarine fish such as Sea Trout and the freshwaters inhabited by Brown Trout. But while the river itself is nationally important it is the combination of the river and its watermeadows that is of even greater importance for the biodiversity of the Wool area as a whole.

The River Frome and its associated watermeadows bisect Wool and occupy between 18% and 20% of the area of the parish.

The river vegetation is dominated by Brook Water Crowfoot a relative of the Buttercup that has feathery leaves to withstand the flow of water. In early summer its masses of white flowers stand above the water surface. Along the margins Rushes, Bur Reed, Common Reed and other tall grass and grass like plants form places where birds can nest. Bur Reed on the river margins is the food of a beautiful golden Green Reed Beetle that has declined nationally by 90% but for which the Wool section of the Frome is one of the best sites remaining in Britain.

The river has an abundant and diverse invertebrate fauna: Mayflies, Caddisflies, Damselies and Dragonflies fly above its surface, Mayflies sometimes in huge numbers, when from below trout snatch them as they land on the surface and swallows and swifts snatch them in the air above.

The lovely Banded Demoiselle with its shining, deep blue-banded wings emerges from its carnivorous aquatic nymph in May and occurs in groups among the riverside vegetation. By contrast the large Southern Aeshna Dragonfly hunts alone for Midge up and down its territory that it will defend against competition from other Dragonflies. There are many more much less visible species and these are also important as food for birds such as warblers for which watermeadows are very important areas. The Reed Warbler is lighter in colour and has a sweet musical song repeated many times unlike the Sedge Warbler which is darker and seems less shy, but it may be the scratchy "chur chur churuc" of the song that draws our eyes to it as it stands like an acrobat with its dark legs perilously clasping different reed stems. Its nest is a deep woven cup and it is a favourite host of the Cuckoo that lays a single egg in the nest that when it hatches takes over all the parents care and

feeding. Both the Reed Warbler and the Cuckoo return from Africa in the Spring and it is then the Cuckoos may be heard and if you are lucky seen, calling all day across the watermeadows.

Not only is it the birds that nest on the watermeadows that feast along the Frome but birds that nest on the heaths such as the Nightjar may come to feed too. As well as birds Daubenton's Bat, sometimes referred to as the Water Bat, feeds on Caddis Flies over water. Until recently the Frome had Crayfish but Crayfish Plague, brought by an introduced American Crayfish, wiped these out. The population of small fish is high and one of our most colourful birds the Kingfisher thrives on the Frome because of the abundant food.



Kingfisher with catch.

Indian Balsam, a plant introduced from the Himalayas, has invaded riverbanks and is still increasing. While its display of pink flowers is attractive it is displacing our native riverbank plants and encroaching onto adjacent fields. Its flowers have a mechanism that bangs down the anthers onto visiting insects and bumblebees that find the flowers very attractive, emerge covered in grey pollen, a similar explosive mechanism helps disperse the ripe seeds.

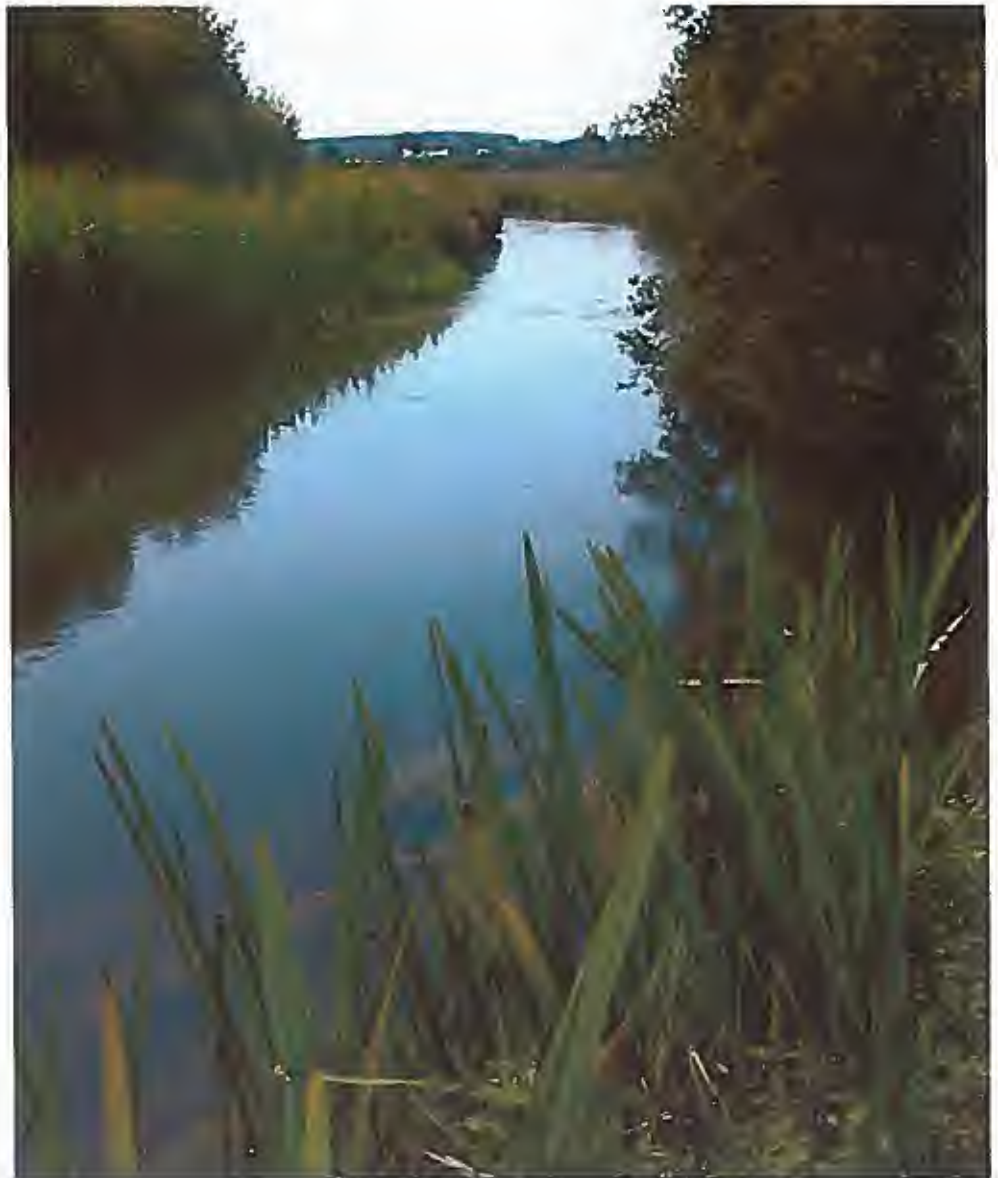
Although the Frome has been managed to control flooding, drain arable land and improve fishing it remains largely semi-natural as it meanders towards the sea. At Woolbridge flooding regularly occurs in winter, this not only brings nutrients, silt and plant debris but large numbers of seeds and invertebrates. The invertebrates are mostly small but include several larger ones such as caterpillars, slugs, snails, worms and fly larvae that are all potential food for birds.

The flood meadows on either side of the Frome are examples of meadows that have existed for centuries taking advantage of the plant nutrients brought by flooding and the high water table to grow lush grass for grazing. Some records of water management on the Piddle go back to 1600. Over the last 100 years the water management has declined and in the last 50 years drainage, ploughing and artificial fertilisers have caused a considerable decline in riverside wildlife throughout Britain, especially wading birds such as Lapwing and Snipe that formerly nested on such meadows. Artificial fertilisers can cause grass to grow tall earlier but many waders prefer to nest in shorter grass so they can see the approach of potential predators. While the watermeadows of Wool have lost their waders there are still large populations of birds. Much of the Wool watermeadows are now managed as organic farmland so helping the return of waders and other birds. Recent winter surveys already show an increase in Snipe, Widgeon, Teal, Mute Swan and Little Egret.



Uncommon Flowering Rush found recently in a survey of ditches on the watermeadows.

The water meadows still have many of the channels that were formerly used to manage the water levels and there are other drainage ditches all of which have a great variation in their vegetation depending on whether and how recently they have been managed. The Dorset Environmental Records Centre has recently surveyed the ditches in the water meadows along the Lower Frome and found notable plants including Flowering Rush and Marsh Cinquefoil. Some are completely choked others have open water.



River Frome with Burr Reed. Important for endangered leaf beetle.

Water plants such as Greater and Lesser Pond Sedge, Burr Weed, Common Reed, Reed Sweet Grass and Rushes choke ditches. This forms swamp conditions that despite the stagnant conditions are important for the larvae of Drone Flies (bee mimicking hoverflies) and Soldier Flies, Drone Fly larvae, known as Rat Tailed Maggots, have a long telescopic breathing tube that enables them to breathe direct from the air so enabling them to inhabit the most stagnant water.



Water Vole. Wool is one of the best remaining sites in Dorset.

Reed Sweet Grass both on the edges of the river and in ditches is a favourite food of the Water Vole (Ratty in the Wind in the Willows) which has declined seriously in the last 25 years but for which the Wool section of the Frome and its watermeadows are one of the best remaining sites in Dorset. Water voles make feeding platforms close to the water made of short lengths of chewed off reeds and grasses and these platforms are useful in assessing the activity of Water Voles along watercourses. Otters have also been recorded using this section of the Frome from the evidence of their spraints (droppings) under Wool Bridge, but so too have Mink which is very destructive to other wildlife especially Water Voles and ground nesting birds.

When ditches become choked they eventually become colonised by Nettles, Woody Nightshade and Great Willowherb. Cyclical maintenance to create a series from open to choked ditches is essential to maintain the greatest diversity of wildlife. When ditches need to be dredged working from one side leaving the other vegetated helps maintain the continuity of the ditch flora and fauna. Following dredging, the ditches recolonise with water plants such as Water Plantain and the bank with plants such as Brooklime and Purple Loostrike. If you are lucky Adders and Grass Snakes may be seen sunbathing on the dry bare mud beside newly dredged ditches but both of these are very shy and the Adder will slip into dense vegetation and Grass Snake into the water as soon as they are aware of visitors.



*Adder found on Heathland, water meadows and old withy beds.
Note the distinguishing "V" shaped markings.*

Part of the Purbeck Keystone Project funded by the Heritage Lottery is focussed on the management of the Frome floodplain and aims to integrate farming with encouragement of wildlife including in some places reintroducing water level management. The historic watermeadow management was labour intensive and this is now not practical so the project introducing simpler management and making scrapes to mimic the historic conditions.

Native and Naturalised Trees of Wool

Of the 35 or so British native trees, 26 are found in Wool Parish. 80% of these occur naturally. This is a noteworthy variety, particularly as some British native trees do not occur anyway in Dorset. Following is a list of what occurs, but more may be found!

Ash	Widespread
Alder	Widespread along River Frome -
Aspen	Four sites, notably along Bovington Lane.
Birch (<i>Silver/Downy</i>)	Widespread. Forms Hybrids
Box	-
Beech	Native. There are records of pollen finds in Wareham dating from 6000BC.
Black Poplar	Planted at the corner of East Burton Road in the water meadow.
Cherry (<i>Gean</i>)	Very occasional; usually planted
Elder	Widespread
Elm	Now suckering
Elm (<i>Wych</i>)	Gone from churchyard recently
Field Maple	Most frequently occurring as hedging
Hawthorn (<i>Quickthorn</i>)	Most frequently occurring as hedging
(<i>May</i>)	Most frequently occurring as hedging
Grey Poplar	Hybrid; possibly native in wet area just east of Parish boundary; other places planted .
Guelder Rose	Wet areas; hedges
Hazel	Very common and widespread in hedges and woodland
Holly	Very common and widespread in hedges and woodland
Hornbeam	Isolated trees; mainly planted as hedging
Lime	The common lime is a non-native hybrid However there are plantings of large-leaved Limes
Oak (<i>Common</i>)	Widespread
Oak (<i>Sessile</i>)	
Rowan (<i>Mountain Ash</i>)	Frequent in Bovington woodlands; regenerates well
Scots Pine	Naturalised, but not native to Southern England
Spindle	Low tree/ shrub; hedges
Whitebeam	Planted in caravan park
Willow Grey (<i>Pussy</i>)	Common; Stretch by A352 near Woolbridge

Willow Goat (<i>Sallow</i>)	Common in wet areas
Willow Crack	Along River Frome
Willow White	Belt of 20 trees north of A352 near Woolbridge
Willow Creeping	On heathland never more than half a metre (20 ins) high. Is it a tree?
Yew	Occasionally planted, but occurs naturally in some woods

Crab Apple used to grow in the hedge on Wool Playing field and a replacement has been recently planted there. Other trees commonly occurring naturally and planted are Sycamore and Sweet Chestnut. Both of these occur planted and arising naturally. However, neither are native; they were introduced. Sweet Chestnut was probably introduced by the Romans who, it is understood, made porridge with the chestnuts. Sycamore was introduced in the 13th Century. However, our oldest Oak could be 1000 years old!

The Oak is one of our commonest trees and of great importance. It provided 95% of all constructional timber up until the last century. Oak beams can be found in many of our old cottages. However, now its importance is mainly as the best tree for wildlife. 4,000 different species of plants and animals can be associated with one mature Oak. It is top of the list for lichens. Exposed sunny trunks provide a habitat for many species that are not found in woodland. Of most interest are the rare southern species, *Physcia clementi* and *Physcia tribacioides*. The latter is the rarest lichen found in the Parish and specially protected under Schedule 8 of the Wildlife and Countryside Act. Many of our largest, oldest Oaks, such as the one at the corner of Cologne Road and that further on towards Bovington on Bovington Lane at a circumference of 3.90 m (153.5"), were boundary oaks or way markers. Some marked Parish boundaries, others ownership of land such as the old worked Oaks on the back track west of Cologne Road. These showed where Frampton ownership ended to the east of Moreton. Another such Oak occurs in Bindon Lane near the farm – probably on the junction to the old track from the church. Oaks are impressive landscape trees living up to 500 years in some cases, so the most impressive Oak in the Parish at Woodstreet at a circumference of 6.44m (21 feet) making it about 250 or so years old is only middle aged! Roughly speaking measured at shoulder height the circumference of the tree in inches equals that age, although this alters with faster growing species.

The Ash is another tree forming the canopy in many of our woods, but also a frequent hedgerow tree. It is not as long lived as the Oak with a maximum of 300 years or so. The old Ash at the corner of the Old Drove off East Burton Road

measures 6.60m (21½ feet) circumference. It is a coppiced tree of years past and is in the order of 260 years old. It was heavily crown reduced in 2006 and fears were expressed, but it is surviving well and this management may actually prolong its life, making a good candidate for veteran tree status. Ashes, particularly old ones, are very good for lichens and generally for insects. Ash seed is important winter food for voles in woodlands and when there is a seedless year the population crashes and owls consequently do badly. The black hard fungi often seen on dead branches are called King Alfred's Cakes. Ash tolerates damper soils than Oak. In most of our woods it is regenerating well. Laid Ashes can be seen at the junction of Bovington Lane and the Bere Regis Road. They have also, like Oak, been widely used as construction timber in particular to support thatched roofs.

Occurring along with Oaks in our woodlands is Hazel, also a very common tree in our Parish. Hazel has been widely worked for coppice in many of our woods. Possibly it occurs naturally as it does in the Cranborne Chase, but it was probably spread by layering. That is taking a branch and laying it down and pegging it to the woodland floor. Its nuts, however, readily germinate. Indeed, if left, the writer's garden would quickly become a Hazel/Oak woodland as little Hazel trees spring up everywhere. Hazel has been used extensively for hurdle fences, thatching spars and occasionally as roofing timbers. It gets its name from Anglo-Saxon "haesel" - helmet, because of the helmet-like cup around the nut.

Though widespread in hedges and woodland, Holly is less frequent than Hazel. Sometimes it is planted but the vast majority occur naturally in hedges and woodland. There are male and female trees so there is only a 50% chance as to whether it will have berries - these are enjoyed by Blackbirds and Thrushes and winter migrants such as Redwing and Fieldfare. Often birds become very possessive of a good fruit bearer and will show other birds off. They also make good nesting and winter sheltering trees. Branches used to be cut off, low pollarding, giving winter feed for livestock. Holly often forms an understorey in our woods, as does Hawthorn and the berries here last well past Christmas, providing a good larder for birds. Woodmice often collect and store nuts inside the berries and eat out the seed by making a neat hole. Unlike Holly it favours more alkaline soils and regularly colonises open areas. It is a good germinator and grows quickly earning its name Quickthorn. It was widely used for enclosure hedges.

Yet another tree with orange/red berries is the Rowan. Its berries commonly get eaten by Thrushes and Blackbirds even before the Autumn starts. So there is a succession of fruits through from late summer to the end of the winter providing with a constant food supply. In Spring Ivy berries become available. It is this diversity of

Two Insects Dependant on Trees



*Privet Hawk Moth
caterpillars feed on Privet
and Ash.*

*Brimstone Butterfly
caterpillars feed on Alder
Buckthorn found plentiful
in Pioneer Copse Wood,
Bovington.*



food supplies that ensures successful survival. Rowan also germinates readily and grows quickly in the more acid woods of the north of the Parish. Trees that grow quickly and begin the cycle of turning open land into woods are called Pioneer species. In the case of Aspen, this means local colonisation along new trackways or openings made in woodland. This is because its reproductive success is not so much by seed as suckers from one parent plant. They are associated with ancient woods or open healthy woodland which becomes thoroughly wet in winter due to underlying clays. This is exactly the place Aspen crops up in the Parish. They grow along trackways and openings because like many Pioneers they need light. This accounts for why they grow in a line along Bovington Lane which would have been a track through woodland in times past. The stock could be the same as from hundreds of years back but, as with all pioneers, individual trees are not long lived. The rounded leaves turn golden or red in Autumn and because of the long leaf stalk or petiole, quiver in the slightest wind. This gives rise to the saying that they are like old ladies tongues! They form a beautiful margin to the road. It is a pity that in 2007 they were flailed unsympathetically and seemingly unnecessarily on the edge of this wide open road.

The Silver Birch is also a significant pioneer, particularly in the northern half of the Parish. This tree is beautiful in its spring green and graces any garden with its dainty branches and silvery white bark. It could be a good substitute for Pine for making paper pulp. It certainly burns well. It is rich in insect life of all sorts, including providing food for the Lobster Moth caterpillar mentioned in the garden section. The millions of little winged seeds from its catkins make an exceptional Pioneer, offering itself so freely as for some to dismiss it lightly by the term weed. But with its natural beauty Tennyson's "Lady of the Woods" and its wildlife rating well above that of so many trees, it should be valued. The weeds of today may be biofuels of the future. Its leaves provide food for many insects including moth caterpillars and these attract birds. Tits, especially Long-tailed Tits are happy swinging in the light branches searching for food and the Tree Creepers look for insects under the bark and use loose patches of bark to nest under. Greater Spotted Woodpeckers find the soft wood easy for boring into for food and tunnelling out deep cavities for nests. It is also rich in associated Fungi (see section on Bovington Middle School). Feeding threads from Fungi enter the roots and both benefit. The nodules formed enable Birch to get minerals from the poorest soil. The Fungi get carbohydrates made by the leaves. When the leaves fall and decay they enrich the soil.

The Scots Pine is not a native but readily colonises our heathlands and therefore is a target for removal as part of Natural England's "Tomorrows Heathland" project.

Unlike the Birch, when its needles fall, the soil can become even less available for growth of other plants, becoming more acid. However, its winged seeds are certainly enjoyed by Goldcrests and this accounts for the numbers in Pioneer Wood, Bovington.

The Sycamore is another tree that spreads seed widely, all seeming to germinate. It is not a problem generally in the Parish. They have not spread widely into our ancient woods. Indeed there are three old trees standing still in the grounds of Old Spring Field, although the finest is now gone. Nearby in the old Pound are two maturing offspring. Old Sycamores are high up in the league for associated lichens (5th in the species numbers score).

Just as in other parts of the country, Dutch Elm disease hit Wool. It was at this time that Church Lane lost some fine trees. They used also to be a feature along East Burton Road. There has been regrowth from suckers, as in East Burton near the triangle, but these appear to be the Dutch Elm hybrid as they have corky flanges on their twigs. However, this specially bred Elm proved more resistant than other species. Another line of Elm along the Bere Regis road, between the new roundabout and the road down to Woolbridge, succumbed about six years ago. The fungus blocks the water transporting tubes, that is why there is sudden death, particularly after a dry spell in Spring. The fungus is carried from tree to tree by a bark boring beetle which flies at about 7m (approximately 23 feet), so trees often survive to this height and then fall victim to the disease. Bovington is not on the rich soils Elms thrive on, so has not lost its landscape trees in the same way.

The abundance of waterways and drainage channels and seepages results in various water-loving tree species being well represented. This is particularly true for Willows which occur all over the Parish. The winter bright orangey branches of the Crack Willows are apparent in the flood plain of the River Frome, including a line of pollards. One tree growing near Woolbridge, lost a large part of it, torn away in a winter storm, showing just how suitable the name Crack is. This, along with White Willow, has long leaves. Both surfaces of the White Willow leaf are covered with long silvery hairs. A line of twenty magnificent trees line along the A352 just past the Woolbridge turn. It is the short-leaved willows that provide us with Pussy Palm at Easter. It is the male catkins – first silvery and then yellow with pollen – that give the name Pussy. They are good producers of pollen for early honey bees. The female catkins are found on a separate tree and are green. Both the Goat Willow and Sallow are found in the region of Woolbridge. Another water-loving tree that grows here, its orangey roots spreading into the river bank, is the Alder. Its pinky/purple Christmas tree shapes are easy to pick out along the river. They

are the only wide-leaved cone-bearing deciduous tree. The cones however are very small. The other deciduous tree with cones has needles. The Larch is not native but is often planted to encourage upward growth of Oaks as a nurse tree. Their bright green new needles can be spotted in Blindman's Wood, south of Bovington Lane.

Brilliant Spring green is offered by Beech trees. These are native to Dorset. Some grow naturally as in 8 Acre Coppice and Menin Wood, Bovington, but large numbers in Cole Wood have been planted. Sweet Chestnut, also occurring in Bovington where there are some fine large specimens. It is not native, however, but spreads naturally favouring poor acid soils. Bovington has many naturally occurring Yew trees of different ages in Menin Wood and there are three in 8 Acre Coppice. Yew trees have red gelatinous "fruits" that have gained the name "Snotty Gogs". The red aril is edible, but the seed poisonous. However, several birds feed on both, but it is Blackbirds and Thrushes who really prize the sticky outside. The fruit takes 2 years to ripen. Everything about Yew is slow. It grows extremely slowly, so even Yews of 1000 plus years old may not look massive. Yews are often associated with churchyards and the dark evergreen strap-shaped needles look somewhat funereal. The one in Wool churchyard lying north of the building suggests from its position that it could pre-date Christianity, but from its size this is unlikely. Its real age will only be known when it is chopped down and the annual rings counted. It is hoped this does not happen! There are 8 Yews all in the area of central Wool. Is it just chance, soil type, or is it related to the religious house of Bindon Abbey having jurisdiction in Wool? Certain it is that the Yew has Christian and pre-Christian religious significance and is a sign of immortality.

Wool does not have any record aged trees of national significance. However there are many veterans occurring mainly in the woods of the Parish. Many large trees date from 250 years ago. Maybe the awareness of need for valuable timber at that time promoted plantings or simply made trees less likely to be removed when once established. However, we do have a near record size Maple at 14.93m (49ft) high in the south of the Parish and a Rowan in the north of the Parish in 8 Acre Coppice at 17.1m (56ft) high! Wool is really noteworthy in its wide variety of naturally occurring different species.

Hedgerows

Hedges are a result of man's land management over the last 500 years. It must be emphasised that Wool is peculiar in its number of early hedges, some of which conform to Governmental criteria. Hedgerow Regulations 1997 as IMPORTANT.

Including in the criteria are such things as the number of woody species in a 30m (approximately 98 feet) stretch, the numbers of woodland plants and the proximity of a similar hedge running opposite or of historical record.

Hedges provide nesting places and shelter for wildlife and in the Autumn a natural larder of berries and nuts. They also act in much the same way as roads for a wildlife allowing movement and spread of species across open and often hostile environments. They are especially important when they link up with woods as do many of our hedges. They may contain remnants of plant life and a natural landscape long gone from the surroundings. This is why Wild Arum, Celandines and Hart's Tongue Fern still persist in the hedge across Wool Playing Field and Wild Angelica hangs on at the base of a hedge near the Black Bear in the centre of Wool and in the case of a hedge on Dorchester Road near Lampton Close.

The hedge near the Black Bear is a remnant of an old hedge resulting from the Enclosure Acts, as is the hedge on the east side of the playing fields and the belt of Hawthorns surrounding the station car park, where a woodland sedge persists. The enclosure hedges were usually planted with Hawthorn (although there is a good show of Blackthorn in the hedge opposite the Black Bear). They were created to divide up the Open Field system and parcel up land including common land. The main period for this in Wool was the late 18th Century and early 19th Century. It enabled farmers and landowners to use land more efficiently for agriculture, but many poor freeholders lost land and livelihood.

Many of our hedges pre-date the Enclosure Acts and are older field boundaries bordering "green lanes", such as the hedges either side of the lane running from Lulworth Road to New Buildings. Wool's earliest hedges date back to the 1500s. They are therefore archaeologically important. The hedge along the Parish boundary leading to New Buildings is one of these, though sadly breached at regular intervals. Another remnant of ancient hedge is found near the watercress beds and certain field boundaries east of Lulworth Road and in the area of Bindon Abbey and Bindon Farm. Perhaps our most easily visible ancient hedge lies to the north of Cowleaze, observable from the footpath which crosses from near the church. Here, a feature of many ancient hedges can be seen, a considerable change in level between the two fields it separates.

Just as biological species can give historical pedigree to woodlands, so it is with hedges – the older the hedge generally the greater numbers of woody species. The Bindon Abbey hedge has six woody species in under 30m (98ft) – Hazel, Hawthorn, Privet, Dogwood, Maple and Guelder Rose. This, along with connection to

woodland, having a parallel hedge within 15m (49ft) and a bank and ditch, gives it IMPORTANT status. Whereas Hawthorn and Hazel are a common component of our hedges, Maple is less so. Hedges with Maple are often over 400 years old. It is well represented in the hedges leading up from Woolbridge to the connection with Bere Regis road. Here Dogwood and Privet occur along with Elder, Oak, Holly, Blackthorn and Willow. However, we have to go to the edge of the Parish to find Spindle as a hedgerow component. It occurs near Broomhill Bridge on the Moreton Road. Spindle is an indicator of alkaline soil which perhaps explains its absence in the Parish generally. It is not an indicator of old hedgerows. There is a fine show where it was planted recently along the north side of Dorchester Road just past Burton Cross. It has wonderful pink berries opening to show orange-coated seeds.

Several hedges protect a range of woodland flowers, for example, the protected verge leading from the Dorchester Road to New Buildings. The stretch up to Coombe Wood shelters Hart's Tongue Fern, Shield Fern and Bluebell. Primrose, Wood Anemone, Barren Strawberry and Black Bryony can be added to this list of flowers seen in the first part of the Bindon Lane hedge. Black Bryony with its heart-shaped glossy leaves and twining strings of glossy red berries adds colour to Autumn and Winter hedges. It is very long lived and can be used to date a hedge by the size of its underground tuber, but please do not dig it up for that purpose! The Hart's Tongue is a handsome fern with its long glossy green undivided leaves and pointed tongue-like shape. The Shield Fern has wonderful coiled-up fronds in Spring making them look like a coiled caterpillar and called therefore Crozier's hooks. Wild gooseberry and Blackcurrant are found in our hedges. Greater Celandine, a small yellow poppy-like flower, produces an astringent latex which was used in removing warts. It is often associated with wise women who lived on the edges of a village, perhaps accounting for it in the hedge at the corner of Quarr Hill which would have been at the end of the village in past times. The old hedge now separated by the widening of Bovington Lane has a show of woodland flowers including Primroses and occasional Orchids in Spring. But perhaps the most lovely old hedge bank is found near Woodstreet. Here one can see old worked trees from former hedge-laying and a profusion of woodland plants, Primroses, Bluebells, Stitchwort, Common Dog Violets and the delightful woodland grass, Wood Melick. It has little hanging, almost cone-like seeds and is almost always associated with old worked banks. Butcher's Broom is an ancient woodland indicator and occurs here. Later in the season there are Foxgloves, Honeysuckle and Wild Roses in profusion all giving a real feeling of Wool in bygone days. Indeed, in this lane, one almost expects to meet with Giles Winterborne and his horse-drawn cart well loaded with

timber as described in Thomas Hardy's "The Woodlanders".

Obviously the greater the variety of plant species providing leaves for caterpillars and seed for other insects, the greater number and variety of birds attracted to them. During a hedgerow survey by the writer this was very noticeable. There was a family of Goldfinches working down the hedge towards Woolbridge from the Bere Regis road and a Chiff Chaff calling constantly. This bird migrates here each year to benefit from the insect explosion that occurs with the new growth of Spring. In Bindon Lane, Chiff Chaffs were also a feature as were a pair of Dunnocks with Buzzards calling above. Wrens, Skylarks, Swallows, Blackcaps, Goldfinches and a Sparrowhawk were all seen and heard in the hedges of the old Drove leading off west from Lulworth Road. The Sparrowhawks obviously knew a good hedge for hunting small birds. The wealth of butterflies seen, Meadow Brown, Red Admiral, Gatekeeper and Painted Lady were all evidence of a well stocked larder for small birds.

Certain it is the older the hedge the greater the wildlife value. However, even recent hedges have wildlife value, for example, for nesting. They have a more visually pleasing aspect than fences. We do have some fine recent hedges. These include the 100m (328ft) Hornbeam and Beech hedge around the Catholic School and a long Privet and Hornbeam hedge at Bovington Middle School. There are also some good Beech hedges in Bovington. Most recent is a mixed hedge planted by Dorset County Council in 2000 near the A352 roundabout east of the village and the 2km (1¼ mile approx) hedge of mainly native species planted by the Ministry of Defence. Here is a list of the relative merits of using some species:

Blackthorn	Good for food; birds and insects; stock proofing
Hawthorn	Good; birds and insects; fast growing; dense
Hazel	Good; birds and mammals; ideal for laying
Hornbeam	Good for some insects
Holly	Cover in winter; food for birds; frost tender; puts up with shade
Field Maple	Nectar for insects

There is protection for certain hedges and a statutory obligation for the District Council to decide whether a hedgerow is "IMPORTANT". If they qualify for this status a "Hedgerow Removal Notification Order" cannot be issued. Generally speaking no hedge can be removed if it is 30 years old or more without agreement of the District Council and the presentation of a "Hedgerow Removal Notification". Sadly a Mediaeval hedge in East Burton Road was removed in 2007. It adjoined

a development site for which planning permission was given. The hedgerow was removed without notification to the Parish. Later a survey based on biological species was commissioned by the developer. The hedge was deemed unimportant because of its poor condition and lack of species content. However some features such as a mature Holly tree had already been removed. The hedge was on a boundary bank and had a ditch. This could have signalled its being old and therefore alerted further enquiry. Indeed, if the Parish had been properly consulted its historical significance would have been checked out and the hedge would surely have satisfied Criterion No. 7 in the Government's list of determining "IMPORTANT" hedges. There is documentary evidence in the County Record Office of its pre-dating the Enclosure Act and being part of an old field system.

The start of hedgerow loss is downgrading where, to an untrained eye, it may appear valueless. The old worked Hollies, Ashes and Oaks of Footpath No. 10 near the Vicarage are impressive and there are remnants of woodland flora, Bluebells, Hart's Tongue Fern and Violets, but because of dumping of garden rubbish outside the garden gates of some adjoining properties, the soil has become enriched and several vigorous weeds such as Goose Grass and Dandelions have taken hold, as have some of the garden species such as Spanish Bluebells. A similar situation occurs at the back of Cologne Road alongside the track leading to the Old Shop. Here there are old Oaks denoting the boundary of the Frampton Estate dating back to the 18th Century. The trees have Tree Preservation Order protection but the woodland plants, Hart's Tongue Fern, Hard Ferns, Shield Ferns, Bluebells, Foxgloves and Redcurrant are all struggling under rubbish tipping, including old plant canes, gates, drink bottles and discarded toys. Another sad occurrence is the breaching of hedgerows at intervals. This makes them "gappy" and reduces their value. Unfortunately, this seems to have happened to many of our oldest and potentially most valuable hedges. A hedgerow may miss out on "IMPORTANT" status by being gappy. Might it be then that this is deliberate?

Proper management of hedges can make them vigorous and a good stock barrier. Hedges left untended will become hollow at the bottom and less valuable for wildlife and less stock proof. Hedges ideally should be cut every 2 or 3 years in January or early February so avoiding disturbing nesting birds. However, hedges cut on a long 5-10 year cycle and given free growth are favoured by song birds for territorial singing. The A-shaped hedge or rounded topped hedge helps to maintain compactness and a good solid base. At present there are no recent laid hedges in the Parish apart from two edging 8 Acre Coppice. One borders the back school drive and was done by the Ministry of Defence a few years ago. Just recently the Local

Nature Reserve Friends Group laid some Hazel along the edge of Cologne Road under the expert guidance of Wool's Hurdlemaker, Alan Brown and Julian Cooper, D.C.C. Senior Countryside Ranger. Apart from vandals removing stakes one night it has had a good reception. It will remove any need to slash it back in the birds nesting season in future. Hedge laying can create a wonderful wild-life rich barrier for stock, even if overstood and previously neglected.

All our hedges, even the old neglected ones, come into their own in Spring with Wild Roses and Honeysuckle rambling over them. This is why the Parish Council are so insistent that the Hawthorn hedge on the approach to the village next to the new housing development remains intact. It at least makes a statement that we are still a rural village. When all our Hawthorn hedges are in bloom in Spring, they form a significant landscape character feature, wearing white for Whitsuntide.

Wool Road Verges

It is easy to take areas of grass such as road verges for granted but they can contribute significantly to biodiversity. Most of the plants and animals of road verges are common but are still very valuable as they can be food for others, road verges may act as corridors linking other more important wildlife areas though this is difficult to demonstrate and they can be visually important creating an attractive and colourful border to sterile roads. In Spring this can be seen on many verges even into the centre of Wool where there are large carpets of shining yellow Lesser Celandines and cushions of pale cream Primroses.

Wool has just over 13k (8 miles approx) of roads of all grades outside the built up area, most have verges on both sides of the road and most have a hedgerow as well. If the average width along this 25k (15½ miles approx) is 2m (6 ½ ft) this makes about 5 hectares (12¼ acres approx) of grassland spread throughout the parish.

A considerable diversity of wildlife can exist in quite small areas of grass from small mammals such as shrews, moles and voles to vast numbers of invertebrates and a wide range of herbaceous plants. Most verges are adjacent to a hedge so that there is a combination of herbaceous and shrub vegetation that can then provide both food and nesting sites for birds. Kestrels are often seen hovering over road verges because their prey, not only small mammals but grasshoppers and other large insects, that can be abundant in rough grass.

Road verges in Wool are diverse depending on whether the soils are developed from nutrient poor sand and gravel, the well-drained chalk or the moister river plain

soils. The nutrient poor and dry soils can be the most botanically diverse because there are fewer of the large aggressive tussocky grasses or tall herbs. The nutrient rich verges have a larger number of large competitive species such as the grasses Cocksfoot and False Oat Grass and herbs such as Hogweed, Cow Parsley, Nettle, Goosegrass and close to the road Dandelion that tolerates winter salt treatment. Throughout Dorset 80-90% of road verges tend to have a high proportion of these plants of nutrient enriched soils. In Wool these plants of rank verges are less common and there are higher numbers with plants such as Knapweed, Yarrow, Wild Carrot, Square Stemmed St John's Wort and Birdsfoot Trefoil that elsewhere are present on 20% of verges.

While most plants and animals on verges are common and widespread in Wool there are some unusual, interesting and colourful species such as Common Broomrape that is parasitic mainly on clovers but also on other plants and Chicory whose bright blue flowers are particularly attractive on the verge from the Lulworth road down to Woodstreet. In some years patches of pale yellow Toadflax or Snapdragons occur to liven up verges in late summer.

Many insects found on verges are attracted by scent to flowers for their pollen and nectar. Plants such as Hogweed that smell repulsive to us are very attractive to insects particularly flies and the Common Red Soldier beetle. Beside the Lulworth road there can be very good patches of Knapweed that is particularly attractive to butterflies and bees.

Road verges are subjected to many pressures that may discourage wildlife. They may be dug up to lay pipes and cables, they may be compacted by vehicle parking, they are subject to noise and pollutants from passing vehicles and they may be mown in a way that is harmful to wildlife, just to keep them tidy.

While disturbance by digging trenches for pipes and cables is in the short term destructive it may in the longer term create areas for recolonising plants such as Teasel and Mullein that may diversify the vegetation for a few years. Buried seeds may come to the surface during digging so that a red flush of Poppies appears. Unfortunately following work on verges nutrient enriched topsoil may be brought in that contains non-local seed. This has occurred in the last 10 years just outside Wool at the corner of the C6 and Bovington Lane when the footpath was reconstructed. The verge on the corner had a diverse flora including a good population of the small orchid, Autumn Lady's Tresses, that was decimated and Pale Flax was lost by the addition of nutrient enriched topsoil containing not only seeds of agricultural weeds but crop seeds as well. Moles do some natural turning over of verge soil and create natural seedbeds for annual plants.

Flail mowers are particularly damaging because they mince up the vegetation and anything in it. This forms a mulch that smothers small low growing plants and it releases nutrients as it decomposes that encourages rank vegetation. Unfortunately removal of cut vegetation to reduce nutrients is desirable but not economic except for very special verges. The success of many insects is dependant on the availability of nectar and pollen but cutting removes the flowers and this important food resource which may be a factor contributing to the decline of Bumblebees in the countryside. Vetches, clovers and docks are important food for the larvae of many insects; larvae that feed on the leaves are very vulnerable to mowing but those that feed on the roots may survive.

A small amount of coarser vegetation on verges can be beneficial. Tussocks of Cocksfoot provide important hibernation sites for invertebrates but late season mowing can damage these, however, with Cocksfoot present on over 90% road verges in Dorset, there should always be some available for hibernation.

A few years ago along the north of the A352 from Burton Cross into Wool, now abutting the new houses being built, the Parish Council tries to establish some patches of wildflowers to enliven the verge but due to the markers being regularly removed it became indiscriminately mown and now only a few Ox-eye daisies and Red Campion remain.

Some Gardens of The Parish

A lot of people have chosen to live in Wool because it is a rural Parish. This means that gardens are often a reasonable size and abut wilder areas. If the gardens have plenty of shrubs and trees, possibly a pond and are not too manicured, this can result in a wealth of wildlife being recorded on the doorstep.

Birds are possibly highest on the list of records, but one person has a regular fox visitor, from the wood opposite where they live, which enjoys a nightly feed of Complete dog food and one night showed itself to be a true European by enjoying a spaghetti meal! The delight of seeing two Sika deer rutting with onlooking females may be offset by incursions on roses! Hedgehogs are common in many gardens in this Parish as are the not so welcome moles looking for patches of drier ground to burrow in. Bats roost in some roof spaces in Cologne Road, including the Brown Long-eared bat. Recently a badger appeared on someone's doorstep one night, so perhaps we will get them in 8 Acre Coppice in the future. Many gardens all over this Parish have Slow worms and unfortunately these are selected by at least one domestic cat who brings them in regularly. Slow worms are legless lizards and are

a protected species. Grass snakes are a feature of gardens where there are large ponds. Seeing them doing their zigzag movements swiftly through the water is a strange sight. However, one resident had a grim view of one that polished off all the newts in their pond. Luckily this did not happen in the pond in the village where rare Great Crested newts occur, along with the much commoner Palmate and Smooth newts. Yet another resident was terrified by the large animal up to 120cm (4ft), coiled up in a cavity of their pond wall. A picture showing the yellowish underhead and lack of V markings down the body finally convinced them that it was a harmless Grass snake, not an Adder and saved its life! Adders do occur on sunny dry banks of gardens, particularly in the north of the parish. Usually they slip away at the first sign of human approach. All British reptiles are protected under the Wildlife and Countryside Act. It is illegal to kill them.

The Wool stream running through the village introduces even more rarities into the centre of the village. On one occasion a resident sitting at home observed a Water Rail, with its distinctive red curved bill and slate grey underparts, walking along on its long legs carefully lifting its large feet out of the water. Reports have been made of Water vole both in Wool and Bovington streams which run through some gardens. The Bovington stream has Stoneloach, Minnows and Eels in it, so it is used occasionally by Kingfishers. The strange loud hard call of "cheekee", usually only performed two or three times followed by an electric blue flash above the stream, is magic. However, when Kingfishers and a Grey Heron visit fish ponds in the area they are not always so welcome. Although in the garden of one keen naturalist a pond is stocked to encourage visits and in yet another, a perching post is erected across the pond. In this garden frogs, Grass snakes, House Sparrows, Bullfinches, Siskins, 20 at a time, Goldfinches, Willow Warblers, Bramblings are all seen. Insects include the dramatic Convolvulus Hawk moth, photographed by the delighted observer, plus Golden Ringed dragonflies and Four-spotted Chaser Dragonfly. The two latter species are visitors from boggy heathland behind the property. A third boggy heathland species is added to the list in a garden not far away – the Keeled Skimmer. This has a wide flat abdomen and the male is coloured Air Force blue.

Also in this garden, Goldcrests visit along with frequent other woodland birds, including Nuthatches, Tree Creepers and Long-tailed Tits. These, because of their black and white back markings look almost like miniature Zebras but with lovely pinky buff fronts. They particularly like to swing on the very lightest Silver Birch twigs. A pair of Marsh Tits have visited regularly for 2 or 3 years. Generally their numbers are declining and are on the Red Alert list of BTO. This year there were

two pairs. Perhaps this is due to selective peanut feeding, they actually come for individually thrown nuts! Fine grated peanuts and porridge encourage small birds, rather than the ubiquitous Chaffinches where there are always hangers-on, never a solitary pair. Thrushes also enjoy porridge, perhaps it is rather like snails! However a few doors away they come to crumbled brown bread. This is much better for birds than white bread. Here Greater-spotted Woodpeckers come daily, but not into the other woodland garden. It really seems that species select gardens according to their own particular preferences. Over feeding can not only result in spreading disease but also increase the numbers of birds of the bolder and more common species, leading to a decline in variety of species. Bullfinches will of course come to eat buds of apple trees. Fruit filled gardens are less common these days which may have led to their decline. So when recently the wonderful cheery pink and black male was spotted consuming forsythia buds in the garden, it was counted as a bonus. Normally a pair visit every Spring to eat Forget-me-not seeds. An old oak tree in a garden attracted a Spotted Flycatcher to nest in a fork of its branches. The owner sat beneath it for a week without knowing it was there. However, once the young started chirping, the cat also discovered then and despite desperate fencing efforts and although the youngsters flew, the parents obviously felt it was a stressful season and did not take up residence again. Attention from a Grey squirrel did not help. They will take eggs and young from nests. The same oak tree acts as a calling post for Tawny owls, with the "twit" often being answered by a "twoo" from the wood opposite.

Many Cologne Road residents look forward to June to hear the strange "brrrr" of the Nightjar and actually see it resting in the trees, although it breeds on the heath. This year it flew in from Africa in April (2007). Climate change will affect even our garden wildlife and a male and female Blackcap (female chestnut cap) are seen even in winter visiting a bird table in Bovington so, although normally a migrant arriving from Africa in March, they were obviously over-wintering. This garden has 18 different species of birds visiting every day with 12 more coming occasionally, including Sparrow Hawks and Jays which seem to be on the increase. Perhaps this is due to the way our smaller birds are surviving better in winter or due to a boost in numbers of small bird species such as Blue Tits which can produce 12 eggs in one clutch!

A garden in the south of the village reports Green Woodpeckers, Fieldfare and Yellow Wagtail, a water-loving species. Also Swallows and House Martins are frequently recorded. These are reported from several houses, mainly south of the River Frome that they obviously use as good insect hunting habitat. However,

declines in Swallows and House Martins may be partly due to use of plastic soffits and eaves. Martins nest in the eaves of a house in Chalk Pit Lane and Swallows nest in the porch of the House of God, Holy Rood and occasionally attend services!

Every garden should have a toad. They eat slugs amongst other things and therefore save on other deterrents, some of which are bad for wildlife. Many gardens in Wool are proud possessors. One toad insists on positioning itself on the front door step, occasionally shocking unprepared visitors. They possibly get a bonus from insects attracted to an outside lamp.

Many moths have been recorded on a light trap here. Over 90 in all have been listed visiting one garden. Unlike lichens they have English names and wonderful ones at that. Often they are descriptive as in Small Emerald, the Magpie moth and the Yellow Tail. The latter feeds on Hawthorn in the garden as does the large orange/brown Oak Eggar. Many feed on trees, particularly Sallow, such as the Chocolate Tip and the Sallow Kitten. Keeping feline, the furry-looking Puss Moth is yet another Willow feeder. The Privet Hawk moth is a very dramatic one both in the adult, when it has pink stripes on the abdomen and hind wings and the caterpillar, which is bright green with purple and white stripes. Other wonderful names include Maiden's Blush with pink smudges on the wings and the setaceous Hebrew character with writing-like squiggles. The Grey Dagger also has its dagger feature as does the Double Kidney with two kidneys on each wing. This is also a Willow feeder and is a nationally notable species, as is the Festoon. The Broad-bordered Bee Hawk feeds on honeysuckle and looks rather like a bee. Perhaps the most curious name is the Uncertain! The best named is the Lobster Moth but here it is not the adult which earns its name but the caterpillar which, when it nearly fell in an early morning teacup taken al fresco by the writer, gave quite a shock as it really does look like a lobster, although more the size of a prawn!

In Spring it is good to be able to record first sightings of the large lemon-yellow Brimstone butterfly or the small Holly Blue or medium-sized Orange Tip. One waits for Autumn to see Commas visiting fallen fruit in large numbers along with Hornets, gentle giants compared to Wasps. The Orange Tip lays its orange eggs on Cuckoo flowers, also named Lady's Smock, for a food plant for their caterpillars. (We can use the leaves as a substitute for cress in egg and cress sandwiches). One garden, along with others left semi-wild to the north of Cologne Road, acts as a veritable nature reserve. The untreated grass only cut occasionally produces Cuckoo flowers. A variety of birds are found in this garden, including Wrens, which love hedges especially when not too frequently cut and Green Woodpeckers that enjoy rough grass looking for ants. One lawn also in the area on drier soil is blue with the

Common Dog Violet in Spring. This elderly lady enjoys counting and watching the numerous Bumble bees that visit her Lavender bush. Another elderly lady has her garden transformed in the Autumn. A picture book view appears of a ring of the red-spotted toadstool, the Fly Agaric. This fungus is linked with Silver Birch trees that occur in this garden. Two other trees, the Holly and the Alder Buckthorn, both trees of wetter areas, are food plants for the butterflies mentioned above. Holly for the Holly Blue and Alder Buckthorn for the Brimstone. Unusual plants spotted in gardens include Broad-leaved Helleborine and in one greenhouse, the Common Earth Star fungus appeared.

Other Wildlife Sites

Other specially important or interesting wildlife sites in Wool are as follows: organic farmland, scrubland, Bovington Middle School grounds, the Watercress Beds and the Old Withy Beds.

ORGANIC FARMLANDS.

Much of the agricultural land in the Parish is farmed organically. Robert Hyde's farmland was registered in 1991 as part of the River Countryside Stewardship Scheme. The land is kept free of pesticides and fertilisers and is therefore providing the kind of farmland habitat largely gone from England today, a farm landscape rich in species. The field edges have a wealth of wildflowers such as Corn Marigolds, Centaury, Poppies and Heartsease. Apparently sheep can safely eat Ragwort, although this may be less tolerated on farmland these days. It is seriously harmful to horses.

50-60 Lapwing (one of the casualties of present day farming methods) were recorded in February 2008 in one field. The hedges, infrequently cut, are left with natural top growth. Cutting is done in February, before nesting, so benefiting a wealth of small birds. Corn Buntings, Goldfinches, Yellowhammers and Skylarks are found throughout the farmland. Snipe and Partridges run along the ground and Sparrowhawks and Buzzards are seen frequently overhead. Fieldfares are regular winter visitors. Badgers, Foxes, Moles, Toads and Frogs are frequently either seen or leave traces, such as the musky smell of the Fox. The farmer records seeing Hares boxing nearly every year in the area of New Buildings and took great pleasure in viewing a family of Roe Deer with mother and twin fawns at very close quarters. This is sustainable farming.

SCRUBLAND

This is sadly underrated in our tidy-minded society. The decline in Cuckoos may well be due to the loss of just this sort of habitat since it results in a reduction in the number of "host" birds such as summer warblers, eg Whitethroat and the resident Dunnock. A recent survey of Wool's hedges revealed one particular area of scrub containing a veritable birds crèche. This was the wasteland near the old Ministry of Defence Forester's Store and east of Bovington Farm. Here family groups of Chiff Chaffs, Goldfinches, Blackcaps were moving around constantly calling. A Goldcrest family was stationed in the large Pine here. The many adjoining hedges provide ideal nesting places.

THE OLD WATERCRESS BEDS

Here, feeding on the seeds of rushes are Reed Buntings, Bullfinches and Goldfinches. Lesser and Common Whitethroats have been recorded in this area, as have Kestrels, Buzzards and Sparrowhawks, all the latter aware of a good place for finding a meal.

THE WITHTY BEDS

Out beyond Cowleaze to the east of the Parish is an area of Willows thriving on seepages which in the past were cut for making baskets. This is a remnant of ancient woodland with Wood Anemones and Bluebells. It is a favourite haunt of Adders, beware! They probably feed on numerous newts in the wetter areas whilst basking on the drier wood banks.

BOVINGTON MIDDLE SCHOOL GROUNDS

This area provides the parkland not found elsewhere. The wide areas of cut grass are often used by Thrushes and Blackbirds, providing ample supplies of worms. Worms are also fed on by many moles who like digging in the sandy but rich light soil. This soil is also ideal for ants, including Yellow Meadow ants and small Black ants and hence pupils at the school can often look out of a window and spot the lime green and red of Green Woodpeckers that regularly probe the anthills and eat the ants, which they extract with long sticky tongues. The rough areas of grass are full of voles, good hunting ground for Tawny Owls from the adjoining wood. There are mature Beech trees. The school grounds were planted at some stage with a variety of trees including several non-natives. There is a Tulip Tree with its strangely beautiful green flowers which come as a surprise every so often and a spectacular non-native

Judas Tree covered in rich pink flowers in Spring, a Quince and a row of Italian Poplars. In all there are thirty mature Birches. These probably are not planted in the main. They reach good heights such as the lovely tree outside the dining hall. They are almost certainly hybrids, which gives them greater longevity. A semi-wild area where several young trees have self-seeded may provide a reservoir for replanting of a tree eminently suitable for school grounds as it is not liable to drop heavy limbs. The bark attracts Tree Creepers whereas the roots provide an amazing number of Fungi including Fly Agaric, the Panther Cap and False Death Cap with its yellow cap and smell of potatoes all of which are associated with Beech, whereas other Agarics, including the Blusher, Tawny Grisette and olive green coloured Death Cap are found with Oaks and other deciduous trees. The list is long, including many Brittle Caps and Wax Gills. There is a huge swathe of brambles in one area. In late summer and autumn it is thick with Blackberries, attracting Red Admirals and Commas which feed on the fruit. It is also a good area for birds' nests.

A few years back a pond was dug and earlier still, a stretch of native trees planted, such as Wild Cherries, Lime trees, Maples and a Guelder Rose, all now fruiting. There is also a small Tree Nursery now used in conjunction with a feeder school in Wool. Children in the First School years visit from Wool, collect and plant seeds, later placing them in a Tree Nursery prior to planting them out to create new woodland in the area at the culmination of their last year at First School. When the pupils arrive at the Middle School their own tree has preceded them! This is an entirely new project launched in Dorset by the International Tree Foundation.

Lost From Wool



Left: Autumn Ladies Tresses Orchid. 30 were recorded on the verge at the junction of C6 and Bowington Lane but lost in providing a cycle path.

Right: Bog Gentian. Lost from Heathland due to damage by motorbikes.

Conclusion

From the account of Wool wildlife it should be clear how important interconnections between different species are to allow feeding and breeding. Also clear is the importance of abutting habitats, with often quite different animal and plant communities and the linking by wildlife corridors of one habitat with another, allowing for migration and therefore viable reproductive populations of species. Wool at present is still an amazing mix of habitat mosaics. If any of these links between species are severed, it will result in decline of its extremely rich biodiversity, our natural heritage. This heritage includes, north of the Frome, an area not unlike the New Forest with similar natural drainage and ancient woodland abutting heathland. South of the Frome is an area rich in ancient working landscapes including the River Frome itself and the water meadows. It is a record of real local sustainability from the past. This outstanding juxtaposition in one Parish should be jealously guarded and handed on in as complete a way as possible to succeeding generations.

We would welcome hearing of more finds as would the Dorset Environmental Records Centre, based at Dorchester Library. Wildlife evolves and changes occur all the time with some losses but also with new sightings. Perhaps with more information coming in and with global warming, in a few years time this account of the wildlife of Wool will need updating.

Acknowledgements

We are very grateful to many people who have provided us with information to compile this account. These include: Bryan Edwards of Dorset Environmental Records Centre, Sharron Abbott of Dorset Wildlife Trust and Judith Baker Purbeck Keystone Biodiversity Officer. We are also very grateful to Barry Pearson and Ann Horsefall for allowing us to use some of their photographs. We are very grateful to the Army at Bovington for access to the ranges to study their wildlife and particularly to George Preston, John Lodge and David Goddard.

We are particularly grateful to Jane Pearson who kindly typed some of the text and Heather Wheeler and Bridget Carter who made helpful comments and suggestions.

Rachel Palmer and Dr Tony Warne.

Books Consulted

- Mabey, R. *Flora Britannica*
 Clapham, Tutin and Moore. *Flora of the British Isles*
 Stace, C. *New Flora of the British Isles*
 Rose, F. Revised O'Reilly, C. *The Wildflower Key*
 Rackham, O. *Ancient Woodland*
 Rackham O. *Trees and Woods in the British Landscape*
 Halliday, F.E. *A Concise History of England*
 Marran, P. *Britain's Ancient Woodland Heritage*
 Milner, J.E. *The Tree Book*
Ordnance Survey 1st Edition Map

Legislation

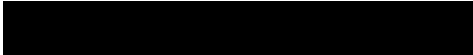
- Hedgerow Regulations 1997*
Wildlife and Countryside Act 1981

Glossary

- | | |
|--------------------|---|
| Nationally Notable | Recorded from 16-100 10km (16 mile) squares in Britain. |
| Red Data Book | Recorded from less than 15 10km (16mile) square in Britain. |
| Red Alert | Decline of 50% or more in the last 25 years. |
| Amber Alert | Decline of 25-50% in the last 25 years. |
| Native | Arrived naturally in Britain after the last Ice Age |
| Hybrid | A cross between two different species or varieties. |
| Aril | A fleshy outgrowth of the seed. |
| Habitat mosaic | A variety of small adjoining habitats. |
| Suckers | Underground stems connected to a parent plant. |
| Hydrological | Relating to water. |
| Enrichment | Increased levels of mineral salts particularly Nitrogen, Phosphorous and Potassium. |



Comment

Consultee	Ms Maria Clarke (1012137)
Email Address	
Company / Organisation	Dorset LNP
Address	Brocklands Farm Forston Dorchester DT4 7AA
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dorset LNP (Ms Maria Clarke - 1012137)
Comment ID	PLPP361
Response Date	03/12/18 14:39
Consultation Point	Chapter 1: Introduction (View)
Status	Processed
Submission Type	Web
Version	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? Para 8-11

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

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)

DNLP recommends that the DLNP's *Vision and Strategy*[1] (2014), is included within the Local Plan evidence base.

[1] www.dorsetlnp.org.uk/Dorset_LNP_Vision_and_Strategy

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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 Maria Clarke (1012137)
Email Address	[REDACTED]
Company / Organisation	Dorset LNP
Address	Brocklands Farm Forston Dorchester DT4 7AA
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dorset LNP (Ms Maria Clarke - 1012137)
Comment ID	PLPP362
Response Date	03/12/18 14:39
Consultation Point	Chapter 2: Vision and objectives (View)
Status	Processed
Submission Type	Web
Version	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? Vision

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

Do you consider that the Local Plan is sound? Yes

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)

DLNP welcomes the vision but recommends that *'The natural and historic assets of the area will be protected and enhanced'*. This is in line with the objectives set out in the local plan as well as the NPPFs aim of securing net gains (NPPF para 8).

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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 Maria Clarke (1012137)
Email Address	[REDACTED]
Company / Organisation	Dorset LNP
Address	Brocklands Farm Forston Dorchester DT4 7AA
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dorset LNP (Ms Maria Clarke - 1012137)
Comment ID	PLPP363
Response Date	03/12/18 14:39
Consultation Point	Objectives (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	Yes

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? Para 39

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

Do you consider that the Local Plan is sound? Yes

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)

DLNP welcomes the environmental objectives set out in paragraph 39 but recommends that climate change mitigation is more clearly referenced as set out in NPPF Strategic policies (NPPF para 20.d) and the references in the local plan para 66.

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Comment

Consultee	Ms Maria Clarke (1012137)
Email Address	[REDACTED]
Company / Organisation	Dorset LNP
Address	Brocklands Farm Forston Dorchester DT4 7AA
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dorset LNP (Ms Maria Clarke - 1012137)
Comment ID	PLPP364
Response Date	03/12/18 14:40
Consultation Point	The green belt (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	Yes

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?	Para 47
Do you consider that the Local Plan is legally compliant?	Yes
Do you consider that the Local Plan is sound?	Yes

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)

Para 47: the second bullet point references there are limited brownfield sites in the district and while DLNP support the use of brownfield sites, a reference here (or elsewhere in the document) should

note that brownfield sites may have a high environmental value and therefore an environmental assessment should be undertaken.

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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 Maria Clarke (1012137)
Email Address	[REDACTED]
Company / Organisation	Dorset LNP
Address	Brocklands Farm Forston Dorchester DT4 7AA
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dorset LNP (Ms Maria Clarke - 1012137)
Comment ID	PLPP365
Response Date	03/12/18 14:40
Consultation Point	Chapter 3: Environment (View)
Status	Processed
Submission Type	Web
Version	0.2
Are you responding on behalf of a group?	Yes

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? Para 49-50

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

Do you consider that the Local Plan is sound? Yes

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)

DLNP requests that Dorset Local Nature Partnership is referenced within Environment chapter introduction. Dorset Local Enterprise Partnership and Dorset Health and Wellbeing Board are included

within their relevant chapters – DLNP is the equivalent partnership for the environment and NPPF para 25 states: ‘Strategic policy-making authorities should collaborate to identify the relevant strategic matters which they need to address in their plans. They should also engage with their local communities and relevant bodies including Local Enterprise Partnerships, Local Nature Partnerships...’

To reiterate DLNP’s submission to the Partial Review Consultation in August 2016:

The DLNP has also published a Natural Capital Investment Strategy[1] in April 2016. This sets out the principle that development can be achieved by taking a natural capital approach (ensuring there is a net gain in natural capital) to increase the quality of Dorset’s assets and make them more resilient. In particular the Natural Capital Investment Strategy makes the following recommendations:

- 1 *That all projects in Dorset seeking LEP and Dorset Growth Board funding, or planning permission from local authorities to develop, should quantify either their impacts on the natural environment or their use of environmental services.*
- 2 *That all development projects increase Dorset’s Natural Capital by ensuring a net gain for the natural environment and/or increase in the natural resource asset base. There are several established methods to achieve this (see section 6).*
- 3 *That development projects in Dorset are planned in a way that integrates economic, environmental and social goals (as being championed by the Resilient Dorset collaboration).*

We therefore request that reference is made to the Natural Capital Investment Strategy and the DLNP Ecological Network Maps[2] (produced by Dorset Environmental Record Centre) as set out in NPPF para 174: ‘To protect and enhance biodiversity and geodiversity, plans should: a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.’

Reference should also be made to the Government’s 25 Year Environment Plan (25YEP)[3] published in January 2018 – Chapter 1 of the 25YEP states the aim: ‘Embed an ‘environmental net gain’ principle for development, including housing and infrastructure.’

Para 50.d: Clearer reference to climate change mitigation should be made in this sentence as set out in NPPF Strategic policies (NPPF para 20.d).

[1] www.dorsetlnp.org.uk/Natural_Capital_Investment_Strategy

[2] www.dorsetlnp.org.uk/ecological_networks

[3] www.gov.uk/government/publications/25-year-environment-plan

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Comment

Consultee	Ms Maria Clarke (1012137)
Email Address	[REDACTED]
Company / Organisation	Dorset LNP
Address	Brocklands Farm Forston Dorchester DT4 7AA
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dorset LNP (Ms Maria Clarke - 1012137)
Comment ID	PLPP366
Response Date	03/12/18 14:40
Consultation Point	Climate change (View)
Status	Processed
Submission Type	Web
Version	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? Para 65-67

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

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)

Para 65: we welcome this reference to climate change mitigation in this paragraph but feel more details should be included, for example references opportunities for energy efficiency.

Para 66: while this paragraph states that the local plan: *'seeks to ensure the needs for growth in Purbeck are managed to reflect the potential impacts of climate change and to support and encourage measures that would assist in climate change mitigation'* there is limited references to energy efficiency (see comment on Policy E12).

Para 67: Energy efficiency needs to be strengthened in this paragraph with new build maximising opportunities for energy efficiency measures. This may be covered as part of building regulations, but local plans have the opportunity to include higher standards for energy efficiency. See comment on Policy E12.

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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 Maria Clarke (1012137)
Email Address	[REDACTED]
Company / Organisation	Dorset LNP
Address	Brocklands Farm Forston Dorchester DT4 7AA
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dorset LNP (Ms Maria Clarke - 1012137)
Comment ID	PLPP367
Response Date	03/12/18 14:40
Consultation Point	Policy E3: Renewable energy (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	Yes

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 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

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)

Policy E3: Renewable Energy – we query the phrase ‘impact on the integrity of the protected sites’ and seek clarity on what this means – we would expect the policy to refuse permission if there were adverse ecological impacts on protected sites and non-protected sites following an avoid, mitigate, compensate approach as set out in the Dorset Biodiversity Protocol. We also query the reasoning on including ‘*unless there is no alternative solution and there are imperative reasons of overriding public interest*’ related to ecological impacts. This weakens the policy and gives an easy get out clause for developers to argue that there are no other alternatives.

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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 Maria Clarke (1012137)
Email Address	[REDACTED]
Company / Organisation	Dorset LNP
Address	Brocklands Farm Forston Dorchester DT4 7AA
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dorset LNP (Ms Maria Clarke - 1012137)
Comment ID	PLPP368
Response Date	03/12/18 14:41
Consultation Point	Policy E4: Assessing flood risk (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	Yes

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 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

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)

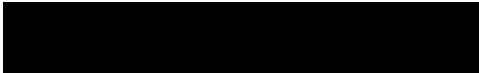
Policy E4: Assessing flood risk – we recommend the inclusion of seeking natural flood management options to reduce flood risk.

(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

Consultee	Ms Maria Clarke (1012137)
Email Address	
Company / Organisation	Dorset LNP
Address	Brocklands Farm Forston Dorchester DT4 7AA
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dorset LNP (Ms Maria Clarke - 1012137)
Comment ID	PLPP369
Response Date	03/12/18 14:41
Consultation Point	Sustainable drainage systems (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	Yes

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?	Para 73
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

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)

Para 73: we support the inclusion of the wildlife and amenity benefits but recommend cross referencing to the Policy I3: Green infrastructure, trees and hedgerows.

(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 Maria Clarke (1012137)
Email Address	[REDACTED]
Company / Organisation	Dorset LNP
Address	Brocklands Farm Forston Dorchester DT4 7AA
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dorset LNP (Ms Maria Clarke - 1012137)
Comment ID	PLPP370
Response Date	03/12/18 14:41
Consultation Point	Policy E5: Sustainable drainage systems (SuDs) (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	Yes
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 E5
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

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)

Policy E5: SuDs – we welcome the policy on SuDs but recommend opportunities for natural flood management are included.

(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 Maria Clarke (1012137)
Email Address	[REDACTED]
Company / Organisation	Dorset LNP
Address	Brocklands Farm Forston Dorchester DT4 7AA
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dorset LNP (Ms Maria Clarke - 1012137)
Comment ID	PLPP372
Response Date	03/12/18 14:41
Consultation Point	Conserve and enhance Purbeck's natural habitat, biodiverse and geodiversity (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	Yes
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?	Para 80
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

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)

Para 80: Reference to the Dorset Biodiversity Protocol should be made here (or para 96) including the avoid, mitigate, compensate hierarchy which should be followed on all development.[1]

[1]

www.dorsetforyou.gov.uk/countryside-coast-parks/countryside-management/biodiversity/biodiversity-appraisal-in-dorset.


(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at 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 Maria Clarke (1012137)
Email Address	
Company / Organisation	Dorset LNP
Address	Brocklands Farm Forston Dorchester DT4 7AA
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dorset LNP (Ms Maria Clarke - 1012137)
Comment ID	PLPP373
Response Date	03/12/18 14:41
Consultation Point	Local biodiversity and geodiversity (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	Yes
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?	Para 96
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

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)

Para 96: we recommend reference to the Dorset Ecological Networks Maps are included here.

(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)

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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 Maria Clarke (1012137)
Email Address	[REDACTED]
Company / Organisation	Dorset LNP
Address	Brocklands Farm Forston Dorchester DT4 7AA
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dorset LNP (Ms Maria Clarke - 1012137)
Comment ID	PLPP374
Response Date	03/12/18 14:42
Consultation Point	Policy E10: Biodiversity and geodiversity (View)
Status	Processed
Submission Type	Web
Version	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?	Policy E10
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

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)

Policy E10: Biodiversity and geodiversity – while we support this policy in principle, as it stands opportunities for enhancement will only be sought where development ‘*affect biodiversity and*

geodiversity, and any sites containing priority species and habitats as well as those of local importance, including Sites of Nature Conservation Interest (SNCI), Local Nature Reserves (LNR), Ancient Woodland, and veteran trees. This policy should be strengthened, and environmental and biodiversity net gain should be sought on all development whether or not the development will impact existing biodiversity (in line with the net gain approach as set out in NPPF and the 25 Year Environment 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)

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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 Maria Clarke (1012137)
Email Address	[REDACTED]
Company / Organisation	Dorset LNP
Address	Brocklands Farm Forston Dorchester DT4 7AA
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dorset LNP (Ms Maria Clarke - 1012137)
Comment ID	PLPP375
Response Date	03/12/18 14:42
Consultation Point	Policy E12: Design (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	Yes

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 E12
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

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)

Policy E12: Design

- 1 we recommend that all develop should support and promote sustainable mode of transformation, stating 'where appropriate' weakens the policy and a clearer guide for reducing carbon emissions is needed.
- 2 'and enhance' biodiversity should be added.
- 3 we recommend reference to the adverse impacts of artificial lighting on wildlife (e.g. bats) and not just on local amenity[1].
- 4 energy efficiency should either be emphasised more in this policy or a specific policy should be added to incorporate design elements such as:
 - 1 the orientation and design of the development to reduce the need for heating, artificial light, and cooling and maximises solar gain
 - 2 the design, construction method and materials to achieve an energy efficient building
 In addition, reducing other resource consumption e.g. water / materials and air pollution should also be added to point g.

The 25YEP states: '*High environmental standards for all new builds. New homes will be built in a way that reduces demands for water, energy and material resources, improves flood resilience, minimises overheating and encourages walking and cycling. Resilient buildings and infrastructure will more readily adapt to a changing climate*' (25YEP page 35).

[1] www.gov.uk/guidance/light-pollution#possible-ecological-impact and www.britastro.org/dark-skies/cfds_environment.php?topic=wildlife

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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 Maria Clarke (1012137)
Email Address	[REDACTED]
Company / Organisation	Dorset LNP
Address	Brocklands Farm Forston Dorchester DT4 7AA
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dorset LNP (Ms Maria Clarke - 1012137)
Comment ID	PLPP376
Response Date	03/12/18 14:42
Consultation Point	Green infrastructure, recreation and sports facilities (View)
Status	Processed
Submission Type	Web
Version	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? Para 247-249

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

Do you consider that the Local Plan is sound? Yes

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)

Para 247: 'Where possible' should be removed from this paragraph. The default position should be that all open space and green infrastructure will be multi-functional in some way. Greater reference to the multi-functional benefits of Green Infrastructure should be included. The Landscape Institute's Position Statement *Green Infrastructure An integrated approach to land use*[1] is a useful document.

Para 248: We welcome reference that Green Infrastructure has on physical and mental wellbeing but there is increasing evidence[2] that this is not just because of physical activity. For example, evidence demonstrates that

spending time in nature-rich spaces reduces stresses and anxiety, reduces blood pressure and are calming spaces so recommend that 'and connection to nature' is added to the end of this paragraph.

Para 249: DLNP is keen to continue our involvement in the development of the Green Infrastructure Strategy. We also recommend linking the green infrastructure section of the Local Plan to Policy E5: SuDs.

[1]

www.landscapeinstitute.org/wp-content/uploads/2016/03/Green-Infrastructure_an-integrated-approach-to-land-use.pdf

[2] For example:

https://www.wildlifetrusts.org/sites/default/files/2018-05/r1_literature_review_wellbeing_benefits_of_wild_places_lres.pdf
and https://beyondgreenspace.files.wordpress.com/2018/09/health-and-the-natural-environment_full-report.pdf

(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 Catherine Bonnett (1190339)
Email Address	[REDACTED]
Company / Organisation	Dorset Local Enterprise Partnership
Address	6th Floor, Poole House Talbot Campus Poole BH12 5BB
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dorset Local Enterprise Partnership (Ms Catherine Bonnett - 1190339)
Comment ID	PLPP586
Response Date	03/12/18 11:29
Consultation Point	Policies List (View)
Status	Processed
Submission Type	Letter
Version	0.6
Files	dorsetLEP-1190339.pdf

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? Many

Comment

Consultee	Ms Catherine Bonnett (1190339)
Email Address	[REDACTED]
Company / Organisation	Dorset Local Enterprise Partnership
Address	6th Floor, Poole House Talbot Campus Poole BH12 5BB
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dorset Local Enterprise Partnership (Ms Catherine Bonnett - 1190339)
Comment ID	PLPP765
Response Date	03/12/18 11:29
Consultation Point	Chapter 2: Vision and objectives (View)
Status	Processed
Submission Type	Letter
Version	0.4
Files	dorsetLEP-1190339.pdf
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:	<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
Which policy / paragraph number / policies map does your comment relate to?	Many
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

Comment

Consultee	Ms Catherine Bonnett (1190339)
Email Address	[REDACTED]
Company / Organisation	Dorset Local Enterprise Partnership
Address	6th Floor, Poole House Talbot Campus Poole BH12 5BB
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dorset Local Enterprise Partnership (Ms Catherine Bonnett - 1190339)
Comment ID	PLPP766
Response Date	03/12/18 11:29
Consultation Point	Policy H1: Local housing requirement (View)
Status	Processed
Submission Type	Letter
Version	0.1
Files	dorsetLEP-1190339.pdf
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:	<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
Which policy / paragraph number / policies map does your comment relate to?	Many
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


Comment

Consultee	Ms Catherine Bonnett (1190339)
Email Address	[REDACTED]
Company / Organisation	Dorset Local Enterprise Partnership
Address	6th Floor, Poole House Talbot Campus Poole BH12 5BB
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dorset Local Enterprise Partnership (Ms Catherine Bonnett - 1190339)
Comment ID	PLPP767
Response Date	03/12/18 11:29
Consultation Point	Policy E3: Renewable energy (View)
Status	Processed
Submission Type	Letter
Version	0.2
Files	dorsetLEP-1190339.pdf
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:	<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
Which policy / paragraph number / policies map does your comment relate to?	Many
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

Comment

Consultee	Ms Catherine Bonnett (1190339)
Email Address	[REDACTED]
Company / Organisation	Dorset Local Enterprise Partnership
Address	6th Floor, Poole House Talbot Campus Poole BH12 5BB
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dorset Local Enterprise Partnership (Ms Catherine Bonnett - 1190339)
Comment ID	PLPP768
Response Date	03/12/18 11:29
Consultation Point	Policy E12: Design (View)
Status	Processed
Submission Type	Letter
Version	0.1
Files	dorsetLEP-1190339.pdf
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:	<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
Which policy / paragraph number / policies map does your comment relate to?	Many
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

Comment

Consultee	Ms Catherine Bonnett (1190339)
Email Address	
Company / Organisation	Dorset Local Enterprise Partnership
Address	6th Floor, Poole House Talbot Campus Poole BH12 5BB
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dorset Local Enterprise Partnership (Ms Catherine Bonnett - 1190339)
Comment ID	PLPP769
Response Date	03/12/18 11:29
Consultation Point	Policy H2: The housing land supply (View)
Status	Processed
Submission Type	Letter
Version	0.2
Files	dorsetLEP-1190339.pdf

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? Many

Comment

Consultee	Ms Catherine Bonnett (1190339)
Email Address	[REDACTED]
Company / Organisation	Dorset Local Enterprise Partnership
Address	6th Floor, Poole House Talbot Campus Poole BH12 5BB
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dorset Local Enterprise Partnership (Ms Catherine Bonnett - 1190339)
Comment ID	PLPP770
Response Date	03/12/18 11:29
Consultation Point	Chapter 5: Economy (View)
Status	Processed
Submission Type	Letter
Version	0.1
Files	dorsetLEP-1190339.pdf

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? Many

Comment

Consultee	Ms Catherine Bonnett (1190339)
Email Address	[REDACTED]
Company / Organisation	Dorset Local Enterprise Partnership
Address	6th Floor, Poole House Talbot Campus Poole BH12 5BB
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dorset Local Enterprise Partnership (Ms Catherine Bonnett - 1190339)
Comment ID	PLPP776
Response Date	03/12/18 11:29
Consultation Point	Policy EE1: Employment land supply (View)
Status	Processed
Submission Type	Letter
Version	0.1
Files	dorsetLEP-1190339.pdf

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? Many

Comment

Consultee	Ms Catherine Bonnett (1190339)
Email Address	[REDACTED]
Company / Organisation	Dorset Local Enterprise Partnership
Address	6th Floor, Poole House Talbot Campus Poole BH12 5BB
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dorset Local Enterprise Partnership (Ms Catherine Bonnett - 1190339)
Comment ID	PLPP777
Response Date	03/12/18 11:29
Consultation Point	Policy EE2: Planning for employment (View)
Status	Processed
Submission Type	Letter
Version	0.1
Files	dorsetLEP-1190339.pdf

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? Many

Comment

Consultee	Ms Catherine Bonnett (1190339)
Email Address	[REDACTED]
Company / Organisation	Dorset Local Enterprise Partnership
Address	6th Floor, Poole House Talbot Campus Poole BH12 5BB
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dorset Local Enterprise Partnership (Ms Catherine Bonnett - 1190339)
Comment ID	PLPP778
Response Date	03/12/18 11:29
Consultation Point	Chapter 6: Infrastructure (View)
Status	Processed
Submission Type	Letter
Version	0.1
Files	dorsetLEP-1190339.pdf

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? Many

Planning Policy Team
 Purbeck District Council
 Worgret Road
 WAREHAM
 Dorset
 BH20 4PP

3rd December 2018

Dear Planning Policy Team

Re: Purbeck pre-submission Local Plan

Thank you for giving the Dorset LEP the opportunity to respond to Purbeck District Council's pre-submission Local Plan.

The Dorset LEP makes the following comments:

Para 32 (p17)

The wording in this paragraph and, in particular, reference to 'retained business rates will be invested in improving the site and local infrastructure over the next 25 years' could lead to a misunderstanding that the council unilaterally control the business rate reinvestment. Dorset LEP would like to draw attention to the following references on this point.

- a. The central government Memorandum of Understanding states: 'In agreement with the Local Enterprise Partnership local authorities responsible for all or part of an Enterprise Zone may use any increase in business rates they collect from each Enterprise Zone site to support the further development of the Enterprise Zone and neighbouring areas'.
- b. The House of Commons Enterprise Zone briefing paper para 1.2 states: 'In addition, all business rates growth within Enterprise Zone's for 25 years from April 2013 will be retained by the Local Enterprise Partnership and reinvested in the area'
- c. The Local Memorandum of Understanding wording para 10.1 is: 'the retained business rates are directed towards the development of the Dorset Green Enterprise Zone (now called the Dorset Innovation Park) and after that towards the Dorset LEP's other growth priorities.

The following wording is suggested:

'The site is in public ownership; with business rates from the site retained by Dorset LEP for reinvestment into the Dorset Innovation Park and neighbouring areas and after that towards the Dorset LEP's other growth priorities over the next 25 years'

Chapter 2: Vision & Objectives

Vision

The National Planning Policy Framework requires that at the heart of planning is the presumption in favour of sustainable development, 'achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives)' p5 NPPF.

Achieving sustainable and meaningful growth in Purbeck requires a balance of the economic, social and environmental needs of the area, in the context of the broader Dorset setting. There is no question that planning policy in Purbeck has a responsibility to conserve and enhance its important natural environment and Dorset LEP strongly supports this role. However, Dorset LEP is concerned that by focusing heavily on the Districts environmental and landscape constraints, rather than what opportunities exist outside of these areas, insufficient consideration is given to supporting the economic and social needs of the plan area and Dorset region.

As the emerging Local Plan highlights, Purbeck doesn't sit in isolation from its neighbouring local authorities, or the wider Dorset region. Despite this acknowledgement there is a concern that overall the emerging plan hasn't demonstrated that it fully recognises its relationship to its neighbours or its role in the Dorset region, particularly in the areas of economic and housing growth. There was a hope that the emerging Local Plan would be more ambitious in its aspirations in these areas, given emerging housing targets across Dorset and proposals for economic growth.

Dorset LEP's modern industrial vision is to double Dorset's productivity and economic output over the next twenty years, generating 80,000 jobs, building around 78,000 new homes and creating a local economy that is sustainable, innovative and inclusive. The Partnerships Horizon 2038: A Vision for Growth document provides the foundation upon which a Local Industrial Strategy for Dorset will be developed. The document is designed to clearly set out and address the areas immediate priorities to secure long term economic growth.

In view of emerging housing delivery targets and opportunities for economic growth, Dorset LEP anticipates greater collaboration amongst authorities in addressing strategic needs and priorities and looks forward to working more closely with the new planning authorities on future plans that facilitate and support the realisation of Dorset's Local Industrial vision and strategy. This is a process that Dorset LEP envisages taking place on the creation of the new councils in Dorset in April 2019.

Policy V1: Spatial strategy for sustainable communities

Policy H1: Local Housing Requirement

The lack of housing, particularly affordable housing, has been identified as a barrier to business and economic growth in all parts of Dorset, for example the ability of business to attract and retain staff is being hindered by issues of affordability and lack of housing choice, with many people of working age unable to access suitable housing. To support economic growth and help improve local productivity more housing needs to be built, this may mean that higher levels of housing growth need to be planned for than the minimum requirement, particularly where there are issues with affordability and the need to attract working age people.

Policy E3: Renewable Energy & E12: Design

Dorset LEP is strongly supportive of policy that encourages and supports clean growth and the adoption of renewable energy technology. As the emerging Local Plan recognises the issue of climate change and the need to take actions to reduce the impact of human activity and mitigates against the impact of global warming is critical. The Dorset LEP would like to see the Purbeck Local Plan take a step further in its policy E12: Design by incorporating the requirement that new development:

- Demonstrates that it seeks to integrate green space within the development;
- Demonstrates that it seeks to maximise opportunities for recycling.

Policy H2: The housing land supply

The Purbeck Local Plan seeks to distribute new housing supply across the District on a range of sites, including at least 10% on small sites. The success of this approach will be determined by actual levels of delivery and Dorset LEP would like to see a continuous review mechanism in place to identify at an early stage where there is a shortfall in sites coming forward and housing completions, with the flexibility to allow the re-evaluation of site allocations and to identify sites where intervention may be required.

The availability of land has been identified as a significant constraint within the house building sector, a theme that has been picked up by Government in its housing white paper: Fixing the broken housing market. One way in which local authorities can actively address issues of land supply is by allocating a higher level of land for development than the minimum required to satisfy its five year land supply. In an area where land prices are already high, which can be considered a good indication of land supply and demand pressures, increasing the supply of allocated sites has the potential of opening up and bringing greater competition to the market. Over allocating sites would also bring greater flexibility in meeting delivery targets by providing a buffer where there is slippage and hold ups in delivery in a 12 month period.

Chapter 5: Economy

Dorset, including Purbeck faces a productivity challenge, with average productivity levels falling behind the national average¹, with issues of connectivity and competitiveness, engagement and aspiration in business and the workforce. It also has a number of strengths, which in Purbeck are seen to include advanced engineering, defence and research. It is disappointing that this is not reflected within the emerging Purbeck Local Plan, with proposals that support the growth of these and other associated sectors, instead focusing attention on retail and tourism.

Dorset Innovation Park (formerly known as Dorset Green) has been named a 'strategic employment site' in Purbeck District Council policy documents for many years now and Dorset LEP would like to see a greater detail for investment to support its success included within the Local Plan. Since the beginning of 2017 Purbeck District Council (and Dorset County Council) has acquired the site and now owns it, however, the Purbeck Local Plan does not reflect the status change and renewed importance of significant upfront investment to create an income-generating employment site for the Council.

Policy EE1: Employment Land Supply

The table included in this policy needs to be amended to show that The Enterprise Zone bid was for a 50 hectare site, 10 hectares of which is to be brought into the Enterprise Zone in the future. The Local Development Order currently being considered covers 40 hectares and is, in effect, the current Innovation Park. The marketing agents can only market the undeveloped plots which cover approximately 35 hectares, as some areas will be set aside for landscaping and green space. The Bournemouth, Dorset and Poole Workspace Strategy 2016 states there is 'approximately 30 ha currently available' at Dorset Innovation Park. In conclusion the asterisk should be on the 50, not the 49, and the estimated remaining availability should be reduced to 35 hectares, or less subject to the Local Development Order master plan that is shortly to be approved.

Para 206 (86)

The paragraph is incorrect and needs to be reworded to reflect the wording of the signed Local Memorandum of Understanding of the Partnership (Purbeck District Council, Dorset County Council and Dorset LEP), which states 'The intention is that the Enterprise Zone will become a catalyst for enhanced economic growth through the creation of highly skilled

¹ Dorset LEP: Dorset's Economic Ambition 2018

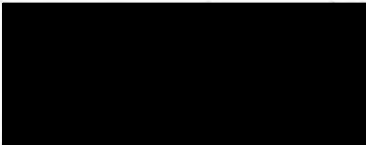
jobs, the unblocking of employment land, and the encouragement of investment into the area'. In April 2017 Dorset County Council (DCC), together with its partner Purbeck District Council (PDC) and with grant support from LEP, purchased the freehold of the entire site. The grant agreement (para 4a) states: 'The grant provided is intended to help ensure the site's success by remaining in public ownership and enabling timely and productive development over the duration of the Enterprise Zone status'.

The employment and estimated GVA figures will need to be cross-checked against the Local Development Order proposal that is shortly to be determined by Purbeck District Council. It should be clear that without implementation of the recommendations proposed in the Local Development Order on the council these employment figures add income to the area will not be achieved.

Chapter 6: Infrastructure

A priority for Dorset, including Purbeck, is investment to improve its infrastructure, with particular regard for transport and digital infrastructure. The emerging Purbeck Local Plan makes no reference to the South East Dorset Urban Mobility Strategy (SEDUMS), that not only includes part of the Purbeck area but will have direct impact and implications for transport infrastructure planning in the District. It is suggested that the emerging Local Plan includes a commitment to be reviewed and updated to encompass the outcomes and recommendations of this and other infrastructure strategies in Dorset.

Yours sincerely



Catherine Bonnett
Housing Policy Manager
Dorset LEP

Comment

Consultee	Dorset Wildlife Trust (1191048)
Email Address	[REDACTED]
Company / Organisation	Dorset Wildlife Trust
Address	Urban Wildlife Centre Corfe Mullen BH21 3RX
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dorset Wildlife Trust (Dorset Wildlife Trust - 1191048)
Comment ID	PLPP435
Response Date	03/12/18 16:32
Consultation Point	Policies List (View)
Status	Processed
Submission Type	Web
Version	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? 1

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)

For its size, Purbeck is arguably the most biodiverse area in the UK. Given the exceptional national and international importance of Purbeck's habitats and associated wildlife, DWT would still wish to challenge the scale of the proposed housing development in the district. In the Plan's introduction, point 1.12 refers to a 'duty to co-operate with other councils'. Dorset is due to become a Unitary

Authority in April 2019 and this should provide the opportunity to take a wider, more strategic approach to housing allocations and associated environmental enhancements across the whole county.

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)

Delay the Purbeck Local Plan until after April 2019

Comment

Consultee	Dorset Wildlife Trust (1191048)
Email Address	[REDACTED]
Company / Organisation	Dorset Wildlife Trust
Address	Urban Wildlife Centre Corfe Mullen BH21 3RX
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dorset Wildlife Trust (Dorset Wildlife Trust - 1191048)
Comment ID	PLPP441
Response Date	03/12/18 16:35
Consultation Point	Moreton Station / Redbridge Pit - 490 homes, 65 bed care home and SANG (View)
Status	Processed
Submission Type	Web
Version	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?	H4
Do you consider that the Local Plan is legally compliant?	Yes
Do you consider that the Local Plan is sound?	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)

Moreton Station / Redbridge Pit 490, 65 bed care home, community facilities and supporting infrastructure.

In the view of DWT, this development is still problematical. Virtually all the Redbridge SNCI (SY78/027) still appears to be covered by the proposed development.

It is recognised that a significant part of the Redbridge SNCI is currently an active mineral extraction site but, under the terms of the minerals planning permission (latest version 6/2018/0352), the area is due to be fully restored to the appropriate wildlife habitat, when the period of extraction operations is completed, and this should result in significant biodiversity gain.

The Pre-submission Draft states (p55) '*Delivery of the homes will be phased, commencing after the current use of part of the site as a sand and gravel pit has stopped (expected December 2022) and the site has been restored in accordance with the relevant minerals and waste planning permission*'. So, although the proposed development would not prevent the habitat restoration work being carried out, it appears that the biodiversity gains arising from this work would almost immediately be jeopardised by commencement of the proposed development work.

The area is shown as a large block, covering the whole site, in the Local Plan. Without knowing more detail re the areas to be covered by both proposals (restoration and housing) it's difficult to know how much of the newly restored wildlife habitat will be compromised to make way for the new development. It would be unfortunate if, at the planning application stage, it was necessary to object on the grounds that the area was now an important wildlife habitat.

There is mention of 'supporting infrastructure' but no specific reference to a new SANG. Redbridge lies close to Winfrith and Tadnoll DWT reserves, and DWT would be very concerned about any additional recreational pressure on that site from this development option. With these additional recreational pressures on our reserves, along with the potential loss of SNCI, more detailed discussions about these proposals are needed as soon as possible. These discussions should include the exploration of significant biodiversity mitigation options.

Comment

Consultee	Dorset Wildlife Trust (1191048)
Email Address	[REDACTED]
Company / Organisation	Dorset Wildlife Trust
Address	Urban Wildlife Centre Corfe Mullen BH21 3RX
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dorset Wildlife Trust (Dorset Wildlife Trust - 1191048)
Comment ID	PLPP447
Response Date	03/12/18 16:37
Consultation Point	Wool - 470 homes, 65 bed care home, SANG, community hub and recreational space (View)
Status	Processed
Submission Type	Web
Version	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?	H5
Do you consider that the Local Plan is legally compliant?	Yes
Do you consider that the Local Plan is sound?	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)

Wool: 470 homes, 65 bed care home, SANG, community hub and recreational space

The DWT still has concerns regarding the scale of this development and the indirect effects on neighbouring areas of national and international wildlife conservation importance.

Before the proposed development is progressed further, a full ecological survey and evaluation should be undertaken for the proposed site and potential SANG, including the potential effects of these

developments on the biodiversity of designated sites within the wider area and River Frome catchment. Local wildlife groups have highlighted a number of priority habitats within the parish which need to be carefully considered.

Although the boundaries aren't clear, the proposed SANG for the Wool development still seems to include Coombe Wood. Despite a number of coniferous trees, this site contains some significant areas of high-quality deciduous woodland with an excellent ground flora, and some very impressive veteran trees. At least 11 Dorset notable species have been recorded here which more than fulfils the SNCI criteria. Further survey work is required but, as an ancient wood with considerable ecological interest, DWT have concerns regarding the suitability of developing this site as a SANG.

DWT has no direct concerns relating to our reserves or SNCIs in this area, although there are several Conservation Verges that need to be carefully considered.

Comment

Consultee	Dorset Wildlife Trust (1191048)
Email Address	[REDACTED]
Company / Organisation	Dorset Wildlife Trust
Address	Urban Wildlife Centre Corfe Mullen BH21 3RX
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dorset Wildlife Trust (Dorset Wildlife Trust - 1191048)
Comment ID	PLPP451
Response Date	03/12/18 16:38
Consultation Point	Chapter 2: Vision and objectives (View)
Status	Processed
Submission Type	Web
Version	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? 39

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

Do you consider that the Local Plan is sound? 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)

DWT welcomes the objectives but this section should should emphasise the international importance of Purbeck's habitats and biodiversity.

Resilience to climate change should also refer to a need to minimise the ecological footprint of all development so that they don't contribute to climate change or other environmental problems

It should be recognised that, although Purbeck's habitats are protected by numerous designations and the district is home to many rare species, much of our wildlife is decreasing and under threat from a number of human and environmental factors

Comment

Consultee	Dorset Wildlife Trust (1191048)
Email Address	[REDACTED]
Company / Organisation	Dorset Wildlife Trust
Address	Urban Wildlife Centre Corfe Mullen BH21 3RX
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dorset Wildlife Trust (Dorset Wildlife Trust - 1191048)
Comment ID	PLPP453
Response Date	03/12/18 16:38
Consultation Point	Chapter 3: Environment (View)
Status	Processed
Submission Type	Web
Version	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? 80

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

Do you consider that the Local Plan is sound? Yes

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)

Biodiversity assets are a fundamental and key part of sustainable development. DWT welcomes the recognition to secure a 'net gain' in biodiversity value.

Comment

Consultee	Dorset Wildlife Trust (1191048)
Email Address	[REDACTED]
Company / Organisation	Dorset Wildlife Trust
Address	Urban Wildlife Centre Corfe Mullen BH21 3RX
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dorset Wildlife Trust (Dorset Wildlife Trust - 1191048)
Comment ID	PLPP454
Response Date	03/12/18 16:39
Consultation Point	Protected habitats (View)
Status	Processed
Submission Type	Web
Version	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? E12

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

Do you consider that the Local Plan is sound? Yes

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)

DWT welcomes reference to biodiversity in design but would prefer 'enhance rather than support'. Maximising biodiversity gain through careful design should be considered at the outset - not added on at the end of the process. Wherever possible imported topsoil should be avoided and tree planting, seed mixes etc should use native species.

Building materials should be as sustainable as possible with waste and carbon footprint minimised in all construction operations.

Comment

Consultee	Dorset Wildlife Trust (1191048)
Email Address	[REDACTED]
Company / Organisation	Dorset Wildlife Trust
Address	Urban Wildlife Centre Corfe Mullen BH21 3RX
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dorset Wildlife Trust (Dorset Wildlife Trust - 1191048)
Comment ID	PLPP456
Response Date	03/12/18 16:39
Consultation Point	Chapter 6: Infrastructure (View)
Status	Processed
Submission Type	Web
Version	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?	Policy 13
Do you consider that the Local Plan is legally compliant?	Yes
Do you consider that the Local Plan is sound?	Yes

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)

DWT welcomes and supports the Purbeck Green Infrastructure Strategy. It is hoped that this will develop the opportunities provided by the scale and scope of the Purbeck Local Plan to take a more strategic and integrated approach to the delivery of biodiversity improvements in the area. The Lawton Review 'Making Space for Nature', which fed into the Government White Paper 'The Natural Choice',

provides a useful basis for a 'bigger, better more joined up' approach (and build on the achievements of Wild Purbeck Nature Improvement Area). This links into the Dorset Wildlife Trust's Living Landscape approach which encourages landscape-scale conservation efforts to halt the decline of wildlife and restore the natural environment. The Government's Biodiversity 2020 strategy also aims to 'halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people'.

To function properly SANGs should be easily accessible, by non-motorised transport, from all parts of the proposed developments. Therefore, proposed SANGs should connect directly with the development wherever possible. Generally, DWT has significant concerns regarding the development of SANGs in areas that already have significant wildlife interest, unless there is an opportunity to secure or enhance such wildlife interest. Where possible SANGs should be seen as an opportunity to restore and enhance the wildlife (as well as recreational) value of new sites.

Comment

Consultee	Dorset Wildlife Trust (1191048)
Email Address	[REDACTED]
Company / Organisation	Dorset Wildlife Trust
Address	Urban Wildlife Centre Corfe Mullen BH21 3RX
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dorset Wildlife Trust (Dorset Wildlife Trust - 1191048)
Comment ID	PLPP457
Response Date	03/12/18 16:40
Consultation Point	Chapter 3: Environment (View)
Status	Processed
Submission Type	Web
Version	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? Policy E10

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

Do you consider that the Local Plan is sound? 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)

Although 23% of the district is covered by national or international nature conservation designations, this means that 77% of the district has no such protection. There has been a well-documented decrease in much of our 'everyday' wildlife such as farmland and woodland birds as well as many butterflies and other insects. Conservation of this wildlife needs to be given greater priority and is one of the reasons why enhanced biodiversity should be a fundamental element of development planning in the district.

Comment

Consultee	Dorset Wildlife Trust (1191048)
Email Address	[REDACTED]
Company / Organisation	Dorset Wildlife Trust
Address	Urban Wildlife Centre Corfe Mullen BH21 3RX
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dorset Wildlife Trust (Dorset Wildlife Trust - 1191048)
Comment ID	PLPP458
Response Date	03/12/18 16:41
Consultation Point	Chapter 3: Environment (View)
Status	Processed
Submission Type	Web
Version	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?	Chapter 3
Do you consider that the Local Plan is legally compliant?	Yes
Do you consider that the Local Plan is sound?	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)

Under a number of headings there is reference to developments not being permitted where there are any adverse effects (directly or indirectly) on various aspects of the environment. This is a welcome but ambitious objective which raises a number of concerns. There is some reference to the available mechanisms to determine these potential adverse effects but, as this is arguably the key environmental issue within the whole plan, it is felt that greater clarity in how this objective will be achieved, is required.

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)

Comment

Consultee	Dorset Wildlife Trust (1191048)
Email Address	[REDACTED]
Company / Organisation	Dorset Wildlife Trust
Address	Urban Wildlife Centre Corfe Mullen BH21 3RX
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dorset Wildlife Trust (Dorset Wildlife Trust - 1191048)
Comment ID	PLPP460
Response Date	03/12/18 16:41
Consultation Point	Chapter 3: Environment (View)
Status	Processed
Submission Type	Web
Version	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?	50
Do you consider that the Local Plan is legally compliant?	Yes
Do you consider that the Local Plan is sound?	Yes

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 brief summary of DWT's specific biodiversity objectives relating to the Purbeck Local Plan include:

- 1 Protecting, expanding and improving the quality of existing sites
- 2 Creating new wildlife sites to expand the number and increase natural resilience.
- 3 Enhancing the ecological network by creating new wildlife corridors and stepping stones

- 4 Reducing the pressures on wildlife by improving the wider environment, providing wildlife-friendly recreational opportunities (SANGs) and creating appropriate buffer zones.
- 5 Ensuring nutrient neutrality particularly in relation to the Frome catchment area and Poole Harbour SPA/Ramsar

Comment

Consultee	Dorset Wildlife Trust (1191048)
Email Address	[REDACTED]
Company / Organisation	Dorset Wildlife Trust
Address	Urban Wildlife Centre Corfe Mullen BH21 3RX
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dorset Wildlife Trust (Dorset Wildlife Trust - 1191048)
Comment ID	PLPP716
Response Date	03/12/18 16:39
Consultation Point	Policy E12: Design (View)
Status	Processed
Submission Type	Web
Version	0.3

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? Yes

Do you consider that the Local Plan is sound? Yes

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)

DWT welcomes reference to biodiversity in design but would prefer 'enhance rather than support'. Maximising biodiversity gain through careful design should be considered at the outset - not added on at the end of the process. Wherever possible imported topsoil should be avoided and tree planting, seed mixes etc should use native species.

Building materials should be as sustainable as possible with waste and carbon footprint minimised in all construction operations.

Comment

Consultee	Collette Drayson (1191856)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Collette Drayson (1191856)
Comment ID	PLPP585
Response Date	03/12/18 09:55
Consultation Point	Policy H14: Second homes (View)
Status	Processed
Submission Type	Letter
Version	0.3
Files	H14-Drayson-PLPP585.pdf
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 sound?	No



For Office Use Only

Requester ID: **C17**
 Consultee ID: **1191856**
 Comment ID's: **PLPP585**

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 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 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:

The Purbeck Local Plan:

I am responding to the Second Home Policy (H14) of the Plan as an individual

- i/it is considered that the Purbeck Local Plan is unsound in terms of its Second Home Policy (H14). To support sustainable development in this area it is required that this policy be strengthened to a Full Time Principal Residency Policy. To be consistent with St Ives (H2) policy and other areas.
- The existing draft H14 second home policy does not fulfil the requirements of the community of Purbeck, in that it continues to allow that new builds be used as holiday lets. The 2017 (Steve Tapscott) provides evidence to support a Principal residency policy. However the 2018 Second Home Evidence document, whilst providing evidence from St Ives and other areas does not support a full time principal residency policy, and instead focuses on a second home policy.
- The Purbeck second home policy lacks clarity and is not designed to sustain the communities of Purbeck. The term second home can be defined in different ways. Throughout the public consultation it was made clear that second homes include holiday lets and it is both types of second home that have reached a 'tipping point' and that a full time residency policy such as St Ives is required to balance the loss of existing market housing to this holiday market.
- A strengthened policy such as St Ives policy (H2) should be made Purbeck wide so as not to have an unintended impact on other areas of Purbeck. i.e. That all new builds should be used as HOMES for full time principal residency.

Previous Purbeck Plan consultations, media handouts and the Purbeck Local Plan highlight the requirements of the NEED for new HOMES. However the Purbeck plan, whilst citing evidence from eg St Ives and other areas, has chosen not to include a strong policy to ensure that all new builds be for full time principal residence i.e. HOMES.

The premise and focus of the Purbeck Plan and its consultation has been to provide HOMES. It has consistently maintained that it is about 'planning for the right HOMES in the right places'. The plan is therefore inconsistent with government policy. (<https://www.gov.uk/government/consultations/planning-for-the-right-homes-in-the-right-places-consultation-proposals>).

The evidence used for the Plan realises and attempts to address the problem of the second home/holiday let market, and highlights that there is a problem however then does not provide a strong policy, that would protect the ongoing sustainability of this area.

The premise of all the documentation sent out by Purbeck District Council, to the community of Purbeck is that the reason that housing is needed is to provide HOMES for people. If this is the case then the right type of HOMES should be built in Purbeck to address the issue of lack of HOMES. HOMES are needed that are affordable for people working locally. As with London, there is a huge difference in incomes and house prices. A strong policy is required that does not allow further new build HOMES to be used as holiday homes/holiday lets. This area is highlighted as a destination for its beauty, AONB, exceptional environmental diversity. It is important that the AONB is valued and protected, and therefore it is important that every build makes good use of land and is for a genuine needed sustainable purpose.

Purbeck has an opportunity to include a St Ives (H2) type policy that supports HOMES for people. People in this area struggle, even those on reasonable incomes to buy market housing. The second home/holiday

let impacts on working people's ability to afford housing. If a H2 full time residency policy was applied to all new builds there would be more opportunity for people to make Purbeck their HOME rather than the housing be lost to the second home/holiday let market.

Purbeck is similar to St Ives and other areas along the South West in that we have a very high % of existing second homes and holiday lets. So much so, that it has been allocated government Community led affordable Housing funds to counter the problem.

The Purbeck Local Plan second home evidence paper supports that second homes/holiday lets provide economic benefit. Whilst it cannot be argued that they do have economic benefit, however where is the evidence that second homes and holiday lets are more beneficial, in terms of economic, social, environmental, than full time residency. Whilst there may be some economic benefit from second homes and holiday lets, a substantial amount is lost to the community and does not necessarily support the local economy more than someone living in a HOME as a full time principal residence? It can be argued that this evidence is not available and so it cannot be claimed to be a reason to continue to allow new builds to be for second home/holiday lets.

In addition to evidence provided in the Second Homes evidence paper 2018, further evidence to strengthen the H14 policy to a full time principal residency policy:

- **The High Court judgement in the case of St Ives offers support for the H2 Full time principal residence policy.** <https://cornerstonebarristers.com/cmsAdmin/uploads/final-rlt-v-cornwall.pdf> ...'excessive levels of second homes and holiday lets can be harmful to the social fabric of the community which will continue unobated if no such restriction is imposed to prevent the use and occupation of new homes by the second home and holiday let market and that therefore is contrary to sustainable development.' Case No: CO/2241/2016 IN THE HIGH COURT OF JUSTICE QUEEN'S BENCH DIVISION PLANNING COURT IN BRISTOL: Bristol Civil Justice Centre 2 Redcliff Street Bristol Date: 10/11/16
- **The St Ives Neighbourhood Plan also offers support that a Full time principal residency policy is vital for the ongoing sustainability of that area. Comparatively Purbeck also has a similar % of second homes/holiday lets and requires a similar policy.**
The St Ives NP offers support offers further support for a full time principal residency policy. 101. However: i) Having a coherent planning system is a matter of national public interest. The overarching national planning policy is the achievement of sustainable development (paragraph 6 of the NPPF), i.e. it is in the national interest that development is sustainable. The NPPF defines "sustainable development" as comprising three dimensions: economic, social and environmental. As for the economic role, paragraph 7 of the NPPF provides that it includes: "contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements...". Where a development makes such a contribution, it thus contributes to "the economic well-being of the country". The justification for Policy H2, as set out in the supporting text of the policy (see paragraph 26 above), is as follows: "... to meet the housing needs of local people, bring greater balance and mixture to the local housing market and create new opportunities for people to live and work here, to strengthen our community and the local economy...". [St Ives Area Neighbourhood Development Plan](#)

- Cllr Rita Lait (chairman of St Ives Neighbourhood Plan.) Additional evidence and clarification for H2 full time residency policy has been provided by Cllr Rita Lait. She has clarified that the reason that their policy is titled 'a full time principal residency policy' is to make it clear that all new builds be intended for that purpose only.

- The examiner of the St Ives plan offers support for the full time principal residency policy:

... On the basis of that justification, the Examiner expressly found that **"the restriction of further second homes does in fact contribute to delivering sustainable development"**, a conclusion which the Claimant does not seek to challenge – nor could it. In making that "economic" contribution to Judgment Approved by the court for handing down R (RLT Environment Ltd) v Cornwall Council sustainable development, Policy H2 thus promotes the interests of "the economic well-being of the country".

The Inspector notes that *'as second and holiday homes are not a category of NEED for which the NPPF advises that provision should be made, the policy (H2) involves no specific conflict with national policy.'*

- Note: In the context of St Ives and the South West the definition of second homes includes private second homes and holiday lets. Whereas The Purbeck Local Plan second homes evidence paper differentiates between second homes and holiday lets, rather than focussing on a full time principal residency policy. The evidence of St Ives has been used in the paper, however Purbeck has chosen not to use a full residency policy. This is not consistent with the evidence provided by other areas that are impacted in a similar way to Purbeck in terms of housing being used as holiday/second home/holiday lets. The outcome of the weakened policy is that it is not protecting future housing to be used as HOMES.
- Evidence in the form of local knowledge has been provided by residents and Parish Councils and NGO groups that whilst it is recognised that second homes/holiday lets are to some extent of economic benefit to this area in terms of tourism, that a tipping point has been reached. The continued increase of Second home/holiday market are influencing house prices and negatively impacting on the ability of key workers and other working people to be able to buy a home in this area. This is consistent with other areas along the South West and in other 'honey pot' areas.
- Purbeck is similar to St Ives and other areas along the South West in that there is a high % of existing second homes and holiday lets. This has been recognised by the allocation of government Community led affordable Housing funds to counter the problem. <https://news.dorsetforyou.gov.uk/2017/08/25/purbeck-village-community-groups-receive-funding-to-kick-start-housing-projects/>

Earlier in 2017, the Council received a grant from the Government of £910,456 from the **Community Housing Fund** to help address the effects of second homes in the district by kick-starting affordable housing projects.

- A St Ives (H2) policy was discussed by Parish Councillors, PDC councillors, officers, members of the public at a Purbeck (affordable) Housing Forum meeting. It was actioned that PDC communicate with St Ives/Cornwall to explore a similar (H2) policy for Purbeck. There was support from residents, Councillors and some officers for such a policy.

- A response to the above meetings was that a second home policy written by Steve Tapscott – senior planning officer, in 2017 provided evidence to support a full time principal residence policy. Unfortunately the second home evidence paper (2018) does not go as far and is therefore weaker and therefore does not support sustainable development. Page 67 of 71 Recommendations for the Local Plan Review: 254. This report recommends that the local plan review incorporates proposed Policy PRH: Principal Residence Housing and that it be monitored over time.
- In response to an earlier consultation, PDC paused to gather further information from the community. The 2017 second home evidence paper (Steve Tapscott) provided evidence and support for a Principal Residency Housing Policy. (This paper appears to have subsequently withdrawn from the current supportive PLP evidence documents previously included on the Dorset For You website. Paper copies are available and PDC may have a link to the document. However there are supportive comments in the link to the document below, from the public that offer evidence from a range of sources that supports a full time principal residence policy.
<https://www.dorsetforyou.gov.uk/planning-buildings-land/planning-policy/purbeck/local-plan-review-purbeck/pdfs/consultations/options/partial-review-options-consultation-report.pdf> pages 22 – 24 Purbeck Plan Partial Review January 2017.
- As mentioned above the more recent 2018 second home evidence document, whilst including much of the same text evidence as the 2017 it did not come to the same conclusion and did not suggest a PRH policy. It focusses on a partial second home policy, whilst giving many reasons to support a PRH policy. The document in some ways seems at odds with its own findings and evidence base.
- The supportive evidence documents and the final copy of the Purbeck Local Plan were not available until the 22nd October, however the public were invited to input at a prior policy group meeting and following full council meeting, where these documents were not available. This to some extent limited full public participation, as they did not have these documents available to them at the policy group or full council meeting. (ref: About Purbeck Issue 39 – November 2018).
- Lack of evidence in the second home evidence paper that supports that second homes and holiday lets compared with full time residency are more or less sustainable than full time residency. It is accepted that second homes and holiday lets do have some economic benefit, however is there any evidence to prove that they have more benefit overall than full time residents? This is where St Ives and others have 'realised' and argued that full time residents have an overall benefit when considering all aspects of 'Sustainable Development'(NPPF) ie. Benefits from living as full time residents should be considered not only the economic factors but also the social and environmental factors, which I believe that the NPPF considers should be taken into account. It is a high priority that our communities continue to exist into the future, and local knowledge supports that many of the existing market houses are being sold to the second home/holiday let market. To allow this to continue should be questioned as to whether it does in fact meet sustainable development. The benefit of having a healthy full time resident community should be seriously be taken into account particularly when considering schools, churches, village halls, volunteers including coastguards, lifeboat, police support, local clubs, neighbourly support for the elderly, allotments, all the year round support for local shops, pubs, pub teams etc.

- The ongoing increase of housing being lost in the centre of villages is meaning that to sustain communities housing is required to be built further away from the centres of villages/towns, to continue to do this is unsustainable.

Conclusion:

To meet the aspirations of a Purbeck Plan that supports and sustains the communities of Purbeck into the future and is consistent with sustainable development (NPPF – Brundtland definition) to be sound the second home H14 policy requires strengthening, to ensure that new builds are used as HOMES.

To make a difference and to be effective and genuinely sustainable the H14 second home policy needs to be strengthened to be consistent with Policy H2 St Ives Policy. The background evidence that has been researched in the case of St Ives and other evidence to support strengthening this policy is available. I have included references in this response, however this is not exhaustive. There is supportive evidence provided by Cornwall other areas in the South West etc that also offer support for a stronger policy. The situation in Purbeck is similar to many other areas along the South West. As was determined by the High Court Judge, to do nothing could lead to unsustainable development, which would be contrary to the Governments aims of Sustainable development.

References: to evidence documents that argue in support of strengthening the (H14) policy. To: support a sound policy in terms of ensuring that Purbeck is sustainable/viable/vibrant/strong community into the future. The evidence highlights the reasoning for (H14) being unsound in the context of meeting the governments aims of Sustainable Development in Purbeck.

- St Ives High Court Case: <https://cornerstonebarristers.com/cmsAdmin/uploads/final-rlt-v-cornwall.pdf>
- St Ives Neighbourhood Plan [St Ives Area Neighbourhood Development Plan](#)
- Examiner/Inspector report in response to St Ives:
- Cllr Rita Lait:
- St Ives Council:
- Cornwall Council:
- Study by Exeter University:
- Evidence provided within the councils own second homes evidence papers 2017/2018
- Responses throughout the 'long' and paused Purbeck Plan consultation: from residents, Parish Councils, groups such as The Purbeck Society, Pan Purbeck Action Campaign, CPRE- Purbeck and Poole branch.
- Government Community Housing Fund – specific to the geographical area of Purbeck: Funds made available specifically because of the high % of second homes (and holiday let) in the area.

Comment

Consultee	Mr Ian Duckworth (1188661)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Ian Duckworth (1188661)
Comment ID	PLPP102
Response Date	29/11/18 14:54
Consultation Point	Conserve and enhance Purbeck's natural habitat, biodiversity and geodiversity (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?	E9 and E10
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)

The pre-submission by PDC does not provide detail or even indications as to how it enhances biodiversity. Although the plan avoids building on land designated AONB, SAC, SPA etc. it is thus

forced into areas without such designations. However, these areas are not without important biodiversity and form important connections to and between designated areas. The NPPF objectives clearly state: contribute to protecting and enhancing our natural environment helping to improve biodiversity ... PDC plans do not demonstrate how the developments they plan will achieve this.

For instance the large development at Wool will replace land managed organically for many years which statistically has a much higher biodiversity than non organically farmed land, surrounded on several boundaries by ancient hedgerows. Furthermore being adjacent to protected heathland they plan to offer as a SANG a woodland recognised by the Woodland Trust as an ancient woodland and ancient woodland site with recorded high biodiversity including listed species. The woodland is not that near the planned building and its biodiversity will not be enhanced by being made a SANG which will need to be a place for people, many of them young, to exercise themselves and their dogs. The sewage from the 460 houses will place considerable strain on the existing sewage system which is already stressed by the last development. This sewage after treatment (or overflow) flows into the Frome River SSSI, which already has nitrate levels 200% higher than the 1960s, then contributes to the nitrate levels causing algal bloom and unstable saltmarsh in the Poole Harbour RAMSAR and SAC.

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)

PDC has failed to explain how the proposed developments will be executed to maintain and enhance the biodiversity of their areas as required by NPPF guidelines. For instance the development in Wool needs to be downsized and probably relocated. Additional sewage treatment needs to be constructed before any development and any SANG needed created in a less biodiverse and more resilient location than the proposed Coombe Wood - ideally directly adjacent to a smaller development.

Comment

Consultee	Mr Ian Duckworth (1188661)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Ian Duckworth (1188661)
Comment ID	PLPP103
Response Date	29/11/18 14:55
Consultation Point	Wool - 470 homes, 65 bed care home, SANG, community hub and recreational space (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?	H5
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)

The pre-submission plans do not provide evidence that the planned developments at Wool are not a response to the needs of the existing community. wages in the immediate area are low (average £22,500) and house prices too high (£250,000 and upwards) for them to afford. **There is no**

evidence provided that more housing will significantly reduce the cost of houses. There is evidence to suggest that developers require a majority of higher cost homes to make developments worthwhile for them.

The Dorset Green Innovation Park has not yet generated sufficient new employment to produce additional local need. Thus the majority of people who will come to reside in the planned development of 470 houses plus Care Home will be from outside the area and work outside the area. The effect of their journeys, and those of service vehicles and delivery vehicles visiting them will have huge impact on the already congested main road. There are already significant queues through the village particularly during 'rush hour' periods and during the tourist season now very much extended into all school holidays and weekends due to being close to a large conurbation of Poole and Bournemouth and as the road crosses the busy main SW Railway line from London to Weymouth. This adds stress, pollution to the inhabitants and considerable inconvenience to all needing to travel along the road. There is also the further consideration of traffic from Lulworth village and Barracks intersecting the main road next to this level crossing, compounding the congestion and queueing. All the Poole bound traffic on the main road then adds to the traffic coming from Swanage and funneling through Sandford which is legendary locally for its queues. This does not just impact on local people but also on the many tourists on which the area is economically dependant for more than 10% of its local economy and a significant proportion of the 30,000 jobs associated with the tourist industry in the county. The EICS study commissioned by PDC simply stated that traffic flows were not a problem without providing the data to support this. Independent studies undertaken by local groups provide a picture of queues stretching through the village at peak times.

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)

Dorset County Council state 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).

(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 Duckworth (1188661)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Ian Duckworth (1188661)
Comment ID	PLPP104
Response Date	29/11/18 14:55
Consultation Point	Support sustainable community growth to provide for the needs of local residents (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?	H11
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)

PDC have not demonstrated how they will ensure the Local Plan provides the homes affordable by the local people in need of housing. In the 2017/18 Consultation by PDC they delineated the need for increased provision of housing: "to help deal with the local gap between average income and

average house prices by providing affordable homes for local people, to help young people who want to stay in the area, to provide homes for people to look after us as we get older, to help people facing homelessness or who live in overcrowded homes, to support our local economy". The average local salary is £22,500 and a low cost home in the area is around £250,000. Clearly, PDC's Local Plan relies on the open market and property developers to provide the housing. They also make use of the government definition of "affordable" (80% of market rate) which does not make houses easily affordable to those on local salaries. So even if developments of sufficient size have to contain a proportion (maybe 40%) of so-called affordable housing, this housing will not provide for any of the categories listed by PDC in their consultation. How many houses will have to be built in this way for the real local needs to be met? The PDC have no strategy to encourage Housing Trusts, or sufficient funds to provide for Community Land Trusts land purchase and no policy on providing council funded house building. Thus their proposals are clearly unsound as very few local people will benefit from the proposed house building. The beneficiaries will be developers from outside the area (no local economy stimulus here) and local landowners only too happy to pocket the inflation of the land prices when planning permission is granted (an increase of 10 - 12 times). The PDC policy on second home purchase is not strong and is unlikely to prevent purchases of this nature, particularly within the small developments envisaged around smaller settlements in the more desired locations within Purbeck. Purchase of properties in any developments as investments by people from outside the area who then proceed to let the properties, merely provide local people with "market rents" from which it is unlikely they can escape to fund their own house purchase.

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 developments have to be limited to genuinely affordable homes provided by Housing Trusts, CLTs and Council building. Nothing else will provide housing at prices local people can afford. There has to be mechanism to ensure that access to purchase of these properties is targeted and that covenants of purchase prevent future sale to non locals. Market led housing has to be limited. There is in fact a good supply of houses available now (as Estate Agent show rooms and site signs bear witness) but which are unaffordable to most local people and certainly those in need of 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)

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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 Duckworth (1188661)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Ian Duckworth (1188661)
Comment ID	PLPP105
Response Date	29/11/18 14:55
Consultation Point	Policies List (View)
Status	Processed
Submission Type	Web
Version	0.1
Files	Dorset's Environmental Economy Summary paper.pdf

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? EE4

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)

Tourism is a vital element of the local economy. **The pre-submission documents offer no evidence as to how this will be supported.** Indeed much of the proposed development will actively disrupt this. No evidence is provided that local people employed in the tourism sector will be able to afford the so called 'affordable housing'. With salaries being low (average local salary for all sectors is £22,500 p.a.), local house prices being in excess of £250,000 and with local rents being also in line with market forces there is insufficient provision for accommodation for those in this sector which tends to be lowly paid and somewhat seasonal.

The scale of development indicated will put great pressure on local infrastructure, the roads and transport systems are particularly relevant to the tourist industry. At present and in the future envisaged by PDC there will be many people employed, but not financially able to be resident, clogging the roads with those commuting to better paid jobs in the nearby conurbation and the luckless tourists supporting the local economy. The roads are very congested at present, particularly at the start and finish of the working day, during all school holidays, weekends and the extended holiday season. **There is no evidence in the pre-submission plans to mitigate the effects of the proposed developments and the conflicts they produce with the needs of the local economy.**

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)

Unless the developments are reduced in size and dispersed to avoid contributing traffic to the A351 and A352 where the congestion converges on the roads to and from the conurbation then increased congestion is inevitable with its effects on air pollution, the local economy and inconvenience to local communities. Limiting housing developments to genuinely affordable homes for local people would reduce the local traffic and improve the situation for visitors.

If you have any supporting documents please [Dorset's Environmental Economy Summary paper.pdf](#) upload them here.

(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

Agent	Mr Nigel Jacobs (1185866)
Email Address	
Company / Organisation	Intelegant Lane
Address	The Studio Ferndown Forest Golf Club Ferndown BH22 9PH
Consultee	(1191181)
Company / Organisation	Dudsbury Homes (LM) Ltd
Address	Ferndown Forest Golf Course Forest Links Road Ferndown BH22 9PH
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dudsbury Homes (LM) Ltd (- 1191181)
Comment ID	PLPP554
Response Date	03/12/18 21:26
Consultation Point	Identifying a local housing requirement (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?	110-112
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 explanatory text in paragraph 110 states that the housing requirement is 168 homes per annum for the period 2018-2034 equating to a total requirement of 2,688. This has been calculated using the Government's standard methodology. However, the calculation uses the incorrect base or start year for undertaking the calculation, using 2017 as the starting year for applying the standard methodology, not 2018 the base or starting year of the local plan. Reference is to the workings are set out in the SHMA 2018 update report. How to calculate the standard methodology is prescribed in national Planning Practice Guidance (PPG) at paragraph 004 Ref. ID: 2a-oo4-20180913. Here it states that the calculation should be undertaken using the current year as the first year. It would not be compliant to therefore commence the local housing need calculation commencing in a previous year, and a year before the start date of the local plan.

Undertaken correctly the calculation of the standard methodology using the current household projections, which as of the date of this representation is the 2016 household based population projections published in September 2018. However, the Government's stated policy is to deliver 300,000 homes per annum which will not be achieved by applying the 2016 household projections. The Government is therefore consulting upon changes to the PPG which require the 2014 household based population projections to be used as the starting point to calculate minimum housing need. It is probable that before submission of the local plan for examination the basis for calculating the plan's housing requirement will have changed and certainly by the time an examination commences the pre-submission plan's housing requirement will not comply with national policy.

Undertaking the minimum local housing need calculation using the correct years i.e. 2018-28 and the 2014 household based projections produces an annual average of 128 homes per annum. Applying step 2 of the standard methodology, the affordability ratio which for Purbeck is 11.1, results in a minimum local housing need of 184 homes per annum. This is an extra 16 homes per annum or an extra 256 homes over the plan period at 2,944. This additional requirement is significant given Purbeck's low housing need, representing 9% of the requirement. Given that the standard methodology produces the minimum local housing need, and the local planning authority has not sought to uplift the requirement beyond the minimum figure, the shortfall should be viewed as the minimum uplift to the plan's housing requirement and consequently the housing requirement adjusted upwards.

The derivation of the standard methodology 'step 1' calculation is the artificially low starting point of the household based population projections. The housing evidence for the 2012 adopted local plan identified an objectively assessed need of 170 dwellings per annum (dpa), however, the plan's requirement was set at 120dpa. Completions average over the period 2006-2018 133dpa. In the context of the plan's requirement completions are slightly above this, however, they are significantly below the identified full need. Planning for less than the full need and delivering below this need affects the population growth and ultimately impacts upon projections and hence the standard methodology calculating the figure it does, irrespective of whether the local planning authority's or the representor's minimum figure is applied. The result is the local planning authority failing to make the step change required by government to the supply of new homes by accommodating the minimum number required of it in an area subject to high house prices, lower than average wages, environmental constraints and self-imposed Green belt restrictions.

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 housing requirement should be calculated correctly applying the methodology set out in the PPG and using the most up to date figures applying to the correct time period. By the time of submission it is likely that the Government's position will have changed and that the calculation will need to be

undertaken again. It is probable that the housing requirement figure will increase requiring the Council to identify additions sites in order to make the plan 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?

Yes. In order to to fully represent my client and to respond to the Inspector's questions and possible suggested amendments.

Comment

Agent	Mr Nigel Jacobs (1185866)
Email Address	[REDACTED]
Company / Organisation	Intelegant Lane
Address	The Studio Ferndown Forest Golf Club Ferndown BH22 9PH
Consultee	(1191181)
Company / Organisation	Dudsbury Homes (LM) Ltd
Address	Ferndown Forest Golf Course Forest Links Road Ferndown BH22 9PH
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dudsbury Homes (LM) Ltd (- 1191181)
Comment ID	PLPP555
Response Date	03/12/18 21:27
Consultation Point	Policy H1: Local housing requirement (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?	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? 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 housing requirement is calculated using the wrong start date and therefore the wrong data to calculate the minimum local housing need.

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)

Before submission the housing requirement will need to be recalculated irrespective of whether the Government amends the base data to be used following its current consultation to ensure the correct requirement is calculated. The outcome is likely to be an upward increase which will require additional sites to be identified.

(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 represent my client in a forum whereby their views can be adequately put across.

Comment

Agent	Mr Nigel Jacobs (1185866)
Email Address	[REDACTED]
Company / Organisation	Intelegant Lane
Address	The Studio Ferndown Forest Golf Club Ferndown BH22 9PH
Consultee	(1191181)
Company / Organisation	Dudsbury Homes (LM) Ltd
Address	Ferndown Forest Golf Course Forest Links Road Ferndown BH22 9PH
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dudsbury Homes (LM) Ltd (- 1191181)
Comment ID	PLPP556
Response Date	03/12/18 21:35
Consultation Point	Lytchett Matravers - 150 homes and a SANG (View)
Status	Processed
Submission Type	Web
Version	0.1
Files	Pre-submission representations on behalf of Dudsbury Homes Ltd
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?	134
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 supporting text explains that three suitable sites providing 150 homes will be provided at Lytchett Matravers together with a SANG. It is unclear how the local planning authority have concluded that only these three sites are suitable when a fourth site i.e. land south of Middle Road submitted through the SHLAA was identified as suitable in principle, and why therefore a stage 2 assessment was not undertaken as part of the Green Belt review despite being identified in the initial 2016 Green belt paper as a potential site to be removed? The evidence base would appear to have arbitrarily not progressed this site without justification but in the knowledge that the site was being promoted and that information was being provided to the Council to give the certainty of the site's deliverability.

Lytchett Matravers lies close to the conurbation of Poole, Bournemouth and Christchurch. The sites are within the south east Dorset Green Belt and therefore require exceptional circumstances to be demonstrated to justify their release for housing development. South east Dorset is a high demand area for housing, has high house prices and a high affordability ratio. It is also home to many internationally protected species and habitats that influence the spatial distribution of housing and future growth of the sub-region.

The Green Belt is drawn tightly round settlements operating as a restraint to the housing and economic growth of south east Dorset. Much of the eastern area of Purbeck is constrained by Green Belt, the part of the District where the highest demand for housing and the need for affordable housing is strongest. The Plan's spatial strategy seeks to spread housing distribution across the plan area and not necessarily where the demand is.

Lytchett Matravers is the largest village in Purbeck Council area, lying in the east of the plan area close to Poole. The plan at paragraph 43 recognises that the village lies in a sustainable and accessible location and through draft policy V1 identifies a housing number for Lytchett Matravers as part of the spatial strategy. It is agreed that Lytchett Matravers does indeed lie in a highly sustainable and accessible location and therefore the question is why is the allocation of sites restricted to just the three identified in the pre-submission plan when there is a fourth that is in a central location and can make a contribution to meeting the District's housing needs?

The evidence base i.e. the SHLAA in its various iterations does not identify a material difference to the sites considered in Lytchett Matravers save for the three sites now identified within the pre-submission plan are informed by supporting text that says that the impact on the Dorset Heaths can be mitigated, as opposed to this not being the case at Land south of Middle Road. Further evidence was submitted to the Council in the summer of 2018 confirming that indeed the proposed SANG for Lytchett Matravers would be available for the additional circa 30 dwellings for this site. Reiteration of this position at December 2018 from both Natural England and the site promoter for the SANG confirms that mitigation can be secured (see Appendix 1 of the attached document) and therefore there is no obstacle to the site coming forward for development.

Examination of the SEA/SA for the sites at Lytchett Matravers indicates that the three proposed allocations cannot be ruled out. Undertaking the same procedural requirements and scoring the site at Land south of Middle Road would secure the same score and reasoning as the promoted sites. This exercise is included at Appendix 2 of the attached document as if undertaken by the Council and its consultants.

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 Plan should include the further allocation of the site Land south of Middle Road, Lytchett Matravers to aid deliverability of the plan's housing requirement.

If you have any supporting documents please upload them here.

Pre-submission representations on behalf of
Dudsbury Homes Ltd
Pre-submission representations on behalf of
Dudsbury Homes Ltd

(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 fully represent my client and to provide clarity of position in response to questions and proposed changes from the Inspector.

Purbeck District Council

**Purbeck Local Plan Pre-submission draft
Publication**

Representations on behalf of

Dudsbury Homes (LM) Ltd

Submitted by Intelligent Land

Land adjacent to Middle Road, Lytchett Matravers

December 2018



1. Introduction

Intelligent Land have been instructed to make representation to Purbeck District Council's Pre-submission draft local plan on behalf of Dudsbury Homes (LM) Ltd. These representations follow up the representations made to the previous Regulation 18 consultation of January 2018 'New Homes for Purbeck Consultation' and to the submission of further information during the summer of 2018 following meeting with the Council. The representations relate to the omission of land adjacent to Middle Road, Lytchett Matravers from being allocated within the plan without justification. A location plan is shown below (Figure 1). The land area extends to 2.5ha.

Figure 1: Location Plan



2. Representations

Paragraphs 110-112

- 2.1. The explanatory text in paragraph 110 states that the housing requirement is 168 homes per annum for the period 2018-2034 equating to a total requirement of 2,688. This has been calculated using the Government's standard methodology. However, the calculation uses the incorrect base or start year for undertaking the calculation, using 2017 as the starting year for applying the standard methodology, not 2018 the base or starting year of the local plan. Reference is to the workings are set out in the SHMA 2018 update report.

- 2.2. How to calculate the standard methodology is prescribed in national Planning Practice Guidance (PPG) at paragraph 004 Ref. ID: 2a-oo4-20180913. Here it states that the calculation should be undertaken using the current year as the first year. It would not be compliant to therefore commence the local housing need calculation commencing in a previous year, and a year before the start date of the local plan.
- 2.3. Undertaken correctly the calculation of the standard methodology using the current household projections, which as of the date of this representation is the 2016 household based population projections published in September 2018. However, the Government's stated policy is to deliver 300,000 homes per annum which will not be achieved by applying the 2016 household projections. The Government is therefore consulting upon changes to the PPG which require the 2014 household based population projections to be used as the starting point to calculate minimum housing need. It is probable that before submission of the local plan for examination the basis for calculating the plan's housing requirement will have changed and certainly by the time an examination commences the pre-submission plan's housing requirement will not comply with national policy.
- 2.4. Undertaking the minimum local housing need calculation using the correct years i.e. 2018-28 and the 2014 household based projections produces an annual average of 128 homes per annum. Applying step 2 of the standard methodology, the affordability ratio which for Purbeck is 11.1, results in a minimum local housing need of 184 homes per annum. This is an extra 16 homes per annum or an extra 256 homes over the plan period at 2,944. This additional requirement is significant given Purbeck's low housing need, representing 9% of the requirement. Given that the standard methodology produces the minimum local housing need, and the local planning authority has not sought to uplift the requirement beyond the minimum figure, the shortfall should be viewed as the minimum uplift to the plan's housing requirement and consequently the housing requirement adjusted upwards.
- 2.5. The derivation of the standard methodology 'step 1' calculation is the artificially low starting point of the household based population projections. The housing evidence for the 2012 adopted local plan identified an objectively assessed need of 170 dwellings per annum (dpa), however, the plan's requirement was set at 120dpa. Completions average over the period 2006-2018 133dpa. In the context of the plan's requirement completions are slightly above this, however, they are significantly below the identified full need. Planning for less than the full need and delivering below this need affects the population growth and ultimately impacts upon projections and hence the standard methodology calculating the figure it does,

irrespective of whether the local planning authority's or the representor's minimum figure is applied. The result is the local planning authority failing to make the step change required by government to the supply of new homes by accommodating the minimum number required of it in an area subject to high house prices, lower than average wages, environmental constraints and self-imposed Green belt restrictions.

Policy H1

- 2.6. Objection is made to the housing requirement figure in that it is calculated incorrectly and should be adjusted to reflect the NPPF compliant position at time of submission. The requirement while being an at least figure minimises the amount of housing that the District is to provide and should plan positively to meet the housing need that exists. Given the coverage of environmental constraints the Council has not sought to identify how the step change in housing can be delivered and should identify sufficient additional sites to meet the correct minimum housing need figure.

Paragraph 134

- 2.7. The supporting text explains that three suitable sites providing 150 homes will be provided at Lytchett Matravers together with a SANG. It is unclear how the local planning authority have concluded that only these three sites are suitable when a fourth site i.e. land south of Middle Road submitted through the SHLAA was identified as suitable in principle, and why therefore a stage 2 assessment was not undertaken as part of the Green Belt review despite being identified in the initial 2016 Green belt paper as a potential site to be removed? The evidence base would appear to have arbitrarily not progressed this site without justification but in the knowledge that the site was being promoted and that information was being provided to the Council to give the certainty of the site's deliverability.
- 2.8. Lytchett Matravers lies close to the conurbation of Poole, Bournemouth and Christchurch. The sites are within the south east Dorset Green Belt and therefore require exceptional circumstances to be demonstrated to justify their release for housing development. South east Dorset is a high demand area for housing, has high house prices and a high affordability ratio. It is also home to many internationally protected species and habitats that influence the spatial distribution of housing and future growth of the sub-region.
- 2.9. The Green Belt is drawn tightly round settlements operating as a restraint to the housing and economic growth of south east Dorset. Much of the eastern area of Purbeck is

constrained by Green Belt, the part of the District where the highest demand for housing and the need for affordable housing is strongest. The Plan's spatial strategy seeks to spread housing distribution across the plan area and not necessarily where the demand is.

- 2.10. Lytchett Matravers is the largest village in Purbeck Council area, lying in the east of the plan area close to Poole. The plan at paragraph 43 recognises that the village lies in a sustainable and accessible location and through draft policy V1 identifies a housing number for Lytchett Matravers as part of the spatial strategy. It is agreed that Lytchett Matravers does indeed lie in a highly sustainable and accessible location and therefore the question is why is the allocation of sites restricted to just the three identified in the pre-submission plan when there is a fourth that is in a central location and can make a contribution to meeting the District's housing needs?
- 2.11. The evidence base i.e. the SHLAA in its various iterations does not identify a material difference to the sites considered in Lytchett Matravers save for the three sites now identified within the pre-submission plan are informed by supporting text that says that the impact on the Dorset Heaths can be mitigated, as opposed to this not being the case at Land south of Middle Road. Further evidence was submitted to the Council in the summer of 2018 confirming that indeed the proposed SANG for Lytchett Matravers would be available for the additional circa 30 dwellings for this site. Reiteration of this position at December 2018 from both Natural England and the site promoter for the SANG confirms that mitigation can be secured (Appendix 1) and therefore there is no obstacle to the site coming forward for development.
- 2.12. Examination of the SEA/SA for the sites at Lytchett Matravers indicates that the three proposed allocations cannot be ruled out. Undertaking the same procedural requirements and scoring the site at Land south of Middle Road would secure the same score and reasoning as the promoted sites. This exercise is included at Appendix 2 as if undertaken by the Council and its consultants.

Policy H6

- 2.13 Objection is made to policy H6 on the grounds that the policy omits the opportunity to secure an additional 30 dwellings by including Land south of Middle Road as an allocation. The process undertaken by the Council fails to distinguish a material difference between the sites proposed in the pre-submission plan and the site at south of Middle Road despite evidence having been submitted to the Council. Failure to fully consider this evidence and

provide adequate reasons for non-inclusion undermines the process of producing the plan. The Council should propose modifications to the Plan to include the site and therefore provide additional certainty to the deliverability of the overall housing requirement.

Appendix 1

1. Email confirmation from Natural England that proposed SANG at Lytchett Matravers has capacity to accommodate the additional dwellings that can come forward on land south of Middle Road.

Dear Mr Jacobs,

Following your consultation I am writing to confirm that as a matter of principle the SANG at Lytchett Matravers would have capacity for an additional 30 dwellings should this come forward as an allocation. Thank you for copying me in on the current Masterplan, the plot is located where I recalled it to be.

The site is located about 1.3km from the proposed SANG and access by car avoids the more congested parts of the village at key times.

Natural England note that in terms of delivery the promoter is reliant on another party to bring forward this development which does bring matters of certainty of delivery into consideration. However as far as Natural England is concerned the proposal is one which can secure suitable mitigation for the European and internationally protected heaths.

Natural England has no information about the existing biodiversity on the promoted site which needs to be addressed prior to the Examination through a survey.

Nick Squirrel
Conservation and Planning Lead Advisor
Dorset and Hampshire Team
Dorset, Hampshire and Isle of Wight Area Team
Natural England

Mob [REDACTED]

Natural England is here to conserve and enhance the natural environment, for its intrinsic value, the wellbeing and enjoyment of people and the economic prosperity that it brings
www.gov.uk/natural-england

From 1 April 2011 please send consultations to Natural England by email to consultations@naturalengland.org.uk.
Or, if it is not possible to consult us electronically then consultations should be sent to the postal address below.

Natural England
Consultation Service
Hornbeam House
Electra Way
Crewe Business Park
Crewe
Cheshire
CW1 6GJ

2. Email confirmation from Wyatt Homes that agreement in principle for accessing the SANG land at Lytchett Matravers has been agreed.

Subject: Re: Lytchett Matravers SANG capacity, Prubeck Local Plan

Dear Mark

I can confirm that in principle we are agreeable to making surplus SANG capacity available to serve your site, this would be subject to us securing the appropriate allocations and consents on our own sites. We would of course need agree terms and put a formal agreement in place at the appropriate time.

Regards

David



David Wyatt
Managing Director

Wyatt Homes
1 Parkstone Road, Poole, Dorset, BH15 2NN

Email: [REDACTED]

Tel: 01202 668266
Mobile: [REDACTED]

Web: www.wyathomes.co.uk

Appendix 2

SA/SEA for Land south of Middle Road, Lytchett Matravers.

Site name: Land south of Middle Road, Lytchett Matravers					
Application Number: SHLAA/ 0030					
Old Ref. Number: 6/14/0375					
SA Objective	Short impact	Medium impact	Long impact	Supporting comments	Mitigation
Meet as much of Purbeck's housing need as possible	+	++	++	Allocation of this site would contribute to the District's housing requirements. As a site of about 30 units, in applying other policies in the Plan, it would allow for the delivery of affordable, self-build and single storey homes. There may be a delay before the site is completed and as such the benefits are likely to be more significant in the medium to long term. The effects are likely and would be permanent.	No mitigation identified.
Promote services and facilities where need is identified	n	+	+	This allocation is within Lytchett Matravers, which has a range of services and facilities. More homes in this location could put pressure on existing services and facilities, but also help to support their retention. New development offers the opportunity to provide new services and facilities alongside it, particularly those that are required within an area. There may be a delay before the site is completed and as such the benefits are likely to be more significant in the medium to long term. Probability of the effect is uncertain – dependent upon the mitigation that can be secured in respect of services and facilities. There would be a short term neutral effect but then the positive effects would likely be permanent.	Monitoring of the existing services and facilities and ensuring any gaps in provision would be secured as part of the planning process when the site is delivered.
Harness the economic potential of tourism and widen employment opportunities	+	+	+	A mix of new housing development at this location has the potential to help diversify the local workforce and introduce new employment to the area, thus bringing permanent improvements to the local economy overall.	No mitigation identified.

Site name: Land south of Middle Road, Lytchett Matravers					
Application Number: SHLAA/ 0030					
Old Ref. Number: 6/14/0269					
SA Objective	Short impact	Medium impact	Long impact	Supporting comments	Mitigation
Help everyone access basic services, reduce the need to travel by car and encourage cycling, walking and use of public transport	n	n	n	The site would benefit from proximity to existing services and facilities. Lytchett Matravers benefits from some bus services but no rail connections. It is likely that many residents would use private vehicles to meet their daily needs. The effect on the local road network is unknown and would need to be explored. The size of the site would mean that any access/transport development delivered alongside it would probably mitigate adverse effects rather than enhance.	Improvements to pedestrian, cycle ways and public transport should be incorporated into development proposals. Improvements to the road network may need further investigation.
Reduce vulnerability to flooding and coastal change and plan for climate change	n	n	n	The site selection has been informed by a comprehensive Strategic Flood Risk Assessment. The site is not at risk from issues due to climate change and subsequent sea level rise. The site is located close to a watercourse to the east for which there is associated surface water flood risk. Mitigation would be required to avoid adverse impacts. There is potential for any new development to impact on flooding through, for example, increased run-off. However, any new development is required to demonstrate that impacts are neutral and drainage solutions are sustainable prior to occupation.	Follow the requirements of relevant local and national planning policy to mitigate flood risk.

Site name: Land south of Middle Road, Lytchett Matravers					
Application Number: SHLAA/ 0024					
Old Ref. Number: 6/14/0269					
SA Objective	Short impact	Medium impact	Long Impact	Supporting comments	Mitigation
Protect and enhance habitats and species and local Geodiversity	-	-	n	Whilst the site is not designated, there is the potential for some harm to biodiversity, geodiversity and loss of green infrastructure. This negative effect is likely but would not be permanent; whilst there could be some harm to biodiversity and geodiversity, and loss of green infrastructure that could be irreversible, new development can compensate by incorporating opportunities for biodiversity and new green infrastructure. If designed well, new development could result in a net increase in biodiversity and green infrastructure. The Plan requires that allocated sites deliver a SANG to mitigate the effects of new homes on European sites.	Ensure new development designs-in opportunities for biodiversity and new green infrastructure.
Protect and enhance Purbeck's unique landscape and townscape, and cultural and historical assets	-	n	n	Development at this site would not represent harm to designated heritage assets or their settings. Archaeological site surveys may be needed to identify the presence or significance of any buried remains and potential harmful impacts on them. The site is located outside of the Area of Outstanding Natural Beauty (AONB). It is within the green belt and thus its removal and development would see the loss of some openness in this location, although the current openness is limited due to development to the north, east and west. The presence of a building site will inevitably cause detriment to the landscape and townscape over the short term construction phase. Development has the potential to minimise impact on the wider landscape through layout and design measures, for instance, through the use of screening and soft edges and with a significant area as open space that would not be removed from the Green Belt.	Further archaeological site investigations are needed to identify any assets and/or the significance of them. Application of high standards of design quality within the site.

Comment

Agent	Mr Nigel Jacobs (1185866)
Email Address	[REDACTED]
Company / Organisation	Intelegent Lane
Address	The Studio Ferndown Forest Golf Club Ferndown BH22 9PH
Consultee	(1191181)
Company / Organisation	Dudsbury Homes (LM) Ltd
Address	Ferndown Forest Golf Course Forest Links Road Ferndown BH22 9PH
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dudsbury Homes (LM) Ltd (- 1191181)
Comment ID	PLPP557
Response Date	03/12/18 21:37
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?	H6
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)

Objection is made to policy H6 on the grounds that the policy omits the opportunity to secure an additional 30 dwellings by including Land south of Middle Road as an allocation. The process undertaken by the Council fails to distinguish a material difference between the sites proposed in the pre-submission plan and the site at south of Middle Road despite evidence having been submitted to the Council. Failure to fully consider this evidence and provide adequate reasons for non-inclusion undermines the process of producing the plan.

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 should propose modifications to the Plan to include Land south of Middle Road as an allocation site and providing additional certainty to the deliverability of the overall housing requirement.

(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 represent my client and to provide clarity to questions and proposed changes from the Inspector.

Comment

Consultee	Mr & Mrs Dunlop (1190181)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr & Mrs Dunlop (1190181)
Comment ID	PLPP174
Response Date	30/11/18 17:46
Consultation Point	Small sites development (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?	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)

The National Planning Policy Framework states that in the Green Belt limited infilling in villages is acceptable. However policy H8 refers to around the edges, this is wrong and will ultimately lead to further and inappropriate settlement extensions and green belt boundary realignments in villages such as Lytchett Matravers whose settlement boundaries have already been defined and that have site(s) allocated through the local plan.

The Government attaches great importance to Green Belts giving them the upmost protection this being fundamental to the framework. Policy H8 will seriously undermine this protection in villages such

as Lytchett Matravers, that sit wholly within the green belt and have sites for housing allocated through the local plan. It will lead to a gross loss of the green belt that surrounds them as apposed to a net gain which is sought when realigning green belt boundaries, due to their importance.

Lytchett Matravers, for instance is to be allocated a further 3 large sites bringing the total to 4 allocated sites for the village. Despite being designated as a key service village it is no less a hill top village community with no railway station, poor and overwhelmed public services and a network of narrow country lanes and roads, many of which are unsuitable and inadequate for the potential housing increase that would come with policy H8 if applied to the edges of the village.

Policy H8 applied in its current format to large villages with allocated site(s) such as Lytchett Matravers will inevitably result in a severe negative, cumulative impact on road safety to all road users and to the communities on the edges of these settlements. The policy is simply not robust enough to have sufficient control in helping to determine planning applications that are intending to extend the boundary of these settlements, releasing further green belt and developing out into open countryside. To determine planning applications "on their own merits" through this policy, especially in villages which are wholly within the green belt and have allocated site(s) would be non compliant and unsound. The reference to 'around the edges' should be removed.

In a recent issue of the "About Purbeck" magazine (November 2018 issue 39 page 4), which delivers news and information from Purbeck District Council to everyone in the district, it was stated that a small sites policy would enable development "in some of the Districts smaller villages where development has not been allowed before". It is obvious from this statement that the small sites policy was not intended for large villages such as Lytchett Matravers that already have a large site allocation and importantly sit entirely within the green belt.

Policy H8 will fail to comply with the National Planning policy Framework if it allows further settlement extensions around the edges of villages within the green belt, especially when the village already has allocated site(s) for 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)

For the plan to be compliant and the small sites policy H8 sound, either one of the paragraphs below should be inserted. This will ensure compliance with NPPF "limited infilling in villages" is met.

In addition the policy should be strengthened perhaps by using '*directly*' in-between existing buildings. Without this the policy is too vague and weak as just 'in-between' suggests that the buildings could be quite some distance apart with anomalous land in-between and would not comply with 'limited'.

(1). Where proposals would be within the green belt, only limited infilling, on sites positioned *directly* in-between existing buildings, within towns and villages will be permitted. *Except for these villages that have sites allocated through the plan then this policy will not allow for any further green belt release throughout the plan period.* Existing towns and villages are listed under 'settlement hierarchy' in the glossary of the Purbeck Local Plan.

or, paragraph 2 below, which as a compromise would allow some limited development for villages and towns with allocated sites and within the green belt but only within the settlement boundary. This will help ensure that there will be a spread of small sites across the district especially in those settlements that do not have any allocated sites for housing and are in need of some new homes albeit limited.

(2).Where proposals would be within the green belt, only limited infilling, on sites positioned *directly* in-between existing buildings, within towns and villages will be permitted. *Except for villages that have sites allocated for release through the local plan, then this policy will not allow for*

any further settlement extensions throughout the plan period. Existing towns and villages are listed under 'settlement hierarchy' in the glossary of the Purbeck Local Plan.

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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?

For involvement in the plans compliance with the NPPF

Comment

Consultee	Mrs Margaret Elizabeth Dunn (1190557)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mrs Margaret Elizabeth Dunn (1190557)
Comment ID	PLPP186
Response Date	01/12/18 08:50
Consultation Point	Policy H4: Moreton Station / Redbridge Pit (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:	<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)
Which policy / paragraph number / policies map does your comment relate to?	H4 d
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)

'Identifying important trees' will not mitigate the loss of the caravan site - an unusually attractive wildlife area.

The caravan site, moulded by old quarrying, now provides mature woodland on former heathland, for a wide variety of wildlife. Housing development here would result in the loss of an unusually attractive area, unknown by many due to its secluded location but not to those who have enjoyed it as a caravan site. It needs to be visited to appreciate the potential loss.

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 caravan site should be retained as a recreation area.

The caravan site is too valuable as a recreation area to be lost to development. Mature woodland set in this unusual undulating landscape would provide a more suitable SANG, unlike the area identified at the eastern end of the main quarry. It is already laid out with paths etc so would need minimal landscaping.

General comment if I may: I understand this consultation is about potential housing and SANG in the Moreton / Redbridge area but it must also be seen in the context of Crossways as a whole. This area provides an invaluable recreational outdoor space for this growing community, qualities increasingly recognised as being so important by health and education authorities. To appreciate the area it really needs to be visited.

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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 barry dyke (1189098)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	mr barry dyke (1189098)
Comment ID	PLPP21
Response Date	22/11/18 15:15
Consultation Point	Foreword (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	2
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?	3
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)

I do not consider that concentrating the developments largely to Wool and Moreton is 'spreading development across the district' as stated in para 3. I do not agree these areas are not environmentally constrained. they may have a railway connection but the majority of the people in the new houses will be travelling by car. Wool is suffering badly, environmentally with the build up queuing of vehicles at the railway crossing which frequently, and at least twice per hour, causes stoppage of up to 8 minutes. the pollution from vehicles is a major unacceptable concern. A by pass is needed now and will be essential if the proposed plan goes ahead!

As a PPG member I know the current medical/health facilities are overstretched and its not the building but the ability to recruit the necessary staff.

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 sound the plan needs to take account of the need stated by the communities concerned. Wool currently has a NEED of less than 30 additional homes for its people. there is no point assuming that the Dorset Innovation Park is going to dramatically expand. History has shown this to be a flop. Although a new company is said to be relocating from Poole the owners have openly stated they will be bringing their current staff with them. They will, in the main, not move home but just add to the traffic difficulties.

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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 barry dyke (1189098)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	mr barry dyke (1189098)
Comment ID	PLPP22
Response Date	22/11/18 15:26
Consultation Point	Chapter 1: Introduction (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	2
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?	13
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 Council has produced a duty to co-operate position statement providing an update on the activities undertaken by the Council since the publication of the New Homes for Purbeck consultation in January 2018. This details the discussions that the Council has had with a number of key partners including other local planning authorities, Dorset County Council, Highways England, utility companies, health and education providers. Further joint working will continue.

contrary to this statement there has been insufficient consultation in the Wool situation with the health and school providers. I was approached, as a PPG member to see what I knew about the proposal to include a major care home in the Wool development. The Surgery said this would have a MAJOR impact and would be unsustainable. They had not been consulted at any stage.

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 listen to the views of the existing population. Coming to meetings, hearing the comments then going away and ignoring them is unacceptable and unfair.

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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 barry dyke (1189098)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	mr barry dyke (1189098)
Comment ID	PLPP23
Response Date	22/11/18 15:32
Consultation Point	Characteristics of Purbeck (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	2
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?	1
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)

Increasing the population of Wool is hardly consistent with the aims of maintaining uniqueness and community which is vital to these villages.

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By reducing the total numbers planned and/or spreading more evenly over the district.

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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 barry dyke (1189098)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	mr barry dyke (1189098)
Comment ID	PLPP24
Response Date	22/11/18 15:40
Consultation Point	Infrastructure (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	2
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?	last
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)

Developments need to provide, or contribute to, necessary infrastructure. In a small rural District with comparatively low levels of development, the resources available for infrastructure are limited and will need to be prioritised.

If the level of building proposed is to go ahead, even at a lower level, then this final statement is unacceptable. INFRASTRUCTURE RESOURCES HAVE TO BE FOUND/PROVIDED otherwise the development plans should be shelved until they are available!

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 proceed with any significant development without GUARANTEED Infrastructure in place.

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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 barry dyke (1189098)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	mr barry dyke (1189098)
Comment ID	PLPP25
Response Date	22/11/18 15:52
Consultation Point	Policy V1: Spatial strategy for sustainable communities (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	2
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 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)

main concern here, as previously stated, is the sudden suggested provision of Care Homes for 60+ in Wool and Moreton. The impact on Wool Surgery has not been considered. Moreover, the new Care Home in Sandford is currently not even half full and, I understand, is going to be split into apartments.

I recently visited a retirement apartment block in Poundbury where over fifty fives can live independently but have onsite facilities and a duty warden always on call. Something along these lines, in my opinion, would be a far better option allowing the freeing up of overlarge homes by the local elderly for younger families. Financial inducements/assistance could/should be provides as incentives.

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 above

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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 barry dyke (1189098)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	mr barry dyke (1189098)
Comment ID	PLPP26
Response Date	22/11/18 15:58
Consultation Point	The green belt (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	2
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 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 not build at Hilton Heath?? It is closer to the industrial/work areas than either Wool or Mreton.

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)

Reinstate the old plan and spend what is necessary to clear the ground. Providing homes for the workers in the Poole/Bournemouth area.

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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 barry dyke (1189098)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	mr barry dyke (1189098)
Comment ID	PLPP27
Response Date	22/11/18 16:09
Consultation Point	Policy E11: Development next to sewage treatment works and pumping stations (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	2
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 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 existing sewage works in Wool is overloaded and produces frequent bad odour. I believe and understand that the level of development proposed will cause the need for major upgrade. It is also essential that pollution from whichever plant is not let out into the river/estuary.

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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 barry dyke (1189098)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	mr barry dyke (1189098)
Comment ID	PLPP28
Response Date	22/11/18 16:16
Consultation Point	Identifying a local housing requirement (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	2
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
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)

With Wools current housing need of around thirty the plan intends to meet the 'local' needs of other communities by proposing 470 plus infill of maybe 90 in Wool.

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)

Reconsider the plan and put the houses where they are needed.

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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 barry dyke (1189098)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	mr barry dyke (1189098)
Comment ID	PLPP29
Response Date	22/11/18 16:28
Consultation Point	Policy H2: The housing land supply (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	2
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 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 distribution of proposed builds is totally unfair. As stated earlier the majority of workers will, regardless of what we might like, be travelling by car. How come that Were Regis being on a major artery in the road network supplying Dorchester, Poole/Bournemouth and even Wimborne, Blandford and Ringwood is not getting a much larger proportion of the development when there is ample land/countryside surrounding the village??

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put a significant volume of the 'need' in the Beer Regis area which with minor tweaks to the roundabouts would serve the industrial and domestic requirements well.

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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 barry dyke (1189098)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	mr barry dyke (1189098)
Comment ID	PLPP30
Response Date	22/11/18 16:34
Consultation Point	Provide a mix of housing, to include affordable options, that meets the needs of local people (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	2
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 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)

Affordable has to be defined otherwise these statements are irrelevant . We in Wool have determined that £150k would be the maximum level and even then deposit support would be required.

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)

Serious consideration needs to be given to building Council/Social housing which I believe the government has recently given support to including the suggestion of funding availability

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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 barry dyke (1189098)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	mr barry dyke (1189098)
Comment ID	PLPP31
Response Date	22/11/18 16:48
Consultation Point	Policy H14: Second homes (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	2
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 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)

A serious second homes policy needs to be applied across the whole area as per St Ives. At a minimum owners who are not letting their property and are not occupying on a near permanent basis should be subject to a suitable levy, i.e., double council tax. This could be used to provide affordable housing support for the real needy cases.

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 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)

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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 barry dyke (1189098)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	mr barry dyke (1189098)
Comment ID	PLPP32
Response Date	22/11/18 17:01
Consultation Point	Policy I2: Improving accessibility and transport (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	2
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 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)

it omits the positive statement of the essential by-pass for Wool

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)

Ensure by whatever means that the by-pass around Wool is on the agenda. The under/overpass of Wool crossing could be an alternative gutless satisfactory option.

[Having lived in Holland for many years I would suggest that if the Dutch can put in suitable underpasses, when they are all below sea level, then our engineers have no excuse]

(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 Lesley Elliott (1188187)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mrs Lesley Elliott (1188187)
Comment ID	PLPP55
Response Date	27/11/18 21:50
Consultation Point	Policy H14: Second homes (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	2
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 / 185 & 186
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)

Under the terms of the military covenant, the definition of second homes should not penalise Service personnel living in military accommodation from owning property in Purbeck. The very nature of their employment means that they are unable to select where they live whilst serving Queen and Country and, especially if posted abroad, may not be able to occupy a property in Purbeck to satisfy the criteria in para 186. Likewise, if a Serviceman/woman owned a property in Purbeck, it would be unreasonable for this to be treated as a second home should he/she be posted away from the District.

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)

Add the following words to the end of para 185

"and military personnel living in service accommodation."

This would ensure that they were treated fairly and not penalised for their military service.

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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 Richard Ettling (1190536)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Richard Ettling (1190536)
Comment ID	PLPP128
Response Date	29/11/18 19:59
Consultation Point	The green belt (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? 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 document does not demonstrate that the removal of land from the Green Belt is proposed for "very special circumstances" and is therefor unlawful.

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)

Degrees of importance are allocated to the importance of Green Belt and the Draft Local Plan allocates parcels 18 and 20 as being of high importance. To suggest that they can be removed from Green Belt protection is contradictory particularly when evidence is not provided that non Green Belt options have been exhausted. Therefore, parcels 18 and 20 must be removed from the plan.

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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 Richard Ettling (1190536)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Richard Ettling (1190536)
Comment ID	PLPP130
Response Date	29/11/18 20:14
Consultation Point	The green belt (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? 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)

Since 2012, 143 dwellings have been built or are in the planning process meaning that Lytchett Matravers has already contributed significantly to the development of local housing stock. This is not reflected in the plan.

The plan does not address the issue of increased traffic joining the hazardous junctions onto the A350 and the A35. It would be naive to suggest that new residents would use public transport at a time when services are being reduced or cut entirely.

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 issue of the contribution already made by Lytchett Matravers to the local housing stock should be properly acknowledged and the method and funding for the necessary road improvements should be included in the plan.

It should also be borne in mind that some of the other proposed locations in the plan have direct links via major roads to centres of employment such as the Poole/Bournemouth conurbation, Dorchester and beyond. In addition, some of the options are within walking distance of rail links to the same areas; this represents a more environmentally friendly solution.

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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