

Wareham Neighbourhood Plan – Regulation 16 Consultation

Comments from Dorset Council

February 2021

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 on-street 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, [where practicable](#), 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 survey needed to confirm extent	Typo.... Survey
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)