Wareham Neighbourhood Plan 2019-2034- Submission Plan-Summary of Representations

Wareham Town Council submitted their final version of the Wareham Neighbourhood Plan 2019 - 2034 to Dorset Council for independent examination in December 2020. People were given eight weeks from Friday 18 December 2020 to Friday 12 February 2021, to comment on the content of the plan or how it was produced. At the close of the public consultation 14 representations were received.

The following table is a summary of the representations received, as required by Regulation 4(3)(b)(iii) of the Neighbourhood Planning (Referendums) Regulations 2012. Copies of the original, full representations as they were submitted to Dorset Council are available online from: www.dorsetcouncil.gov.uk/wareham-neighbourhood-plan

Rep ID	Respondent	Summary		
WA01	Ruth Hall Wessex Water	Policy H5. Westminster Road. An existing 3 inch water main, 6 inch water main and 150mm foul sewer cross the site. The design for this development must consider the required easements necessary when building near Wessex Water assets. Subject to engineering agreement and application it may be able to divert these apparatus at the developer's cost to suit site layout.		
		Policy H7 Wareham Town Northern Gateway The policy identifies support for the redevelopment of the former gasworks site and Autopoint garage site for housing. There is an existing Wessex Water Sewage Pumping Station (SPS) which lies to the north of the gasworks site. Please find attached an extract from our asset database showing the location of the North Bridge SPS. A 15m buffer should be retained around the SPS to the nearest residential property to minimise noise and odour nuisance. The need to incorporate such a buffer may impact on the number of dwellings which can be delivered.		
		Policy H8 Former Hospital and Health Centre Site An existing 4 inch water main crosses the site. The design for this development must consider the required easements necessary when building near Wessex Water assets. Subject to engineering agreement and application it may be able to divert these apparatus at the developer's cost to suit site layout.		
		Policy GS1 Protection of Local Green Spaces Existing Wessex Water assets cross the Proposed designated local green spaces (i.e A, B, C, K and O) This policy must not constrain maintenance or improvement programmes, which are critical for the efficient and safe operation of Wessex Water services.		

WA02	Highways England	Thank you for providing Highways England with the opportunity to comment on the revised submission version of the Wareham Neighbourhood Plan. Highways England is responsible for operating, maintaining and improving the strategic road network (SRN) which in this case comprises the A35 to the west of Bere Regis and the A31 between Bere Regis and Ringwood, which pass to the north of the plan area. We have noted the changes that have been made to the version previously consulted on in 2018 and subsequently withdrawn from examination. We are satisfied that these changes do not alter our earlier comments. The plan identifies sites to deliver housing growth of around 300 dwellings over the plan period 2019-2034, reflecting the level of growth identified within the Purbeck Local Plan, but delivery now expected to be met wholly from sites within the existing settlement boundary. The existing Sandford Industrial Estate will continue to be safeguarded for employment uses. We are therefore satisfied that the plan's proposed policies are unlikely to result in levels of development that will significantly impact upon the SRN, and for which transport modelling was undertaken by Purbeck District Council in support of their Local Plan. However, we welcome the inclusion within Chapter 3 Infrastructure that large scale development will be expected to be supported by an appropriate transport assessment, in line with the requirements of DfT Circular 02/2013 The Strategic Road Network and the Delivery of Sustainable Development. In more general terms, we welcome policies which aim to safeguard the viability of town centre retail and local facilities, and that will improve of pedestrian, cycle and train links, as these will increase the sustainability of the community, reducing the need for private car trips and encouraging the use of non-car modes. These comments do not prejudice any future responses Highways England may make on site specific applications as they come forward through the planning process, which will be considered by
WA03	Avision Young on behalf of National Grid.	National Grid has appointed Avison Young to review and respond to Neighbourhood Plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document. About National Grid National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators across England, Wales and Scotland. National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use. National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States. Proposed development sites crossed or in close proximity to National Grid assets: An assessment has been carried out with respect to National Grid's electricity and gas transmission assets which include high voltage electricity

assets and high-pressure gas pipelines. National Grid has identified that it has no record of such assets within the Neighbourhood Plan area. National Grid provides information in relation to its assets at the website below.

www2.nationalgrid.com/uk/services/land-and-development/planningauthority/shape-files/

Please also see attached information outlining guidance on development close to National Grid infrastructure.

Distribution Networks Information regarding the electricity distribution network is available at the website below: www.energynetworks.org.uk Information regarding the gas distribution network is available by contacting: plantprotection@cadentgas.com Further Advice Please remember to consult National Grid on any Neighbourhood Plan Documents or site specific proposals that could affect our assets.

We would be grateful if you could add our details shown below to your consultation database, if not already included:

Guidance on development near National Grid assets National Grid is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Electricity assets

Developers of sites crossed or in close proximity to National Grid assets should be aware that it is National Grid policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance. National Grid's 'Guidelines for Development near pylons and high voltage overhead power lines' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here:

https://www.nationalgridet.com/document/130626/download

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site. National Grid's statutory safety clearances are detailed in their 'Guidelines when working near National Grid Electricity Transmission assets',

which can be downloaded here:www.nationalgridet.com/network-and-assets/working-near-our-assets

		Gas assets
		High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Grid's approach is always to seek to leave their existing transmission pipelines in situ. Contact should be made with the Health and Safety Executive (HSE) in respect of sites affected by High-Pressure Gas Pipelines. National Grid have land rights for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Grid's 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement.
		National Grid's 'Guidelines when working near National Grid Gas assets' can be downloaded here: www.nationalgridgas.com/land-and-assets/working-near-our-assets
WA04	Office for Nuclear Regulation (ONR)	Please note that ONR's land use planning processes published at http://www.onr.org.uk/land-use-planning.htm may apply to some of the developments within the Wareham Neighbourhood Plan. If you are a Local Authority with areas that are within an ONR consultation zone please be aware that in order for ONR to have no objections to such developments we will require: • confirmation from relevant Council emergency planners that developments can be accommodated within any emergency plan required under the Radiation (Emergency Preparedness and Public Information) Regulations 2019; and • that the developments do not pose an external hazard to the site. Also please see the attached email which includes details of a letter sent to all local authority planning departments regarding forthcoming changes ONR is to make to our consultation zones. Further correspondence involving the ONR is available via the

is made. • SGN are unable to book capacity and the above assessment does not guarantee the availability of future capacity which is offered on a 'first come, first served basis'.

STATUTORY OBLIGATIONS

Where required, SGN will look to manage the provision of any off-site infrastructure improvements, in line with the overall development growth and / or timescales provided. The full extent of these works will be dependent on the nature and location of the requested load(s), potentially requiring LP reinforcement in addition to that required for the IPMP networks and will only become clear once a developer's request has been received. Reinforcement solutions are likely to involve the provision of a new pipeline in parallel to SGN's existing mains system but may also include the installation of above ground apparatus involving land purchase.

- 2 As this is a high-level assessment and response, the information provided is indicative only and should be use as a guide to assist you on your assessment. While information obtained through consultation and / or engagement on Local Development Plans is important to our analysis, it only acts to identify potential development areas. Our principle statutory obligations relevant to the development of our gas network arise from the Gas Act 1986 (as amended), an extract of which is given below:- Section 9 (1) and (2) which provides that:
- 9. General powers and duties (1) It shall be the duty of a gas transporter as respects each authorised area of his:(a) to develop and maintain an efficient and economical pipe-line system for the conveyance of gas; and (b) subject to paragraph (a) above, to comply, so far as it is economical to do so, with any reasonable request for him (i.) to connect to that system, and convey gas by means of that system to, any premises; or (ii.) to connect to that system a pipe-line system operated by an authorised transporter.
- (1A) It shall also be the duty of a gas transporter to facilitate competition in the supply of gas.
- (2) It shall also be the duty of a gas transporter to avoid any undue preference or undue discrimination (a) in the connection of premises or a pipe-line system operated by an authorised transporter to any pipe-line system operated by him; and in the terms of which he undertakes the conveyance of gas by means of such a system. SGN would not, therefore, develop firm extension or reinforcement proposals until we are in receipt of confirmed developer requests. As SGN is the owner and operator of significant gas infrastructure within the area and due to the nature of our licence holder obligations; Should alterations to existing assets be required to allow development to proceed, such alterations will require to be funded by a developer.
- Should major alterations or diversions to such infrastructure be required to allow development to proceed, this could have a significant time constraint on development and, as such, any diversion requirements should be established early in the detailed planning process. SGN would therefore request that, where the Council are in discussions with developers via the Local Plan, early notification requirements are highlighted. Additionally, SGN are

		aware of the advances being made in renewable technologies, especially those related to the production of biomethane. Should any developer be proposing to include such technology within their development, then we would highlight the benefits of locating these facilities near existing gas infrastructure. Again, where the Council are in discussions with developers via the Local Plan, we would hope that these early notifications requirements are highlighted.
WA06	Gloucestershire Council	Minerals and Waste Policy officer comments All of the details set out within this section are made by officers on behalf of Gloucestershire County Council in its capacity as the Mineral and Waste Planning Authority (MWPA): - In general, the County Council can confirm that it considers this consultation request alongside previous correspondence between the two authorities, as evidence of ongoing co-operation on planning matters. This should be recognised as part of the wider evidence base to show that the statutory Duty-to Cooperate requirements are being met. However, on this occasion GCC have no comments to make on the contents of the submission version Wareham Neighbourhood Plan
WA07	Dorset Area Ramblers	Wareham is a town of considerable historic value which is highly constrained, being surrounded by water meadows, Dorset Area of Outstanding Natural Beauty, the Dorset Green Belt and Nature Conservation designations. The whole of the historic town is covered by a conservation area. The Wareham Neighbourhood Plan makes good use of the opportunities for development of underused land within the settlement boundary to meet the needs for future housing whilst protecting the town's environmentally sensitive surroundings. Government policy aims to bring forward underused and vacant brownfield land before going into greenfield and Green belt land which the Plan successfully does. The Plan also considers all aspects of development to meet the community's needs over the Plan period and includes policies which will support the vitality and viability of the town centre, access for pedestrians and cyclists, the protection of valued green spaces and community facilities and the maintenance of the character of this distinctive town. The Wareham Town Trust is a local amenity society with some 200 members committed to supporting the conservation and enhancement of the town. Members have been involved in shaping the Plan and fully support its policies and proposals. We hope that it is able to go forward to referendum.
WA08	Wareham Town Trust	Wareham is a town of considerable historic value which is highly constrained, being surrounded by water meadows, Dorset Area of Outstanding Natural Beauty, the Dorset Green Belt and Nature Conservation designations. The whole of the historic town is covered by a conservation area. The Wareham Neighbourhood Plan makes good use of the opportunities for development of underused land within the settlement boundary to meet the needs for future housing whilst protecting the town's environmentally sensitive surroundings. Government policy aims to bring forward underused and vacant brownfield land before going into greenfield and Green belt land which the Plan successfully does. The Plan also considers all aspects of development to meet the community's needs over the Plan period and includes policies which will support the vitality and viability of the town centre, access for pedestrians and cyclists, the protection of valued green spaces and community facilities and the maintenance of the character of this

		distinctive town. The Wareham Town Trust is a local amenity society with some 200 members committed to supporting the conservation and enhancement of the town. Members have been involved in shaping the Plan and fully support its policies and proposals. We hope that it is able to go forward to referendum.
WA09	North Wareham Action Group	During the last 5 years the North Wareham Action group has worked closely with the Neighbourhood Planning Group to ensure that the community north of Wareham, some 3500 residents, have been involved in the consultation and decision-making regarding development in their area. We distribute letters to the community advising them of initiatives being considered and asking for their involvement. The community is very supportive of the Neighbourhood Plan, particularly the element concerning the protection of green belt land. Allotment holders on the Northmoor estate have been threatened with the loss of this land for over forty years and the current proposals ensure that this land will be protected.
WA10	Carter Jonas on	1.0 INTRODUCTION
	behalf of Wellbeck Land	1.1 This statement is submitted by Welbeck Land ("Welbeck") in relation to the Submission (Regulation 16) consultation of the Wareham Neighbourhood Plan 2019 - 2034 ("the new plan"). Carter Jonas LLP is instructed by Welbeck.
		1.2 The Wareham Neighbourhood Plan was originally submitted to Purbeck District Council (now Dorset Council) in October 2018. The plan was withdrawn due to issues raised at the examination ("the revised plan").
		1.3 In preparation of the new plan, a second pre-submission consultation (Regulation 14) took place from 28th February 2020 until 14th April 2020 (which was extended due to the Covid-19 pandemic). Welbeck provided evidence through the consultation process as to why the pre-submission consultation plan was fundamentally flawed.
		1.4 Nevertheless, Wareham Town Council considered the comments raised through the pre-submission and, on 1st December 2020 Wareham Town Council met and agreed to submit the new plan for examination.
		1.5 Welbeck is promoting the potential for the development of land at North Wareham and Sandford for residential and associated development acting on behalf of Charborough Estate. The two parcels, as evidenced by discussions with senior officials at Natural England, are capable of coming forward independently of each other with suitable ecological mitigation, or combined.
		1.6 Welbeck welcomes the opportunity to comment on the new plan but remains concerned about the timing of its production. Since the formation of the Dorset Unitary Authority the emerging Purbeck Local Plan has continued through the examination process. The draft Purbeck Local Plan (2018 – 2034) with tracked Proposed Main Modifications was published on 3rd December 2020 in advance of the consultation.
		1.7 Dorset Council is in the process of preparing a new Dorset Local Plan and is currently consulting on the Options strategy for the plan. The Local Development Scheme anticipates adoption in 2023.

- 1.8 Our advice in the Regulation 14 pre-submission consultation on the new plan was that the Regulation 16 consultation (this consultation) does not take place until there is some certainty about the future of the Purbeck Local Plan. Whilst the Inspector believes that the plan may be found sound there is still uncertainty about its future. No report has been issued by the Inspector confirming they find the Purbeck Local Plan (2018 2034) sound, nor has it been adopted.
- 1.9 We will find ourselves in the same complicated and unsatisfactory situation that we did for the previous Wareham Neighbourhood Plan submission and examination with misaligned plans and uncertainty about which strategic document the Neighbourhood Plan must conform. The adopted strategic plan for Wareham is The Purbeck Local Plan 1, the emerging Purbeck Local Plan is yet to be adopted and the emerging Dorset Local Plan is at is very early stages of preparation. Therefore, the Neighbourhood Plan Welbeck Land Wareham Neighbourhood Development Plan 2019 2034. Revised submission (Reg. 16) 2 should be delayed until there is sufficient certainty regarding an up-to-date strategic plan.
- 1.10 Welbeck is not persuaded that there has been enough investigation regarding the suitability, viability and deliverability of ensuring that at least 300 dwellings in Wareham can be delivered. Welbeck remains unconvinced by the proposed housing allocation of active employment sites and other sites that would be unviable and likely undeliverable. Furthermore, there is an over reliance on 'windfall' development in a tightly constrained settlement.

 1.11 Welbeck acknowledges that the Purbeck Local Plan Inspector has suggested that there are no exceptional circumstances to remove land from the Green Belt at Wareham. In the Post Hearing Note (March 2020) the Inspector clarifies that the emerging allocations in this neighbourhood plan can deliver sufficient housing for Wareham without the need to remove land from the Green Belt. However, Welbeck maintain that the allocations referred to are undeliverable and therefore should not be relied upon.
- 1.12 Furthermore, this could change through to the Inspector's final report, but of potentially more significant importance is the expected emergence of the (whole of) Dorset Local Plan in the coming months. Welbeck respectfully suggests that the Wareham Town Council ought to more explicitly acknowledge in their Neighbourhood Plan that the Dorset Plan and the likely increase in housing needs and helping to meet the needs of neighbouring planning authorities will have a material impact on Wareham.
- 1.13 This consultation is held under regulation 16 of the Neighbourhood planning regulations and therefore must comply with the basic conditions. Hereunder, Welbeck comments on suggested site allocations H5, H6, H7 and H8. Also, policies GS2 and GS3, and Plan Monitoring and Review. Welbeck also submits comments relating to the delivery of SANG at Bog Lane. Welbeck Land Wareham Neighbourhood Development Plan 2019 2034. Revised submission (Reg. 16) 3 2.0 SUGGESTED SITE ALLOCATIONS H5, H6, H7 AND H8
- 2.1 Welbeck has very significant concerns about the appropriateness of the proposed allocations, and their deliverability in the revised Plan. Welbeck has the following concerns and observations about the included sites: Policy H5: Westminster Road (30 homes) and Policy H6: Johns Road Industrial Estates (15 homes)

- 2.2 These are protected employment sites in the extant Local Plan (The Purbeck Local Plan Part 1 2006 2017) and moreover, their exemption from such a designation might be proposed but it has not yet been accepted through the Local Plan examination or been adopted.
- 2.3 During the examination of the emerging Purbeck Local Plan 2018 2034, the Inspector released a Post Hearing Note (March 2020). The proposed revisions to the plan included modifying policy EE1 to reference Westminster Road Industrial Estate and Johns Road Industrial Estate in Wareham as non-strategic employment sites (but with reduced site areas 2.5ha and 0.5ha respectively). Whilst there is a dispensation in the non-strategic allocation, on the southern end of the industrial estate, to allow for the Neighbourhood Plan allocation, the specifics of the allocation are not considered by the Purbeck Local Plan inspector to establish whether they are suitable, achievable and deliverable. The designation of the industrial estate as a non-strategic industrial estate cements the role which it plays in delivering local economic prosperity and therefore the Neighbourhood Plan should seek to protect this rather than compromise its existing and future use with an adjacent residential housing allocation which will threaten the viability of the industrial estate through noise, pollution, and traffic issues.
- 2.4 Furthermore, as provided in relation to the Neighbourhood Plan regulation 14 consultation Welbeck submitted strong evidence confirming that both Westminster Road Industrial Estate and Johns Road Industrial Estate is not suitable for residential development. This evidence, a report produced by Vail Williams, can be read at Annex A.
- 2.5 The clear viability and subsequent deliverability implications of reducing the proposed redevelopment of Westminster Road Industrial Estate from 90 dwellings to 30 dwellings has not been considered by the Town Council, or through Neighbourhood Plan.
- 2.6 The Vail Williams report includes recent purchase prices of the industrial units which are considerably in excess of any likely land value achievable with residential development and that both the 90 dwelling and 30 dwelling options are demonstrably not viable even when applying the Neighbourhood Plan's own consultant's (Aecom) methodology.
- 2.7 In any event, part development of an industrial estate is not good planning and place making. It is unlikely that appropriate buffering will be achievable between industrial uses and new residential development. This will threaten both the amenity of future Welbeck Land Wareham Neighbourhood Development Plan 2019 2034. Revised submission (Reg. 16) 4 residents and the proper and viable future of employment on the industrial estate. There is a risk of piece meal and uncoordinated development of the industrial estates which would be ineffective and inefficient. This would be the case for both H5 and H6.
- 2.8 This is further evidenced by the recent 12 house outline application (reference 6/2020/0163) which is under consideration by Dorset Council. 50% of the proposed housing numbers for this allocation is being provided on just 25% of the land area. This results in gross over-development of the site, creates a poor design which is vehicle led and dominated by car parking. This demonstrates that higher densities are required to make the site financially viable against the use of the land as industrial units. Therefore, the site cannot be considered viable.

- 2.9 Whilst this is not the platform to voice objections to an individual planning application, it should be noted that environmental health has not been consulted. If consulted they are likely to raise issues relating to noise, pollution and harm to human health which would further demonstrate lack of suitability for residential development. The application is premature of the plan and therefore inappropriate. Policy H7: Wareham Town Northern Gateway (Gasworks and Autopoint Sites) (20 homes)
- 2.10 Welbeck is concerned that the Town Council is seeking to allocate another site which provides employment, for residential use. There is no provision in the proposed policy to seek recourse for the loss of employment or the loss of the service which a mechanic provides to the town. The auto garage is operating as a going concern and as such, this raises concerns like for policies H5 and H6 that this proposed allocation is undeliverable.
- 2.11 Turning to the Gasworks, this site has been vacant for well over 10 years. In that time approval for residential development has been granted and subsequently lapsed. As such, the principle of residential development of the site has been long established but development has not occurred due, most likely, to issues of viability. Given that there is no evidence to suggest otherwise the site should be considered at best as a potential windfall. Policy H8: Former Hospital and Health Centre Site
- 2.12 Policy H8 is entirely reliant on policy GS2 (Proposed Health Care and Housing Hub (former Middle School site)) being deliverable and coming forward. Proposed policy H8 is confusing and reliant on several circumstances converging to provide for the site's development. Welbeck is not convinced that a policy which opens with a statement: "Provided that the GP surgery is relocated..." is either positive or can demonstrate that development is deliverable. Welbeck suggests that this policy is reviewed so that either it is supported by robust evidence that the site is available and viable for development or it is treated as a windfall site. Such evidence should be available from Dorset Council Welbeck Land Wareham Neighbourhood Development Plan 2019 2034. Revised submission (Reg. 16) 5 and should amount to more than aspiration/intention but firm funding commitments with appropriate timescales for delivery.
- 2.13 The Neighbourhood Plan indicates that development of the 'health and housing hub' (GS2) will need to be undertaken in phases, as funding becomes available. With policy H8 so heavily reliant on the delivery of the 'health and housing hub' before it can be delivered itself, it further demonstrates the lack of deliverability for Policy H8.
- 2.14 Before the development can begin (or an application be submitted) a masterplan must be approved by the authority in consultation with the town council, which is likely to be a lengthy process. In the interests of good planning a masterplan should form part of the Neighbourhood Plan process, in order to demonstrate the sites suitability for the proposed allocation.
- 2.15 Furthermore, the proposals for the site appear to suggest a capacity of 40 dwellings. This would equate to about 49 dwellings per hectare. This seems to be an excessively high density, especially given the proximity of heritage assets and their setting, and when the Neighbourhood Plan evidence suggests a capacity of 19 new homes. Welbeck again, has concerns that this does not represent good planning, respect of heritage assets or good place making.

2.0 SUGGESTED POLICIES GS2 AND GS3

- 3.1 It is not clear why policies GS2 and GS3 are drafted in the local green space and community facilities section. Given that the Town Council is seeking to rely on the two sites to deliver a third of the overall housing need at Wareham, it would be more appropriate for them to be part of the housing chapter. Policy GS2: Proposed Health Care and Housing Hub (former Middle School Sites) and Policy GS3 Proposed Affordable Housing and Extra Care Housing, Bonnets Lane
- 3.2 Welbeck has serious concerns about the Town Council's most recent and revised proposals for the Middle School sites. There is no convincing evidence that these sites are deliverable and viable. There is, again the strong likelihood that redevelopment costs will adversely affect the provision of affordable housing and other mitigation, and there is also no publicly available confirmation that the protected status of the school playing field has been (or can be) extinguished. Even if these matters can be overcome, they will inevitably result in delays to housing delivery. There is also anecdotal evidence that there is local opposition to this idea.
- 3.3 Policy GS2 states that the site 'may include extra care housing, key worker housing, a care home facility and affordable housing'. The policy therefore does not explicitly require residential development in this location. Welbeck Land Wareham Neighbourhood Development Plan 2019 2034. Revised submission (Reg. 16) 6
- 3.4 Policy GS3 confirms scheme for affordable housing and extra care housing will be supported. However, it is unclear whether market housing will be permitted on the site. It is unlikely that both affordable housing and extra care housing will come forward without market housing and therefore this policy requires clarification.
- 3.5 It is completely unclear how many new homes will be delivered on each of GS2 and GS3. We are only told in 'Table 1' that the two sites could potentially deliver 100 new homes. However, previous publicly available consultations options suggested around 90 new homes on GS2. This would give and indicative density of 53 dwellings per hectare. This seems to be an excessively high density, especially given the proximity of heritage assets and their setting, and when the Neighbourhood Plan evidence suggests a capacity of 41 new homes. Welbeck once again, has concerns that this does not represent good planning and place making.
- 3.6 Welbeck is also not convinced that the types of homes that are suggested and already have temporary permission on the Middle School site will meet identified needs. The recently consented scheme provides accommodation for vulnerable adults and is not the market houses necessary to meet the overall target of Purbeck or Wareham. These specialist types of homes are counted 'on top of' the overall housing target. This is with reference to the proposed care home at Moreton Station, which was described at the Purbeck Local Plan Examination as in addition to the 490 homes proposed there.

4.0 WINDFALL ALLOWANCE

4.1 Welbeck's position remains that a windfall allowance of 100 dwellings is too high. This view is especially in light of many of the proposed Neighbourhood Plan sites being those that would usually be considered as windfall e.g. H7 and H8.

- 4.2 Welbeck is also concerned that the Town Council's decision to scrap the provision of a SANG north of the railway line will artificially cap development in this general location at 45 dwellings. The implication of this is that the full 100 dwelling windfall allowance will need to be accommodated south of the railway line to ensure cumulative development does not impact Wareham Forest without mitigation. This would bring the windfall in direct conflict with conservation and flood avoidance priorities.
- 4.3 It is unlikely that there will be sufficient suitable sites in Wareham to accommodate 100 windfall dwellings in the plan period. Further positive allocations should be made.

5.0 PLAN MONITORING AND REVIEW

- 5.1 Welbeck is pleased to note that the Town Council has included a chapter in the revised plan which identifies the need to monitor and review policies, as necessary. It is reasonable to suggest that the plan will need reviewing in five-year cycles and to cite "...possible changes in national or local policies..." but this commitment should be Welbeck Land Wareham Neighbourhood Development Plan 2019 2034. Revised submission (Reg. 16) 7 strengthened. Welbeck has highlighted some significant challenges with the sites proposed to be allocated, and even if they do prove to be deliverable it is likely that they will take some time to come to fruition. If the sites do not deliver in a timely fashion (after all as highlighted in relation to H7 the time horizon for the plan is 15 years and planning consents can be secured and lapse in that time) then the Town Council will need to consider alternative sites to ensure conformity with the Local Plan.
- 5.2 Whilst Welbeck maintain that the Neighbourhood Plan is premature and should be delayed until the Purbeck Plan is adopted, it could further be considered that it would be wise to wait until the strategy for the Dorset plan area is agreed. Should the Neighbourhood Plan progress through examination there should be a clear commitment, in the Neighbourhood Plan, to ensuring that it must be reviewed as soon as the Dorset Local Plan is adopted to ensure that is meets the base conditions of conforming with its strategic plan.
- 5.3 Welbeck acknowledges that, at present, there is no mechanism to allocate its land interests in the Green Belt through the Neighbourhood Plan and although in relation to the Local Plan Inspector's view that there are no very special circumstances at Wareham to justify release of land from the Green Belt, the Town Council should also acknowledge that the emerging Dorset Plan will be a material change in circumstance that will affect the Neighbourhood Plan. This could include the need to meet neighbouring authorities (BCP) unmet housing need.
- 5.4 There is a proposed modification in the Purbeck Local Plan (MM28) which is to include a commitment to reviewing the Plan in the event of increased housing needs being identified. The Post Hearing Note (2020) sets out further need to review MM28 to indicate that the new Dorset Local Plan will serve as the vehicle for an early review in relation to ensuring that any housing need above the capped level is provided for as soon as possible. Welbeck agrees with, and supports, the introduction of this important modification and suggests that the Town Council follows this lead an includes a similar specific reference in its monitoring chapter. The proposed timetable for the Dorset Plan puts its adoption in 2023 and before any five-year review of the Wareham Neighbourhood Plan.

5.5 Housing needs and requirements are likely to increase in Purbeck, and Wareham specifically, in the foreseeable future, especially as it is a logical and sustainable location to help meet some of the expected unmet housing needs of Bournemouth, Christchurch and Poole. This too, the Local Plan Inspector has commented upon when she noted in her post hearing note at paragraph 19 that: "...there is a general acceptance that there is likely to be some unmet need in neighbouring authorities particularly the new adjoining unitary authority of Bournemouth, Christchurch and Poole, New Forest District and the New Forest National Park..." 5.5 Wareham is on a direct and sustainable rail connection to the areas of unmet needs and the political designation of Green Belt can and should be reviewed. Whilst in Welbeck Land Wareham Neighbourhood Development Plan 2019 – 2034. Revised submission (Reg. 16) 8 relation to the emerging Purbeck Local Plan, the Inspector concluded that there are no very special circumstances to release land from the Green Belt in Wareham, this may well change when reviewing Dorset plan area as a whole (potential increased housing need and neighbouring authority unmet need).

5.6 Welbeck disagrees with the Purbeck Local Plan Inspector's conclusion (above) and maintain that evidence exists which demonstrates that review of the Green Belt at Wareham is reasonable, and the unmet needs will provide the exceptional circumstances to change the Green Belt boundaries. This is a situation that the Town Council should embrace and identify opportunities for positive development that, especially in the case of the land promoted by Welbeck, will bring with it the genuine benefits of new homes and appropriate ecological mitigation that would be a major benefit to both existing and new residents.

6.0 PROVISION OF A SANG AT WAREHAM

6.1 Welbeck has significant concerns about the appropriateness of the choice of Bog Lane as a SANG location to mitigate development in Wareham. Bog Lane is a site of limited accessibility. It is a location that can only practically be reached by car and it is counter intuitive to suggest that it will reduce pressure on sensitive ecological heathland and woodland; nor would it promote sustainable behaviours and attitudes. Bog Lane is also a walk of some 30 minutes from the "middle school" proposed development site, and around 45 minutes from north of Wareham railway station. Moreover, the site is separated from Wareham by the A351 bypass road. Dorset Council has published a Green Belt Mitigation Strategy document as part of the Local Plan Examination [ID: SD93], which includes a usage survey of the existing SANG at Bog Lane. This information demonstrates that the site is not heavily used and the majority of those people who do visit the site do so by car. The survey was carried out over four days and only recorded 30 people on the site in the whole period. 75% of those people surveyed arrived by car. What the survey does not capture is the people who, having little option but to travel by car, then decide to travel to the attractive sensitive destinations that a SANG is meant to protect. To be effective a SANG needs to be within easy walking distance of residents which Bog Lane is not.

6.2 Furthermore, the Bog Lane SANG is in the wrong location to mitigate development in the area of Wareham that Natural England reports as being particularly sensitive i.e., development land in Wareham located north of the railway. Indeed, the latest information suggests that no more than 50 homes can be built north of the railway without mitigation. The Neighbourhood Plan now proposes an allocation of 45 new homes north of the railway on the two industrial estates. This leaves no headroom for further growth; in this regard, the Town Council strategy which relies on infill and windfall development, cannot effectively be mitigated.

- 6.3 A strategy that includes a SANG or HIP at north Wareham is necessary to intercept people travelling towards the Wareham Forest or proposing to use the heath especially those arriving on foot. It would also complement the Bog Lane SANG. Such Welbeck Land Wareham Neighbourhood Development Plan 2019 2034. Revised submission (Reg. 16) 9 a strategy has been agreed with the necessary parties and is deliverable as I have set out above. It is therefore very disappointing to see this approach abandoned at this very late stage in the process.
- 6.4 Welbeck is in the process of producing a master plan and vision for the proposed SANG at North Wareham and this can be seen at Annex B to this report. Welbeck initially had a proposal for a smaller SANG to which Natural England previously confirmed that there was SANG capacity for around 180 dwellings in Wareham. Through further discussion with Charborough Estate and careful planning Welbeck is now able to present a proposal which will see the creation of over 19ha of natural green space. The SANG can be delivered as part of a phased approach commensurate to the delivery of housing. The principles of SANG are to provide areas of natural green space for informal recreation as mitigation for new development which may put pressure on nationally or internationally designated ecological sites, such as Special Protection Areas (SPAs). The SANG will provide a series of walking routes within a natural setting near to new developments to reduce visitor pressure on existing habitats. The proposed SANG will provide a high quality, heathland fringe landscape, with undulating walking routes and opportunities to experience nature at first hand.
- 6.5 The proposals have the potential to include:
- A 3.76 km circular walking route. This will be surfaced with hoggin to ensure a low impact, decent walking surface is achieved;
- Informal, mown paths will also be created, providing alternative routes around the SANG; Visitor parking for 20 cars, including two disabled spaces;
- Two pedestrian crossing points on Bere Road to enable a larger circular walk to be achieved; Management and enhancement of areas of wet grassland;
- New native tree and scrub planting. The proposed trees will include a mix of deciduous and evergreen species, reflecting the localised landscape context;
- New planting will be introduced along key boundaries to create a degree of separation between the SANG and neighbouring uses;
- Management of existing areas of acidic grassland and creation of new areas through the spreading of topsoil won from the proposed development areas to the east;
- 25 m planted buffer to Wareham Forest, which includes new fencing to deter public access between the SANG and Northport Heath; Welbeck Land Wareham Neighbourhood Development Plan 2019 2034. Revised submission (Reg. 16) 10
- Creation of several viewpoints along the walking route which will afford panoramic views of Wareham Forest, the Seven Barrows and the Purbeck Hills, as well as providing elevated views over Wareham;
- Provision of interpretation boards around the SANG which will provide information on the landscape setting, the history of the area and the ecology associated with the site and its context;
- Protection of the tumuli which form part of the Seven Barrows SAM by new fencing and the introduction of interpretation boards providing information about the features and their history;

		 A secure area will be created for dogs to be off lead. Livestock fencing will be introduced along vegetated boundaries to ensure that it is not visually obvious, but ensures dogs are contained within the defined area; Existing internal fences will be removed to open up the grassland, reducing the perception of an agricultural landscape; Informal paths will be cut through the areas of dense scrub to create fire breaks, as well as alternative routes to the circular path. 7.0 CONCLUSION 7.1 Welbeck acknowledges that the Purbeck Local Plan Inspector, in her post hearing note, has indicated that there are not the exceptional circumstances (at this time) to change the Green Belt at Wareham. However, this is not yet a final report. Welbeck respectfully suggests that the Town Council remains circumspect about the submission of its plan for examination until at least the final report of the Inspector is published. 7.2 More importantly, however, Welbeck remains unconvinced about the deliverability of many of the sites included in the revised Neighbourhood Plan and also its over reliance on windfall development. It is likely that the Town Council will need to review its allocations in the face of the uncertainty about their completion, potentially after the plan has been 'Made.' Welbeck suggests that in committing to the review of the Neighbourhood Plan the Town Council should specifically acknowledge that the Dorset Plan could affect its own proposals. Welbeck would welcome a working relationship with the Town Council, to build on previous work, which looks at the potential to deliver some homes north of the town at the appropriate time alongside a comprehensive SANG.
WA11	Mr I Baggs	H2 Housing Mix: The plan states: New residential development should comprise predominantly smaller dwellings with 1, 2 or 3 bedrooms. The plan focuses on high density housing development with smaller units. There is limited scope for family homes (e.g. including gardens), and these should also be included as part of an inclusive, mixed community. 3.3.2 The plan states: "Dorset is currently a candidate for designation as a National Park. This is strongly supported, and the boundary should include the whole of Wareham Parish in view of its outstanding landscape character, ecological value and heritage assets." This is a subjective statement, as it is not clear who this is supported by. 6.2.4 & 6.3.2 Bog Lane SANG is proposed to mitigate adverse environmental impact of new houses allocated in policies GS2 and GS3. As Bog Lane is an existing, operational SANG, the proposed Neighbourhood Plan offers no new SANG provision for the residents of Wareham. Bog Lane is a poorly used SANG; putting it plainly, barely anyone uses it. This has been proven by Dorset Council's own monitoring, see SD93-Appendix (Summary of visitor monitoring Bog Lane SANG), with visitor numbers of 0.6 people per hour. By comparison, at two other local SANG sites, Frenches Farm recorded 5 people per hour, and Upton Country Park 21 people per hour. Wareham Common and Wareham Forest also frequently receive hundreds of visitors in a single day. It is unrealistic to expect that additional 'minor works' (signage, footpath resurfacing, vegetation clearance, etc.) will have a significant impact on the popularity of this SANG.

		Bog Lane SANG does not fulfil its purpose diverting recreation pressure away from the Dorset Heathlands, as proven by the council's own monitoring evidence, and so does not comply with Appendix E of the Dorset Heathlands Planning Framework 2015-2020 Supplementary Planning Document. Assuming that on this basis the Bog Lane SANG is non-compliant with the Supplementary Planning Document, this undermines the deliverability of the Wareham Neighbourhood Plan
		H2 Remove text stating "New residential development should comprise predominantly smaller dwellings with 1, 2 or 3 bedrooms", as there is a need for housing across society. Modify policy to include a broad mix of homes for all people in society, to include suitable family homes, smaller units and care housing; this will help create a sustainable and inclusive community.
		3.3.2 Remove references to "strong support" for Wareham's inclusion in a National Park, and that a Dorset National Park "should include Wareham"; these opinions may be fair but should be addressed through a separate and relevant consultation.
		6.2.4 & 6.3.2 Provide proposals of alternative new SANG in place of the existing Bog Lane SANG, ideally in closer proximity to housing development, but as a minimum it must be more desirable to visit than the area it is supposed to protect. This would serve to mitigate impact on heathlands to a far greater extent than the improvements to the Bog Lane SANG proposed in the Wareham Neighbourhood Plan. A better SANG will help safeguard our important local habitats and environment, and improve recreational quality of life for local residents. —
		As a separate note, I would like to express support for policy PC2, Pedestrian and Cycle Route Infrastructure Improvements; it is great to see this being included, and will help create a sustainable and healthy place to live.
WA12	Ruth Warren	Maybe roadwise the causeway over the river meadows should have much stricter speed controls bearing in mind it is used a lot by children, scooters and dog walkers, Sometimes it is like a racetrack it's length and straightness inviting burn ups with no regard for current limits. It spoils the approach to the town and could be easily changed. I don't know who is responsible for this matter but this sound like a good opportunity to mention it! Otherwise, congratulations on the plan which seems to steer a sensible course for a lovely little town
WA13	Historic England	Thank you for your Regulation 16 consultation on the (re) Submitted Version of the Wareham Neighbourhood Plan. Our understanding is that the resubmitted version of the Plan is essentially the same as the previously submitted version other than for the removal of a site allocation to the west of Westminster Road. As we confirmed in our Regulation 14 consultation response to the community, this deletion helpfully removes an issue which had been the subject of residual concerns for us (see attached). On this basis I can confirm that there are no remaining issues associated with the Plan upon which we wish to comment.
WA14	Dorset Council	Introduction Dorset Council (DC) is pleased to have received this submission version of the Wareham Neighbourhood Plan after a number of years of hard work by the local community, with the support of the Town Council. This document sets out the Council's comments on the Wareham Neighbourhood Plan submission draft (October 2020).

This response considers the extent to which the Plan complies with national policy and guidance (primarily the National Planning Policy Framework (2019)) and is in general conformity with the strategic policies of the development plan for the area, including the Purbeck Local Plan Part 1 (2012), and the emerging Purbeck Local Plan (2018- 2034) which is at a very advanced stage.

The neighbourhood plan should also contribute to sustainable development and be compatible with relevant environmental requirements.

Purbeck District Council (one of the predecessor authorities to Dorset Council) and Dorset Council (since its inception) has actively engaged with Wareham Town Council throughout the preparation of the Neighbourhood Plan. This engagement has helped to shape the Plan and as such this representation only contains commentary on the Plan where Dorset Council considers issues remain. Within the comments below, recommendations and suggestions have been made. Recommendations are where the Council is of the view that a change needs to be made to the plan to ensure that it complies with national policy and in general conformity with the Local Plan. Suggestions are where the Council consider a minor change may aid with the interpretation or clarity of the plan.

Chapter 3 Housing and development

Within paragraph 3.3.1, under the heading Nationally, European and internationally important wildlife sites, the plan makes reference to 'Within 400m of a protected heathland site (SAC) residential development that would...'. The Council suggests that the text makes reference to all the relevant European/international designations. Most overlap in some way but they are not synonymous and not necessarily co-terminus boundaries.

Recommendation: Amend wording to include 'Within 400m of a protected heathland site (SAC, SPA and Ramsar)'

Policy H3 Stock of smaller dwellings

A Dorset Council Conservation Officer has suggested that the policy should include a qualification, such as 'subject to relevant heritage policies', as some of the larger buildings to be subdivided could be listed or otherwise form positive contributory elements to the Conservation Area, for example. Recommendation: Amend the wording of the policy "The subdivision of larger homes will be supported, subject to relevant heritage policies and provided that there is adequate parking and private amenity space for future occupants." A Dorset Council Conservation Officer has suggested that within page 17 amendments are made to the wording to better reflect national policy wording. "The Conservation Area, historic Listed Buildings...': This end of this section could benefit from being reworded thus: '...great weight should be given to these assets' conservation, and any harm to their significance (including any contribution made by their setting) should require clear and convincing justification'."

Suggestion: Amend wording '...great weight should be given to these assets' conservation, and any harm to their significance (including any contribution made by their setting) should require clear and convincing justification'."

Proposed housing sites (including Policy GS2 – Proposed Health Care and Housing Hub (former Middle School site) and Policy GS3 – Proposed Affordable and Extra Care Housing (Bonnets Lane site)

The Council notes the changes that have been made to the policies in light of its comments at regulation 14 stage. However, the Council does still have some concerns over the prescriptive nature of the policies. The Council's main

concern is that it does not want the prescriptive nature of the policies to negatively impact on the deliverability of the sites particularly the three sites earmarked for the Building Better Lives Purbeck Gateway project to provide new independent housing with care in the centre of Wareham, a new specialist nursing & dementia care home and health hub on the old Middle School site, and to provide a mix of affordable, supported and market housing on the former Middle School site and the Wareham Hospital site. As referred to in the Council's regulation 14 consultation response it is still relatively early days in the planning/development of all the sites allocated in the plan. More detailed technical work will need to be carried out by developers and commercial considerations will also need to be made. As a consequence the Council suggests building in some greater flexibility into the policies to allow for schemes that are worked up to respond to issues that might arise. Examples of suggested modifications to the policies are set out in more detail below. With regards to waste arising from new development a Dorset Council Minerals and Waste Planning Officer has commented: 'Our previous comments on the revised draft neighbourhood plan (March 2020) referred to Policy 22 – Waste from new developments of the adopted Waste Plan. It would be helpful to add a cross reference to Policy 22 of the Waste Plan which explains provisions that should be made for residential developments, perhaps in section 7 of the neighbourhood plan.'

Suggestion: Make a cross reference in the plan to Policy 22 in the Bournemouth, Christchurch, Poole and Dorset Waste Plan (2019).

Policy H8 – Former Hospital and Health Centre site

As set out above, whilst it acknowledges the changes that have been made to policies in light of its comments at regulation 14 stage, the Council does still have some concerns over the prescriptive nature of the policies that propose new housing. As a consequence the Council suggests building in some greater flexibility into Policy H8 to allow for schemes that are worked up to respond to issues that might arise. In addition, given that the site is adjacent to the Conservation Area, the Council considers that a further principle should be added to the policy regarding the need for development to respect the setting of the adjacent Conservation Area. In addition to the principle of development being added the explanatory text (paragraph 3.7.1) could note that the site also abuts the Conservation Area, its setting also thus requires consideration As an example, please see the suggested modification to Policy H8 – Former Hospital and Health Centre site below. A similar modification could be made to the other housing sites including those sites covered by policies GS2 and GS3.

'Policy H8 – Former Hospital and Health Centre site

Provided that the GP surgery is relocated, the redevelopment for residential development of the former Wareham Health Centre (GP Surgery), Wareham Hospital and Ambulance Station will be supported, subject to the retention of the trees along the northern boundary. New development must demonstrate good quality design as set out in Policy LDP2 and must contribute to tackling climate change as set out in Policy LDP3, and should aim to conform with the following principles of development (illustrated in figure 29): • Create active building frontages onto Streche Road and onto the access road within the site

- Enhance the setting of the listed former workhouse by creating active building frontages facing west
- Create an active building frontage facing the common
- Buildings to be generally 2 storeys in height
- Vehicular access to the site to use the existing eastern access point and a new access road to be curved so as to contain views along it

- There should be a pedestrian and cycle route through the site
- Parking to be provided to the rear or alongside homes
- Trees and vegetation surrounding the site to be retained and strengthened within a publicly maintained area
- Respect the setting of the adjacent Conservation Area New residential development must also provide heathland mitigation in accordance with Policy H4.'

Recommendation: Amend wording of the policy to provide greater flexibility and add further principle of development to the policy regarding the need for development to respect the setting of the adjacent Conservation Area.

Policy H11 Sandford Lane Employment Safeguarding

It is noted that the proposed area safeguarded for employment use differs from that identified in the current adopted Purbeck Local Plan Part 1 (PLP1), the emerging Purbeck Local Plan review, which is at an advanced stage, and the emerging Dorset Council Local Plan. The area safeguarded in the neighbourhood plan excludes an area of land to the north of Sandford Lane which is safeguarded employment land in the PLP1 and the emerging Purbeck Local Plan review and the emerging Dorset Council Local Plan. Dorset Council considers that the employment area at Sandford Lane is a key employment site and any amendments to the safeguarding boundary are a strategic matter that should be dealt with as part of the emerging Dorset Council Local Plan. The emerging Dorset Council Local Plan is reviewing employment sites and considering employment needs in general, including at Wareham. It will also consider whether it is appropriate to amend any existing site boundaries.

Recommendation: The Policies Map should be amended so that the area covered by the policy is consistent with that in the PLP1 and the emerging Purbeck Local Plan review.

Chapter 5

Pedestrian and Cycle PC1 Main Pedestrian and Cycling routes

As set out in our response to the regulation 14 consultation, it is not within Dorset Council's gift to retain the level crossing when Network Rail eventually closes it. This is why the Council continues to work with Network Rail, the Civic Trust, Friends of Wareham Station, the local MP and the DfT to find alternative solutions in providing a surface level crossing over the railway line, especially as ramped and lift options have previously been ruled out. Dorset Council's Transport Manager has commented that "in highways terms we are generally supportive of the Wareham Neighbourhood Plan other than objecting to the retention of the crossing in Policy PC1. The surface level railway crossing is not provided as of right and is entirely by the permission granted by lease, in effect a permissive way which cannot be taken being in perpetuity and thus included in any plan with the inference of permanence. We have previously requested that this wording should be amended accordingly but see that it remains unchanged in the latest draft of the Plan."

Recommendation: Policy should be amended to reflect the comments made by the Council's Transport Manager.

PC2 - Pedestrian and Cycle Route Infrastructure Improvements

PC2 isn't so much of a spatial policy as it is a list of priorities for pedestrian and cycle access. The expenditure of Section 106 funds, and the majority of CIL funds, is determined by Dorset Council, not at a neighbourhood plan level. It is more appropriate to present it as a list of priorities rather than a policy. The list of priorities would be useful to inform the review of the Local Transport Plan.

Recommendation: The improvements identified should be set out in a list of priorities rather than in a policy.

Chapter 6

Local Green Space and Community facilities

Suggest amendment to part of sentence in paragraph 6.2.5, which reads, '... hub, which would need to be undertaken in phases as funding becomes available.' The phasing would not be in relation to funding but ensuring the residents are housed sufficiently and our health partners' services can continue to function during the build.

Suggestion: Remove part of sentence in para 6.2.5 preamble regarding development being undertaken in phases as funding becomes available.

Policy GS2 – Proposed Health Care and Housing Hub (former Middle School Sites)

As set out above, whilst it acknowledges the changes that have been made to policies in light of its comments at regulation 14 stage, the Council does still have some concerns over the prescriptive nature of the policies that propose new housing. As a consequence the Council suggests building in some greater flexibility to Policy GS2 to allow for schemes that are worked up to respond to issues that might arise.

Recommendation: Amend wording of the policy as suggested below.

Policy GS2 - Proposed Health Care and Housing Hub (former Middle School Site)

'Development of the area of the former Wareham Middle School buildings, playgrounds and parking areas as a new Health Care and Housing Hub for the Town and surrounding area which may include extra care housing, key worker housing, a care home facility and affordable housing will be supported, subject to the provision of:

- space for the relocated Wareham GP Surgery and Ambulance Station, on the former Middle School site with a view to providing improved primary health care facilities;
- sufficient parking space for staff, patients and residents;
- vehicular access to the adjoining Primary School from Worgret Road together with parking and drop off space for parents/carers;
- a contribution towards changing facilities to encourage use of the recreation ground and playing fields to east and west. A master plan for the development of the site will be submitted to and approved by the Local Planning Authority in consultation with the Town Council prior to any development. New development must demonstrate good design quality as set out in Policy LDP2 and must contribute towards tackling climate change as set out in LDP3, and should aim to conform with the following principles of development (illustrated in figure 46):
- New health hub to form a landmark building fronting onto Worgret Road

- Buildings generally 2 and 3 storeys in height
- · Active building frontages onto Worgret Road and onto the access roads through the site
- Create new street leading off Worgret Road with vista terminated by landmark building
- A tree lined avenue through the site to be created linking the Recreation Ground with the Playing Fields, with onstreet parking
- Retention of trees in good condition along Worgret Road and the western edge of the development site along the Playing Fields
- Main vehicular access to be at the eastern side of the site to enable the Health Hub and related visitor parking to be within the western part of the site
- · A drop off point to be provided at the front of the health hub fronting Worgret Road
- A new vehicular access and shared parking to be provided for the Primary School and Playing Fields
- A new footway to be provided along Worgret Road between the eastern access point and Westgate New residential development must also provide heathland mitigation in accordance with Policy H4.'

Policy GS3 - Proposed Affordable Housing and Extra Care Housing, Bonnets Lane

As set out above, whilst it acknowledges the changes that have been made to policies in light of its comments at regulation 14 stage, the Council does still have some concerns over the prescriptive nature of the policies that propose new housing. As a consequence the Council suggests building in some greater flexibility to Policy GS3 to allow for schemes that are worked up to respond to issues that might arise.

Recommendation: Amend wording of the policy as suggested below.

Policy GS3 – Proposed Affordable and Extra Care Housing, Bonnets Lane Redevelopment of the Bonnets Lane site, as shown on the Policies Map, for affordable housing and extra care housing will be supported. New development must demonstrate good quality design as set out in Policy LDP1 and must contribute to tackling climate change as set out in policy LDP3, and should aim to conform with the following principles of development (illustrated in figure 48):

- Create active building frontages to Bonnets Lane, St Martins Lane, Brixey's Lane and Moretons Lane. The frontages along Brixey's Lane and Moretons Lane should follow the curves of the street with small front gardens enclosed by walls, railings or hedges
- New 3 storey landmark building fronting Bonnets Lane/St Martins Lane terminating the vista along Dollins Lane
- Buildings generally 2 storeys in height and have a rhythm to respect the fine grain of the Town. A large monolithic institutional building will not be supported
- Car parking should be retained within the site and not dominate the street frontage
- The preferred location for communal parking would be accessed from Bonnets Lane in the southern part of the site with appropriate boundary definition enclosed by walls, railings or hedges and trees around the proposed parking area to be retained A noise impact assessment be carried out to inform a project level HRA in order to determine that construction and operational activities will not significantly disturb SPA or Ramsar interest features. New residential development must also provide heathland mitigation in accordance with Policy H4.

Chapter 7

Locally Distinctive and Sustainable Places LDP1 – Design of New Development within Wareham Conservation Area

As with the housing policies the Council has concerns that the design policies are overly prescriptive in places. National planning policy sets out that 'planning policies and decisions should ensure that developments: c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities).' (Para 127 c) NPPF) 'Design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests. Applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot.' (Para 128 NPPF). However, with respect to the specific matters of windows and rainwater goods, a Dorset Council Conservation Officer has commented that there is an opportunity here to stress that windows should be timber/metal and rainwater goods metal to ensure that they are congruent with prevailing historic material palette of the Conservation Area.

Recommendation: Amend wording of the policy as suggested below.

LDP1 – Design of New Development within Wareham Conservation Area

All new development must demonstrate good quality design which responds to and integrates with the site's context as well as the overall character of the Town. Development proposals which meet the following criteria will be supported:

- The grid street layout of the Town should be maintained and, where appropriate, continued, avoiding cul-de-sacs where possible;
- Buildings should be sited next to or close to the street with windows and doors to create an active frontage to the street;
- Buildings should be two, or in some instances, three storey in height, but with a ground floor level close to street level and low floor to ceiling heights to respect the smaller scale of older properties within the walls. Roofs should be steep pitched;
- Buildings should be sited on street corners to provide a tight sense of urban enclosure
- Buildings should articulate established plot widths and heights to establish a rhythm to the architecture in a street
- Brick walls or railings should define front garden areas. Paving should be natural stone;
- Parking should be to the rear of or set behind the front face of buildings to avoid dominating the street scene;
- Buildings should respect, where appropriate, the Town's Georgian heritage, by either following a simple Georgian style with sash windows with narrow glazing bars and deep reveals or cottage style with casement windows with narrow glazing bars are the dominant form;
- Windows should be timber/metal and rainwater goods metal; Front doors should be functional not false;
- Building materials should be red/brown brick laid Flemish bond with narrow joints and plain clay tiles for the roof.

• Meter boxes, flues, pipes (other than cast iron, aluminium or similar down pipes), vents, solar panels, satellite dishes etc. should not be visible from the street.

LDP2 - Design of New Development outside Wareham Conservation Area

A Dorset Council Conservation Officer has suggested rewording the first bullet point 'Respect site qualities / characteristics of the area including, topography, slopes and designated heritage assets and their settings'. This is because there are more designated heritage assets outside the Conservation Area than just the Seven Barrows monument that would need to be taken into account in these general design principles. Furthermore, bullet point 5 is considered overly prescriptive and as such the Council would suggest making the design of public space boundaries less specific.

Recommendation: Amend wording of the policy as suggested below.

LDP2 – Design of New Development outside Wareham Conservation Area

All new development must demonstrate good quality design which responds to and integrates with the site's context. Development proposals which meet the following criteria will be supported. Development should:

- Respect site qualities / characteristics of the area including topography, slopes, and designated heritage assets and their settings Seven Barrows Ancient Monument and its setting;
- Provide a street layout which maximizes permeability (choice of routes) on the site through, where appropriate a loose grid network of streets that maximises ease of access for the pedestrian and cyclist and connects to nearby developments;
- Provide a clear hierarchy of streets and spaces readily identifiable by their width, alignment and sense of enclosure to reinforce the legibility (ease of finding your way about) of the settlement;
- Build active frontages to create a safe and vibrant public realm with buildings close to or on the back of the street with windows positioned to ensure informal surveillance of all public space;
- · Clearly define public space with walls, hedges or railings;
- Ensure that settlement edges are suitably landscaped to soften and assimilate the built-up area into the landscape, as viewed from the surrounding countryside;
- Provide parking on plot or nearby and not dominate the street scene;
- Ensure legibility by designing buildings at key locations to incorporate memorable forms or features;
- Develop a local design vocabulary. Establish a palette of locally distinctive architectural features and building materials. Ensure quality workmanship.

LDP3 -Sustainable Design

The Council notes the changes that have been made to policies in light of its comments at regulation 14 stage. Nevertheless, the Council considers that the requirements of the policy are still quite prescriptive. It would seem sensible to build in some additional flexibility to try and ensure that the policy does not have a detrimental impact on the delivery of sites allocated in the plan. Some examples of possible changes to the policy are set out below.

LDP3 – Sustainable Design

All new development proposals must contribute to tackling climate change by ensuring that:

- buildings are orientated (where compatible with Policy LPD1) and designed to use passive design features to minimise the need for artificial light, heating and cooling and maximise solar gain;
- the layout of the development maximises opportunities for use of common walls to limit winter heat loss;
- public and commercial buildings meet at least BREEAM Very Good standard
- the design, construction method and materials achieve an energy efficient building, where practicable, and include grey water recycling where appropriate;
- biodiversity is supported through the design of buildings incorporating nesting and roosting spaces and open space supports native habitats and using native species;
- trees are planted to improve biodiversity and air quality and provide shade where feasible;
- open water features are provided, <u>where practicable</u>, which support native habitats and use native species as part of sustainable drainage systems;
- sufficient refuse and recycling storage and bicycle parking should be provided to ensure a high quality and well managed streetscape and encourage cycle use.
- at least 1, and where possible 2, covered cycle spaces should be provided per dwelling
- all new homes should have private amenity space that provides a pleasant space in which to enjoy the outdoors in both sunlight and shade
- details of charging points for electric vehicles should be provided for all new homes and work places

Recommendation: Amend wording of the policy as suggested above.

Policy LDP4 Wareham Station Approaches Enhancement Area

A Dorset Council Conservation Officer has suggested that the explanatory text should acknowledge that the station is Grade II-listed and so its setting should be preserved and enhanced in a manner consistent with its significance.

Recommendation: Amend text to include reference to the station being a grade II listed building.

In addition to the comments above, there are a couple of issues below that Dorset Council would like to clarify.

Green Belt Amendments

The emerging Dorset Council Local Plan is seeking to make amendments to the boundary of the Green Belt in some locations. In order for the Council to do this there has to be exceptional circumstances. The published draft Dorset Council Local Plan states, in Policy SED1, that there are exceptional circumstances to make amendments to the Green Belt boundary at Wareham. However, there is then reference in paragraph 15.3.1 that "It is considered that there are no exceptional circumstances to justify the release of Green Belt land around Wareham".

Dorset Council was made aware of this inconsistency following the start of the Options Consultation on the Local Plan and issued an errata slip which clarifies that there are no exceptional circumstances for a change to the Green Belt at Wareham.

Office for Nuclear Regulation

The Office for Nuclear Regulation (ONR) has a non-statutory role when considering the impact of proposed developments on local detailed emergency planning arrangements for nuclear sites, and the potential for developments to pose external hazards to sites. Local planning authorities are therefore encouraged to notify the ONR of relevant emerging neighbourhood plans within the area. Within fairly close proximity of the Wareham Neighbourhood Plan area is a former Atomic Energy Authority site (Winfrith Atomic Energy Establishment) near Winfrith Newburgh.

It was felt that the ONR's land use planning processes published at http://www.onr.org.uk/land-use-planning.htm may apply to some of the developments within the Wareham Neighbourhood Plan. As such in order for ONR to have no objections to such developments confirmation must be received from the relevant Council emergency planners that developments can be accommodated within any emergency plan required under the Radiation (Emergency Preparedness and Public Information) Regulations 2019; and that the developments do not pose an external hazard to the site.

A Dorset Council Emergency Planner has commented that: "While the local authority has a statutory duty to have (Off-site) Plans in place for REPPIR sites, including setting the DEPZ's and OPZ (Outline Planning Zones in this case – OPZ's) planning. With Winfrith not being a REPPIR site and not requiring off-site planning, we (Emergency Planning Dorset Council) find ourselves in a position of not being able to pass such comment, as we do not have the insider, nor the specific technical information required to do so. As such, upon discussions with our Planning colleagues we would be grateful if Magnox, as current site managers, could look into the consultation for the Wareham Neighbourhood Plan and feedback any comments. It would be equally useful if we take this opportunity to have a quick update from Magnox on the decommissioning work progress. It may be that with the decommissioning programme coming to an end, future impact would be minimised, information which would help us in upcoming assessments."

The Council has not yet received a response from Magnox.

Minor points

Policy H7 more detailed site survery needed to confirm	Typo Survey
extent	
Local Green spaces table	A bit blurry, can this be made clearer?
3.4.11 Waste and minerals plans now adopted.	
Also, planning permission was granted for the	
'extension to Tatchells Quarry by way of extraction of	
Baggs Land to the south of Carey Road' on 27	
September 2019 (reference: 6/2018/0378)	

Wareham Neighbourhood Plan 2019 - 2034 – Submission Consultation Summary of Regulation 16 Responses