

No specific comments requiring changes to the plan contents:

- Gloucestershire County Council
- Highways England
- Historic England
- National Grid (Avison Young)
- North Wareham Action Group
- Office for Nuclear Regulation
- SGN
- Wareham Town Trust

Respondent/s	Matters raised	Wareham NP Steering Group Comment
Mr I Baggs	Concerns about the appropriateness of the choice of Bog Lane as a SANG location to mitigate development in Wareham	The suitability of the Bog Lane site has been considered by Natural England who are in support of the Neighbourhood Plan in this respect. However alternative provision is not ruled out (as per the Reg 14 consultation response to Mrs Baggs on the supporting text (3.7.2)).
Mr I Baggs	Raises similar points to those submitted by Ann Williams and anonymously at Regulation 14 stage with relation to: Policy H2 - broader mix of homes needed	As per the Reg 14 response - The Housing Needs Evidence is based on the consideration of the household composition and age structure in Wareham in comparison to Purbeck, as well as the understanding of the housing market context, which suggests there is likely to be a significant need for mid-sized homes of two and three bedrooms, and that a reasonable proportion are provided as apartments or flats (given the trend across the district of older people moving into flats, and likely growth in this demographic). The policy does not prohibit larger family homes, but simply ensures that these are not the predominant house type.
Mr I Baggs	Objects to reference of strong support for Wareham's inclusion in a National Park	This is not policy and is a statement of fact - although the text could be amended to clarify that this is the Town Council's position (by adding 'by the Town Council' after strongly supported).
Dorset Area Ramblers	Minor point raised regarding potential to expand references to accessing the wider countryside	Point noted - however this is not considered necessary to meet the basic conditions.

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Dorset Council	3.3.1 - recommend amending heathland reference to SAC, SPA and Ramsar	Whilst the SAC covers the more limited areas that are either RAMSAR or SPA in this locality, and the SPA coverage is in relation to Poole Harbour (rather than heathland) there is no objection to this proposed change.
Dorset Council	Policy H3 Stock of smaller dwellings - suggests reference to subject to relevant heritage policies included	Whilst this policy would be considered in conjunction with the heritage policies, there is no objection to this proposed change.
Dorset Council	3.3.2 amendments suggested to better reflect national policy wording	Whilst this is not policy, there is no objection to this proposed change.
Dorset Council	Policy H8, GS2 and Policy GS3: seeks greater flexibility in the policies (ie "should aim to" conform with the design principles)	Whilst the principles are considered to be flexibly written in themselves, there is no objection to this proposed change if it can be made clear in the supporting text that any deviation should be clearly justified on planning grounds.
Dorset Council	Section 7 - amendment suggested supporting text to add a cross reference to Policy 22 of the Waste Plan	Policy 22 refers for incorporating adequate waste for recycling and recovery facilities on-site into the design of major developments. This links with Policy LDP3 (8 <sup>th</sup> bullet), and whilst not strictly needed, there is no objection to this proposed change.
Dorset Council	The proposed area safeguarded for employment use at Sandford Lane differs from that in the current adopted Local Plan.	The reason for the amendment is explained in the consultation statement - ie that the main change to this is the exclusion of the Dorset Council's Purbeck Connect centre which we understand caters for adults with learning and physical disabilities and may in the future become available for residential development. Everdene House (to the south side) was approved for conversion to residential in 2013 (PDD/2013/0001) as a result of the Government permitted development rights legislation - so the centre is now in a mainly residential area, and as such the changes recognise the actual situation on the ground. It would be helpful if Dorset Council could address the above points

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		in their objection, rather than saying that this must be done through the Local Plan update.
Dorset Council	Object to the retention of the crossing in Policy PC1	<p>This point was raised in the Reg 14 consultation and is covered in the consultation statement - 5.1.3 reflects the planning history and rejection of alternative options, and suggests that the potential to improve the operation of the ground level crossing such as linking the operation of the barriers/gates to the signalling should be explored, and legal advice was obtained (October 2018 attached) which concluded that PC1 was likely to satisfy the basic conditions. The issue of maintaining a ground level crossing between the two halves of the Town is of vital importance to the local community and is essential to avoid severing the community. There is no other pedestrian/cycle link between the two halves of the Town. The attached back paper sets out the background to this issue in more detail.</p> <p>The Town Council has sought specific Advice (attached) on this policy from Sasha White QC of Landmark Chambers, London, on whether the retention of pedestrian routes including the ground level railway crossing is a legitimate policy to include in the Plan. He concludes that it is legitimate for the local community to express their desire for the ground level railway crossing to be maintained, and for this to be considered as part of the development plan if a planning application is made in relation to this land. He considers it likely that the policy will meet the Basic Conditions.</p>
Dorset Council	Policy PC2 - The improvements identified should be set out in a list of priorities rather than in a policy.	This was raised in the Reg 14 consultation and is covered in the consultation statement - it is considered that including them as a policy ensures that if any elements would require planning consent that it is clear they should be supported.
Dorset Council	6.2.5 The phasing would not be in relation to funding but ensuring the residents are	Noted - the reference to funding can be deleted from the supporting text, ie amend to read “which may be undertaken in phases”.

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	housed sufficiently and our health partners' services can continue to function during the build.	
Dorset Council	Policy LDP1 - changes suggested by the Conservation Officer.	<p>NPPF para 125 states that “Neighbourhood plans can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development.” In response to the Building Better, Building Beautiful Commission, the Government is proposing to amend NPPF para 126 to encourage Neighbourhood Plans to set out clear design guidance which “which reflect local character and design preferences”. The Neighbourhood Plan aims to improve the quality of new development and ensure it reflects local character. Whilst appreciating the need to avoid being overly prescriptive, the Steering Group does not wish to “water down” the community’s aspiration to achieve higher quality design which respects the special character of the Town. There is no objection to the changes proposed to bullet points 5,7 and (new) 8. On bullet 6 it is suggested that “where appropriate” is added before paving should be natural stone. On (new) bullet 11 there is a clear palette of building materials in the town which should be respected. To recognise the need for some flexibility it is suggested that “where appropriate” be added in front of the bullet. On bullet 12 these detailed points can have a devastating impact on the appearance of new development in the conservation area and it is considered that this bullet should be retained. By careful design these features can in most instances be tucked out of sight.</p>
Dorset Council	Policy LDP2 - changes suggested by the Conservation Officer.	<p>There is no objection to the suggested change to bullet 1. On bullet 5 it is considered that this be retained as set out. The Steering Group is keen to avoid larch lap panel, picket or similar fences adjoining public spaces because in practice they are easily damaged and unless regularly maintained they can become an eyesore.</p>

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Dorset Council	Policy LDP3 - changes suggested by the Conservation Officer to include the wording 'wherever practicable' in relation to open water features.	There is no objection to this proposed change.
Dorset Council	Policy LDP4 - reference the Grade II status of the station in the supporting text	There is no objection to this proposed change.
Ruth Warren	Reference potential for stricter speed limits on the causeway over the river meadows	This is beyond the scope of the Neighbourhood Plan (and would be better raised directly with Dorset Council as the highways authority).
Welbeck Land	<p>There is insufficient certainty regarding an up-to-date strategic plan for the plan to proceed.</p> <p>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.</p>	<p>The first point is addressed in the consultation statement.</p> <p>National Planning Guidance (PPG Reference ID: 41-009-20190509) advises on whether a neighbourhood plan can come forward before an up-to-date local plan or spatial development strategy is in place. The guidance makes clear that there is no requirement to delay a Neighbourhood Plan, but that the local planning authority should work with the qualifying body so that complementary neighbourhood and local plan policies are produced. The Town Council has worked closely with Purbeck District / Dorset Council to ensure that the Wareham Neighbourhood Plan and Purbeck Local Plan are aligned, and have also been able to consider the Local Plan Inspector's post hearings note that gives a clear indication of the key matters that require modification, and there is no reason therefore to delay the Neighbourhood Plan at this stage.</p> <p>In respect of the Dorset Local Plan, the first draft has been published for consultation (the consultation closes on the 15 March) and does not propose the release of Green Belt land. An extract from the draft 2021 plan is shown below:</p>

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		<p data-bbox="987 172 2101 252"><b>15.3. Development strategy</b></p> <p data-bbox="1014 272 2063 496">15.3.1. The strategy for Wareham focuses on maximising opportunities for development within the existing urban area, recognising the highly-constrained nature of the land around the town. It is considered that there are no exceptional circumstances to justify the release of Green Belt land around Wareham in part due to the constrained nature of this land and the preferable opportunities that exist elsewhere.</p> <p data-bbox="1014 523 2063 632">15.3.2. Allocations within the existing urban area identified through the neighbourhood plan are likely to deliver around 207 new homes. Opportunities for development at Wareham include:</p> <ul data-bbox="1115 655 2063 919" style="list-style-type: none"> <li>• the redevelopment of underused employment land on Westminster Road and John’s Road Industrial Estates;</li> <li>• the redevelopment of public land following the rationalisation of education and health facilities including the town’s former middle school, the health centre, the community hospital and the Social Services site in Bonnet’s Lane; and</li> <li>• the redevelopment of commercial sites on the northern edge of the old town, which have the potential to create an attractive gateway into the urban area.</li> </ul> <p data-bbox="1014 943 2063 1246">15.3.3. All of these sites are within the wider 5 km heathland buffer, where it is essential that any adverse impacts from additional recreational pressure on the heathland sites are avoided. The neighbourhood plan group has worked closely with Natural England and Dorset Council to develop an approach that enables the development to take place. For sites in the ‘old town’ an extension to the existing Suitable Alternative Natural Greenspace (SANG) at Bog Lane is proposed and for sites at north Wareham a financial contribution towards Heathland Infrastructure Provision (HIP) will be secured.</p>
Welbeck Land	Policy H5 / H6: refers to the conformity issues given the adopted Local Plan’s position on protected employment sites and	This conformity issue is discussed in the Basic Conditions Statement. Furthermore, Case Law (2017 EWHC 1711 (Admin)) is clear that the judgement on general conformity is not based on identifying any conflict with a strategic

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	<p>concerns about viability (and therefore deliverability).</p>	<p>policy but has to be considered against the strategic policies as a whole. The plan is also required to have regard to national policy. John Howell QC (sitting as a Deputy High Court Judge) reflected that “84. While I agree that it is “proper” for individual policies in the neighbourhood plan to be considered against the strategic policies in the development plan (whether or not those individual policies involve site-specific proposals), it is not those policies individually that have to meet this “basic condition”: it is the neighbourhood plan (that is to say the policies in that plan collectively) which are required to be in general conformity with the strategic policies in the development plan as a whole. ... the fact that a policy in a neighbourhood plan may be in conflict, or not in general conformity, with a strategic policy in the development plan does not necessarily mean that the plan itself may not be in general conformity with the strategic policies as a whole. Indeed, as has often been observed, development plans are full of broad statements of policy, many of which may be mutually irreconcilable.”</p> <p>The statement that the planning application 6/2020/0163 “demonstrates that higher densities are required to make the site financially viable” is not related to any evidence on viability, and there are no suggestions that there are any viability issues in the submitted design and access statement. The Neighbourhood Plan is supported by its own viability evidence and employer survey findings. Whilst there are differences between this and the Welbeck Land (who are seeking to demonstrate the special circumstances necessary to justify the release of Green Belt land) report, it is clear that, with matters such as Brexit, Covid-19 and changes to permitted development rights there is no absolute certainty in planning. The evidence provided is not required to be absolute but is required to be proportionate.</p>

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Welbeck Land	Policy H7: Wareham Town Northern Gateway: 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	<p>The site is not identified in Table 2 nor shown on the Inset Map as Employment Land and is therefore not subject to safeguarding under Policy E of the adopted Local Plan.</p> <p>As part of the Regulation 14 consultation (as noted in the consultation statement) notification was received from Hamelins Group that they had acquired an interest in the site for its redevelopment.</p> <p>Similarly BNP Paribas Real Estate, acting for National Grid Property Holdings, confirmed in an email (dated 19 November 2020) that they were in negotiations with a developer and anticipate a planning application for residential development will be submitted next year, once contracts had been exchanged.</p>
Welbeck Land	Policies H8, GS2 and GS3: Suggest that there remains uncertainty regarding the delivery of these proposals	The proposals are included in the 2021 draft Local Plan (prepared by Dorset Council), and the policies have been developed with input from the Council, who have confirmed the quantum of housing on these sites.
Welbeck Land	Welbeck's position remains that a windfall allowance of 100 dwellings is too high.	<p>This was previously raised by other consultees and responded to in the consultation: the level of windfall is based on a 33% discount rate to the past average to provide a robust assumption on windfall housing deliverability.</p> <p>Furthermore in 8.3 the Town Council proposes to monitor both development and infrastructure as outlined in the Plan and undertake a thorough review of progress five years following adoption. Attached is a statement from Dorset Council on the calculation of the housing requirement for Wareham as proposed in the draft Dorset Local Plan 2021 which shows that they expect 8.8 dwellings pa to come forward as windfall in Wareham Parish.</p>
Welbeck Land	Welbeck is also concerned that the Town Council's decision to scrap the provision of a SANG north of the railway line will	The potential for a SANG north of the railway line has not been ruled out, however it has not been included in the plan due to the deliverability concerns raised by Welbeck who considered Green Belt release to be fundamental to that SANG strategy. As per the Reg 14 consultation response



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	artificially cap development in this general location at 45 dwellings.	to Mrs Baggs the supporting text (3.7.2) was amended to clarify that, subject to landowner agreement and consultation with Natural England, alternative arrangements could be considered at planning application stage.
Welbeck Land	Concerns about the appropriateness of the choice of Bog Lane as a SANG location to mitigate development in Wareham	See earlier comment (Mr Baggs)
Wessex Water	Notes existence of utilities infrastructure - with regard to site allocations H5 and H8 it may be able to divert these apparatus at the developer's cost to suit site layout. With regard to H7 a 15m buffer should be retained around the Sewage Pumping Station (SPS) which lies to the north of the gasworks site to minimise noise and odour nuisance	Wessex Water have not previously commented on the plan. The infrastructure does not prevent the development of the sites, and these would be matters considered in the detailed design and layout at planning application stage. For example, the 15m buffer to the SPS is outside the site to the north and impacts on the area proposed for the access only. For clarity, these could be referenced in the supporting text.