

## Comment

<b>Consultee</b>	Mr WL Marshall (1189661)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Mr WL Marshall (1189661)
<b>Comment ID</b>	PLPP236
<b>Response Date</b>	02/12/18 14:15
<b>Consultation Point</b>	Arrangements for commenting on the Presubmission Purbeck Local Plan timings and next steps ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Are you responding on behalf of a group?</b>	Yes
<b>If yes, how many people do you represent?</b>	3
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	This Policy
<b>Do you consider that the Local Plan is legally compliant?</b>	No
<b>Do you consider that the Local Plan is sound?</b>	No
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	No

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Completing this is like swimming through treacle. It fails to allow the public to respond easily. In this respect it is clearly designed to be complex, confusing, time consuming and excludes a large proportion of the public from being able to make comment.

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Initially any opportunity to make comment had to be made via the internet. Therefore excluding a significant proportion of our society.

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<b>Comment by</b>	Mr WL Marshall (1189661)
<b>Comment ID</b>	PLPP237
<b>Response Date</b>	02/12/18 14:15
<b>Consultation Point</b>	Improving accessibility and transport ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Are you responding on behalf of a group?</b>	Yes
<b>If yes, how many people do you represent?</b>	3
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	12
<b>Do you consider that the Local Plan is legally compliant?</b>	No
<b>Do you consider that the Local Plan is sound?</b>	No
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	No

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The level crossing in Wool is an issue requiring special restructuring and is needed to be bypassed in some form.

The council has failed to properly encourage and develop its professed alternative transport arrangements of walking and cycling. A few hundred yards of cycle way here and there, a bit of paint and a leaflet does not represent a safe and viable alternative environment to cycle on. There are no proper safe links between each of the towns and villages, for example Wool to Wareham has no safe cycle path or foot path.

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I have identified that the council has considered a number of options in relation to this issue. However, I have also identified that there is no suggestion that any action will be taken by the council in respect of any of these options.

*Council Quote: “The need to travel will be reduced by increased self -containment and the concentration of employment, shops, services and community facilities.” HOW?*

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Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr WL Marshall (1189661)
Comment ID	PLPP238
Response Date	02/12/18 14:16
Consultation Point	Policies List ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	3
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	H5
Do you consider that the Local Plan is legally compliant?	No
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*H5 – Wool Housing Need*

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470 houses is not in proportion to the local need, which is around 30 homes.

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#### EE1 & H5 WOOL – Employment

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After many years, Dorset Green has consistently failed to attract any significant new employment opportunities. The newly built units are too small and hugely overpriced to attract small businesses and too small to attract larger businesses. The developers are who believe they have a diamond opportunity appear to have failed to attract any significant new business. I implore the inspectors to ask the question "What companies / organisations have actually taken up a contract to rent on the Innovation Park." And disregard any answers along the lines of "We are talking to and we have had interest".

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H5 & 244 - For Wool, a cohesive transport infrastructure is the primary development need. Without the instigation of a sustainable road network towards Wareham and Poole all other development of the area will be an imitation of sound development practice.

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*and a leaflet does not represent a safe and viable alternative environment to cycle on. There are no proper safe links between each of the towns and villages, for example Wool to Wareham has no safe cycle path or foot path.*

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Consultee	Mr WL Marshall (1189661)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr WL Marshall (1189661)
Comment ID	PLPP239
Response Date	02/12/18 14:16
Consultation Point	Improving accessibility and transport ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	3
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	238
Do you consider that the Local Plan is legally compliant?	No
Do you consider that the Local Plan is sound?	No
Do you consider that the Local Plan complies with the duty to co-operate?	No

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<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Mr WL Marshall (1189661)
<b>Comment ID</b>	PLPP241
<b>Response Date</b>	02/12/18 14:16
<b>Consultation Point</b>	Policy I2: Improving accessibility and transport ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Are you responding on behalf of a group?</b>	Yes
<b>If yes, how many people do you represent?</b>	3
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	244
<b>Do you consider that the Local Plan is legally compliant?</b>	Yes
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A bypass around the east of Wool. Or, significant widening of the A352 with an underpass for the level crossing at Wool.

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<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Mr WL Marshall (1189661)
<b>Comment ID</b>	PLPP689
<b>Response Date</b>	02/12/18 14:16
<b>Consultation Point</b>	Policy H5: Wool ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Are you responding on behalf of a group?</b>	Yes
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## Comment

<b>Consultee</b>	Mr Paul Marsh (1187916)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Mr Paul Marsh (1187916)
<b>Comment ID</b>	PLPP123
<b>Response Date</b>	29/11/18 18:58
<b>Consultation Point</b>	Wool - 470 homes, 65 bed care home, SANG, community hub and recreational space ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Are you responding on behalf of a group?</b>	No
<b>If yes, how many people do you represent?</b>	1
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	131
<b>Do you consider that the Local Plan is legally compliant?</b>	Yes
<b>Do you consider that the Local Plan is sound?</b>	No
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Site on East Burton Road.

A Landmark Envirosearch carried out on 11/12/2014 shows that there is significant risk of surface water flood on the proposed site. As recent as October 2018, photographic evidence quite clearly shows actual surface flooding.

Any attempt to develop this site for housing places the existing housing along East Burton Road, Sandhills Crescent and Giddy Green Lane at great risk of future flooding, directly exacerbated by any development, and would also be ruinous to any housing placed on this site.

It is quite clear that climate change over the past two decades has resulted in much greater, and severe rainfalls in this area, and as such, any decision to develop this site is seriously flawed.

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This cannot be made sound - Flooding on this site makes this location unsuitable for housing

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<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Mr Paul Marsh (1187916)
<b>Comment ID</b>	PLPP126
<b>Response Date</b>	29/11/18 19:49
<b>Consultation Point</b>	Affordable housing need ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Files</b>	<a href="#">Affordable Housing for Purbeck</a>
<b>Are you responding on behalf of a group?</b>	No
<b>If yes, how many people do you represent?</b>	1
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	161-169
<b>Do you consider that the Local Plan is legally compliant?</b>	Yes
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There are no end of references to "Affordable Housing" with **no** attempt to define what actually is affordable for the average Purbeck family. There are multiple references to "National Averages" but these are truly irrelevant numbers when it comes to local need. The attached short paper defines Affordable in a Purbeck context - that is, an affordable house should cost no more than £150,000. PDC should be engaging with entrepreneurial developers and architects that can design and build to such a brief. Additionally, PDC should be looking to provide building plots costing no more than £50,000 so that a £150,000 house is a reality. Purbeck Gate is an example of how large scale housing is not, and has never, addressed local needs - there is not a single house for sale under £230,000. Building affordable housing is the first stage - making sure that they remain affordable requires policy in place to ensure that onward ownership is only to people working in the Purbeck area.

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See above

**If you have any supporting documents please upload them here.** [Affordable Housing for Purbeck](#)  
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## **AFFORDABLE HOUSING FOR PURBECK**

This short paper has been prepared to clarify what “Affordable” means when it comes to providing housing for local people living in Purbeck. The term affordable is not a useful word when debating and discussing the provision of future housing stock for local people with developers and local government.

WoolRATH completely accepts that Wool needs some housing stock for it's' people.

WoolRATH calculates that no more than 100 houses are required in the Wool area over a period of years.

WoolRATH requires that housing stock needs to cater for young & old.

### Local Average Income

In Purbeck, a sensible starting point, therefore, should be incomes, which are the main factor determining how much people can afford to pay for housing. Average full-time weekly earnings in Purbeck for 2015 were \*£603 for males & \*£449 for females. The weighting applied to calculate the earnings for two wage earners in a household is 0.67 of the primary wage & 0.33 of the secondary wage, giving an average household income of **£552**. Using the same data source, the figure for Poole Unitary Authority is £519.

\*Source – Office of National Statistics (2015)

Converted into pre-tax annual earnings at 52 ¼ weeks per year this equates to an annual household salary of **£28,842**.

### Current Mortgage Policy

Banks & Building societies have tightened lending over the last 10 years, since the latest financial crisis. The salary multiple varies on average from 3.0 – 4.5 times salary. This would give a Purbeck household borrowing capacity of **£86,526 - £129,789**. The average deposit that a financial institution requires is **16%** which translates into an affordable buying price range of **£103,007 - £154,511**.

## Affordable

So, the local consensus is that a house costing around **£150,000** is within the grasp of local people.

## Housing for Rent

Not everyone can afford to buy, so it is crucial that there are properties available for rent for the lower-paid in our community. At the time of writing, there were only 3 properties available for rent from Letting Agents within 3 miles of Wool in the £500 - £900 pcm range.

On the same basis that an affordable house should cost £150K, then an affordable rental property of the same value would further fulfil a local need. A rental yield of 4% would be consistent with this area. This would enable a landlord, private or public to charge £500 pcm or £115 p.w.

## How

### **Six Simple Steps**

1. **Purbeck District Council** should do all in their power to identify small pockets of land that could support a cluster of 10 houses at most, to blend with the local environment. High priority should be in-fill and brown field sites before any consideration of using pristine green field sites.
2. These sites need to be provided at no more than 1/3 of the house price, i.e. a maximum price of **£50,000**.
3. **Purbeck District Council** should engage with innovative local architects with the vision to design houses costing **£100,000** to build – to include the developer's profit.
4. **Purbeck District Council** needs to work with local developers that can work within this framework – it is unlikely that large national developers would be too enthused to work within such a budget constraint.
5. **Purbeck District Council** needs to formulate a binding policy so that these new houses are only available to be sold on to people working & living in the local community.
6. **Purbeck District Council** needs to evaluate infrastructure changes and formulate a cohesive plan to provide for the local people if, and when, the population increases.

## Result

An environmentally sensitive solution, meeting local needs, that would demonstrate how our Public Authority can work with its' people to address the Purbeck housing need for decades to come.

## Comment

<b>Consultee</b>	Mr Paul Marsh (1187916)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Mr Paul Marsh (1187916)
<b>Comment ID</b>	PLPP552
<b>Response Date</b>	03/12/18 21:04
<b>Consultation Point</b>	Foreword ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1

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

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

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

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

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

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

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

I do not consider the Local Plan is sound

I am appalled at the difficulty in reading, understanding, navigating and commenting on this document. So much so, that I am entering my overall comments here and trust that they will be read by the Inspector, who will find that the majority of these points represents local feeling.

I have 25 years background in specialist IT systems, an Honours degree and a modicum of common sense. - But, even I am at a loss when trying to understand how PDC have interpreted the voice of the local people, and the method by which people are expected to comment, using a complex online process, which has resulted in the vast majority of Wool residents unable to participate in this process and submit their views - so, it is not sound - it has prevented the voice of the people to be heard.

As an attendee at many of the public sessions in Wool & Wareham, it is quite clear that representations made by local people at these meetings have not been picked up by PDC, considered and acted upon to provide a viable solution for housing in Wool.

I think the consensus is: Yes, there is a housing need in Wool, probably in the order of 60 houses to cover the next few years - The household income in the area would dictate a house costs at most £150,000.

Yes, there is a need for affordable rented stock. Again, an affordable rent should be in the £500 - £900 p.m. range. TODAY, on the biggest rental aggregator web-sites, there are only 5 properties with rents under £900 in the Wool area. Doing the maths, there is a consistent theme - A house that costs £150,000 to build can provide a landlord (PDC or whoever), to earn a 4-5% return at an affordable rent.

Where did "The Hub" come from? Totally unnecessary.

65-bed care homes! - No mention of how they will be funded or what they will cost.

No guarantees on infrastructure, specifically the Wool Surgery, which is already straining to cope with the existing population of Wool and reduced the "Emergency Same Day Surgery" to a single doctor commencing November 19th.

On a lighter, comical note concerning infrastructure, a representative of the PDC planning committee stated publicly "that even if traffic volumes doubled, this would not be a mitigating circumstance to cater for. So what would? 300%? 1000%?"

Dorset Innovation Park - sadly, the building of houses will not generate enterprise - it's the other way round. The innovation Park will never be more than providing "Cottage Industry" style small businesses. What large business would set up in a country that possesses zero motorway links?

Unfortunately, Purbeck Gate with 140-odd properties, is testament to the quality of housing that large developers impose on the local community. A brief walk around this area with its tired, stained rendering (See attached document) suggests 470 more houses will follow the same cost-cutting, cheap development route - no doubt providing disproportionately big profits for developers and landowners alike.

What consideration had PDC made to ensure that new housing stock is only available to local people. Without such policies, new developments will once again be unaffordable for purchase or rent by local people - The cheapest property for sale in Purbeck Gate is £230,000, a mere £80,000 more than an affordable £150,000 home.

With 24% of homes in Dorset classified as second homes, new housing policies are needed now.

Perhaps, with a little bit of investigation and entrepreneurial spirit, PDC could identify 60 plots that would be suitable for local housing needs in Wool. Perhaps, PDC could engage with any number of innovative, local architects & builders to address the LOCAL need.

What consideration has been made to the whole issue of surface flooding in the new order? That is, the increasingly severe sustained heavy rainfall that is more commonplace over the last 15 years. Let's not all be Donald Trump and put our heads in the sand!

So, in summary, I'm sorry that I cannot easily respond to:

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

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

Are we also expected to possess a legal qualification?

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

See above

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

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

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

## Comment

<b>Consultee</b>	Mrs Sheila Marsh (1191259)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Mrs Sheila Marsh (1191259)
<b>Comment ID</b>	PLPP567
<b>Response Date</b>	03/12/18 23:54
<b>Consultation Point</b>	Policy H5: Wool ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.2
<b>Are you responding on behalf of a group?</b>	No

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

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

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

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

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

A care home seems to be a last minute addition to the plan with no evidence of a study into the need for one, the funding of one or the suitability of such a large building. I believe PDC has failed to comply with the duty to co-operate on this.

**Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make**

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

The care home should be removed from the plan. The size of the building required for such a care home would be greater than any existing building and would be totally out of character in Wool. The medical facilities in Wool are already stretched and no consideration has been given to increasing these. The medical needs of those living in a care home are likely to be greater than other local people.

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

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

## Comment

Consultee	Mrs Susan Marsh (1189956)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mrs Susan Marsh (1189956)
Comment ID	PLPP54
Response Date	27/11/18 18:26
Consultation Point	Chapter 4: Housing ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.1

Are you responding on behalf of a group? No

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

Which policy / paragraph number / policies map does your comment relate to? H2 paragraph 118, Policy H8

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

Do you consider that the Local Plan is sound? No

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

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

At a recent meeting convened by the Parish Council, (26/11/18) a number of local residents expressed concern that they had not been consulted.

SHLAA process not carried out sufficiently thoroughly for the small sites within West Lulworth.

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

Ensure that information relating to the PLP is provided for all residents.

The information about the suitability of the sites, and the necessary improvements to the infrastructure, has not been given enough consideration. Some of the sites, eg. one in School Lane and Allotment Gardens would be technically very difficult to use as building plots, due to the gradient of the land, existing footpath, current use as agricultural and biodiverse sites. The School Lane plot has a new animal sanctuary, which appeals to both residents and visitors.

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

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

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

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

Currently recovering from a major operation so unlikely to be fit for this process.

## Comment

<b>Consultee</b>	Mr Tony Medley (1185759)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Mr Tony Medley (1185759)
<b>Comment ID</b>	PLPP589
<b>Response Date</b>	03/12/18 14:03
<b>Consultation Point</b>	Policy H5: Wool ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Letter
<b>Version</b>	0.3
<b>Files</b>	<a href="#">H5-Medley-PLPP589.pdf</a>

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

The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report)

<b>Which policy / paragraph number / policies map does your comment relate to?</b>	H5
<b>Do you consider that the Local Plan is legally compliant?</b>	Yes
<b>Do you consider that the Local Plan is sound?</b>	No
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	No



## For Office Use Only

Requester ID: 006  
 Consultee ID: 1185759  
 Comment ID's: PLPP589

## PART B

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

Policy number	MS
Policies map	
Paragraph number	

2. Do you consider that the Local Plan is:

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

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

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

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

- positively prepared - providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- justified - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- effective - deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- consistent with national policy - enabling the delivery of sustainable development in accordance with the policies in the Government's National Planning Policy Framework.

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

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

I am enclosing with this submission a letter in which I mention the objections that I have to the proposals as put forward in your submission.

They all relate to the village of Wool Ref H5. And the Environment.

Therefore Chapter 3 Environment :-

Policy E4 Flood Risk

Policy E5 Su Ds

Policy E7 The River Frome

Policy E9 Poole Harbour

All these Environmental Policies need very serious consideration before any Planning permissions are granted. I do not believe that the environmental impact of house building on these Greenfield sites has been thought through. The proposal to build on the soggy wet land behind Portland House north of the East Burton Roundabout is crazy when they could be situated to the west where there is already 30 planed.

Air pollution is not mentioned, we know now how bad this can get when the traffic is held up by the Railway Level Crossing. The queues often stretch from Roundabout to Roundabout and beyond.

As a member of the Medical Practice Participation Group I am deeply concerned that the medical facilities and lack of G P's will not be able to cope with the proposed increase in population and an additional 65 bed Nursing Home.

(Please continue on a separate sheet if necessary)

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

(Please continue on a separate sheet if necessary)

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

Yes

No

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

(Please continue on a separate sheet if necessary)

**Please sign and date this form:**

Signature:

Date:



1<sup>st</sup> December 2018

Chairman Purbeck District Council.  
Westport House  
Wareham  
BH20 4PP

Dear Sir,

Ref. Purbeck Local Plan, Pre Submission Publication.

What Has Changed?

If it was wrong to build 700 homes on a Brownfield site at Dorset Green in 2012, how can you possibly justify the building of up to 470 houses, and now an additional 65 bed Nursing Home on an adjacent Greenfield site? With no guarantee that more will not follow.

We therefore hope that you will take note of the objections that you received from Natural England in 2012 which states that 'given the sensitivity of the designated sites and wildlife features, (the Frome SSSI lies shortly to the north and the whole site lies within the catchment of Poole Harbour SSSI, SAC & RAMSAR) N.E advise that this proposal raises very serious concerns'.

The fact that the houses and accompanying infrastructure have been moved a few fields to the east will have made no difference to the worries expressed by Natural England back in 2012.

WE need your assurance that you will follow the Policy E 1 in that any 'development which harms the landscape character and fails to take the opportunity to improve landscape character should be refused'.R

We can not possibly see how the area can have it's 'character improved' by the construction of so many houses on Greenfield sites.

## 2.

At the present time all the land that is allocated for building is being farmed organically. This inherently means that the agricultural activity is low and therefore any pollution is unlikely. Building upon fertile green fields, in Wool, will inevitably cause numerous pollutants to reach the River Frome SSSI and down stream to the Poole Harbour SAC & RAMSAR site.

As the farmland is now being formed organically we fail to see how it will be possible to decrease the nitrogen pollution into the Poole SPA. (Para 86)

It is therefore thought to be essential that a fully Independent Environmental Impact Survey be undertaken before any planning permissions be granted.

We know from our own observations and the British Geological Survey that the natural Spring Line runs right through Wool and on into the proposed development areas.

Already you will be aware of the flooding that is happening at Purbeck Gate which can only get worse if the surrounding area is developed. The amount of flash flood water that would be generated by building over this large area would cause a major problem to any developer and just piping it to the River Frome would be totally unacceptable.

The proposed building of 90 Homes close to Portland House north of the East Burton Roundabout is madness, the area floods now without any houses and tarmac.

We note that the report agrees that the area is prone to flooding so why build on it and increase the problem. ?

These houses should be relocated to the north of the Innovation Site road., if it is thought essential that 470 houses are built. ( It might be possible to create an environmental wildlife area with a settlement pond to cope with surface water behind Portland House!)

The inevitable increase of waste water emanating from the East Burton Sewage Treatment Works, which we believe will have to be extended, is already a source of pollution of the Frome SSSI. This system is already overloaded at times and has the capacity to discharge untreated waste water directly into the R Win in times of flood.

This is unacceptable now and any increase in housing can only make it worse.

Already the R. Win floods the road at East Burton and this can only get worse with house building on such a large scale without some form of mitigation.

3.

We note that there is no mention of air pollution in the document. Which is an area of great concern.

The existing contamination that has been found around the East Burton Cross Roundabout leads us to have great concern for the future inhabitants of any houses built close to the A 352 road system. Examination of the surrounding vegetation shows that it is contaminated with fine particles including rubber. There is much reference to a healthy environment but the proposed increase in population will inevitably increase environmental hazards.

We are already saddled with the air pollution caused by the stationary traffic held up by the Level Crossing which will only get worse with the building of more homes.

We note that ' details in a traffic statement or assessment of improvements to the local road network (C6) and a program to reduce volumes of traffic on A351' are to be made by the developer. This we are dying to read ! East Burton is already a 'Rat Run' at busy times and can only get more congested and dangerous if there more homes.

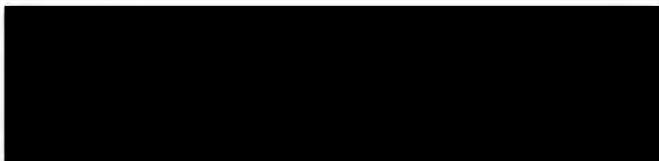
WE have already asked for a detailed Independent Environmental Survey to be published, an air quality survey and a guarantee that there will be no increased pollution of the R. Frome SSSI.

We also need an assurance that we will not have any of the 933 houses dumped on Wool at a later stage.

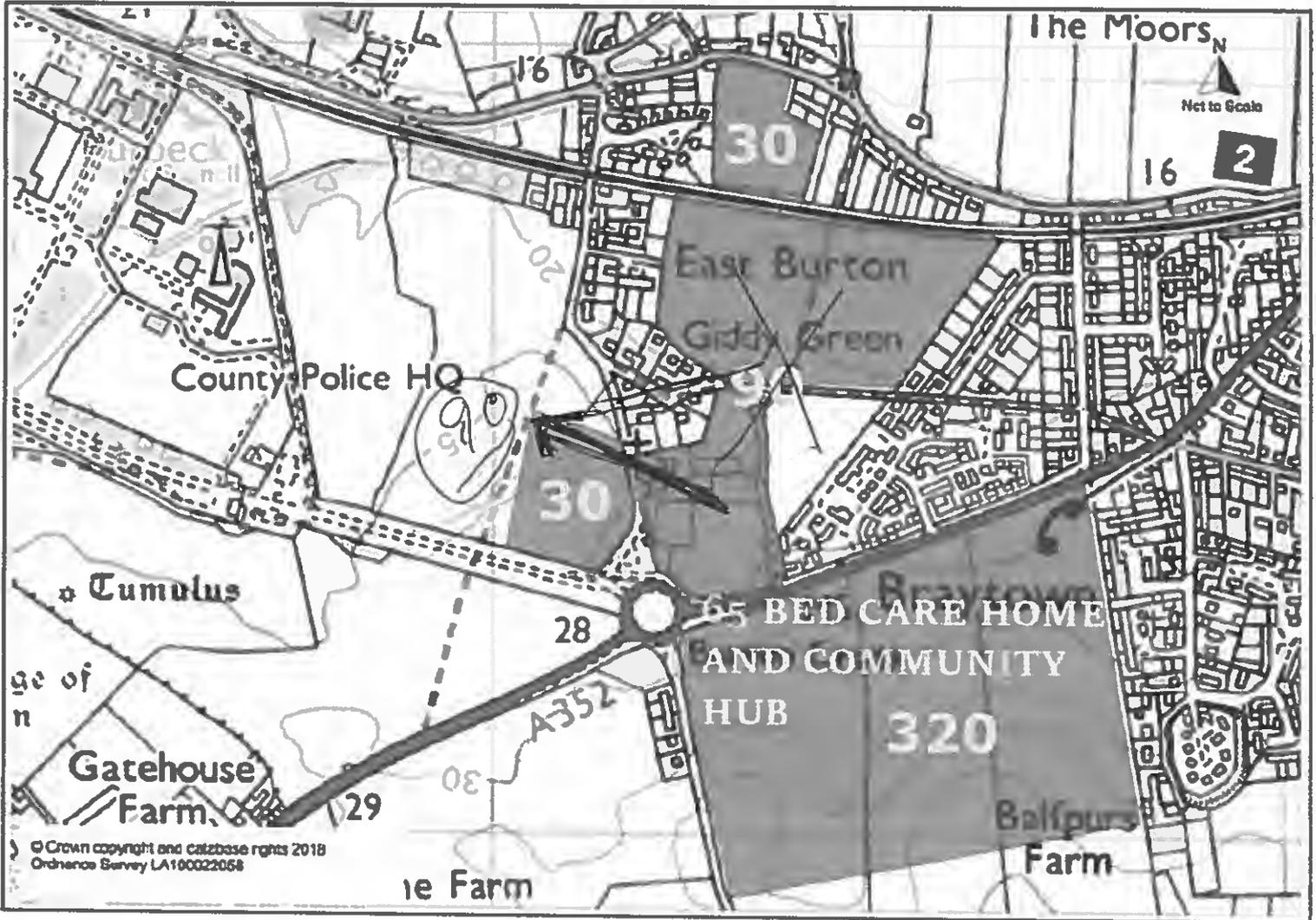
This letter has not touched upon other causes for objection, traffic, population or employment but is only concerned with the environment,

We look forward to reading your considered reply.

Yours sincerely,

A large black rectangular redaction box covering the signature area.

C A B Medley WRATH



**Environmental Statement and Considerations regarding the proposed building of homes in the catchment of the River Frome.**

River Frome below Dorchester is designated an SSSI.

The River flows into the Poole Harbour basin designated an SAC and Ramsar Site.

It is therefore essential that any development does not adversely effect the delicate habitat of the river and its flood plain.

The possible effect of development in the Purbeck District on the River can not be viewed in isolation. All the catchment developments will combine to effect the River. Increasing populations within the catchment inevitably will lead to increasing pollution and, unless some form of mitigation is built in, an increase risk of flash flooding.

Over time the river meanders across its flood plain with great force,(witness Wool Bridge collapse), additional house building can only increase the bankside damage.

It is vital that the chemical composition of the water is kept as pure and as clean as possible. In the past nitrogen, phosphate and other chemicals have polluted the river water, Leading to an overabundance of weed a major cause of flooding.

More insidious are the chemicals reaching the river via sewage, Many of the drugs taken by humans are now reaching the rivers. It has been demonstrated that the contraceptive pill is taken up by fish, who knows what other chemicals are affecting the natural balance of nature. We know from the River fly monitoring program that the in river invertebrates, so vital to all life, are diminishing. No longer do we have to wash the car windscreen after crossing a river bridge in summer to remove the dead flies.

Any increase in human population is inevitably going to adversely effect the existing populations of Water Voles and Otters. Sewage and other chemicals do escape and can have disastrous effects. (Paint stripper 1996 wiped out all fish below Bovington.) The River is a vital resource, it not only carries our waste away but produces a wealth of environmental benefits.

The Water, the Silt, the Invertebrates, the Fish, the Bird and Mammalian Wildlife ,plus the natural vegetation, a complete eco system.

**WE must look after it.**

Tony Medley 20.11.2018

Nuff. Sch., Frome, Piddle & West Dorset Fisheries Association

## Comment

Consultee	Mrs Catriona Miller (1189872)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mrs Catriona Miller (1189872)
Comment ID	PLPP255
Response Date	02/12/18 18:31
Consultation Point	Policies List ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.1

Are you responding on behalf of a group? No

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

Which policy / paragraph number / policies map does your comment relate to? E2 Para 50c SHLAA Oct 2018 West Lulworth

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

Do you consider that the Local Plan is sound? No

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

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

**Policy Statement E2** stresses the importance of conserving and enhancing historic assets. The contribution that such an asset makes to the local character, distinctiveness and economy of the area and the effects on the area of noise, traffic and lighting.

**Para 50 c.** states that the Plan strives to conserve and enhance Purbeck`s natural habitat, biodiversity and geodiversity.

The inclusion of 8 sites within the village of West Lulworth does not follow my understanding of this policy statement. It does not take into consideration the impact of such development on the AONB; SSSI; Conservation Area or proximity to a UNESCO World Heritage Site. Infilling so many green spaces within the village of West Lulworth contravenes this policy.

The loss of habitat in the Bindon Road Allotment Gardens is a major concern. Many rare species overspill into this area from Bindon Hill itself, including The Lulworth Skipper and Chalk Hill Blue Butterfly, which are both unique to this area. There is ancient orchard and the scrubland on the northern slope is never accessed by humans as it is very steep. These areas provide food and habitat for numerous garden birds, including thrushes, which are endangered. The orchard is a favourite for Fieldfares and Redstarts in cold winters. The area would need to be surveyed by RSPB, Butterfly Conservation and Dorset Wild Life Trust, before any planning permission could be granted. Badgers, deer and foxes are frequent visitors to the Allotments together with dormice, toads, adders, grass snakes and slow worms to name but a few. Owls and birds of prey, including the rare Peregrine Falcon, regularly hunt in this area. Building on Allotments is also against the declared policy of Healthy Living encouraged by the Government.

West Lulworth is particularly proud of its `no light pollution` policy with no street lights. Any modern development would require lighting which would totally change the ambience of the village at night.

People come from all over the world to see Lulworth Cove and the village of West Lulworth in its unique setting. Developments on the proposed scale contravene this policy statement and threaten the AONB, the SSSI, the Conservation Area and the Unesco World Heritage Site of the Jurassic Coast and would be detrimental to the economy of Dorset as a whole.

The Draft Purbeck Plan is an impressive piece of work but it has failed to analyse these small sites in sufficient depth. I would conclude that it is very unlikely that 107 houses would be deliverable in West Lulworth for the reasons outlined above. The Draft Plan is therefore unsound.

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

*Before these 8 sites within West Lulworth can be adopted as part of the Purbeck Plan consultations must take place with the relevant bodies concerned. The impact on our flora and fauna needs to be fully understood. The geodiversity also needs to be investigated in depth. The effects of paving roads, concrete foundations, loss of natural drainage and increased sewage outfall must all be considered.*

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

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

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

## Comment

<b>Consultee</b>	Mrs Catriona Miller (1189872)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Mrs Catriona Miller (1189872)
<b>Comment ID</b>	PLPP632
<b>Response Date</b>	02/12/18 18:34
<b>Consultation Point</b>	Policy H8: Small sites next to existing settlements ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Are you responding on behalf of a group?</b>	No
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	H8 SHLAA Oct.2018 W.Lulworth
<b>Do you consider that the Local Plan is legally compliant?</b>	Yes
<b>Do you consider that the Local Plan is sound?</b>	No
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	Yes

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

**Policy H8** states that the Plan must be able to justify the building of houses in sensitive areas.

For any development to be undertaken within this sensitive environment, the Purbeck Plan must be able to justify the need for increased housing in the area. Any such building must be supported by appropriate infrastructure including education, transport and healthcare. Our new school is already at capacity. Our nearest health centre is in Wool 5 miles away. There are no regular buses to help existing residents reach the Doctor, the train station or work. Without increased transport links, the village cannot support more housing. There is certainly not enough work in the immediate area to support 107 families.

Policy H8 states that the scale of the proposed development must be proportionate to the size and character of the existing settlement, up to a maximum of 30 houses, up to a maximum of two sites per settlement. The 8 sites within the village of West Lulworth far exceed this policy statement. Taken as one development this proposal ceases to be a `small site`. 107 dwellings is far in excess of advised levels for a village which has a population of 714 people and only 291 houses.

53 of the proposed dwellings are concentrated in the Sunnyside/Bindon Road Area. This is half the allocation for West Lulworth as a whole. Such a development cannot be classed as a `small site`. Large developments are subject to completely different criteria, particularly in identifying a `need` for such housing. The Draft Purbeck Plan, as it stands, does not justify the need or the viability of the 8 sites outlined in West Lulworth. The Draft Purbeck Plan is therefore unsound.

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

*The need for large scale housing in this sensitive area must be investigated further.*

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

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

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

## Comment

<b>Consultee</b>	Mrs Catriona Miller (1189872)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Mrs Catriona Miller (1189872)
<b>Comment ID</b>	PLPP633
<b>Response Date</b>	02/12/18 18:33
<b>Consultation Point</b>	Policy H2: The housing land supply ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.2

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

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

**Which policy / paragraph number / policies map does your comment relate to?** H2 SHLAA Oct18 W.Lulworth

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

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

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

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

The Draft Purbeck Plan suggests as sound the possible building of 107 houses within the boundaries of West Lulworth Village, greatly increasing the size of the village.

**Policy H2** states that any sites put forward for development must be viable.

As a resident of West Lulworth I believe the Plan is Unsound as many of the sites outlined would prove unsuitable, if they came to planning, for the following reasons:-

The existing infrastructure cannot support this number of houses. The increased sewage outfall would be beyond the capacity of our existing sewage system and treatment plant. At the moment this plant is small and unobtrusive. It is difficult to see how it could be enlarged without detriment to the AONB within which it stands.

By indicating those sites which are `suitable` and which are `unsuitable` for consideration, the SHLAA identifies and assesses the potential for development of specific sites. Land to the East of Farm Lane, West Lulworth has been identified as `unsuitable` because of adverse impact on the AONB. Many of the small sites identified in the village would be unsuitable for the same reason.

In the specific instance of the developments proposed for Bindon Road and Sunnyside Road, the roads are completely unsuitable for more traffic, let alone plant and machinery because they are unmade and very steep. Access to dwellings within the Sunnyside/Bindon Road area would be impossible during any building process as there is only one possible access point to this area of the village.

The Bindon Road Allotment Gardens act as a soak-away for water running off Bindon Hill which is both an SSSI and AONB. Without this area of soak-away the village land drains would be overwhelmed in extreme weather.

The only access point to Bindon Hill and the Coastal Footpath is in Bindon Road which is unmade and rural, in keeping with the AONB that surrounds it. Bindon Road would have to be upgraded and widened to allow for two way traffic. Parking would have to be found for existing cars which currently park in the road. The present soft edge to the village would be lost.

The drainage system, both sewage and mains water, electricity and telephone, would have to be upgraded which would mean the whole area would have to be dug up for prolonged periods, making life for the residents impossible. Emergency vehicles would have no access throughout the building process. If the road were widened, the area for building would be much reduced. Houses on this site would be situated under the north face of Bindon Hill, with no sunshine in the winter months.

Access to the plot near Limberlost would be via Sunnyside Road. It would be impossible to widen Sunnyside Road as there are already houses on both sides. The increased traffic would be quite unsustainable in this area and the parking problems would be as difficult as in Bindon Road.

The addition of 9 dwellings next to Cove House would further exacerbate the problems outlined above as these would also be accessed from Bindon Road.

Traffic in Lulworth is already at gridlock in the Summer months. Increased traffic at the Bindon Road junction would exacerbate these problems, as it is the major junction for all traffic heading for the Cove. Access to the area for emergency vehicles is already very difficult.

The area by 1 Church Road is also situated on the same busy junction, further exacerbating the traffic problems in this area. It might seem suitable as it is a flat plot, but it takes the water from both Bindon Hill and Hambury Hill as a soak-away. Storm drains regularly overflow in this area.

By selecting these 4 areas as suitable for development, none of these issues has been identified. The plan is therefore unsound.

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

*More research needs to be carried out into the viability of these sites with regard to the housing need in West Lulworth. Do we need these houses, who will live in them, how can they be affordable when the cost of development is likely to be very high? Relevant conservation bodies must be consulted with reference to effects on the AONB. Why were these sites deemed suitable for development when other areas of the village were deemed unsuitable because of impact on the AONB? The whole village*

*can be seen from the surrounding hills and the impact of such large scale building must have an effect on the AONB and other designations. Why have these sites been divided into small plots when they are so close together? All 8 sites need to be reviewed together as a large scale development and the criteria for large developments must be applied.*

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

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

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

## Comment

<b>Consultee</b>	Mr Norman Miller (1192529)
<b>Address</b>	
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Mr Norman Miller (1192529)
<b>Comment ID</b>	PLPP641
<b>Response Date</b>	03/12/18 11:37
<b>Consultation Point</b>	Policies List ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Letter
<b>Version</b>	0.3
<b>Files</b>	<a href="#">Miller-PLPP641.pdf</a>
<b>Are you responding on behalf of a group?</b>	No
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	<input type="checkbox"/> The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report)
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	All
<b>Do you consider that the Local Plan is legally compliant?</b>	No
<b>Do you consider that the Local Plan is sound?</b>	No
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	No



**For Office Use Only**

Requester ID: 27  
 Consultee ID: 1192529  
 Comment ID's: PLPP641

## PART B

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

Policy number	
Policies map	
Paragraph number	

**2. Do you consider that the Local Plan is:**

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

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

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

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

- positively prepared - providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- justified - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- effective - deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- consistent with national policy - enabling the delivery of sustainable development in accordance with the policies in the Government's National Planning Policy Framework.

(1)  
If your representation relates to how the Council has consulted with other relevant bodies during the plan making process, it is likely to relate to how the plan process has complied with the duty to co-operate in relation to the planning of sustainable development.

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

VISION The plans proposals of siting a huge amount of housing in the Ullest of the Parbeck area in just a few villages, is wrong. These areas have the least access to the most basic of infrastructure and community facilities.

NUMBERS The consultation for the SHLAA (PARA115) did not identify the small sites which were later published in the SHLAA (OCT.18). Parish Councils were not consulted on identified sites. The plan suggests small sites spread across the district, oddly ~~at~~ 26% are in Ullest Lulworth and 23% in Winfrith. I would suggest that this is totally unbalanced. The policy H8a needs to be re-written.

AFFORDABILITY Given that the housing proposed in these smaller areas would command top of the market prices, most of the housing would end up as holiday or second homes. Local, seasonal wages would not ~~to~~ enable families to buy. This is already happening on a large scale in villages across Parbeck, resulting in unbalanced communities. In some cases destroying village life altogether. The plan does not identify as to <sup>how</sup> it helps young families at all. Or even as to what "affordable" really means.

(Please continue on a separate sheet if necessary)

(2)  
 4. Having regard to your comments in question 3, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text and where appropriate provide evidence necessary to support/justify the representation. (Please be as precise as possible)

INFRASTRUCTURE "The little villages of Ullinfrith and Ulest Tulworth do not have the infrastructure to cope with the large numbers of proposed homes. Tulworth is 5 miles from the nearest A road, there is insufficient public transport to access jobs, shops or even enough medical facilities, which are over-stretched now. Because of where Ulest Tulworth in particular is, on the Jurassic coast, we have gridlock on a regular basis.

Adding to the sheer weight of people and traffic on B. and C. roads will only compound the problem the local people have to put up with. The sewerage and drainage which are pre-war, can't hold up now in Tulworth.

How can increasing 2 villages by one third in size be justified? It goes against the whole ethos of the plan. Where is the evidence that Tulworth needs those houses?

ENVIRONMENT

"To allow the proposed scale of building around edges of villages or settlements will have an adverse affect upon the A.O.N.B., we are also on the U.N.E.S.C.O world heritage Jurassic Coastline and the South West Coast footpath runs through one of the ~~prose~~ proposed building sites. Six of the eight proposed sites in Ulest Tulworth are in such close proximity to each other. that they should be considered as one large site.

To be treated as or under large site criteria.

(Please continue on a separate sheet if necessary)

TURN TO PAGE (3)

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

Yes

No

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

Indeed, when looking at the proposed sites, this village would be surrounded by a large scale development. This does not pass the SHLAA test, or even discussed in the plan. It clearly and demonstrably would have an adverse effect on the character of the village. Where in the plan do the holiday lets and second homes figure, because these will ~~inevitably~~ <sup>inevitably</sup> be the outcome of any new build.

#### HEALTHY LIVING

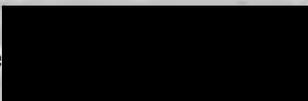
Building on allotments and taking out green spaces do not encourage healthy pursuits or lifestyles. There are few leisure facilities in this area. Gardens and green spaces contribute enormously to clean living and the character of the villages. The plan facilitates the taking away, permanently, of village attributes.

(Please continue on a separate sheet if necessary)

TURN TO PAGE (4)

Please sign and date this form:

Signature



Date:

3/12/18

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

I do not consider this plan to be sound or even properly consulted upon by the Parish Councils. A lot of it is self-conflicting, access to it is discriminatory and disenfranchising to most people. As a councillor I have heard a lot of complaints that people cannot access on line or do not understand computers sufficiently to participate fully.  
This is not a democratic way to proceed.

(Please continue on a separate sheet if necessary)

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

Yes

No

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

(Please continue on a separate sheet if necessary)

**Please sign and date this form:**

Signature:

Date:

## Comment

**Consultee** Mr Francis Millingen (1190837)  
**Email Address** [REDACTED]  
**Address** [REDACTED]  
**Event Name** Purbeck Local Plan Pre-submission Draft  
**Comment by** Mr Francis Millingen (1190837)  
**Comment ID** PLPP188  
**Response Date** 01/12/18 11:12  
**Consultation Point** Policy H5: Wool ([View](#))  
**Status** Processed  
**Submission Type** Web  
**Version** 0.1

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

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

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

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

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

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

A required answer but no option for 'do not know'. Not everyone is qualified to answer 'yes/no'

**Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested**

**revised wording for any policy or text and where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)**

### **Infrastructure**

The plan is long on wishful thinking but short on concrete guarantees that adequate infrastructure improvements will be made to support the number of houses being proposed. The number of 470 appears to have come from the need to make up a total of 1000 for the general area. This figure itself coming from further subdivisions of totals in a government housing plan. At no point is the question asked - how many houses do we actually need locally and can we support them. How long are we going to continue building over green land?

The traffic on the Dorchester road is already heavy, aggravated by the railway crossing. Suggestions have been made that the local population should seek alternative routes. This is hardly a solution to the extra traffic that will occur and would appear to show that no thought is being given to this problem. Some definite infrastructure commitments are required.

The recent piecemeal upgrade of the road and pavement alongside the Purbeck Gate development is evidence that Section 106 money is not always well spent. While satisfactory in itself, it has created a ridiculous layout where cyclists are fed back into the traffic at a narrow point in the road at the Bailey's Drove junction where the upgrade arbitrarily comes to an end.

### **Endorsement of plan**

Manipulation of the consultation data statistics by selective inclusion to produce an apparently favourable outcome of democratic support for the plan raises the question of how much of the information in the plan itself can be trusted.

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

## Comment

<b>Consultee</b>	Mr Ronald Millington (1190032)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Mr Ronald Millington (1190032)
<b>Comment ID</b>	PLPP62
<b>Response Date</b>	28/11/18 12:40
<b>Consultation Point</b>	Chapter 1: Introduction ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Are you responding on behalf of a group?</b>	Yes
<b>If yes, how many people do you represent?</b>	2
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	Chap 1, Introduction
<b>Do you consider that the Local Plan is legally compliant?</b>	No
<b>Do you consider that the Local Plan is sound?</b>	No
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	No

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

I believe that the council did not fully consult with local bodies with regard to the consequences of the proposed housing. Existing local roads/medical facilities/schools will not cope with the additional population.

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

I consider that an in depth investigation/consultation is necessary to ensure that full consideration is given to the quality of life of existing and additional populations. Additionally, it should be recognised that the vast majority of the proposed housing is on greenfield sites, which are one of the main attractions of life in Purbeck.

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

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

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

I consider it necessary because I have lived in Wool/East Burton for 50+ years and have a wealth of experience in the management of the area. I also have a deep love of the area and do not wish to see it destroyed by uncaring Councils or developers.

## Comment

<b>Consultee</b>	Mr Ronald Millington (1190032)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Mr Ronald Millington (1190032)
<b>Comment ID</b>	PLPP64
<b>Response Date</b>	28/11/18 13:39
<b>Consultation Point</b>	Chapter 3: Environment ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1

**Are you responding on behalf of a group?** Yes

**If yes, how many people do you represent?** 2

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

**Which policy / paragraph number / policies map does your comment relate to?** Chap 3, Environment

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

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

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

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

I consider that unwarranted use of greenfield/Organic land is proposed for additional Housing.

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

Purbeck is rightly proud of its landscape with the existing Heritage sites and AONBs. Additionally the proposal to make large areas into a National Park make the proposals totally unacceptable.

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

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

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

## Comment

<b>Consultee</b>	Mr Ronald Millington (1190032)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Mr Ronald Millington (1190032)
<b>Comment ID</b>	PLPP65
<b>Response Date</b>	28/11/18 13:40
<b>Consultation Point</b>	Chapter 4: Housing ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Are you responding on behalf of a group?</b>	Yes
<b>If yes, how many people do you represent?</b>	2
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	Chap 4, Housing
<b>Do you consider that the Local Plan is legally compliant?</b>	Yes
<b>Do you consider that the Local Plan is sound?</b>	No
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	No

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

I am commenting mainly with regard to the area around Wool/East Burton.

Once again the Council has taken an easy option because large amounts of land has been made available by local landowners. The overall plan places large influence on the west of the district which is essentially rural in nature. Also, it is where existing infrastructure would be incapable of coping, and there are insufficient job opportunities to offer incoming residents (as the majority will be incoming because there is small local demand for housing).

Within the SHLAA document there are identified further large sites (a total of 638 for Wool alone) which would obviously increase the problems already stated.

Additionally, small sites (up to 30 houses) are identified that would increase the number by a further 88. Conversely, it was implicit in the Consultation Document that the small sites would be to help rural communities - allowing local people (particularly the young) to remain in their area.

An earlier Parish Plan for Wool (which was adopted by PDC) emphasised the wish of the large majority of residents for the parish to remain a **VILLAGE**.

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

The obvious answer is to put the houses where they are needed, and also where there are work opportunities available - ie towards the Poole area.

It is also necessary to give more than lip-service to affordable homes, and provide a suitable number that are truly affordable considering the average wage in the Purbeck District.

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

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

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

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

I have lived in Wool/East Burton for 50+ years and continued living here because of its village atmosphere, and the beautiful surroundings that I do not wish to be destroyed

## Comment

<b>Consultee</b>	John Morbey (1192391)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	John Morbey (1192391)
<b>Comment ID</b>	PLPP621
<b>Response Date</b>	03/12/18 13:10
<b>Consultation Point</b>	Policy H2: The housing land supply ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Letter
<b>Version</b>	0.4
<b>Files</b>	<a href="#">H2-Morbey-PLPP621.pdf</a>
<b>Are you responding on behalf of a group?</b>	No
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	<input type="checkbox"/> The submission of Local Plan to the Secretary of State for Public Examination <input type="checkbox"/> The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report) <input type="checkbox"/> The adoption of the Purbeck Local Plan
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	H2
<b>Do you consider that the Local Plan is legally compliant?</b>	Yes
<b>Do you consider that the Local Plan is sound?</b>	No
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	Yes

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

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

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



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

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

### **Policy H2 - Housing Land Supply**

The figure of 933 small sites next to existing settlements and windfall within existing settlements (excluding Wareham) is not achievable and therefore unsound.

Although the supporting SHLAA identifies 31 small sites with the potential to provide 446 homes a number of the sites identified (in West Lulworth in particular) would not comply with criteria (a) and (b) of Policy H8.

The SHLAA process has not been carried out adequately in the case of West Lulworth and as a consequence the scale of potential development would have an unacceptable visual and environmental impact on what is already identified as an area of outstanding natural beauty and have a detrimental effect on the character of the village.

The selection of suitable sites arising from the SHLAA process has also been inconsistent in that site 0065 (land to the East of Farm Lane and Shepherds Way) was considered to be unsuitable "due to the potential impact on the Dorset Area of Outstanding Natural Beauty."

This should also have been the case made to rule out consideration of a number of the other small sites within or adjacent to West Lulworth village.

(Please continue on a separate sheet if necessary)

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

In order to make the Plan sound in this respect the SHLAA needs to be revisited/amended to reflect a more realistic/Policy H8 compliant number of small sites. This applies particularly to West Lulworth and a proposed site development map needs to be generated which demonstrates that the character and landscape of the village will be adequately protected in the event of further small site development.

(Please continue on a separate sheet if necessary)

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

Yes

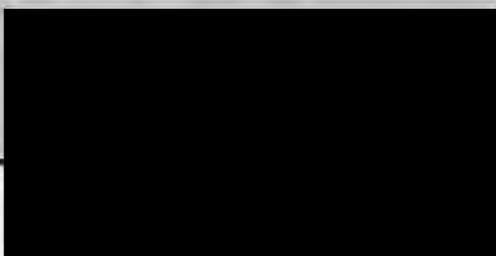
No

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

(Please continue on a separate sheet if necessary)

**Please sign and date this form:**

Signature:



Date:

2/12/18

## Comment

<b>Consultee</b>	John Morbey (1192391)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	John Morbey (1192391)
<b>Comment ID</b>	PLPP622
<b>Response Date</b>	03/12/18 13:10
<b>Consultation Point</b>	Policy H8: Small sites next to existing settlements ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Letter
<b>Version</b>	0.4
<b>Files</b>	<a href="#">H8-Morbey-PLPP622.pdf</a>
<b>Are you responding on behalf of a group?</b>	No
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	<input type="checkbox"/> The submission of Local Plan to the Secretary of State for Public Examination <input type="checkbox"/> The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report) <input type="checkbox"/> The adoption of the Purbeck Local Plan
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	H8
<b>Do you consider that the Local Plan is legally compliant?</b>	Yes
<b>Do you consider that the Local Plan is sound?</b>	No
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	Yes

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

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

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



## For Office Use Only

Requester ID: 021

Consultee ID: 1192391

Comment ID's: PLPP622

**PART B**

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

Policy number	H8
Policies map	
Paragraph number	

2. Do you consider that the Local Plan is:

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

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

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

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

- positively prepared - providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- justified - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- effective - deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- consistent with national policy - enabling the delivery of sustainable development in accordance with the policies in the Government's National Planning Policy Framework.

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

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

### **Policy H8 - Small Sites Next to Existing Settlements**

Based on the number/location of small sites identified in the SHLAA for West Lulworth the Plan is not sound as it does not comply with the requirements of criteria (a) and (b).

The SHLAA process has also not been carried out on a satisfactory basis as it places an unreasonable/unsound expectation that only 2 villages (West Lulworth and Winfrith Newburgh) will provide the potential for almost 50% of the total number of small sites and associated homes in the Purbeck area.

Whilst I am not in a position to comment on the likely impact of the potential 98 homes in Winfrith Newburgh I am well placed to do so for the 107 homes potentially being proposed for West Lulworth as I have lived in the village for nearly 40 years.

The sheer scale of development being considered would have a serious impact on the character and visual aspects of West Lulworth (thus not compliant with H8 criteria (a) and (b)). A number of the sites proposed involve land not suitable for development either due to topography, access constraints and/or their special position within the village. For these reasons a number of these sites should have been classed as unsuitable in the SHLAA (in particular the land adjacent to Lilacs in West Road, opposite Wilton Cottage in School Lane, adjacent to Limberlost in Sunnyside, at Allotment Gardens in Bindon Road, adjacent to 1 Church Road and adjacent to Cove House Bindon Road.

(Please continue on a separate sheet if necessary)

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

In order make the Plan sound the SHLAA should be revisited to ensure that the small sites identified are spread more reasonably across the whole area of Purbeck covered and reassess the West Lulworth sites referred above with a view to removing some/all of them from the potential development currently proposed.

Also amend Policy H8 criteria (a) and (b) to read "the scale of proposed development is to be proportionate to the size and character of the existing settlement (10% maximum) with no more than 30 homes/2 sites per settlement."

(Please continue on a separate sheet if necessary)

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

Yes

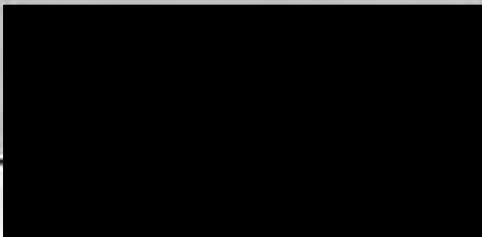
No

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

(Please continue on a separate sheet if necessary)

**Please sign and date this form:**

Signature:



Date:

2/12/18

## Comment

<b>Consultee</b>	John Morbey (1192391)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	John Morbey (1192391)
<b>Comment ID</b>	PLPP623
<b>Response Date</b>	03/12/18 13:10
<b>Consultation Point</b>	Policy H11: Affordable housing ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Letter
<b>Version</b>	0.4
<b>Files</b>	<a href="#">H11-Morbey-PLPP623.pdf</a>
<b>Are you responding on behalf of a group?</b>	No
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	<input type="checkbox"/> The submission of Local Plan to the Secretary of State for Public Examination <input type="checkbox"/> The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report) <input type="checkbox"/> The adoption of the Purbeck Local Plan
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	H11
<b>Do you consider that the Local Plan is legally compliant?</b>	Yes
<b>Do you consider that the Local Plan is sound?</b>	No
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	Yes

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

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



For Office Use Only

 Requester ID: 021  
 Consultee ID: 1192391  
 Comment ID's: PLPP623

## PART B

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

Policy number	H 11
Policies map	
Paragraph number	

2. Do you consider that the Local Plan is:

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

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

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

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

- positively prepared - providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- justified - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- effective - deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- consistent with national policy - enabling the delivery of sustainable development in accordance with the policies in the Government's National Planning Policy Framework.

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

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

### **Policy H11 - Affordable Housing**

The Affordable Housing targets are unlikely to be met (and therefore unsound) for the following reasons:

- (a) The settlements identified are generally some distance from areas of major employment which will therefore incur significant commute costs for residents. Dorset also remains an area of limited employment opportunities and lower than average wages in any case.
- (b) High house prices in Purbeck will result in most new homes being unaffordable for local people on limited incomes.
- (c) For any new homes to be genuinely "affordable" in the Purbeck area prices would probably need to be in the region of £150K which is likely to be close to the build cost of most of them so therefore not viable for any potential developer (especially if significant site preparation/infrastructure costs are also involved).
- (d) In order to mitigate against (c) above developers are likely to seek viability/constraint assessments to maximise the prices of homes being built.

(Please continue on a separate sheet if necessary)

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

The Plan needs to be reviewed/amended to reflect a more accurate/realistic Affordable Housing expectation for both rented and owned homes.

(Please continue on a separate sheet if necessary)

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

Yes

No

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

(Please continue on a separate sheet if necessary)

**Please sign and date this form:**

Signature:		Date:	2/12/18
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## Comment

<b>Consultee</b>	John Morbey (1192391)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	John Morbey (1192391)
<b>Comment ID</b>	PLPP624
<b>Response Date</b>	03/12/18 13:10
<b>Consultation Point</b>	Policy H14: Second homes ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Letter
<b>Version</b>	0.4
<b>Files</b>	<a href="#">H14-Morbey-PLPP624.pdf</a>
<b>Are you responding on behalf of a group?</b>	No
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	<input type="checkbox"/> The submission of Local Plan to the Secretary of State for Public Examination <input type="checkbox"/> The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report) <input type="checkbox"/> The adoption of the Purbeck Local Plan
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	H14 Paragraphs 184 and 187
<b>Do you consider that the Local Plan is legally compliant?</b>	Yes
<b>Do you consider that the Local Plan is sound?</b>	No
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	Yes

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

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



For Office Use Only

Requester ID: 021

Consultee ID: 1192391

Comment ID's: PLPP624

## PART B

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

Policy number	H114
Policies map	
Paragraph number	184 187

2. Do you consider that the Local Plan is:

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

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

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

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

- positively prepared - providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- justified - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- effective - deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- consistent with national policy - enabling the delivery of sustainable development in accordance with the policies in the Government's National Planning Policy Framework.

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

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

### Policy H14 - Second Homes

Para 184. Whilst the intended restriction to prevent new homes being purchased/used as second homes is welcomed it may only be a matter of time before (wealthy) prospective owners find a way around this initiative.

Para 187. Holiday Lets - this is not a sound policy and still provides an undesirable loophole for (wealthy) outsiders to be able to purchase new properties in the Purbeck area purely for financial gain instead of (as intended) making any such homes available for local people.

By allowing the unrestricted purchase of new homes for holiday letting purposes the owners will not only gain significant additional income but will also be able to use the property themselves during the holiday season(s) i.e. second home use.

I am surrounded by increasing numbers of such properties in West Lulworth (as the old idea of a holiday home has now been replaced by the more financially attractive holiday let type arrangement). These properties generate no benefit for the village but do add to the general level of noise/disruption on a year round basis.

The existing high market level of house prices in this village will continue to disadvantage local people wishing to live/work in the Purbeck area and result in yet more (new) homes not being lived in on a permanent resident basis. This has been increasingly the case in West Lulworth in the last 10 years or so (e.g. the Shirley Close development).

(Please continue on a separate sheet if necessary)

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

Solutions;

- (a) Ensure ban on Second Homes is enforceable
- (b) Limit Holiday Let property purchase to 10% of any development in perpetuity (amend para 187 accordingly).

(Please continue on a separate sheet if necessary)

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

Yes

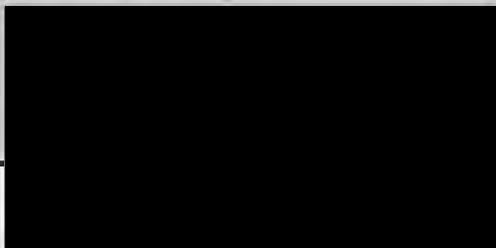
No

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

(Please continue on a separate sheet if necessary)

**Please sign and date this form:**

Signature:



Date:

2/12/18

## Comment

<b>Consultee</b>	Mr Malcolm Hill (1188470)
<b>Email Address</b>	████████████████████
<b>Company / Organisation</b>	Moreton Parish Council
<b>Address</b>	12 Redbridge Road, Crossways Dorchester DT2 8DY
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Moreton Parish Council (Mr Malcolm Hill - 1188470)
<b>Comment ID</b>	PLPP643
<b>Response Date</b>	03/12/18 11:46
<b>Consultation Point</b>	Vision ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Letter
<b>Version</b>	0.8
<b>Files</b>	<a href="#">vision-Hill-PLPP643.pdf</a>

**Are you responding on behalf of a group?** Yes

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

**Which policy / paragraph number / policies map does your comment relate to?** Vision and other policies

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

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

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

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

See attached

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

See attached

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

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

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

See attached



## Comment Receipt

<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Moreton Parish Council (Mr Malcolm Hill - 1188470)
<b>Comment ID</b>	PLPP643
<b>Response Date</b>	03/12/18
<b>Consultation Point</b>	Vision
<b>Status</b>	Final
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Are you responding on behalf of a group?</b>	Yes
<b>If yes, how many people do you represent?</b>	Moreton Parish Council- 5 + 124 Moreton household petitioners (81% of Moreton)
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	Vision and A range of Policies:V1 H2, H11,EE1, EE2, EE3, I2, I4, I7
<b>Do you consider that the Local Plan is legally compliant?</b>	Yes
<b>Do you consider that the Local Plan is sound?</b>	No
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	No
<b>Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)</b>	

### Automation

1. This comment form applies to many areas of the Pre- Submission and indeed to the complete document.
2. As an example of what is already available, the Local Plan is eminently automatable. The Local Plan is iterative and there are many examples on line, and hence the production process lends itself to machine learning. Government guidance, data, mapping etc is online and can be sought and analysed by a program using cloud based computing and artificial general intelligence. There is a market for such a system over the whole country. The Local Plan production time and cost would be a fraction of the present. The Local Plan update cycle could be made much more frequent to make is continually relevant.

3. The automation technologies referred to below will have a dramatic impact on reducing employment, the types of jobs available and the skills required, a probable reduction in in-migration and increase in outward migration and consequent significant reduction in the number of houses required, a need for more genuinely affordable homes because many of the remaining jobs will be poorly paid, a dramatic increase in life-long learning and retraining to keep pace with machines, driverless transport and delivery which will be a definite positive for older people, new uses for town centres, automated health systems, community facilities for those not fully employed, care of the elderly with robots, automation of council budgets etc.
4. Regrettably the Pre-Submission completely ignores all the automation technologies such as artificial general intelligence, robots, self-driving cars, 5G communications, cloud computing etc and the impact they will have on many of the aspects covered in the Pre- Submissions.
5. This comment form will continue with an outline of the impact of automation which I have written and then present a speech by Mr Haldane, the Chief Economist of the Bank of England on the effect of automation on the work place.
6. Following Mr Haldane's speech I have produced a spreadsheet in which I assess the impact of automation on employment in Purbeck.

**The impact of robots and artificial intelligence  
on employment in West Dorset and Weymouth & Portland  
during the plan period**

7. A search of the Pre-Submission document online for the words: computer, cloud computing, automation, artificial general intelligence, robots, 5G communications, machine learning, drones and driverless vehicles reveals that these words are not present in the document.
8. None of the technologies in paragraph above were mentioned in the public documents on the case for unitary administration in Dorset, Bournemouth and Poole or in the June 2016 Purbeck Local Plan Partial Review consultation document. None of the technologies were, amazingly, mentioned in the recent Clinical Services Review despite advances in computer diagnostics, remote monitoring, the Da Vinci hand for the remote conduct of complex surgical operations and the use of mobile phones for diagnostics and health care, and many other uses of computers in medicine.
9. The Bournemouth, Dorset and Poole Workplace Strategy also does not contain the words robot, artificial intelligence, cloud computing, 5G communications and driverless vehicles. The Strategy does contain the word computer, twice, in paragraph 6.62 on page 131/adobe page 149. This is in a description of a Digital Village in Poole, associated with Bournemouth University. Specifically, paragraph 6.62 refers to *computer games* and *computer-generated animation*.
10. Robotics, artificial intelligence, cloud computing, 5G computing and the seamless internet coverage which it will provide, and driverless vehicles are all technologies which will have a major impact on the automation of a wide range of jobs in Purbeck and the unitary Dorset Council area during the plan period and, therefore, a consequent likely very major reduction in employment.
11. The reduction in employment is likely to have a significant impact on the number of houses required during the plan period ( a reduction) and, therefore, the whole basis of the Pre-Submission.

12. It is very likely that economic growth in Purbeck and rural Dorset will be driven not by the creation of more houses to attract more workers, but by the adoption of the technologies in paragraph 7 which very largely will not require any workers. Many other jobs will employ people working for or with automation.
13. 5G communications and the technologies mentioned above will provide seamless access across Purbeck and rural Dorset to artificial general intelligence which will be superior to all but the brightest and most gifted of people, to robots which are more dexterous than all but the most creative workers, and to vehicles which need no driver to deliver goods and people. As a result, there will be little need to employ human workers with inferior intelligence and ability.
14. Consequently, there will not be a need to build large numbers of houses since there will be little work to attract the prospective occupants.
15. This section will start by reviewing a major speech by the Chief Economist of the Bank of England, Mark Haldane, and show how the probabilities of automation of specific occupations he mentions would impact on employment in Purbeck.
16. As Professor Ira Sohn, Professor of Economics and Finance at Montclair State University, Upper Montclair, NJ, US, wrote in his letter to the Financial Times on 1 August 2016 (page10):

*The issue we should be discussing is not whether, but how quickly, the routine service jobs will disappear.*

17. As the spreadsheet later in this section shows, about 44% of the jobs in Purbeck are vulnerable to being automated and hence Professor Sohn's statement is very prescient.

**Speech by Mr A Haldane,  
Chief Economist to the Bank Of England  
to the Trades Union Congress, London.**

12 November 2015

18. Mr Andrew Haldane, Chief Economist to the Bank of England, gave a speech to the Trade Union Congress in London on 12 November 2015. The speech was available on the Bank Of England's web site:  
[www.bankofengland.co.uk/publications/Pages/speeches/default.aspx](http://www.bankofengland.co.uk/publications/Pages/speeches/default.aspx)
19. In the speech Mr Haldane surveyed economic growth over the last 200 years and the impact change in technology has had on employment and wages. He developed his theme to project the possible impact that robotics and AI may have on employment over the next 10 to 20 years.
20. The key part of his speech which is of particular relevance to the Preferred Options is Chart 28 (reproduced later in this chapter) which shows the probabilities of various sectors of the economy being automated by robots and AI.
21. I have reproduced key relevant sections of his speech below which help make the case for Chart 28. I have reproduced these sections to help substantiate the case for taking the impact of robotics and AI on West Dorset employment seriously and why I consider it should have been covered in the Preferred Options.
22. I have also included brief summaries and extracts from other authoritative researchers and organisations to reinforce the message that Mr Haldane made about the impact that robotics and AI will have on employment. Some of these extracts are in the main body of this document, and others in another q4-i comment. I have also included short summaries of articles in the Financial Times and The Times to illustrate the breadth and depth of automation in employment which is already taking place.

23. The following are extracts from Mr Haldane's speech. The page numbers refer to the page numbers of Mr Haldane's speech. I have added the titles in italics to provide a guide through the speech.

***P7 technology and jobs***

24. Over the longer run, technology may be the single most important force shaping the fortunes of jobs and wages.

***P7 Into 21<sup>st</sup> century – different***

25. Moving into the 21st century, this debate has once again been re-kindled. The prompt this time has not so much been rising rates of unemployment. Rather it is been the rapid emergence of smart machines, jet-propelled by modern computing. These machines are different. Unlike in the past, they have the potential to substitute for human brains as well as hands (Autor et al (2003), Manyika et al (2013)).

***P7 The second machine age***

26. In *Race Against the Machine* and *The Second Machine Age*, Eric Brynjolfsson and Andrew McAfee paint a persuasive picture of robot-fuelled growth in productivity and an accompanying reshaping of the role and nature of work (Brynjolfsson and McAfee (2011, 2014)). Whether this vision is utopian or dystopian, it poses a fundamental challenge to the relationship between jobs and technology, to which I will return.

***P9***

27. Looking more closely at past phases of rapid technological change paints a more nuanced picture. Each phase has eventually resulted in a growing tree of rising skills, wages and productivity. But they have also been associated with a "hollowing out" of this tree. Indeed, this hollowing-out has widened and deepened with each new technological wave.

***P10 widening gap in 20<sup>th</sup> century***

28. Moving into the 20th century, and the third industrial revolution, these emerging patterns in jobs and wages have become clearer. Technology appears to be resulting in faster, wider and deeper degrees of hollowing-out than in the past. Why? Because 20th century machines have substituted not just for manual human tasks, but cognitive ones too. The set of human skills machines could reproduce, at lower cost, has both widened and deepened.

***P12 machine substitute for man – lower slice of cake***

29. As machine has substituted for man across a greater number of tasks, and as hollowing-out has intensified, the balance of bargaining power has swung against labour. That would tend to show itself as labour securing a smaller slice of the income pie, as we have seen.

***P12 Second Machine Age***

30. Based on past patterns, it is argued that information technology may be poised for exponential growth, as its full fruits are harvested. Indeed, we may be on the cusp of a fourth Industrial Revolution or *Second Machine Age* (Brynjolfsson and McAfee (2014), Ford (2015)).

***P12 machines span a much wider part of the skill distribution***

31. Its defining feature would be that new-age machines will be thinking as well as doing, sensing as well as sifting, adapting as well as enacting. They will thus span a much wider part of the skill distribution than ever previously. As robots extend their skill-reach, "hollowing-out" may thus be set to become ever-faster, ever-wider and ever-deeper. Or that, at least, is the picture some have painted.

**P12 Frey and Osborne probabilities**

32. How much wider and deeper? Research by Carl Benedikt Frey and Michael Osborne has tried to quantify this hollowing-out, by assigning probabilities to certain classes of job being automated over the course of the next few decades. Their work was initially done for the US, but has recently been extended to the UK (Frey and Osborne (2013), Deloitte (2015b)).

**P12+13 Table 3 page 33 probability of job automation – UK: up to 15 million jobs could be at risk of automation**

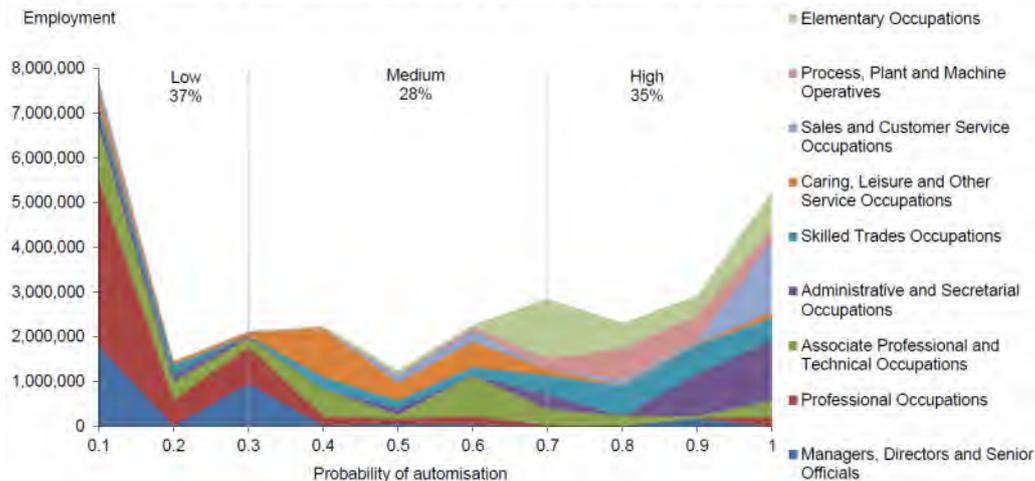
33. Using this methodology, the Bank has recently done its own exercise for the UK. Table 3 classifies jobs three ways in the US and UK – high (greater than 66%), medium (33-66%) and low (less than 33%) probability of automation. It also shows the fraction of employment these jobs represent. Chart 27 provides a more granular breakdown of these jobs.

**Table 3: Percent of employment at risk of automations**

Risk of automation	US (Frey and Osborne (2013))	UK
Low (<33%)	33	37
Medium (33-66%)	10	28
High (>66%)	47	35

Source: Frey and Osborne (2013); Bank calculations.  
Notes: The UK probability of automation figures are based on estimates in Frey and Osborne (2013) matched against UK occupations.

**Chart 27: Distribution of occupational employment in the UK by probability of automation**

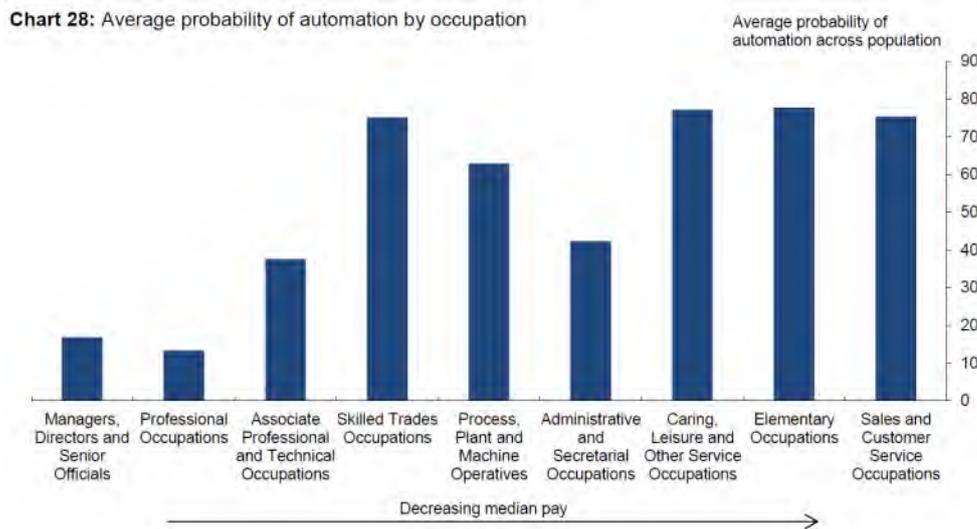


Source: Frey and Osborne (2013); Bank calculations  
Notes: This chart shows the probability of automation based on estimates in Frey and Osborne (2013) matched against UK occupations

34. For the UK, roughly a third of jobs by employment fall into each category, with those occupations most at risk including administrative, clerical and production tasks. Taking the probabilities of automation, and multiplying them by the numbers employed, gives a broad-brush estimate of the number of jobs potentially automatable. For the UK, that would suggest up to 15 million jobs could be at risk of automation. In the US, the corresponding figure would be 80 million jobs.

**P13 Chart 28 - very important for West Dorset**

35. Another perspective on hollowing-out comes from looking at how automation might affect the distribution of skills and wages in the economy. Chart 28 ranks job-types by their median wage rate and plots this against their probability of automation. This probability rises strikingly as we move down the wage/skill curve. Those most at risk from automation tend, on average, to have the lowest wage. In other words, technology could act like a regressive income tax on the unskilled. It could further widen income disparities.

**P14 artisan class Back to the Future**

36. Even if this diagnosis is right, it nonetheless may suggest a fundamental reorientation in the nature of work could be underway. We may already be seeing early signs of that in the move towards part-time working, temporary contracts and, in particular, self-employment. Some have speculated that these seismic shifts could result in the emergence of a “new artisan” class : micro-businesses offering individually-tailored products and services, personalised to the needs of customers, from healthcare and social care, to leisure products and luxuries. This really will be Back to the Future.

**P14 Smarter machines take over from humans**

37. Yet the smarter machines become, the greater the likelihood that the space remaining for uniquely-human skills could shrink further. Machines are already undertaking tasks which were unthinkable – if not unimaginable – a decade ago. The driverless car was science fiction no more than a decade ago. Today, it is scientific fact. Algorithms are rapidly learning not just to process and problem-solve, but to perceive and even emote (Pratt (2015)).
38. As digital replaced analogue, perhaps artificial intelligence will one day surpass the brain’s cognitive capacity, a tipping point referred to as the “singularity” (Stanislaw (1958))). Brad DeLong has speculated that, just as “peak horse” was reached in the early part of the 20th century, perhaps “peak human” could be reached during this century (DeLong (2014)). In the words of Marc Andresen, in future there could be two types of worker – those who own the robots and those who work for them.

**P14 Hollowing out**

39. If these visions were to be realised, however futuristic this sounds, the labour market patterns of the past three centuries would shift to warp speed. If the option of skilling-up is no longer available, this increases the risk of large scale un- or under-employment. The wage premium for those occupying skilled positions could explode, further widening wage differentials. And labour’s share of the pie could fall even more dramatically than in the past. On this view, the tree could become hollowed-out to the point that it may no longer be able to support itself.

**P15 significant and persistent shift in labour**

40. Yet in a survey of almost 2,000 (admittedly self-selecting) technologists and economists in 2014, the Pew Research Center found that almost half thought AI and robots would cause a significant and persistent displacement of labour in future (Pew Research Center (2014)). Maybe Ricardo and the Luddites had a point after all, albeit two hundred years too early.

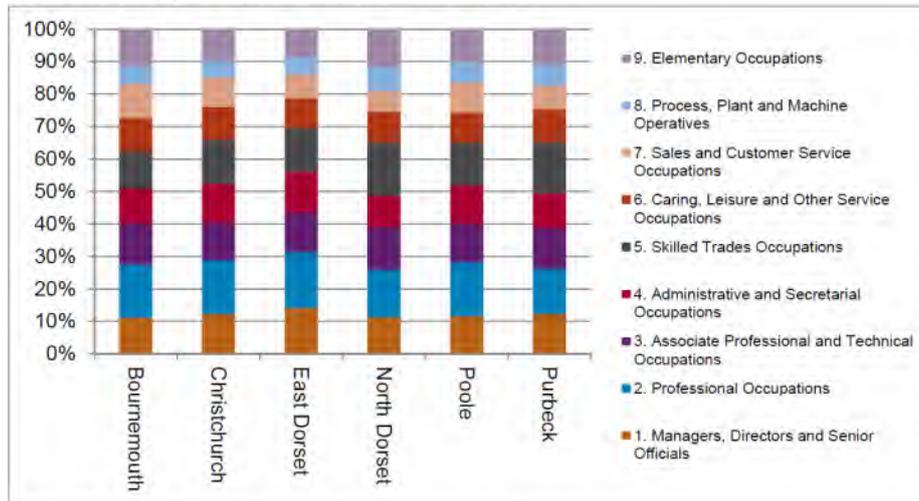
**P16 Future more emphasis on EQs**

41. In a world in which machines came to dominate tasks involving core cognitive processing, the importance of, and skill premium attached to, non-cognitive skills is likely to rise. The high skill - high pay jobs of the future may involve skills better measured by EQs than IQs, by jobs creating social as much as financial value. Yet our education system, at present, has a strongly cognitive slant. Perhaps in future that will need to change, with as much effort put into cultivating social CVs as academic ones.
42. I should add here that though I have made continued reference to Mr Haldane's speech, Mr Haldane is only one of a very large body of expert authoritative individuals and organisations predicting the same sort of impact on employment by robots and AI as Mr Haldane described.
43. Mr Haldane quoted from the *The future of employment : how susceptible are jobs to computerisation*(2013) by Frey and Osborne Oxford University. Brynjolfsson and McAfee of the MIT Center for Digital Business have written a similar book entitled *The Second Machine Age: work, progress, and prosperity in a time of brilliant technologies* (2014). The McKinsey consulting company and The Economist , amongst many others have also written about the impact on employment by robots and AI. The World Economic Forum which meets annually in Davos, and is attended by world leaders has also produced a large report describing the significant impact of robots and AI on the probability of job losses due to automation.

**Mr Haldane's Chart 28:****Average probability of automation by occupation of jobs in Purbeck**

1. Mr Haldane's Chart 28 reflects research conducted by the Oxford University academics Carl Benedikt Frey and Michael Osborne:  
**Frey, C B, and Osborne, M A (2013)** "The future of employment: how susceptible are jobs to computerisation.", *available at: [http://www.oxfordmartin.ox.ac.uk/downloads/academic/The\\_Future\\_of\\_Employment.pdf](http://www.oxfordmartin.ox.ac.uk/downloads/academic/The_Future_of_Employment.pdf)*
2. The SHMA Figure 18 on page 41 shows the Occupational Profile of Purbeck, and is reproduced below.

Figure 18: Occupational Profile of Local Authorities



Source: 2011 Census

- Figure 18 was used to measure the percentages employed in each of the 9 sectors.
- The total number of people employed in Purbeck, 21,419 was obtained from the DCC Stats web site and uses ONS data from the 2011 Census.
- The number of people employed in each sector were calculated by multiplying the total number of people employed in Purbeck by the relevant percentage from Figure 18.
- The average probability of automation of each employment sector was measured on Figure 28.
- The number of people in each employment sector was then multiplied by the average probability of automation for that sector to show the likely number of jobs which may be lost due to automation.
- These calculations are shown on the spreadsheet below.
- The table shows that 9337 jobs out of Purbeck's total of 21,419 jobs could well be automated. This represents 44% of the total number of jobs in Purbeck.



- a. Vision: add a statement to the effect that automation due to a wide variety of computer-based capabilities such as artificial general intelligence, robotics, driverless vehicles etc are likely to significantly change the lives of younger people in work and older people in need of care. These changes are likely to be very wide ranging and affect employment, health care (via mobile phones for example) and care for the elderly using robots. It is likely that the effect on employment may reduce the number of people who migrate into Purbeck and increase the number who migrate out of Purbeck to find work. This may change the demand for affordable homes and indeed the total number of homes that are required in Purbeck as the total number of workers changes and probably reduces.
  - b. Policy V1 Spatial Strategy: With an increasing number of people who commute to work and for life long training there may well be an increase in demand for houses in the east of the district and this may require the release of more Green Belt land.
  - c. Policy V2 Green Belt: There will probably be a requirement for more frequent and less sensitive reviews of the Green Belt in order to provide more homes in the east of the district.
  - d. Policy H1: Local housing requirement: A continuing review of SHLAA sites may well be necessary to find more sites suitable for housing in the east of the district. With more people travelling to the conurbation from Purbeck the demand for houses in the east is likely to rise and it is only by continuing to call for sites and be more objective than formerly in the review of sites that it will be possible to keep pace with demand.
  - e. Policy EE1: Employment land supply: with greater automation of jobs there could well be a reduction in the demand for employment land as companies reduce their workforce. This could result in less car parking space and possibly smaller production facilities. It is also likely that there will be a reduction in the demand for office space.
  - f. Policy EE3: Vibrant town and local centres: It is very likely that more shops will disappear in the high street as more shopping is done on line. It is likely that the composition of high street premises will change from predominantly being shops to being eating establishments, community entertainment and social centres with a few niche shops.
  - g. Policy I2: Improving accessibility and transport: The growth of mobility as a service (Maas) will become more widely adopted and this could result in the disappearance of traditional bus services. Self-driving cars, car-sharing, Uber and Lyft and electric vehicles will provide individuals with the ability to order up mobility on their smart phones without the need to drive themselves. This will be especially useful for older people who are could become the majority demographic as more workers migrate to towns.
  - h. Policy I7: Community facilities and services: The demand for more community facilities may well rise with the increase in the number of older people in the district increases. Some of these could be located in former shops in order to keep the high street alive and vibrant.
48. The foregoing represent brief additions to the relevant policies to ensure the Local Plan recognises that increasing automation will profoundly change to society in Purbeck. .

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

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

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

Yes

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

I wish to participate in the oral part of the examination to emphasise that the Local Plan must recognise that during the plan period 2018 to 2034 there are likely to be profound changes in Purbeck society as a result of the increasing adoption of technologies such as artificial general intelligence and robotics. The Local Plan needs to be amended along lines I have explained above in order to move with the changes and not become outdated.



## Comment Receipt

<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Moreton Parish Council (Mr Malcolm Hill - 1188470)
<b>Comment ID</b>	PLPP645
<b>Response Date</b>	03/12/18
<b>Consultation Point</b>	Policy H4:Moreton Station/Redbridge Pit
<b>Status</b>	Final
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Are you responding on behalf of a group?</b>	Yes
<b>If yes, how many people do you represent?</b>	Moreton Parish Council- 5 + 124 Moreton household petitioners (81% of Moreton households)
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	Policy H4:Moreton Station/Redbridge Pit
<b>Do you consider that the Local Plan is legally compliant?</b>	Yes
<b>Do you consider that the Local Plan is sound?</b>	No
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	No

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

### Introduction

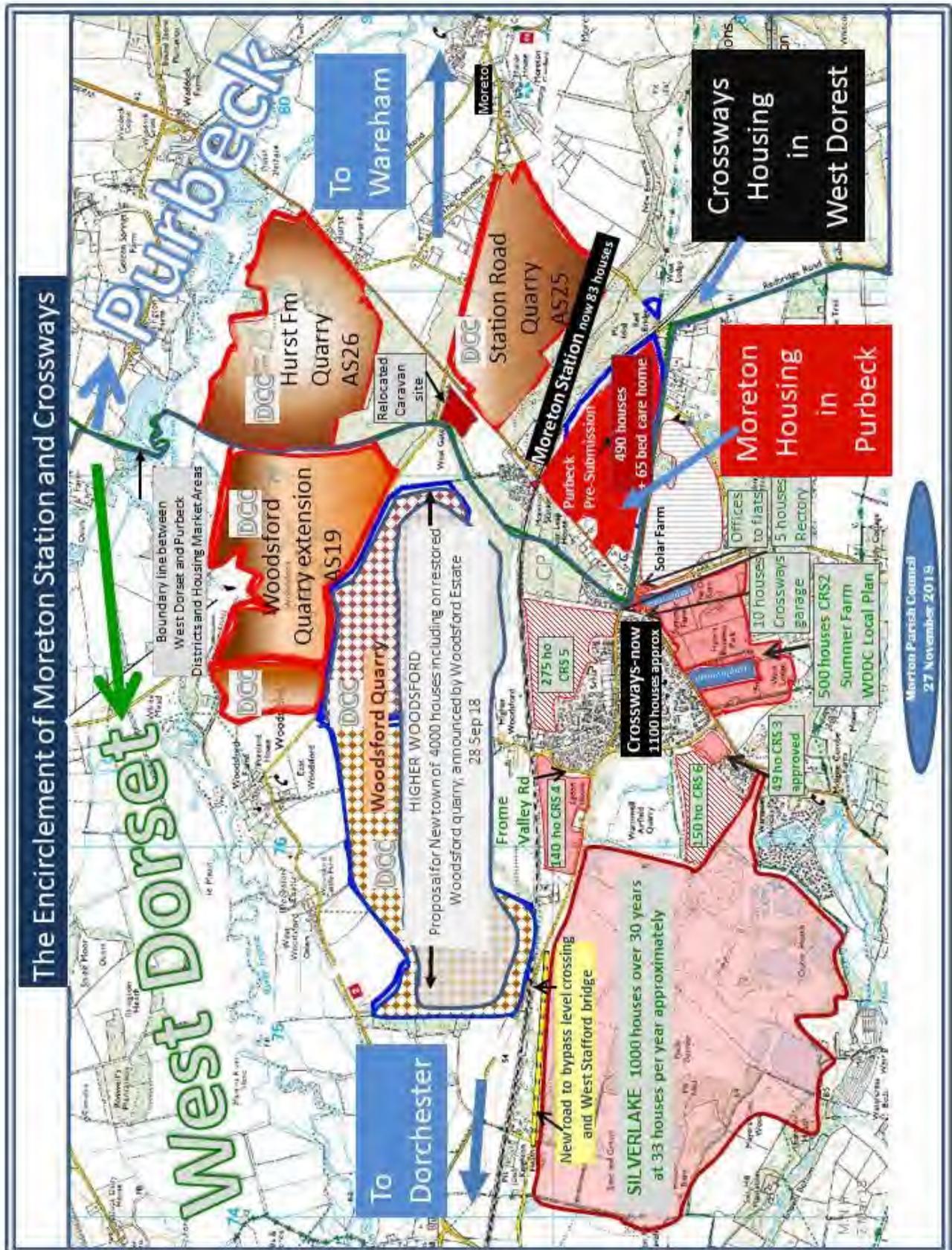
1. This part of the Local Plan is not sound. It takes virtually no account of Crossways and the approved and proposed 1114 houses to be built in Crossways. Thus, the total number of houses approved but not yet built and proposed for Crossways is 1604. A 140% increase.

### Location relative to Crossways

2. Policy H4 allocates 490 homes and a 65 bed care home to Redbridge Pit and does not mention Crossway. The Moreton Parish Council Encirclement map on the following page shows that the proposed 490 homes and 65 bed care home will be closer to the centre of Crossways than houses in Crossways, and therefore closer to Dorchester than houses in Crossways in West Dorset. Redbridge Pit is effectively in Crossways.

Crossways approved and proposed housing allocations

- The Moreton Parish Council Encirclement map, below shows the housing sites in Crossways selected by West Dorset for housing in the Joint Local Plan Review for West Dorset and Weymouth & Portland Preferred Options Consultation dated August 2018.



4. An extract from the West Dorset and Weymouth & Portland Local Plan Preferred Options Consultation August 2018 Table 3.3 on page LPR 81/Adobe 84 is given below.

Crossways								
South of Warmwell Road	500	⇒	⇒	⇒		✓	✓	CRS2
Land adjacent to Oaklands Park (PO)	49	⇒	⇒			✓	--	CRS3
Frome Valley Road (PO) Consent for 85	140	⇒	⇒			--	✓	CRS4
Woodsford Fields (PO)	275		⇒	⇒	⇒	--	✓	CRS5
West of Crossways (PO)	150			⇒	⇒	--	✓	CRS6
Bridport								

5. Sites with Planning Permission, CRS3 and 4 are shown with grey shading.
6. The site titled *South of Warmwell Road* was part of the 2015 approved Local Plan.
7. Woodsford Fields (PO), CRS5, and West of Crossways (PO), CRS6, are preferred options in the Preferred Options document.
8. Consultation on the Preferred Options document closed in October.
9. A 1000 holiday homes site called Silverlakes is currently under construction on the former Warmwell quarry directly adjacent to Crossway. It is building at the rate of approximately 30~33 per year and so far about 60 houses have been completed.
10. As the table shows 689 (500+49+140) houses are approved to be built in Crossways and the Preferred Options proposes a further 425 (275+150) houses. The total of approved and proposed housing to be built in Crossways is, therefore, 1114 houses. None of these houses has been built so far.
11. Purbeck's proposed 490 houses plus a 65 bed care home would bring the total number of houses to be built in Crossways to 1604 houses and a 65 bed care home.
12. Crossways currently has about 1143 houses and thus the 1604 houses represents another complete Crossways plus almost another half of the current Crossways to be built directly on the borders of the current Crossways, as shown on the Encirclement Map.
13. This represents a 140% increase in the size of Crossways.
14. This increase will generate an additional 2266 cars (@1.4 cars per house based upon the 2011 census plus about 20 cars for the care home) and about 3273 people (@ 2 per house based upon the 2011 census plus the care home's 65 residents).
15. As a result of the this expansion and the growth of Silverlakes a Dorset County Council Moreton/Crossways/Woodsford Traffic Impact Assessment 2016 (AM Peak) projects that there will be 81.3% more trips (page 18 paragraph 5.5) on the B3390 through Crossways than a neutral time of year (spring) in 2016 (page 10 paragraph 2.8).

16. This is a significant increase in traffic (page 4 no paragraph number) along the B3390 through Crossways. This level of increase could cause some additional queuing at the Moreton level crossing (page 4).

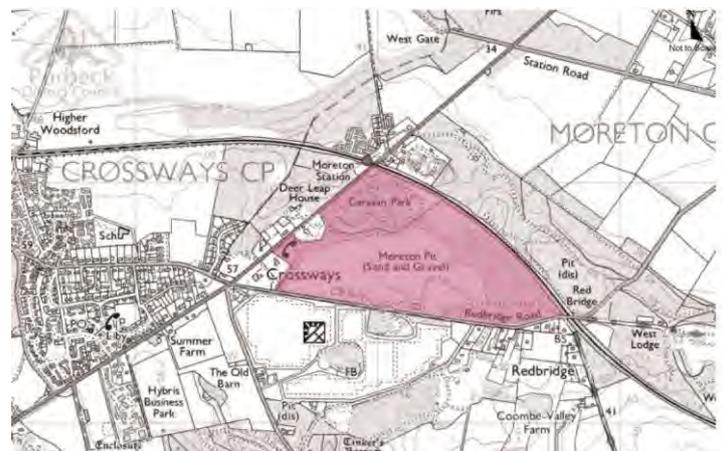
### The Purbeck Local Plan Pre-Submission

17. None of the above detail is contained in the Purbeck Pre-Submission Policy H3 or in the paragraphs dealing with the Redbridge site even though Redbridge Pit is effectively in Crossways.
18. There is no indication in the Pre-Submission, as shown on the Encirclement Map, that 500 houses were approved to be built on the Summer Farm site in 2015, only about 100 yards away from the Redbridge Pit site at the western ends of both sites. Planning Permission has already been granted for the building of the first phase of the Summer Farm development and is currently held up whilst developers resolve some issues with West Dorset council.
19. The Summer Farm development was considered by the Inspector examining the draft West Dorset and Weymouth & Portland Local Plan in 2014 (I attended the hearings) before Purbeck published its Issues and Options document in January 2015 and was in the approved extant West Dorset Local Plan in 2015 at least 9 months before Purbeck District Council published its Options Consultation in June 2016.
20. It is very instructive to look at the maps of Crossways in the West Dorset Preferred Options document and the Purbeck Pre-Submission draft. I have reproduced both maps below:

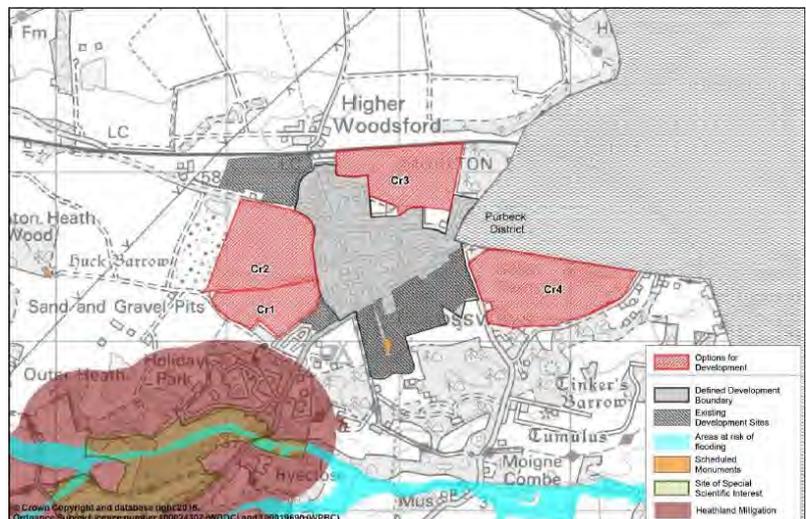
West Dorset and Weymouth & Portland Preferred Options – page LPR 256/Adobe 259



Purbeck Local Plan Pre-Submission draft page 53/Adobe 59



21. The West Dorset Preferred Options Sustainability Appraisal on page 114 has an even blunter view of development in Purbeck as shown on the map opposite.



22. To be fair to West Dorset the Redbridge Pit/Moreton Station proposed development is mentioned in the West Dorset and Weymouth & Portland Local Plan Preferred Options Consultation 2018 on page LPR 245/Adobe 248 in paragraph 12.3.4.
23. Both councils also completely ignore the proposed Station Road and Hurst Farm quarries in Moreton as part of the Mineral Sites Plan.
24. Not only does the Purbeck map totally ignore the fact that planning permission has been granted for 500 houses on the Summer Farm site very close to Redbridge Pit but their map also totally ignores the proposed aggregate quarry on the fields to the south of Station Road, where the word MORETON appears on the map above.

### Summary

25. Purbeck's Preferred Options does not mention the West Dorset and Weymouth & Portland housing plans in Crossway, not even the 500 houses to be built on Summer Farm close to Redbridge Pit.
26. The West Dorset and Weymouth & Portland Preferred Options does refer to the Purbeck housing plans on Redbridge Pit in Chapter 12 on pages LPR 245/Adobe 248 and 246/Adobe 249 but as the above maps indicate they do not appear to have taken the 490 houses into consideration when allocating 1114 houses to Crossways.
27. As the above maps, especially the West Dorset Preferred Options Sustainability Appraisal clearly show, Purbeck's Pre-Submission draft and West Dorset and Weymouth & Portland's Preferred Options have plans for Crossways which appear to take no note (Purbeck) or little notice (West Dorset and Weymouth & Portland) of the plans of the other council.
28. The result is that both council's housing plans have allocated almost the maximum number of houses to their respective parts of Crossways without any consideration for the ability of Crossways to cope with their combined housing numbers.
29. This has resulted in a total of 1604 houses being planned and proposed for a village which only has 1143 houses.
30. I have dealt with the services and facilities in Crossways in a separate Pre-Submission comment form, suffice to say they are totally inadequate for a 140% expansion of Crossways.
31. It is worth remembering that the average growth in the other locations in Policy V1 is approximately 10% and Swanage is only planned to grow by 3%. This is shown on the chart in the Policy V1 Spatial Strategy comment form.

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

32. The best solution to the approved and planned gross over development of Crossways is for Purbeck District Council to delete its Redbridge Pit allocation.
33. As explained in the Policy V1 Spatial Strategy Pre-Submission consultation comment form, the proposed Purbeck allocation to Redbridge Pit is so close to Dorchester (approximately 5~6 miles) and so far away from where at least 79% of Purbeck's population live (east of the Worgret railway bridge – at least 10 miles) that in effect the allocation represents a donation of 196 affordable homes (@40% of the allocation) and 294 market houses (total 490) to Dorchester since Crossways is officially a dormitory of Dorchester (Inspector's Report to West Dorset, Weymouth and Portland dated 14 August 2015, page 31 paragraph 153, on the conclusion of his inspection of their extant Local Plan).
34. I propose that the Redbridge Pit 490 houses are allocated to a site(s) to the east of the Worgret railway bridge with some or all being allocated to Purbeck's largest community of Swanage which only has an allocation of 60 affordable homes (at 40%) as part of its Local Plan allocation of 150 houses. This is far too small an allocation of affordable homes for a community of at least 5759 houses.
35. I have discussed the availability of sites in my response form dealing with the SHLAA.

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

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

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

Yes

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

I wish to participate in the oral part of the examination to explain why the Pre-Submission's largest allocation should not be put on Redbridge Pit but instead be located to the east of Worgret railway bridge where 79% of Purbeck's population lives but only 39% of the housing is proposed to be built. In the process I would like to explain that the combined West Dorset and Purbeck proposed allocations represent a 140% increase in the size of Crossways, but that both councils appear to plan independently of each other.

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## Comment Receipt

<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Moreton Parish Council (Mr Malcolm Hill - 1188470)
<b>Comment ID</b>	PLPP646
<b>Response Date</b>	03/12/18 16:18
<b>Consultation Point</b>	Policy V1: Spatial Strategy
<b>Status</b>	Draft
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Are you responding on behalf of a group?</b>	Yes
<b>If yes, how many people do you represent?</b>	Moreton Parish Council- 5 + 124 Moreton household petitioners (81% of Moreton)
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	Policy V1: Spatial Strategy Policy H4:Moreton Station/Redbridge Pit
<b>Do you consider that the Local Plan is legally compliant?</b>	Yes
<b>Do you consider that the Local Plan is sound?</b>	No
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	No
<b>Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)</b>	

### Moreton – Introduction

1. This comment form starts by providing background on the parish of Moreton.
2. Following the background is A Vision Statement for Moreton in which the Parish Council have laid out how the people of Moreton perceive the community in which they live.
3. Purbeck District Council published their Purbeck Local Plan Partial Review Issues and Options Consultation, January 2015. This proposed that on page 29 that:

*...land at Redbridge Pit and land to the north of Moreton Station could potentially accommodate between 200 and 900 new homes, plus employment space SANG and community facilities.*

4. As a result of this consultation Moreton Parish Council conducted a petition in the summer of 2015 against large scale housing development in Moreton.
5. Moreton is now under threat from a combination of the Purbeck Pre-Submission Policy H4 Moreton Station/Redbridge Pit housing; from 2 quarries as part of the DCC Mineral Sites Plan which is currently being examined by a Government Inspector; from the proposal in the West Dorset and Weymouth & Portland Joint Local Plan Review Preferred Options Consultation dated August 2018 for 1114 houses in Crossways; and from the 81% increase in traffic projected to flow on the B3390 through Moreton Station settlement as a result of the house building and quarry developments, with additional queueing at Moreton Level Crossing.

### **The Parish of Moreton – a brief history**

6. Moreton is a rural Parish of about 300 people within a landscape of fields and woods with the River Frome meandering gently through the Parish. To the south the parish abuts Egdon Heath mentioned in Hardy's Tess of the Durburvilles. Very little has changed in large parts of the parish from the times when Thomas Hardy rode his bicycle along its country lanes in search of ideas for his novels and poetry. Because Moreton is such a small rural dispersed community there is no village or shop, just a pub next to the railway station which is overwhelmingly used by people from outside the parish. Instead the parish contains a collection of habitations reflecting its agricultural past. The Waddock Drove road bridge over the River Frome is a designated ancient monument and the Normans settled in the area. A clearly visible folly called the Obelisk stands on top of Fir Hill. Moreton makes a significant contribution to Dorset's main industry of tourism by hosting 2 very popular caravan parks and the Jubilee Trail runs through the parish. The parish has a strong equestrian tradition with events taking place frequently during most of the year. Moreton has featured as a location in films and tv shows.
7. Moreton has an unusually rich history. It has been associated with 3 major world events. In the community known as The Street is the cemetery containing the grave of Lawrence of Arabia, whose exploits in the Middle East in World War 1 are still reverberating today. Moreton House close by was the home of Mr Frampton who initiated and actively took part in the trial of the Tolpuddle Martyrs, and who could be said to have been the instigator of the world-wide trade union movement. More recently during the Second World War some parishioners were strafed by the Luftwaffe along Station Road and a bomb was dropped close to the parish church of St Nicholas, blowing out its stained-glass windows. These were replaced after the war by 13 clear glass windows containing beautiful etchings by the renowned poet and artist Sir Lawrence Whistler.
8. Although the community is dispersed the people of Moreton have a very strong sense of place and community. When surveyors reported that the old wooden village hall could well collapse in the event of a heavy snowfall, a large body of parishioners joined together and worked hard to obtain the funds for a replacement village hall. Within about 4 years of the surveyor's report their hard work was rewarded with a splendid new hall which is the envy of many other parishes.

### **A Vision Statement for Moreton**

9. The people of Moreton are very keen that the unique character, history and rural beauty of their parish is sustained for the benefit of those who live in the parish, the many people from around the world who visit the parish throughout the year, and the people of Moreton in the future. The people of Moreton consider that future development in the parish should be of a scale and character that blends well with the existing parish, does not overwhelm the delicate balance of nature and dispersed habitations within the parish, is proportionate relative to the small size of the parish and the allocations to other communities, and takes account of the significant and altruistic housing and quarrying contributions already made by the people of

Moreton for communities outside the parish. The people of Moreton have tolerated successive extensions of the aggregate quarry for over 50 years, and it is only fair that future quarrying in the parish should be restricted to the proposed Hurst Farm site.

### **Moreton Parish Council Housing Petition**

10. The results of a petition against the building of hundreds of houses in Moreton, proposed in the Purbeck Local Plan Partial Review Issues and Options Consultation, January 2015 (page 29) were presented to Purbeck District Council, together with the individual petition forms on 23 February 2016 with a correction on 3 March.
11. 81% of the households in Moreton agreed that Purbeck Council should not allocate 900 houses to Moreton in the Local Plan and agreed that Purbeck Council should only expand the number of houses in Moreton by approximately 10% which would be proportionate with the small size of the parish.
12. Ten percent is also the average percentage increase for the allocations to all the other locations in Policy H2: The housing land supply. This is shown on the page following this Petition section and, therefore, the petition is still very valid for the Pre-Submission consultation. The numbers are shown in columns P and Q.
13. The petition was conducted in the wake of the first Purbeck Partial Review which proposed allocating up to 900 houses in Moreton.
14. Moreton Parish Council considers that the petition is also still valid because the current proposed allocations of 490 houses and a 65-bed care home on Redbridge Pit equates to a 490% increase in the number of houses in Moreton Station Settlement as shown on the chart following the petition form in columns P and Q.
15. The proposed allocations would also put a tremendous strain on the already overburdened infrastructure and facilities in Crossways.
16. As a result of its work on the SHLAA, Moreton Parish Council raised its acceptable limit on development in Moreton to 13.2% on 3 March 2016. Moreton Parish Council showed that this was the maximum percentage increase that any community needed to accommodate in order for Purbeck Council to meet its SHMA housing target using sites deemed acceptable by Purbeck District Council in its extant SHLAA.
17. A copy of the petition form is shown below followed by a map of the areas which took part in the petition and indications of the housing and quarrying sites proposed in and around Moreton .
18. On the page following the petition form is a chart showing the derivation of the 10% average figure for all the locations with housing allocations in the Pre-Submission consultation and the 490% expansion proposed for Moreton Station/Redbridge Pit.

**Purbeck Local Plan Review *Moreton Petition***

Purbeck District Council is reviewing its Local Plan with the aim of building more houses in Purbeck. It is considering two options for Moreton:

- To increase number of houses in the parish by 10% - approximately **17 houses** or
- To expand Moreton by **900 houses** (559%) split between Moreton Station and Redbridge Quarry

Do you want Moreton to expand by 17 houses or 900 houses?  
Have your say by ticking the relevant box below in the Moreton Petition

**Moreton Petition**

	Agree	Signature
Purbeck Council should <b>not allocate 900 houses for Moreton</b> in the Local Plan Review	✓	<div style="border: 2px solid red; padding: 5px; display: inline-block; font-size: 2em; font-weight: bold;">81%</div>
Purbeck Council should only expand <b>the number of houses in Moreton by 10%</b>	✓	

Name: \_\_\_\_\_ Address: \_\_\_\_\_

If you would like to contribute, we will collect your response on Fri 7, Sat 8 and Mon 10 August. We would be grateful if you could leave your response somewhere obvious by your main entrance, or contact one of us and we will come and collect at a mutually convenient time.

**You might like to be aware:**

**Quarry development**

- A large field to the west of Hurst Bridge and a large field opposite the proposed Moreton Station development have been submitted for consideration as large quarry sites (Mineral Sites Consultation to 23 September).
- The existing Hills quarry, just off the Crossways - Dorchester road near the level crossing will probably expand up to near Woodford Castle (Planning Application) and across to the B3390.

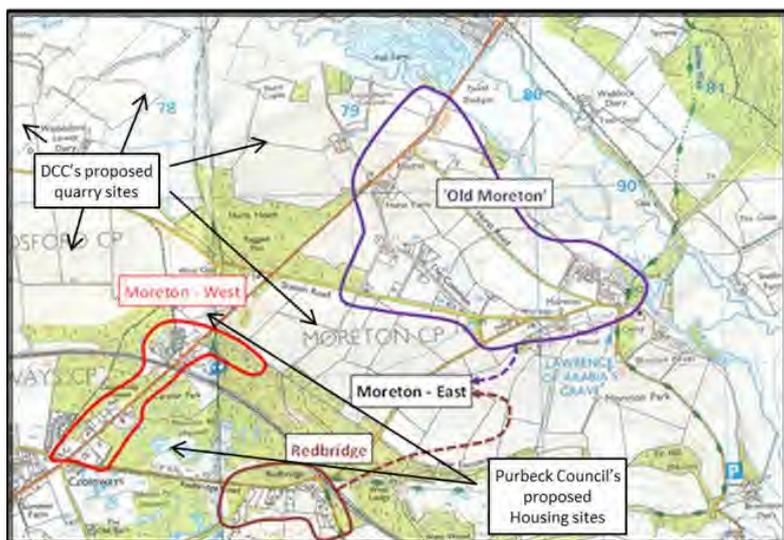
**House building**

- 480 houses are to be built on the eastern side of the B3390 between Moreton Road and field containing Crossways village hall (West Dorset Drift Local Plan).
- 49 houses have been approved to be built on the 'hippy field'
- 10 house planning application has been submitted for the Crossways garage site.
- 85 house planning application has been submitted for the field on the edge of Crossways between the Crossways to Dorchester Road and the railway line.
- 1000 houses are planned to be built on the Silverlake site.

Say no to 900 houses in Moreton

**Enough is Enough**

**Contacts:** Nigel Hill 01305 852 659, Chrissie Fudge 01305 853 039, Sandra Bartlett sandrabartlett@tiscali.co.uk



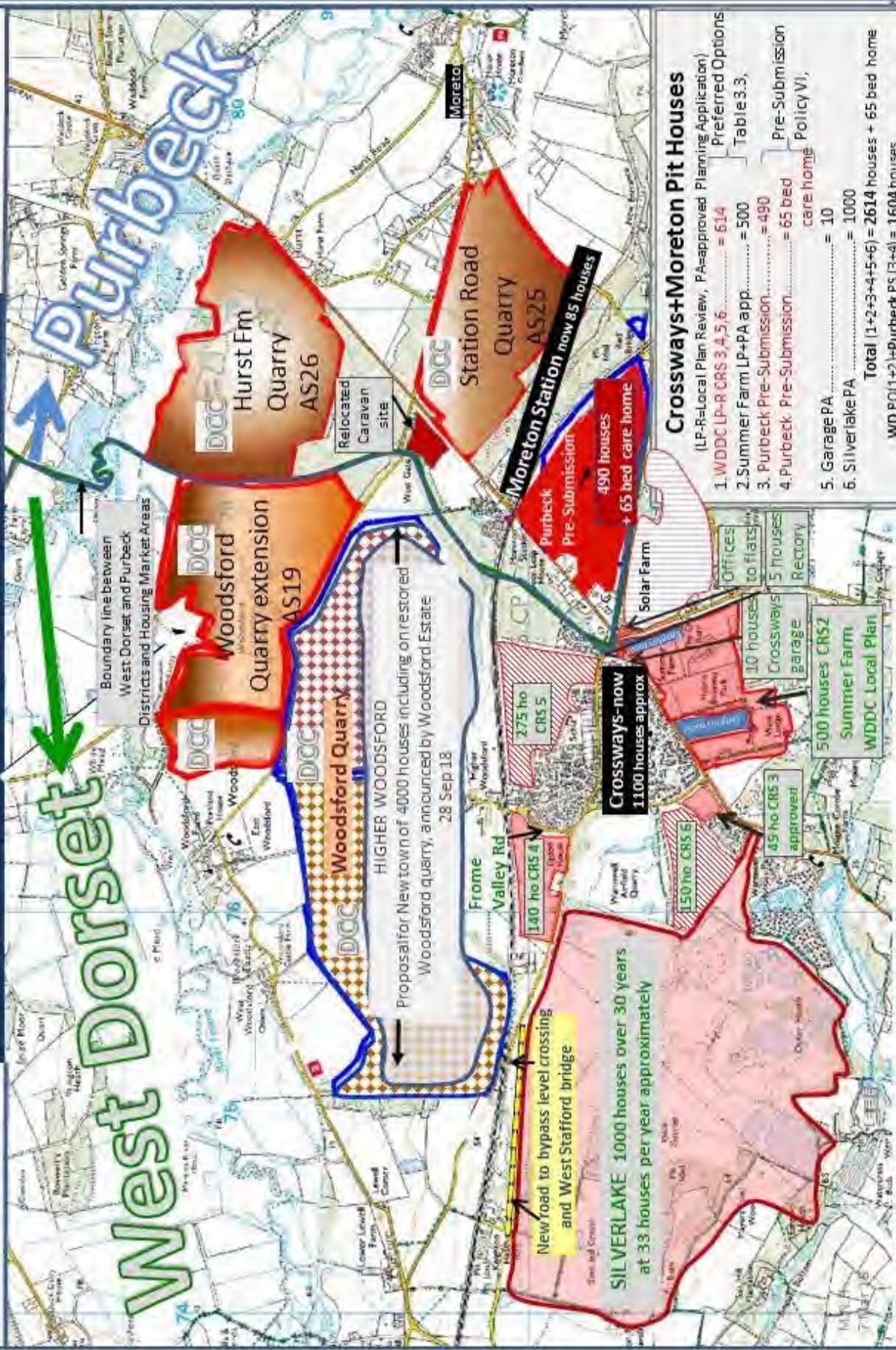
Monday, 03 December 2018 9:39 AM Map showing the areas of Moreton in which the Moreton Parish Council Housing Petition was conducted



**Cumulative impacts on Moreton**

19. Moreton is now not only under threat from the Purbeck Pre-Submission Policy H4 Moreton Station/Redbridge Pit Policy H4 490 houses and a 65 bed care home (page 55/Adobe 57) but is also faced with:
  - a. 2 quarries as part of the DCC Mineral Sites Plan Pre-Submission Draft dated December 2017 which is currently being examined by a Government Inspector.
  - b. A proposal in the West Dorset and Weymouth & Portland Joint Local Plan Review Preferred Options Consultation dated August 2018, page LPR 81 for building of 689 approved houses and 425 proposed houses in Crossways
  - c. A projected 81% increase (DCC Moreton/Crossways Woodsford Traffic Impact Assessment 2016 (AM Peak), page 18 paragraph 5.5) in traffic the B3390 through Moreton Station settlement as a result of the house building and quarry developments, with additional queueing at Moreton Level Crossing (page 27, paragraph).
  - d. The total housing increase in the small area of Moreton and Crossways is proposed to be 1604 houses which is equivalent to another 1 and a 1/2 Crossways villages being deposited on Moreton Station settlement and Crossways.
  - e. This will introduce an additional approximately 2266 cars (@1.4 cars per house using the 2011 Census results) and about 3273 people (@2 per houses plus the 65 bed care home using the 2011 Census results)
20. No other community is faced with level of housing, quarrying and traffic impacts
21. The Purbeck District Council Parish Housing Needs Survey Report dated July 2016 stated that 1 household required rented affordable housing in the parish (page 5).
22. The site for the proposed housing and quarrying described above are shown on the Moreton Parish Council Encirclement Map on the following page.

The Encirclement of Moreton Station and Crossways



**West Dorset**

**Purbeck**

Boundary line between West Dorset and Purbeck Districts and Housing Market Areas

Hurst Fm Quarry AS26

Woodsford Quarry extension AS19

WOODSFORD  
HIGHER WOODSFORD  
Proposal for New town of 4000 houses including on restored Woodsford quarry, announced by Woodsford Estate 28 Sep 18

Station Road Quarry AS25  
Moreton Station now 85 houses

Purbeck Pre-Submission  
490 houses + 65 bed care home

Crossways-now 1100 houses approx

SILVERLAKE 1000 houses over 30 years at 33 houses per year approximately

140 ho CRS 4  
275 ho CRS 5  
150 ho CRS 6  
45 ho CRS 3 approved

Relocated Caravan site  
West Gate  
Solar Farm  
Offices to flats  
10 houses Crossways garage  
500 houses CRS2 Summer Farm WDDC Local Plan

**Crossways+Moreton Pit Houses**  
(LP-R Local Plan Review, PA-approved Planning Application) Preferred Options Table 3.3.

1. WDDC LP-R CRS 3, 4, 5, 6 = 614
2. Summer Farm LP+PA app = 500
3. Purbeck Pre-Submission = 490
4. Purbeck Pre-Submission = 65 bed care home Policy VI,
5. Garage PA = 10
6. Silverlake PA = 1000

**Total (1+2+3+4+5+6) = 2614 houses + 65 bed home**  
WD PO(1+2)+Purbeck PS (3+4) = 1604 houses  
(Crossways currently = 1100 houses approx.)

Moreton Parish Council  
25 September 2016

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

23. Moreton Parish is a bucolic rural parish into which an excessive load of housing, quarrying and traffic is proposed to be imposed.
24. Alternatively, the Petition proposal to only increase Moreton by the average of the other allocation in Policy V1 should be implemented, which would equal about 15 houses in Moreton. However, at the time the Petition was being conducted West Dorset and Weymouth & Portland had not published their proposal for 1114 houses in Crossways and DCC had not published their Traffic Impact Assessment. Both of these factors considerable increase the load on the small settlement of Moreton Station.
25. As a result of the excessive load proposed to placed on the small Moreton Parish Moreton Parish Council propose that the proposal in Policy V1 (page 21) for an allocation of 490 homes and a 65 bed care home on Redbridge Pit should be deleted.

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

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

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

Yes

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

I wish to participate in the oral part of the examination to explain why the Pre-Submission's largest allocation should not be put on Redbridge Pit because Moreton Station settlement now faces impacts not only from the 490 houses and 65 bed care home on Redbridge Pit, but also the 689 houses approved to be built and 425 houses proposed to be built in Crossway and an 81% increase in traffic on the B3390 through Moreton Station with increased queueing at the level crossing in Moreton.

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## Comment

<b>Consultee</b>	Mr Malcolm Hill (1188470)
<b>Email Address</b>	████████████████████
<b>Company / Organisation</b>	Moreton Parish Council
<b>Address</b>	12 Redbridge Road, Crossways Dorchester DT2 8DY
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Moreton Parish Council (Mr Malcolm Hill - 1188470)
<b>Comment ID</b>	PLPP650
<b>Response Date</b>	03/12/18 11:46
<b>Consultation Point</b>	Policy E1: Landscape ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Letter
<b>Version</b>	0.4
<b>Files</b>	<a href="#">E1-Hill-PLPP650.pdf</a>

**Are you responding on behalf of a group?** Yes

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

**Which policy / paragraph number / policies map does your comment relate to?** E1 V1 SHLAA

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

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

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

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

See attached

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

See attached

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

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

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

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

See attached



## Comment Receipt

<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Moreton Parish Council (Mr Malcolm Hill - 1188470)
<b>Comment ID</b>	PLPP
<b>Response Date</b>	03/12/18 16:18
<b>Consultation Point</b>	Policy E1:Landscape
<b>Status</b>	Final
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Are you responding on behalf of a group?</b>	Yes
<b>If yes, how many people do you represent?</b>	Moreton Parish Council- 5 + 124 Moreton household petitioners (81% of Moreton households)
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	Policy E1: Landscape – AONB + Green Belt Policy:V1: Spatial strategy SHLAA
<b>Do you consider that the Local Plan is legally compliant?</b>	Yes
<b>Do you consider that the Local Plan is sound?</b>	No
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	No

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

### **Policy E1: Landscape**

1. Policy E1: Landscape states that:  
*Development, other than major development (where the NPPF provides guidance), will be permitted in the Area of Outstanding Natural Beauty (AONB) provided the proposals would conserve or enhance the natural beauty of the area...*
2. Paragraph 53 states that  
*Around 60% of the District (covering approximately 24,250ha) is designated as part of the Dorset Area of Outstanding Natural Beauty (AONB).*

### **Policy V1: Spatial strategy**

3. As a result of Policy E1 there are no allocations in the AONB in Policy V1.



5. The chart is described in detail in the response form dealing with Policy V1: Spatial Strategy.
6. The chart shows that over 40% of the existing housing stock is located in the AONB (column M), but there is nothing in the Pre-Submission document about this having any negative effects on Purbeck District so it cannot be said that large scale housing detracts from the AONB because it is already in the AONB and is, apparently, entirely acceptable.
7. The effect of concentrating all housing allocations outside the AONB is that 61% of Policy V1's housing allocations are to the west of the eastern boundary of Wool (column Q), whilst 79% of the people in Purbeck live to the east of a north south line through Worgret railway bridge (column L), a minimum of 5 miles to the east.
8. Wool with an allocation of 470 houses (a 22% growth, column P) is 5 miles west the Worgret railway bridge.
9. Bere Regis with an allocation of 105 houses (a 10% growth, column P) is about 8 miles from the Worgret bridge.
10. Redbridge Pit which is effectively in Crossway in West Dorset, has the largest allocation in the Pre-Submission of 490 houses (a 590% growth with respect to Moreton Station settlement) and is 10 miles west of the Worgret Bridge. This allocation is actually closer to Dorchester (about 5~6 miles) than houses in Crossways and closer to Dorchester than it is to the Worgret Bridge (10 miles). Crossways is officially a dormitory of Dorchester (Inspector's Report to West Dorset, Weymouth and Portland dated 14 August 2015, page 31 paragraph 153, on the conclusion of his inspection of their extant Local Plan).
11. Hence one of the results of Policy E1 Landscape is that Purbeck's largest housing allocation of 196 affordable homes and 294 market homes, and a 65-bed care home, have been put into a dormitory of Dorchester and, therefore, effectively serve the affordable and market housing need of Dorchester.
12. West Dorset Council has already given approval for 649 homes to be built in Crossway (building not yet started) and another 425 are proposed in the current Joint Local Plan Review for West Dorset and Weymouth & Portland Preferred Local Plan Preferred Options Con 2018 document dated August 2018.
13. In summary: there are no housing allocations in the AONB in Policy V1, 40% of Purbeck's existing housing is in the AONB, the AONB covers 60% of the land area of Purbeck, 79% of Purbeck's population lives east of the Worgret railway bridge, whilst 10 miles west of the Worgret railway bridge Purbeck's largest housing allocation of 196 affordable homes and 294 market homes has been located in a dormitory of Dorchester where they will be only about 5~6 miles from Dorchester and closer to Dorchester than even houses in Crossways. The only bus service is between Crossways and Dorchester, there is no bus service connecting Crossways with anywhere in Purbeck.
14. 79% of Purbeck's population (column L) will have to make do with only 39% of the housing allocations and the people living in the 40% of Purbeck's housing in the AONB (8908 houses, column M) will have to make do with no housing allocation. This includes Swanage which has 5759 houses (column J), is the largest settlement in Purbeck and has about 65% of all the housing in the AONB (5759/8908). Swanage is 69 times larger than Moreton Station settlement (column K).
15. Thus, the Pre-Submission's largest allocation, in Redbridge Pit, will do a lot for Dorchester but very little for Purbeck.

### **The NPPF's guidance for development in an AONB**

16. The NPPF's guidance for development in an AONB is contained on page 49 in paragraph 172.
17. Policy E1 repeats most of the guidance in paragraph 172 but omits the references to the National Parks and the Broads.

### **West Dorset, Weymouth & Portland Local Plan 2015 - AONB**

18. The West Dorset, Weymouth & Portland Local Plan 2015 contains allocations for a number of locations in the AONB which continues across Purbeck District.
19. The 2015 Local Plan has a list of housing allocations in Table 3.7 on pages 68 and 69.
20. The total allocations for the West Dorset section of the table is 4228.
21. Of these 2705 are in the AONB, which represent approximately 64% of the total number of West Dorset allocations.
22. Allocations in the AONB have been made in Dorchester-Poundberry, Littlemoor, Bridport, Beaminster and Lyme Regis.
23. A significant part of Poundberry is in the AONB and because it is on high ground is visible from many miles distant.

### **REPORT ON THE EXAMINATION INTO THE WEST DORSET, WEYMOUTH AND PORTLAND JOINT LOCAL PLAN**

#### **Report to West Dorset, Weymouth and Portland Councils 14 August 2015 by their 2015 Local Plan Inspector.**

24. This report was by the Inspector who conducted the examination of the Joint Council's draft Local Plan.
25. The Inspector who examined the draft Local Plan was Mr Paul Crysell.
26. In his report he made a number of statements about the plan and the AONB. The following represent an extract of Mr Crysell's comments.
27. I have included virtually all Mr Crysell's comments about the AONB so that the extracts do not appear as selective editing. I have not put Mr Crysell's text in italics so that it is easier to read. I have added highlighting in red to sections which are particularly pertinent to Purbeck.

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## 1. Page 32 paras 32-37

**Issue 1 – Whether the spatial strategy is the most appropriate one to deliver the sustainable development objectives promoted in the National Planning Policy Framework.**

32. The objective of the LP is to direct most development to the principal towns of Dorchester and Weymouth and the larger communities in West Dorset. Where possible, use will be made of previously developed land although greenfield sites will also be needed.

33. Many parts of the Plan area are subject to constraints and this has had a bearing on the choices made in formulating the spatial strategy. For example, extensions to some settlements could have an adverse effect on the natural environment by increasing the risk of flooding or by detracting from the landscape. The latter is of particular concern because a large proportion of the Plan area lies within the Dorset AONB.

34. Despite physical and environmental restrictions the Councils have concluded that allocations in parts of the AONB are unavoidable even though the NPPF says that ‘great weight should be given to conserving landscape and scenic beauty’ in these areas (paragraph 115). Although paragraph 14 refers to the presumption in favour of sustainable development and the need for local plans to meet objectively assessed needs, it advises that some designations, such as AONB, may influence what development is allowed.

35. **There has been widespread opposition to a number of proposals in the LP, particularly where allocations have been put forward within the AONB. It is difficult to see how some incursions can be avoided if the Councils are to adhere to sustainable development principles and meet the needs of rural communities.**

36. Concentrating development in the larger settlements means there is access to existing services and facilities while new development can be the catalyst for improved provision. With the exception of Crossways and Sherborne, criticism of the Councils’ approach focused more on site selection, scale and the effects of change rather than opposition to the distribution of growth in the spatial strategy.

37. Having regard to the purposes of the LP, sustainability objectives, environmental constraints and my conclusions about housing land supply, I am satisfied that the spatial strategy can, in principle, be supported. Nevertheless, I am concerned that the LP fails to give sufficient emphasis to the sustainable role of particular settlements and the contribution they could make to meeting development needs. I examine the merits of proposals for each of the key settlements later in this report. However, as part of my overall findings I consider a modification is required to ensure the Councils identify further development options at specific settlements as part of an early review of the LP which, it was made clear, they intend to undertake. I therefore recommend the wording of modification MM60 is revised in order to make the LP sound.

## 2. Page 15 para 66

66. Having regard to previous representations on this matter I consider the Councils should revert to their original policy provisions i.e. that all new market housing should make a contribution towards affordable housing needs. This would support efforts to provide this type of accommodation and would largely affect sites of five or fewer dwellings which would have been exempt from contributions in **those areas designated as AONB (approximately 70% of the Plan area)** and sites of ten or fewer dwellings elsewhere.

## 3. Page 23 para 109

**Issue 3 – Whether the distribution of development and other proposals for the various settlements is justified?**

109. I have previously acknowledged the spatial strategy means that land has been allocated in the LP which, in some cases, lies within the Dorset AONB but is regarded as necessary to meet future development needs. The Countryside and Rights of Way Act 2000 says regard should be had to conserving and enhancing the natural beauty of an AONB, a matter which is repeated in the NPPF29 and PPG, the latter also pointing out the duty is relevant where development outside an AONB could have an impact on its setting. Paragraph 116 of the NPPF makes clear that exceptional circumstances are required for major development in these areas. I have therefore had regard to this duty when considering proposals which may affect land whether in or adjacent to the AONB.

4. Page 26 Para 123

**Littlemoor**

123. The allocation of land at Littlemoor (LITT 1) involves the northwards extension of Weymouth beyond the administrative boundary into WD and part of the Dorset AONB. The Councils identify this as a strategic site representing major development thereby giving rise to concerns regarding its impact both on the AONB and wider landscape.

5. Page 26 para 124

124. Rising land to both the north and east helps to contain the proposed site and I agree with the Councils that strategic planting would help mask the scale of the development and mitigate the obvious boundary between the countryside and the existing urban edge. Internal planting could further help to contain building forms and ameliorate its impact on the surrounding countryside.

6. Page 27 para 129

129. Taking the various factors into account I consider there are sound reasons to support the Councils' preferred choice of site at LITT 1 despite its location in the AONB. Having regard to the overall level of housing need and the availability, size and merit of other sites on the periphery of the Weymouth urban area, I am satisfied it would be less visually harmful when compared to the release of a number of smaller sites. In coming to this conclusion, I also recognise the development would provide an opportunity to improve the transition between the countryside and urban area. Furthermore, positively promoting the use of nearby land at Icen and Weyside Farms for employment uses (LITT 2) would, in turn, help to resolve historical planning issues and improve the containment of an adjacent and prominent site in the AONB.

7. Page 33 para 166

**The Western Settlements - Lyme Regis, Bridport and Beaminster**

166. Allocations are proposed in the larger communities in the western parts of WD at Beaminster, Bridport and Lyme Regis although these settlements are located in the Dorset AONB. This, together with other factors have been considered by the Councils when balancing the likely impact of development on the natural environment and the future needs of each community.

8. Page 34 para 169+170

The site is flat but would extend the western edge of the town into the countryside and intrude into the designated AONB while it can be seen from higher land beyond the settlement.

170. I find it difficult to conclude that BEAM 1 represents major development in the AONB given the scale of strategic sites promoted elsewhere in the Plan area although I do not dispute it would be a significant scheme for Beaminster. I have therefore had regard to its potential impact on the landscape while recognising that some development is required to maintain the vitality of the settlement. **I consider there are exceptional circumstances to support the allocation because of the need for new homes and jobs** and the scope for minimising the visual impact of the development and protecting wildlife interests through strategic planting.

Bridport

9. Page 34 para 173

173. The size and extent of the allocation challenges the presumption in the NPPF that major development should be avoided in AONB unless there are exceptional circumstances. **It is clear to me that the Councils are well aware of the importance of protecting designated landscape but face the difficult problem of balancing such concerns with the need to provide homes and jobs to meet future needs.** In order to achieve this and adhere to sustainable development principles it is inevitable that some areas in the AONB will be affected.

10. Page 37 para 187

Lyme Regis

187. Reservations were expressed over the feasibility of developing land at Woodberry Down (LYME 1) because of **geological problems and soil conditions.** The site was allocated in the previous LP and has been enlarged to accommodate some 90 dwellings as well as employment uses. Visually it is very well contained by the surrounding landform so its impact on the AONB is limited and is not, in my view, a reason for opposing development. As I saw work is underway, the **developer having piled the site to overcome stability issues.** Despite the awkward nature of the site the housebuilder is confident of meeting the Councils' objectives although **it illustrates the difficulties associated with finding suitable development land.**

11. Page 39 para 200

**Issue 4 – Whether generic policies for the Plan area are appropriate and consistent with the requirements of the NPPF and PPG?**

200. Adopting a more dispersed spatial strategy could make a modest contribution to housing needs in WD but it would not be a sustainable option. Many villages have limited facilities, poor public transport links and are in sensitive locations in the Dorset AONB. Nevertheless, the Councils say they welcome initiatives to promote schemes which have local support through neighbourhood planning and I was told of several communities who are engaged in this work. There is no guarantee that plans will come to fruition but the Councils' stance accords with the Government's localism agenda and could assist in delivering more affordable housing.

End of quote

12. A remark which sums up Mr Crysell's approach throughout the above extract is the one he made in commenting on proposed development in Bridport:

**It is clear to me that the Councils are well aware of the importance of protecting designated landscape but face the difficult problem of balancing such concerns with the need to provide homes and jobs to meet future needs.**

13. Mr Crysell recognised the guidance in the NPPF but also recognised that in an area with a large covering of AONB, that some allocations will have to be made in the AONB if local people are to be provided with homes and jobs

14. Mr Crysell's approach is equally appropriate for Purbeck which shares the same AONB.

### Proportion of land in Purbeck and West Dorset covered by designations

15. The Government produced a document in October 2017 entitled *Planning for the right homes in the right places*. The document covered a spreadsheet which contained column showing the indicative assessment of housing need for local authorities and a column showing the proportion of land in each local authority covered by designations. An extract for Purbeck and West Dorset is shown below:



Department for  
Communities and  
Local Government

Planning for the right homes in the right  
places: consultation proposals

#### Application of proposed formula for assessing housing need, with contextual data

Published 14th September 2017

All data is correct to the best of our knowledge as of publication.

Figures for authorities marked with \* have not been verified by the authority, and may be subject to correction

ONS Code	Local Authority	Indicative assessment of housing need based on proposed formula, 2016 to 2026 (dwellings per annum)	Current local assessment of housing need, based on most recent publicly available document (dwellings per annum)	Proportion of Local Authority land area covered by Green Belt, National Parks, Areas of Outstanding Natural Beauty or Sites of Special Scientific Interest
E07000051	Purbeck	168	238	73%
E07000052	West Dorset	see West Dorset, Weymouth & Portland	605	71%

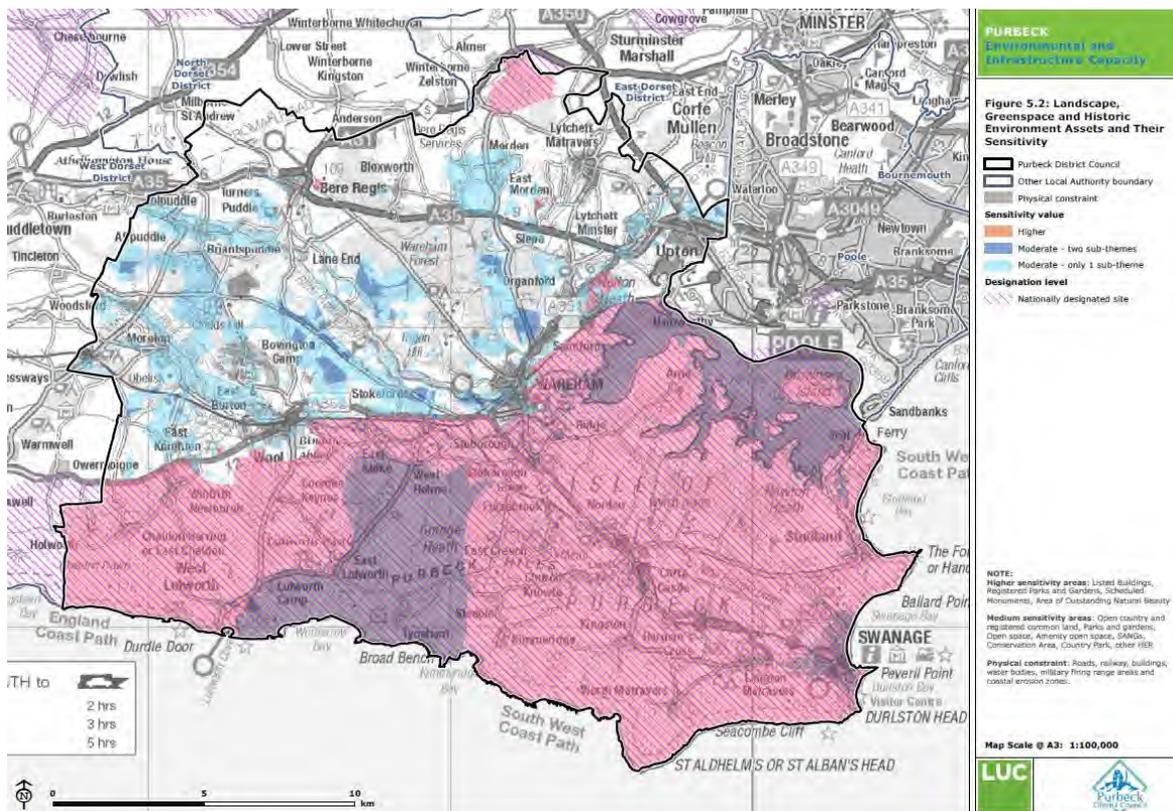
16. The spreadsheet shows that the amounts of land covered by designation in Purbeck (73%) and West Dorset (71%) are virtually identical.
17. Epping Forest, Sevenoaks and Tandridge are joint equal top with 94% of their land areas covered by designations and Purbeck and West Dorset are about 30 positions below the top. Thus Purbeck and West Dorset are not unique in having much of their land area covered by designations.

### The Environmental and Infrastructure Capacity Study ECIS

18. The ECIS states in Chapter 5 on page 60 in paragraph 5.83 under the title *Environmental capacity of Dorset* that:

*5.83 Figure 5.1 shows that over half of the District is constrained by the Dorset AONB, a national designation. It is likely that some of the areas within the AONB (for example sites close to existing settlements) may have capacity for residential development, and therefore have moderate sensitivity.*

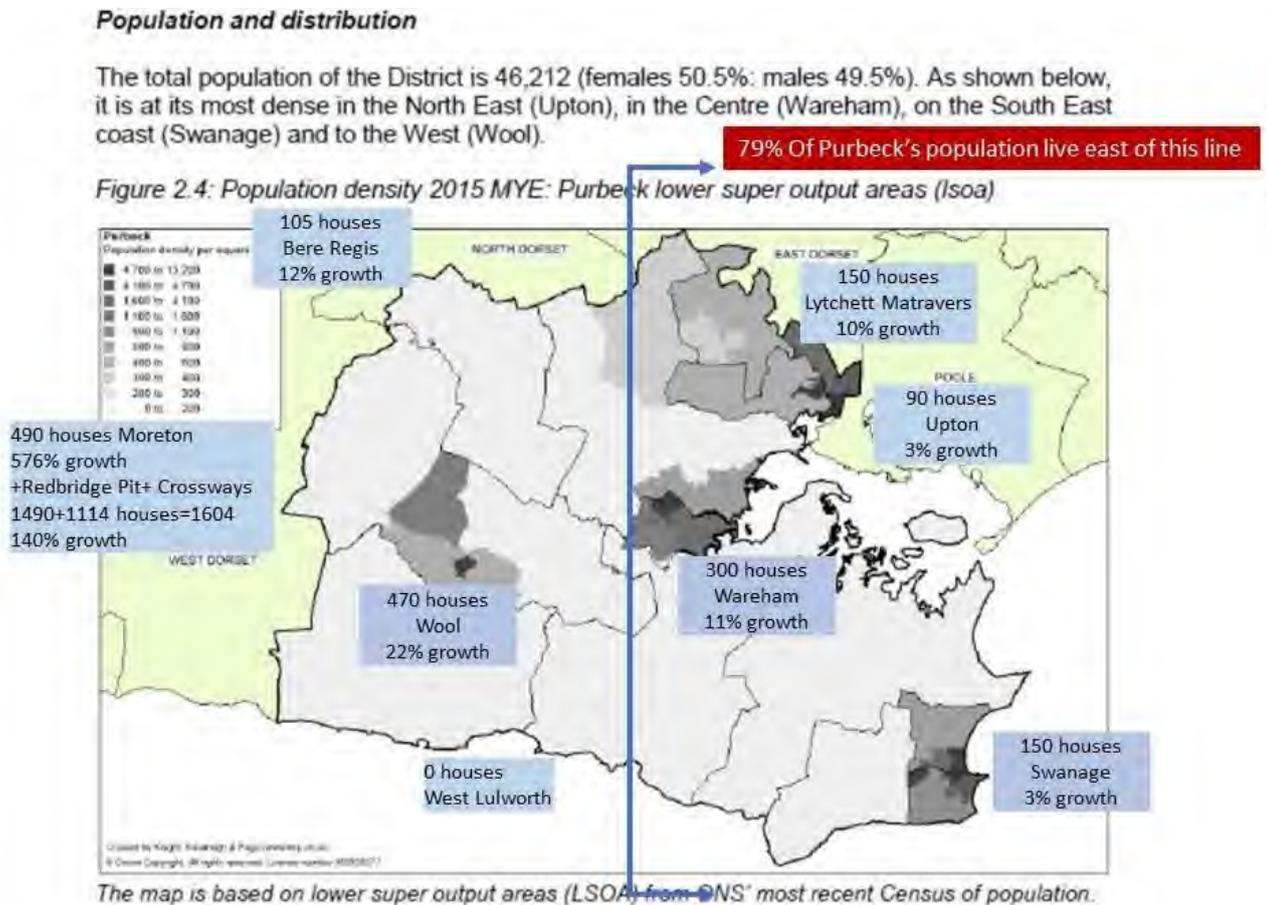
19. Figure 5.1 is shown below:



28. The ECIS thus accepts that: ... some of the areas within the AONB (for example sites close to existing settlements) may have capacity for residential development, and therefore have moderate sensitivity.
29. On the left of Figure 5.1 the AONB cross hatching changes from maroon in Purbeck district to purple in West Dorset emphasising that the Purbeck and West Dorset AONBs are the same AONB.
30. As discussed above the West Dorset and Weymouth & Portland Local Plan 2015 allocated 2705 houses in the AONB, approximately 64% of its total housing allocations.
31. The Inspector of the Local Plan endorsed the council's allocations in the AONB.
32. The statement in the ECIS combined with the Inspector's words supports the case for the Purbeck Pre-Submission to also allocate housing adjacent to existing settlements in the AONB.
33. This is particularly pertinent as 79% of the district's population lives east of the Worgret railway bridge but only 39% of the housing allocations are east of the Worgret bridge and Swanage in the AONB, the largest community in Purbeck has approximately 5759 houses or 64% of the houses in the AONB, but has no housing allocation in Policy V1, only 150 (3% growth) in the Swanage Local Plan.
34. Swanage is approximately 1.7 times larger than the next large settlement in Purbeck.
35. There are a number of large sites in the SHLAA, including in the AONB, which could be used to provide housing east of the Worgret railway bridge to match the fact that 79% of Purbeck's population lives east of the Worgret railway bridge and that a significant proportion live in Swanage.

## Purbeck Population Concentrations

36. The Purbeck Pre-Submission library contains the report: ACTIVE DORSET: SPORT & LEISURE FACILITIES NEEDS ASSESSMENT: PURBECK DISTRICT COUNCIL dated April 2017.
37. The report contains a map on page 13/Adobe 18 showing population densities in Purbeck. The map is shown below with some additional annotation which I have applied.



38. The map shows that the major concentrations of population are concentrated in Swanage, Wareham and Lyttchett Matravers and Upton. All east of the line approximately through the Worgret railway bridge.
39. The only centre of population concentration west of the line is in Wool.
40. There is no concentration of population in Moreton Station.
41. My annotation shows that 1065 houses are allocated west of the line and only 540 east of the line with an additional 150 (or 3% of its housing total) allocated to Swanage in its Local Plan.
42. As the map shows there is a dramatic imbalance in the location of housing allocation and existing centres of population.
43. This is emphasised dramatically by the fact that the largest single allocation has been allocated to a dormitory of Dorchester in West Dorset and therefore would serve Dorchester's housing need and have very little to do with Purbeck let alone the population concentrations in the east of the District.

## Purbeck District House Prices

44. The Viability report in the Pre-Submission Library :



contains data on house prices in Purbeck. This data, taken from pages 33 and 34 (Adobe 35 and 36) is shown below:

Table 1d – Land Registry Sold Prices Review Analysis – Purbeck DC Re-sale data (Feb – May 2018)

Sub-Market	Updated Values in Line with UK HPI (£)	Updated Values in Line with UK HPI (£/m <sup>2</sup> )
The Coast	£661,967	£4,519
Upton	£283,538	£3,636
Swanage	£357,734	£3,617
Purbeck Rural Centre	£330,784	£3,452
Wareham	£289,395	£3,364
Purbeck Rural Fringe	£374,340	£3,204

Locality	Updated Values in Line with UK HPI (£)	Updated Values in Line with UK HPI (£/m <sup>2</sup> )
Studland**	£1,611,385	£5,606
Worth Matravers**	£777,603	£5,337
Corfe Castle	£629,053	£4,898
West Lulworth**	£341,104	£4,609
West Morden**	£606,616	£4,242
Bere Regis**	£340,336	£4,202
Hyde**	£582,696	£4,103
Langton Matravers	£466,465	£3,981
Beacon Hill	£304,240	£3,710
Upton	£283,538	£3,636
Swanage	£357,734	£3,617
Sandford	£367,508	£3,599
Ridge**	£531,086	£3,588
Coombe Keynes**	£345,463	£3,455
Stoborough**	£273,300	£3,374
Wareham	£289,395	£3,364
Lytchett Matravers	£380,126	£3,341
Bovington**	£173,078	£3,313
Wool	£307,116	£3,297
Winfrith Newburgh	£380,350	£2,625
Bloxworth**	£185,622	£2,508

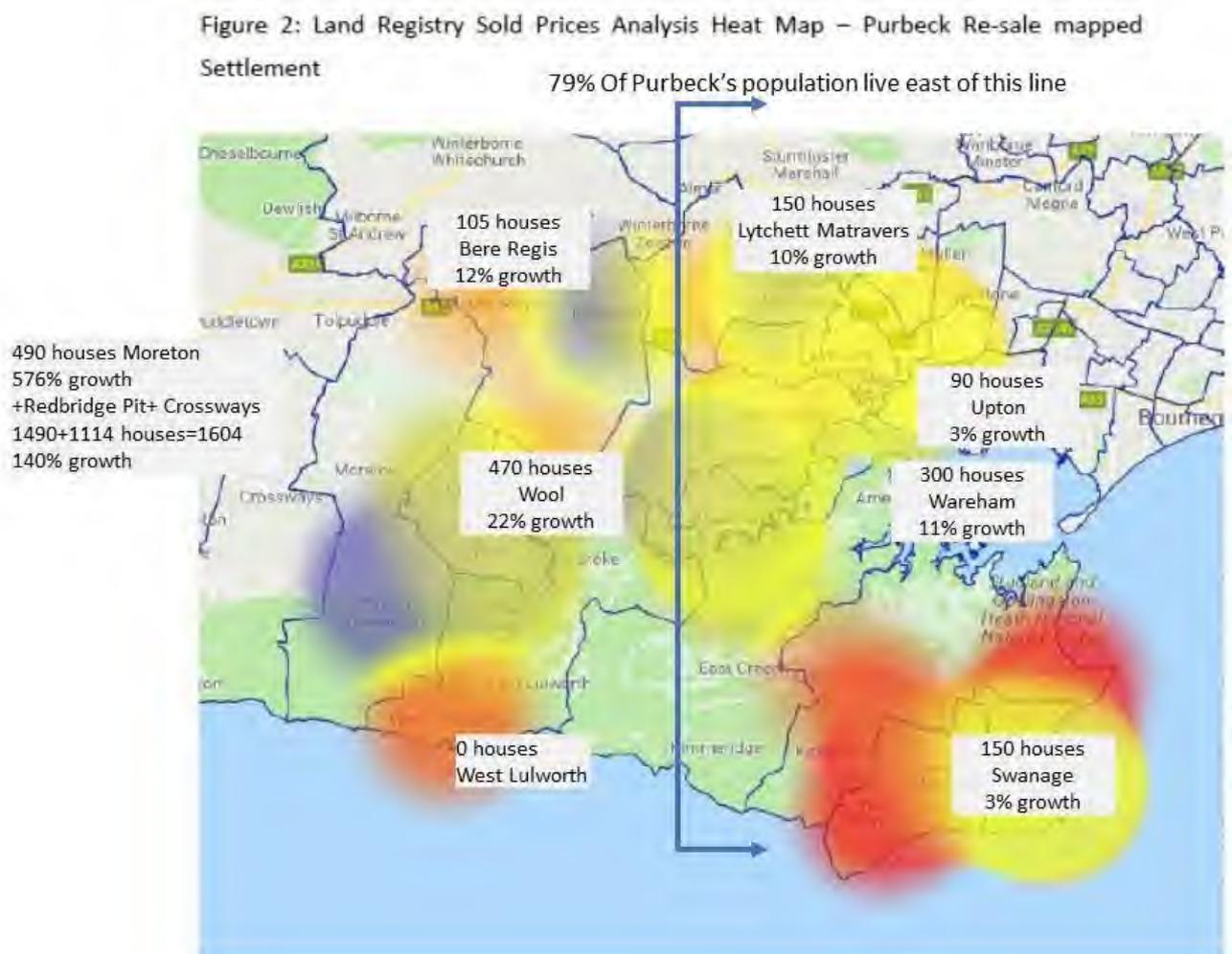
\*\* Limited Data Set

45. The highest house prices are in Studland and Worth Matravers , both close to Swanage in the AONB where no houses have been allocated. Houses in Corfe Castle, a few miles from Swanage and also in the AONB are also significantly more expensive than those in other areas.
46. The ACTIVE DORSET report also provides data on incomes on page 15/Adobe 19 and this is shown below:

*Income and benefits dependency*

*The median figure for full-time earnings (2015) in Purbeck is £24,908; the comparative rate for the South West is £26,686 (+7.1%) and for Great Britain is £28,132 (+12.9%). In November 2016, there were 102 people in Purbeck claiming Job Seekers Allowance (JSA); this represents a decrease of 68.9% when compared to November 2008 (329).*

47. The disparity between median full-time earning and house prices is stark and emphasises why local people find it so hard to buy a house, especially in and around Swanage. It also highlights the perversity of donating 196 affordable houses and 294 market houses to Dorchester in its dormitory of Crossways.
48. The West Dorset and Weymouth & Portland Local Plan Inspector agreed with the councils in 2015 that it is necessary to locate housing allocations in the AONB to provide much needed housing for local people.
49. The viability report illustrates house prices in Purbeck in a heat map on page 34/Adobe 36 and shown below to which I have added annotation:



50. The map highlights that prices in the AONB are the highest, especially around Swanage and in the AONB. House prices are also high around Lytchett Matravers, Upton and Wareham.

51. All these areas are east of the Worgret bridge. No houses are allocated in the AONB and only a minority are allocated in the other eastern locations.
52. There is no heat indication in Moreton.

**The Purbeck District Council Housing Need Study for Moreton (July 2016) reported that**

*1 Households meet the District Council's criterion for rented affordable housing (1% of occupied households).*

53. But Moreton Station has the largest housing allocation in the Pre-Submission of 490 houses

**Green Belt**

54. The ECIS states in Chapter 5 on page 48 that:

5.7 Although not a landscape designation, the overall function of a Green Belt relates to landscape as it can contribute significantly to openness of land, as the NPPF states:

*"The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence."*<sup>90</sup>

5.8 It must be noted however, that *"land within the Green Belt is not protected for its landscape qualities"* and *"openness is not the same as landscape character"*.<sup>91</sup> Openness relates to a lack of built development as opposed to visual openness.

55. The ECIS in chapter 7 on page 97/Adobe 36 in paragraph 7.71 that:

*The north east of the District lies within the South East Dorset Green Belt which "serves to prevent coalescence of settlements through a westward sprawl of the Poole/ Bournemouth conurbation. It bounds Holton Heath, Lytchett Matravers, Lytchett Minster, Sandford, Upton and Wareham*

56. The essential aim of the South East Dorset Green Belt is thus to prevent a westward sprawl of the Poole/Bournemouth conurbation.

57. In paragraph 7.72 the ECIS states that:

*In 2015, land put forward by landowners for potential new housing sites, as part of the Local Plan Review Issues and Options work were subjected to a Green Belt review<sup>139</sup>. This work identified sites suitable for potential release from the Green Belt, i.e. sites in Lytchett Matravers, Lytchett Minster & Upton, Morden, Sandford, and North Wareham. Several of these sites would harm the Green Belt, however these proposals were considered to have sustainability credentials as they are within close proximity to services and facilities in nearby settlements.*

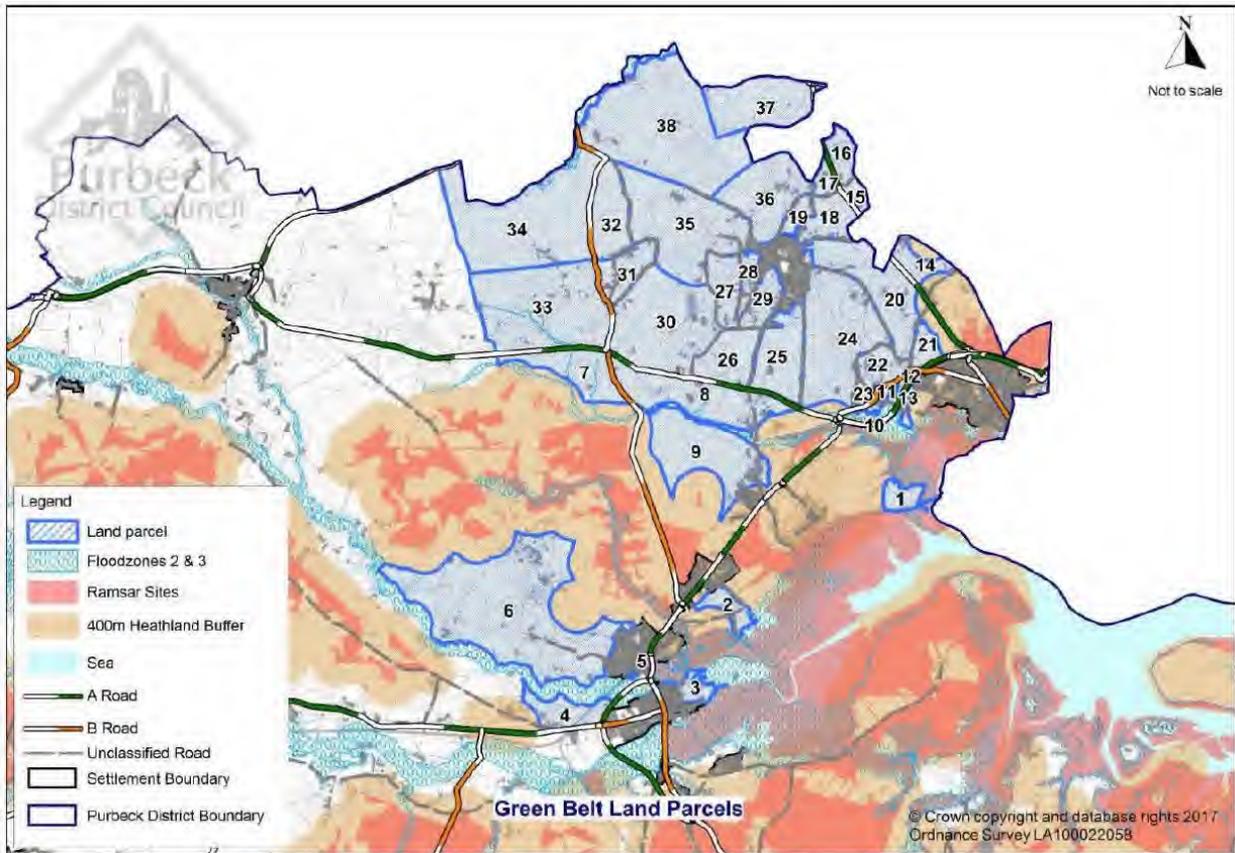
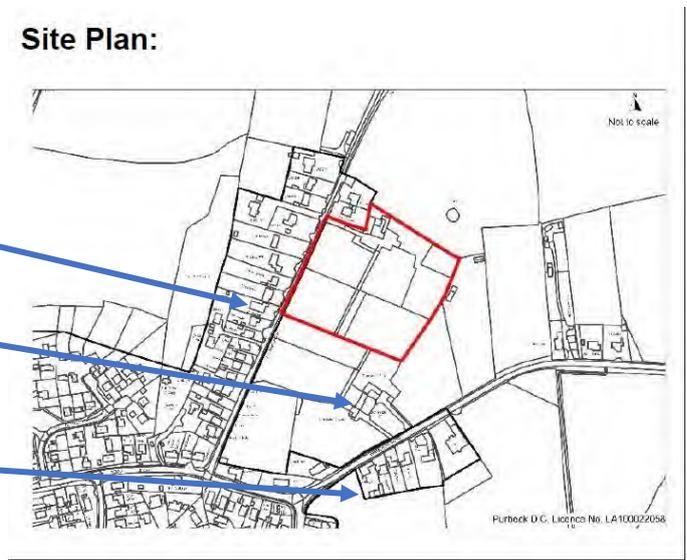
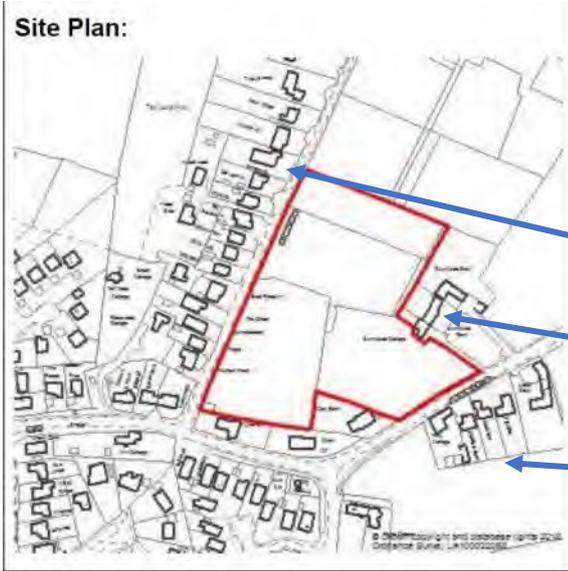
58. The review accepted the release of land in the named locations because they had sustainability credentials and were within proximity to services and facilities in nearby settlements.

59. Thus the principle has been established that sites may be released if they are within close proximity to services and facilities in nearby settlements.

60. The Purbeck District Council Green Belt Review was underway at the date of the ECIS and as part of it the Purbeck District Green Belt Review it was divided into parcels and shown on a map. This map is included in the section of the comment form below which asks for what changes I should propose.
61. In the Green Belt Review the map was changed and is shown below. It is significantly less helpful than the ECIS map in the 'changes' section below.
62. The area around Lytchett Matravers is divided into 8 parcels. The assessments associated with these parcels appear to be about constraining growth in Lytchett Matravers. The ECIS paragraph 7.71 above is concerned with preventing the westward sprawl of the Poole/Bournemouth conurbation.
63. As an example, I have chosen parcel 18 on page 35 of the Green Belt Review dated October 2018.
64. Parcel 18 is adjacent to the north west of Lytchett Matravers.
65. One of the assessment criteria is Merging. The description for Merging, assessed as Medium, states:
- The parcel is positioned close to the north east corner of Lytchett Matravers. Whilst a substantial distance from the western edge of the large built-up area, the parcel's size and position mean that it serves a function in preventing the merging of settlements.
66. The Poole/Bournemouth conurbation would have to sprawl a long way for it to merge with Lytchett Matravers.
67. The parcel receives a High rating for Openness, yet openness is a characteristic of Green Belts not the aim or even a purpose of a Green Belt as the NPPF (2018) states on page 40 in paragraph 133:
- The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.*
68. In the summary at the bottom of page 35 the assessment states:
- As a whole the parcel makes a significant contribution to the openness of the Green Belt, and the character of the countryside. It also serves a function on checking the merging of settlements.
69. So Parcel 18 only serves a function in preventing urban sprawl but makes a significant contribution to Openness which is not an aim of a Green Belt but a characteristic of a Green Belt.
70. Within Parcel 18 there are two adjoining SHLAA sites: SHLAA/00 25(page 82 of the SHLAA) and SHLAA/0137 on page 107.
71. SHLAA/0025 has been accepted for as suitable. SHLAA/0137 has been rated as unsuitable.
72. The logic for not accepting SHLAA/0037 but accepting SHLAA/0025 is difficult to understand.
73. This is not an unusual apparently illogical example of a SHLAA site in the Green Belt being classified as unsuitable
74. The site plans for the two sites, which are adjacent, and each is faced by housing on the left on the same road, are shown below:

SHLAA/0025 -suitable

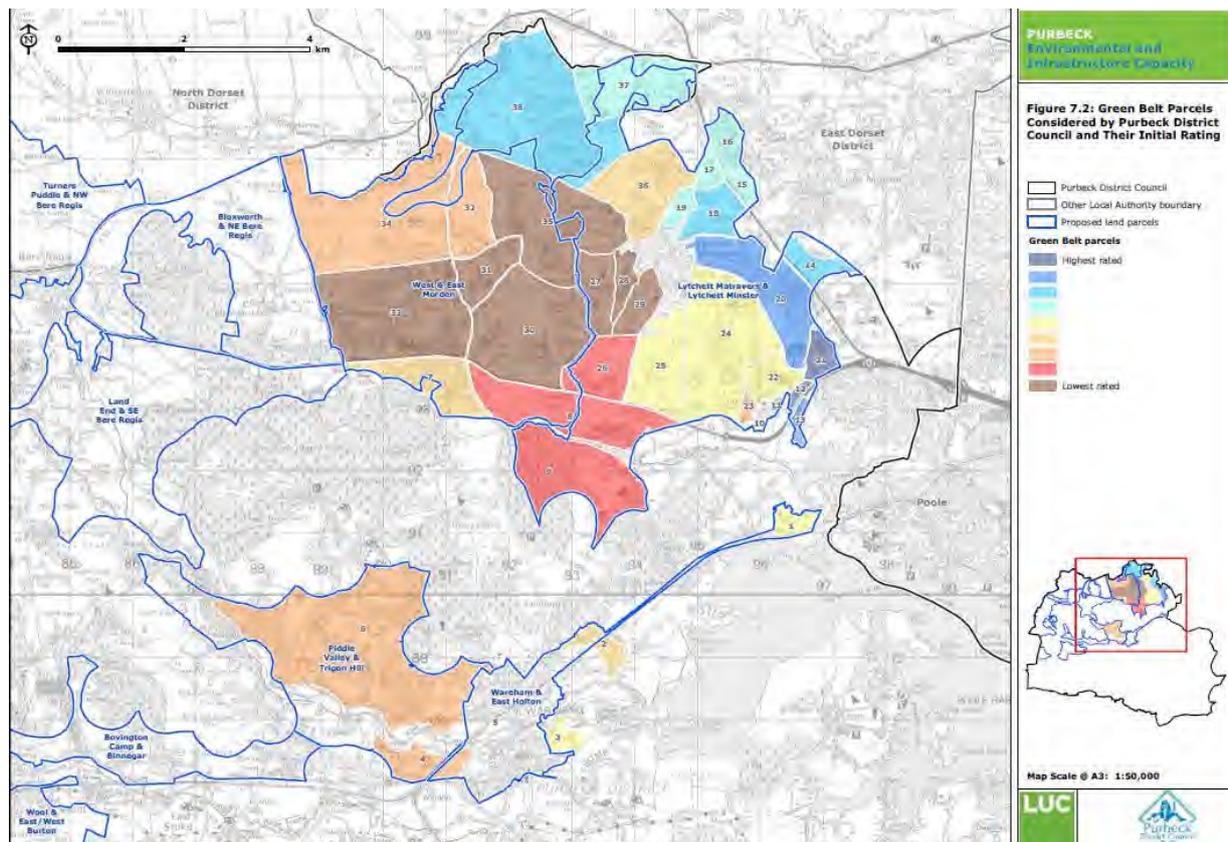
SHLAA/0137 - unsuitable



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

#### The SHLAA

75. The SHLAA contains a number of sites which could be used for housing in the AONB and in the Green Belt. I have read through the extensive paper work associated with the 70 large site which are either in the AONB in the Green Belt.
76. My comments below are, therefore, considered and not cursory.
77. Throughout my review I have been guided by the words of the West Dorset and Weymouth & Portland Local Plan 2015 Inspector's words above when reviewing the allocations in the AONB.
78. The Inspector, Mr Crysell, stated that:
- I consider there are exceptional circumstances to support the allocation because of the need for new homes and jobs.
79. The Pre-Submission Local Plan donates 196 affordable homes and 294 market homes (total 490) to Dorchester by locating them effectively in the Dorchester dormitory of Crossways, upon which the Pre-Submission states the residents of the 490 homes will depend for their services and facilities and upon Dorchester for jobs, services and facilities.
80. This is a great loss of affordable and market housing for the 79% of Purbeck residents who live east of the Worgret railway bridge where only 39% of Purbeck's allocated housing has been located.
81. Almost all the SHLAA sites are adjoining existing villages and built up areas and almost none represent a major intrusion into the open countryside. In almost all cases it has to be said that if the proposed development would spoil the AONB or Green Belt then the existing housing in the settlement must also be spoiling the AONB or Green Belt. But none of the SHLAAs includes any negative comment about the existing built up area.
82. For example in Swanage, by far the largest settlement in Purbeck district with approximately 5759 houses it is very difficult to understand why the SHLAA sites I have indicated below would harm the AONB.
83. It is the 5759 houses that harm the AONB, the addition of the SHLAA sites I have proposed below would only add 389 houses. If the 389 houses would harm the AONB, then the existing 5759 must be doing terrible damage, but there is no comment to this effect in in the Pre-Submission or Environment Capacity and Infrastructure Study (ECIS).
84. But the opposite is true. Photos of the 5739 houses sitting in the surrounding AONB are prominent in Dorset holiday advertising material.
85. Similarly, the map of the Green belt in the ECIS paper (chapter 7 page 98/37 Adobe chapter 7 section), shown below, indicates that a significant proportion of the Green Belt, marked brown in the map is of very limited value in presenting urban sprawl because it is so far from the Poole/Bournemouth conurbation.



86. I think many of the comments in the SHLAA on individual sites are over sensitive and do not recognise, as Mr Cysell did in the extracts from his report on the West Dorset Local Plan 2015 shown above, that there is a need to provide homes and jobs for people in the communities in which they currently live and/or work rather than expecting them to travel many miles to West Dorset to obtain a house
87. For example, in Swanage site SHLAA/0057 on page 156 could provide 132 houses, and SHLAA/0053 on page 159 could provide up to 257 houses. A total of 389 houses or 155 affordable homes and 233 market houses.
88. SHLAA/0088 on page 132 is just across the bypass from Wareham and could provide up to 500 houses. The concept of locating housing on the opposite side of a bypass has precedents in Bridport and in Dorchester. West Dorset is also proposing to build over 2000 houses on the opposite side of the water meadow from the existing Dorchester site, so that proposed development will be disjointed from the existing Dorchester as described on page LPR232 of the Joint Local Plan Review for West Dorset and Weymouth & Portland Preferred Options Consultation August 2018.
89. The two SHLAA sites on Redbridge Pit are separated from Moreton Station are by electrified railway lines. This present a far greater separation between Redbridge Pit and Moreton Station than the bypass does in separating SHLAA/0088 from Wareham.
90. These are just 3 sites which could provide a total of 889 houses for the 79% of Purbeck's population who live east of the Worgret railway bridge, rather than donating 490 houses to Dorchester in one of its dormitories.
91. There are a number of other sites which could be used in the AONB and Green Belt, for examples SHLAA/0065 in West Lulworth to provide 173 houses in an area which shows up as hot in the Viability Figure 2 heat diagram above. The problem with the site being visible could be reduced by making the site smaller

92. SHLAA/0078 in Winfrith Newburgh may be best as a smaller site but is still acceptable.
93. SHLAA0137 in Lytchett Matravers compared above with SHLAA0025 to which it is adjacent would not harm the Green Belt and is acceptable.
94. SHLAA/0075 in East Stoke could be reduced in size with no access onto the main road close to the bend.
95. SHLAA/0052 in Swanage appears to be acceptable.
96. SHLAA/0032 in Lytchett Matravers is fronted by a large number of houses and there are buildings to the left and right. This is another site which could be utilised without significant impact on the Green Belt.
97. SHLAA/0030 in Lytchett Matravers is bounded on 2 and 3 sides by houses so it is very difficult to see what damage to the Green Belt acceptance of these sites would cause
98. SHLAA/0044 has been dismissed because it would impose a large number of homes (46) on the small village.
99. This argument means that other communities do have to accept excessively large numbers of houses. For example Moreton Station settlement with 83 houses has been allocated 490 houses, a 590% growth. But this apparently is deemed acceptable.
100. The total number of houses approved but not built and proposed for Crossways is 1114 houses. Purbeck District Council proposes to add to this with it's 490 house allocation on Redbridge Pit. This would bring the total to 1604 houses for a community of 1143 houses, a 140% increase. Neither Purbeck District Council or West Dorset Council have remarked said that this is excessive
101. There are also sites in the Green Belt for which Purbeck District Council has not made a very logical or strong case as to why they should not be used for housing.
102. SHLAA/0029 in Lytchett Matravers is unsuitable because of its effect on European sites. But this site is across a road from a large housing site to the east and a short distance away are more houses. If there is an impact on the European sites it is already being made by the existing large number of houses. SHLAA/0029 will not make much difference.
103. SHLAA/0022 dismisses the housing needs of the people of Langton Matravers in favour of sports pitches and allotments. The sports pitches could be moved and some houses including much needed affordable houses could be built on at least part of this site
104. SHLAA/0020 indicates that there are already houses on the Wool Road and in fact there are a large number of houses on this road not indicated due the scale of the Site Plan. Whilst building 215 houses might be excessive there is certainly scope to build at least a hundred houses on this site.
105. SHLAA/0005 is a site which has remained vacant and just as with a site which was safeguarded for employment for over 20 years without success in Crossways , this site could be converted to a mixed use site as has happened now happened to the formerly safeguarded employment site in Crossways.
106. Thus, there are many sites in the AONB and Green Belt which could be utilised to provide housing for the 79% of Purbeck residents who live east of the Worgret railway bridge but for whom only 39% of Purbeck's housing sites have been allocated, meanwhile 490 of Purbeck's allocated housing has been donated to West Dorset

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

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

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

Yes

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

I wish to participate in the oral part of the examination to make the case that Purbeck District Council should heed the words of the West Dorset and Weymouth & Portland Local Plan Inspector in his report on their 2015 report concerning allocating housing in the AONB. The Inspector presented a pragmatic approach to meeting the housing and work needs of people in communities surrounded by the AONB. I believe his approach should be adopted by Purbeck District Council in allocating homes for people in communities in the AONB and in the Green Belt. I believe that Purbeck Council has been oversensitive in their rejection of a number of acceptable SHLAA sites.

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## Comment

<b>Consultee</b>	Mr Malcolm Hill (1188470)
<b>Email Address</b>	████████████████████
<b>Company / Organisation</b>	Moreton Parish Council
<b>Address</b>	12 Redbridge Road, Crossways Dorchester DT2 8DY
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Moreton Parish Council (Mr Malcolm Hill - 1188470)
<b>Comment ID</b>	PLPP651
<b>Response Date</b>	03/12/18 11:46
<b>Consultation Point</b>	Policies List ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Letter
<b>Version</b>	0.3
<b>Files</b>	<a href="#">SA-Hill-PLPP651.pdf</a>

**Are you responding on behalf of a group?** Yes

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

**Which policy / paragraph number / policies map does your comment relate to?** Sustainability appraisal and H4

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

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

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

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

See attached

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

See attached

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

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

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

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

See attached



## Comment Receipt

<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Moreton Parish Council (Mr Malcolm Hill - 1188470)
<b>Comment ID</b>	PLPP
<b>Response Date</b>	03/12/18 16:18
<b>Consultation Point</b>	Sustainability Appraisal
<b>Status</b>	Draft
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Are you responding on behalf of a group?</b>	Yes
<b>If yes, how many people do you represent?</b>	Moreton Parish Council- 5 + 124 Moreton household petitioners (81% of Moreton)
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	Sustainability Appraisal Policy H4:Moreton Station/Redbridge Pit
<b>Do you consider that the Local Plan is legally compliant?</b>	Yes
<b>Do you consider that the Local Plan is sound?</b>	No
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	No
<b>Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)</b>	

### **Sustainability Appraisal** (page82/Adobe87)

1. Nowhere in the Captia assessment of Policy H4 does it mention that 1114 houses are approved and planned for Crossways in addition to Purbeck's 490 houses and a 65 bed care home.
2. The total housing is thus 1604 which will have a very significant impact on the facilities and services available in Crossway which the text supporting Policy H4 suggests will also be used by Redbridge Pit residents.
3. In addition, 1000 houses are due to be built on the Silverlake site at 30 per year and they will also impose a load on Crossways services and facilities.

4. The thousands of people in these new houses will all want to access the same facilities and services. There is nothing definite in the Purbeck and West Dorset plans to expand the existing facilities and services.
5. This failure to recognise the major concurrent housing developments in Crossways, 500 houses are due to be built within yards of Redbridge Pit, effectively nullifies the Capita SA for Redbridge Pit.
6. It is the sustainability appraisal for the 1604 houses that is required not just one portion of the approved and proposed developments.

#### **Policy H4 Page 24**

7. The SA states: *Further attention could be given to the potential for flooding.*
8. This seems a strange remark. In 20 years I have never seen this site with any flooding.
9. Flooding is not mentioned in Policy H4 or the supporting text.
10. The ECIS only mentions the word flooding in connection with Lytchett Minster and Wool and only on page 83/Adobe 22 in Chapter 7 in paragraph 7.43.
11. Flooding is not mentioned in chapters 1 to 4 of the ECIS.
12. It is mentioned in Chapter 5 on page 50/Adobe 5 paragraph 5.22 in connection with agriculture

#### **13. Policy H4 page 29**

14. The SA states *This site would benefit from its proximity to services and facilities in Crossways...*(continued after quote).
15. As the West Dorset and Weymouth & Portland Preferred Options states on page LPR 76/Adobe 79 Crossways has:  
*has few facilities and relies on Dorchester for many higher level services and jobs.*
16. The SA statement above continues. *...and to the rail station at Moreton.*
17. The ONS Census 2011 results for Crossways show that only 1.9% of the population go to work by train.
18. The SA statements appear to indicate that Capita is not very aware of the West Dorset and Weymouth & Portland Local Plan Preferred Options Consultation 2018 and the Census 2011 result for Crossways.
19. Capita state that:  
*The site is located entirely within flood zone 1 and therefore a sequentially preferable location for housing development*
20. This statement appears to indicate that the Capita statement on page 24 about flooding is wrong.
21. Capita state that:  
*This allocation has come forward as part of Housing Site "Option A"*

22. This is wrong. Option A was for 440 houses. The current allocation is for 490 houses and a 65 bed care home and, therefore, is Option B+ because it is even greater than Option B. With the size of the care home and the quantity of ground it is likely to require this really Option C – 600 homes.
23. Capita assess policies against objectives in the appendices. The short/medium/long term impact is graded for each objective with a column for mitigation
24. **Policy H4 : Appendix 1** page 24/Adobe page 76
25. 1<sup>st</sup> objective. The answer to the first SA objective should have stopped after the first line as the rest of the wording has little to do with the question. I disagree with comments. The Policy only provides a limited amount of detail about the housing and especially about the care home.
26. 2<sup>nd</sup> objective. The statements in paragraphs 123 and 124 (pages 53 and 54/Adobe pages 55 and 56) clearly indicate that the residents of the Redbridge Pit site will be very dependent on Crossways providing infrastructure, services and facilities. Capita should have mentioned this requirement. This will have significantly higher impact than is indicated.
27. 3<sup>rd</sup> objective. This mentions ... *expected to include new retail provision...* The policy does not mention retail and therefore Capita should not have made the above statement. The statements in paragraphs 123 and 124 indicate that there is no intention of providing retail provision.
28. The PolicyH4 and preceding text do not mention *enhancements to transport*. The Policy H4 in sub-paragraph a. only refers to improving accessibility by *forming or improving defined walking and cycling routes*. Sub-paragraph b. is merely about improvements at the station for travellers.
29. Sub-policy b. refers to the station as a *travel interchange*. There is no bus service at the station. Individuals arrive and depart by their own means, usually by car and to a lesser extent on foot. Extremely few people cycle to and from the station. I have only seen one person arrive by cycle in 20 years.
30. The supporting comments conclude by stating:
- However, the policy will safeguard the sustainable delivery of new homes and provide greater certainty over infrastructure provision that will support and enhance the positive effects of the proposal.*
31. Without any acknowledgement of and co-ordination with the providers of the other 1114 homes to theoretically be built concurrently with the Policy H4 development I disagree with this statement.
32. 4<sup>th</sup> Objective. Policy H4 and its preceding text give no indication that only 1.9% of the Crossways population said they travel to work by train in the 2011 Census. 87% said they travel to work by car. I have provided an analysis of why so few people travel by train to work in a separate comment form.
33. Travel to work in Dorchester, the main destination for work and access to services and facilities, is cheaper by car than by train and the journey time will be between a half and a quarter of the time a corresponding journey by train would take. The same applies to journeys to Weymouth. Unless the destination is very close to the Poole or Bournemouth stations it would still be much much quicker and cheaper to travel by car.
34. The train is very good for journeys to London.

35. The Innovation Park is some way from Wool station and would take far too long to consider travelling by train to the Innovation Park from Moreton.
36. Thus, the supporting comments for the 4<sup>th</sup> objective are totally unrealistic.
37. 5<sup>th</sup> Objective. It is difficult to understand where the Capita authors obtain this opinion. The site is formed of sand. Unless the site is deliberately taken below the water table it has not and is most unlikely to flood.
38. 6<sup>th</sup> Objective. In fact, there are various species on site. For example, deer frequently use the site. Bats are plentiful in the area.
39. 7<sup>th</sup> Objective. It is not obvious how the building of 490 houses on Redbridge Pit would *contribute to ensuring the protection of landscapes and historical assets*. This is not explained.
40. The *Supporting comments* includes the statement: .... *but without the requirement of different expectations by the Council,...* I have no idea what this means. Capita should use plain language.
41. 8<sup>th</sup> Objective. The policy does not contain the word sustainable and does not contain the expression sustainable transport options.
42. The statement in the Supporting Comments that *It may take some time for these to be delivered but when they are, their positive effect would be permanent* is extremely nebulous. What is it that will take some time to be delivered? What will be their positive effect? Why would the positive effect be permanent? All of this is against an objective which states: *Minimise all forms of pollution and consumption of natural resources*.

### Summary

43. I have not had time to go through the SA comments on the other policies
44. The SA is a very weak and a surprisingly anodyne document.
45. It quotes statements as being in Policy H4 which are not in the policy.
46. It makes broad statements with no attempt to explain or justify them
47. It makes claims which are contradicted by the text supporting the policy
48. It fails completely to recognise that up to 1114 houses are likely to be built in Crossways at the same time as the Redbridge Pit site is being developed.
49. Although I have only read and commented upon Capita's assessment of Policy H4: Moreton Station/Redbridge Pit, I would assume that Capita's comments on the other sites and policies will be equally unimpressive.

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

50. I have only read the Capita assessments for Policy H4 Redbridge Pit/Morton Station.

51. The appear to indicate that the Capita SA is a poor document.

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

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

Yes

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

I wish to participate in the oral part of the examination to explain the Sustainability Appraisal appears from its assessment of the largest housing allocation to be a very poor document. Also there are many aspects of Policy H4 which Capita have not assessed.

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## Comment

<b>Consultee</b>	Mr Malcolm Hill (1188470)
<b>Email Address</b>	████████████████████
<b>Company / Organisation</b>	Moreton Parish Council
<b>Address</b>	12 Redbridge Road, Crossways Dorchester DT2 8DY
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Moreton Parish Council (Mr Malcolm Hill - 1188470)
<b>Comment ID</b>	PLPP652
<b>Response Date</b>	03/12/18 11:46
<b>Consultation Point</b>	Policy H4: Moreton Station / Redbridge Pit ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Letter
<b>Version</b>	0.4
<b>Files</b>	<a href="#">H4-Hill-PLPP652.pdf</a>
<b>Are you responding on behalf of a group?</b>	Yes
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	H4
<b>Do you consider that the Local Plan is legally compliant?</b>	Yes
<b>Do you consider that the Local Plan is sound?</b>	No
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	No

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

See attached

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

See attached

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

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

See attached



## Comment Receipt

<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Moreton Parish Council (Mr Malcolm Hill - 1188470)
<b>Comment ID</b>	PLPP
<b>Response Date</b>	03/12/18
<b>Consultation Point</b>	Policy H4:Moreton Station/Redbridge Pit
<b>Status</b>	Final
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Are you responding on behalf of a group?</b>	Yes
<b>If yes, how many people do you represent?</b>	Moreton Parish Council- 5 + 124 Moreton household petitioners (81% of Moreton households)
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	Policy H4:Moreton Station/Redbridge Pit
<b>Do you consider that the Local Plan is legally compliant?</b>	Yes
<b>Do you consider that the Local Plan is sound?</b>	No
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	No
<b>Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)</b>	

### Services and Facilities

1. The Purbeck Local Plan Pre-Submission Draft (2018 to 2034) states on page 53/Adobe 55 in paragraph 123 that:

*Occupants of new homes at Moreton Station /Redbridge Pit are likely to make use of existing infrastructure, services and facilities in Crossways as well as that in Purbeck.*

2. The Pre-Submission also states on page 54/Adobe 56 in paragraph 124 that:

*Many of the needs of the proposed Moreton Station / Redbridge Pit residents will be met by services and facilities in Crossways and elsewhere.*

3. Purbeck council makes no mention in Policy H4 on page 55/Adobe 57 or in the preceding Moreton Station/Redbridge Pit paragraphs of providing any services or facilities for the people who will live in the proposed 490 homes and 65 bed care home.
4. Purbeck Council are totally depending on Crossways to supply all the services and facilities needed by the residents of their 490 house and 65 bed care home allocation.

**Statements made by West Dorset Council on the services and facilities Crossways**

5. Background Paper 2012. The West Dorset District Council and Weymouth and Portland Borough Council Eastern Area (Dorchester, Crossways & Surrounds) background paper, dated June 2012, states on page 13 in the top box marked *Initial SEA appraisal for allocations in Crossways* that:

*...essential services in this area are barely adequate to support the new residents....*

6. This was in connection with a proposal to locate about 1400 houses in Crossways. The current Purbeck and West Dorset proposals would locate 1604 houses in Crossways. So if the services were barely adequate in 2012 they are very inadequate for an additional 1604 houses in Crossways.
7. Preferred Options Chapter 3 - Sustainability - The Preferred Options Sustainability chapter, Chapter 3, states on page LPR 76 that Crossways:

*....has few facilities and relies on Dorchester for many higher level services and jobs.*

8. Local Plan Inspector – travel by train. The Inspector for the adopted Local Plan (Inspector's Report to West Dorset, Weymouth and Portland dated 14 August 2015, on the conclusion of his inspection of their extant Local Plan) stated on page 31 in paragraph 154 that:

*The presence of the railway station means the village is theoretically a sustainable location even though parts of the settlement are beyond a reasonable walking distance. While it is possible for residents to use public transport I was presented with evidence to suggest the limited service means most people are likely to use their cars.*

9. There have been no enhancements to transport links. DCC have withdrawn their subsidy for the bus service. The bus company is now operating a more limited service with buses traveling from Dorchester to Crossways then to Weymouth and return on the same route. The service is currently operating on a trial basis.
10. The 2011 Census indicates that 87% of Crossways people travel to work by car, the highest for any of the strategic locations in West Dorset according to the Census results. Only 1.9% use the train to travel to work which is less in relative and absolute terms than Dorchester's 2%.
11. Facilities in Crossways. According to West Dorset Council's Rural Functionality Study (covered in a separate comment form) produced in the about 2007, Crossways gained a primary school in about 2005, and a cash point. The village lost its petrol station at about the same time and a few years later the petrol station in Moreton closed. The village has a post office in a shop. The post office operates all day on Mondays and just mornings for the rest of the week.

12. The only changes since 2007 are that the library is now operated by volunteers and with the shutting of the GP practice in Broadmayne village there are now considerably more people attending the Crossways GP surgery
13. The village has a Co-op top up shop on the B3390 road which has 8 designated parking places including 2 for the disabled. There is space for 8 cars to park literally on the edge of the road opposite the shop and this is causing the edge of the road to break up. At least 1/3 of the shoppers using the Co-op by car do not live in Crossways. This is obvious from the fact that on departing from the Co-op travelling north, the cars do not enter Crossways.
14. It is not unusual for large lorries, including articulated lorries to park close to the Co-op, thereby restricting the road to a single carriageway. People entering/reversing from the Co-op car park compound the congestion. None of this was mentioned in the DCC Traffic Impact Assessment 2016 and hence the Assessment provides an understatement of the projected congestion on the B3390.
15. The ECIS states in Chapter 7 on page 88/Adobe 28 of separate ECIS Chapter 7 that:

*\*Whilst Crossways is in West Dorset, Weymouth and Portland Borough and is not defined as a 'key service village' in its Local Plan, the level of retail services provided in Crossways is considered to represent a scale equivalent to a key service village.*

16. As the above quotes show Crossways barely copes with itself let alone acting as a Key Service Village such as Bere Regis, Corfe Castle, Lytchett Matravers, Sandford and Wool.
17. It is the quote from the West Dorset and Weymouth & Portland Local Plan Preferred Options Consultation 2018 which is the most accurate description of Crossways:

*.....has few facilities and relies on Dorchester for many higher level services and jobs.*

#### **Future Housing and facilities**

18. 1604 house are planned or proposed for Crossways by Purbeck (490 houses and a 65 bed care home) and West Dorset and Weymouth & Portland (689 houses approved and 425 proposed).
19. As discussed above there are no proposal by Purbeck to provide and services and facilities
20. The most positive statement in the West Dorset and Weymouth & Portland Preferred Options Crossways concerning facilities is that on page LPR 246, paragraph 13.4.2:
 

*Proposals for enhanced retail provision in Crossways to serve the village would generally be supported to allow the settlement to become more self-sufficient. However, any proposal would need to be sequentially tested and assessed in relation to the scale of the existing settlement, taking into account proposals for housing growth in the wider Crossways area*
21. In summary, Purbeck and West Dorset and Weymouth & Portland propose the building of 1604 houses and a 65 bed care home on the borders of Crossways which will increase the population by 3273 (@2 per houses-2011 census ratio) and 2266 more cars (@1.4 cars per house – census ratio -plus 20 for the care home) directly adjacent to the current village.
22. DCC have projected that this will cause the traffic along the Warmwell Road (B3390) in the AM peak at a neutral time of year (Spring) to rise 81.7% above today's level.

23. There are no plans in either the Purbeck Pre-Submission or the West Dorset and Weymouth & Portland Preferred Options to improve services.

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

24. The best solution to the approved and planned gross over development of Crossways is for Purbeck District Council to delete its Redbridge Pit allocation.
25. The lack of facilities and reliance on Dorchester emphasise that Crossways is a dormitory of Dorchester and hence that a Purbeck allocation would effectively donate 196 affordable homes and 294 market homes to Dorchester.
26. I propose that the Redbridge Pit 490 houses are allocated to a site or sites east of the Worgret railway bridge with some or all being allocated to Purbeck's largest community in Swanage which only has an allocation of 60 affordable homes (at 40%) as part of its Local Plan allocation of 150 houses. This is far too small an allocation of affordable homes for a community of at least 5759 houses.
27. I have discussed the availability of sites in my comment form dealing with the SHLAA.

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

Yes

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

I wish to participate in the oral part of the examination to explain why the Pre-Submission's largest allocation should not be put on Redbridge Pit because the facilities and services are totally inadequate for such a large allocation, especially as West Dorset and Weymouth & Portland have approved the building of 689 houses in Crossways and have proposed a further 425 houses for Crossways in their Preferred Options bringing their Crossways total to 1114 houses.

The combined total of houses from the Preferred Options and the Pre-Submission is 1604 houses a village which only has 1143 houses, a 140% increase in the size of Crossways.

I wish to raise the fact that the services and facilities in Crossways are totally inadequate for 1604 additional houses and a 65 bed care home and propose that Purbeck delete its 490 allocation to Redbridge Pit/Moreton Station.

## Comment

<b>Consultee</b>	Mr Malcolm Hill (1188470)
<b>Email Address</b>	████████████████████
<b>Company / Organisation</b>	Moreton Parish Council
<b>Address</b>	12 Redbridge Road, Crossways Dorchester DT2 8DY
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Moreton Parish Council (Mr Malcolm Hill - 1188470)
<b>Comment ID</b>	PLPP653
<b>Response Date</b>	03/12/18 11:46
<b>Consultation Point</b>	Policy EE1: Employment land supply ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Letter
<b>Version</b>	0.4
<b>Files</b>	<a href="#">EE1-Hill-PLPP653.pdf</a>

**Are you responding on behalf of a group?** Yes

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

**Which policy / paragraph number / policies map does your comment relate to?** EE1 H4

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

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

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

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

See attached

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

See attached

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See attached



## Comment Receipt

<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Moreton Parish Council (Mr Malcolm Hill - 1188470)
<b>Comment ID</b>	PLPP
<b>Response Date</b>	03/12/18 16:18
<b>Consultation Point</b>	Policy EE1 Employment land supply
<b>Status</b>	Draft
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Are you responding on behalf of a group?</b>	Yes
<b>If yes, how many people do you represent?</b>	Moreton Parish Council- 5 + 124 Moreton household petitioners (81% of Moreton)
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	Policy EE1: Employment; Policy H4:Moreton Station/Redbridge Pit
<b>Do you consider that the Local Plan is legally compliant?</b>	Yes
<b>Do you consider that the Local Plan is sound?</b>	No
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	No
<b>Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)</b>	

### Policy EE1: Employment land supply (page82/Adobe87)

1. This policy states:

*To enable the growth of high quality employment opportunities and a prosperous local economy, provision is made for 47.0 hectares of available employment land at a range and choice of employment sites, particularly in the District's towns and villages and including the development of strategic employment sites of 45.7 hectares at Holton Heath and Dorset Innovation Park.*

2. Of the total site area shown in the table only 40% is available and only on 2 sites. The Dorset Innovation Park constitutes 34% of the 40% of available land and hence it skews the Total Site Extent figure.
3. An Innovation Park is a very specialised centre requiring unique skills and above all educational attainment on the part of its workers. Thus, it represents a very specialised employment site not suitable for the majority of Purbeck's workers. ONS Census 2011 results for educational qualifications for almost all Purbeck's communities indicates that only about a third of the people who responded had high qualifications such as a degree.
4. The Innovation Park and automation are discussed in more detail in the response form on the economy and vision.
5. I have sent e-mails requesting information on the projected employment growth at the Innovation Park to Purbeck District Council and to Dorset County Council and have spoken to a senior manager at the Innovation Park, but have failed to obtain any details about projected employment growth at the Innovation Park.
6. The only information available appears to be from Ms Anne Grey of the Dorset County Council Research Team who stated in the last paragraph of her 6 October 2017 report titled DORSET ECONOMIC PROJECTIONS 2017: BACKGROUND – PURBECK, that:

*Dorset Innovation Park*

*Jobs growth is still anticipated at the Dorset Innovation Park Enterprise Zone, but this is now projected to take place over a longer time period than previously envisaged. The Enterprise Zone will take some time to achieve momentum and has an end date of 2042, thus extending significantly beyond the period considered by the 2017 economic projections (which cover the period up to 2033).*

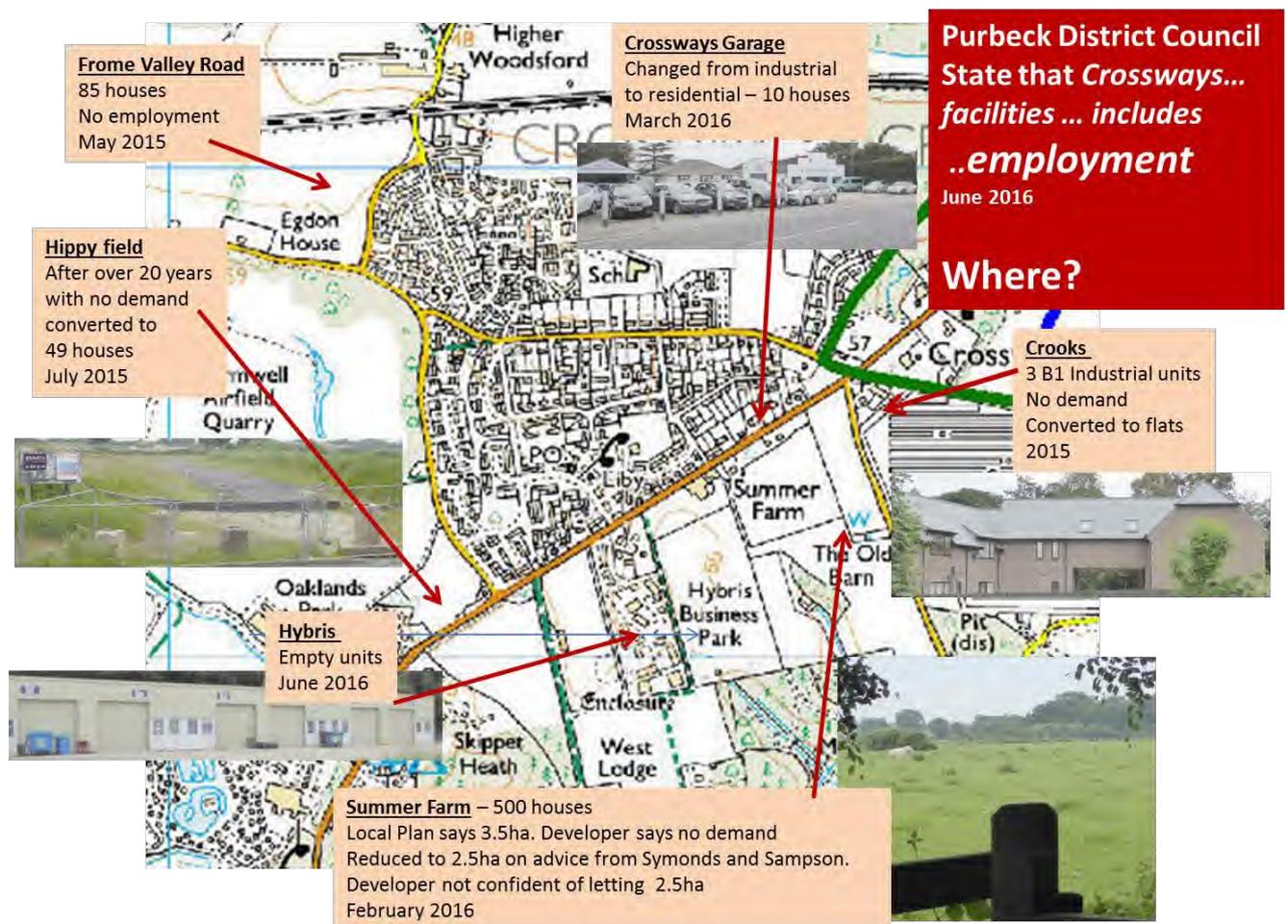
7. Thus, for the time period of the Local Plan Pre-Submission draft of 2018 to 2034, the Innovation Park cannot be depended upon to provide a large number of jobs.
8. The significant and long-time employer on the site, predating the site's creation as an Innovation Park by a number of years is Atlas Electronik which has recently recruited new staff, though this increase may well be a one-off event for the new Atlas facility.
9. In 2018 the government donated money to Enterprise Zones in the Poole/Bournemouth conurbation but failed to give any money to satisfy an application from the Winfrith Enterprise Zone.
10. Of the 12 sites in Policy EE1, 10 are east of the Worgret railway bridge where 79% of Purbeck's population lives but only 39% of the allocated housing is located
11. The new economically active residents of the houses on the proposed Redbridge Pit site will have the choice of travelling approximately 5-6 miles to Dorchester for work or 10 to 12 miles to sites east of Wareham, about 20 miles to Swanage or about the same distance to Poole and about 25 miles to Bournemouth (measured to the railway station in each case with [www.freemaptools.com](http://www.freemaptools.com))
12. The West Dorset and Weymouth & Portland Joint Local Plan Preferred Options (August 2018) states on page 221/Adobe 224 in paragraph 11.1.2 that:

*11.1.2 The town currently also has around twice as many jobs (15,100) as it has economically active residents (9,195). Workers commute in from nearby towns (particularly Weymouth) and from the surrounding rural area reflecting its historic position as the county town.*

13. With good employment opportunities in Dorchester it is most likely, in line with the current Crossways population, that they will drive to Dorchester for work. Then ONS Census 2011 results show that about 87% of Crossways economically active residents travel to work by car and only 1.9% travel by train.
14. This further emphasises that the 490 houses allocated to Redbridge Pit in the Dorchester dormitory of Crossways (Inspector's Report to West Dorset, Weymouth and Portland dated 14 August 2015, page 31 paragraph 153, on the conclusion of his inspection of their extant Local Plan) will serve Dorchester in West Dorset.

## Employment in Crossways

15. Apart from work in the Frampton Arms in Moreton Station settlement, the only local work available is in Crossways. The ONS Census 2011 results indicate that only about 1% of Crossways economically active population work in quarries.
16. The diagram below shows how employment opportunities in Crossways are declining.



17. Proceeding clockwise around the diagram from the word *Where?* In the red block:

- a. Crooks has been given permission by West Dorset District Council to convert purpose-built offices into flats due to lack of demand for the offices.

b. The Summer Farm developers have been given permission by West Dorset District Council to reduce the employment land on their development from 3.5ha to 2.5ha because a report from a Dorchester estate agent has said that there was very little demand for employment land in Crossways. The developers have said unofficially that they are not very confident that the 2.5ha will be occupied by industrial units due to the lack of demand.

c. The Hybris Industrial Estate currently has a number of empty units which is nothing new as the site occupancy has always meant that a number of units are empty.

d. The West Dorset Planning Committee gave permission in July 2015 for the industrial estate on the corner of the Dorchester Link Road and the Warmwell Road to be converted to a mixed use site. The site had been designated in successive Local Plans as an industrial site without any firm occupancy proposals. Forty-nine houses are to be built on the site. Whether any industrial units will be built remains to be seen.

e. The 85 house Frome Valley Road development will not have any employment land.

f. The Crossway Garage site owner was given permission by West Dorset Planning Committee to change the use of the site from industrial to residential and build 10 houses.

18. Thus, far from there being any growth in employment in Crossways, there has been a very significant decline in employment sites in Crossway.

19. This decline confirms the West Dorset Local Plan Inspector's comment on page 31 of his final report, in paragraph 153 that :

*Crossways lies close to the District's eastern boundary with Purbeck District and functions as a dormitory settlement for Dorchester.....*

20. As a dormitory Crossways cannot be considered a sustainable community.

### **Summary**

21. Policy EE1 provides no employment land in Moreton for the economically active residents of the proposed 490 house allocation on Redbridge Pit

22. There may be some employment at the Innovation Park though by its nature as an Innovation centre this may be quite specialised and require good academic qualifications and skills. Employment growth on the Park is not projected to start increasing significantly until after the end of the Plan Period in 2034.

23. There may be limited employment opportunities at sites beyond the Worgret railway bridge about 10 to 12 miles away, in Swanage about 20 miles away or in the Poole/Bournemouth conurbation about 20 to 25 miles away.

24. Alternatively, the new residents could do as the majority of the current Crossways economically active residents do and drive 5-6 miles into Dorchester where there are good employment opportunities.

25. The attractive option of driving the relatively short distance to a reasonable job in Dorchester emphasises that the 490 houses (196 affordable and 294 market) will serve Dorchester and not Purbeck.

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

26. Policy EE1 does not allocate any employment land to Redbridge Pit/Moreton Station.
27. The closest Purbeck employment site is the Innovation Park at Winfrith but employment growth is expected to be slow during the period of the plan.
28. Thus, those wanting employment on the Redbridge Pit site will most likely travel by car to Dorchester.
29. This emphasise that the 490 houses allocated to Redbridge Pit in effect represent 490 houses donated to Dorchester in West Dorset.
30. I therefore propose that the Redbridge Pit/Moreton Station allocation be deleted.
31. I propose that the Redbridge Pit 490 houses are allocated to a site or sites east of the Worgret railway bridge with some or all being allocated to Purbeck's largest community in Swanage which only has an allocation of 60 affordable homes (at 40%) as part of its Local Plan allocation of 150 houses. This is far too small an allocation of affordable homes for a community of at least 5759 houses.
32. I have discussed the availability of sites in my response form dealing with the SHLAA.

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

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

Yes

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

I wish to participate in the oral part of the examination to explain why the Pre-Submission's largest allocation should not be put on Redbridge Pit because there is extremely little employment in Moreton Station settlement and Crossways and that the majority of workers are most likely to find work in Dorchester. This emphasises that Purbeck is donating 196 affordable and 294 market houses to Dorchester and doing very little for the 79% of Purbeck residents who live east of the Worgret railway bridge, 10 miles away to the east.

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## Comment

<b>Consultee</b>	Mr Malcolm Hill (1188470)
<b>Email Address</b>	<span style="background-color: black; color: black;">[REDACTED]</span>
<b>Company / Organisation</b>	Moreton Parish Council
<b>Address</b>	12 Redbridge Road, Crossways Dorchester DT2 8DY
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Moreton Parish Council (Mr Malcolm Hill - 1188470)
<b>Comment ID</b>	PLPP654
<b>Response Date</b>	03/12/18 11:46
<b>Consultation Point</b>	Vision ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Letter
<b>Version</b>	0.4
<b>Files</b>	<a href="#">vision-Hill-PLPP654.pdf</a>

**Are you responding on behalf of a group?** Yes

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

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

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

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

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

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

See attached

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

See attached

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

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

See attached



## Comment Receipt

<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Moreton Parish Council (Mr Malcolm Hill - 1188470)
<b>Comment ID</b>	PLPP
<b>Response Date</b>	03/12/18 16:18
<b>Consultation Point</b>	Vision
<b>Status</b>	Final
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Are you responding on behalf of a group?</b>	Yes
<b>If yes, how many people do you represent?</b>	Moreton Parish Council- 5 + 124 Moreton household petitioners (81% of Moreton)
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	Vision – across the spectrum of subject in the Local Plan including rural shops, employment, public transport, sustainability, economy
<b>Do you consider that the Local Plan is legally compliant?</b>	Yes
<b>Do you consider that the Local Plan is sound?</b>	No
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	No
<b>Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)</b>	

### Introduction

1. In about 2008 (document not dated) West Dorset Council published the Rural Functionality Study that appeared to overturn a number of planning assumptions and myths. A number of the points raised are very pertinent to the Purbeck Local Plan Pre-Submission draft.
2. For example the Study quotes a 2005 statement from the Countryside Agency that “ *Long standing assumptions that adding development to larger villages will make them more sustainable appear to be misconceived.*”
3. The report found that when relocating to a village, moving to be nearer to shops and facilities is not an important factor. The study found that the private car was the dominant mode of transport for all journeys. And ...even where there was a bus service available it was rarely utilized by residents.

## West Dorset District Council - Rural Functionality Study

4. West Dorset District Council in about 2008 produced an excellent report on a detailed study that they undertook to look at a range of issues in a number of West Dorset villages.
5. Crossways was one of the villages studied.
6. The study relied on responses by villagers to a questionnaire and used the data to make some broad conclusion statements which were accompanied by detailed analysis.
7. I have only presented the conclusions below, but because they were well written they provide a very good overall appreciation why people live in villages and development in villages.

### Study conclusions

8. Page 88 presents a comparison with other studies and states in the last paragraph that:

The conclusions of a research note published by the Countryside Agency (Roger Tym&Partners (2005) *South West Regional Authority: Functional Analysis of Settlements*) also reflect the findings for the Rural Functionality Study. After considering a range of studies into rural areas and villages, they concluded that;

***“Long-standing assumptions that adding development to larger villages will make them more sustainable appear to be misconceived.”***

9. Development in villages – page 84.

*Supporting development in villages with facilities is more sustainable.*

10. The sustainability of Crossways is an integral part of the Redbridge Pit/Moreton Station proposed development as stated in Policy H4 (page 55/Adobe 57) and the supporting text on pages 53 and 54 /Adobe 55 and 56). I have quoted the following statements about Crossways in my comment form on Key Service Village:

***....essential services in this area are barely adequate to support the new residents....***

West Dorset District Council and Weymouth and Portland Borough Council( *Eastern Area Dorchester, Crossways & Surrounds*) background paper, dated June 2012, page 13 in the top box marked *Initial SEA appraisal* for allocations in Crossways.

And that Crossways:

***....has few facilities and relies on Dorchester for many higher level services and jobs.***

The Preferred Options Sustainability chapter 3, page LPR 76.

11. No facilities are proposed for Crossways as part of the proposed 1604 housing developments increasing the size of Crossways by 140%. The proposed health centre on the Summer Farm CRS2 site had been withdrawn and there are now significant doubts about the proposed new village hall.

12. Thus, Crossways does not fit the Rural Functionality Study quote above as it is not a village with facilities upon which development can build.
13. But as the following sections of the study indicate people move or do not move to a village because in the view of planners it is more sustainable. Sustainability of a village is a planners concern, but is not of concern to people choosing to live in a village.
14. Development in villages (page 84)  
*But development in villages does not necessarily mean facilities will be retained*
15. Crossways has experienced this statement. The petrol station has closed and 10 houses are being built on the former employment site.
16. The post office now only operates all day on a Monday, and only half a day on the rest of the days of the week.
17. The DCC subsidy for the bus service has been withdrawn and a trial reduced service is currently in operation.
18. DCC wanted to close the library and it is now kept in operation by volunteers.
19. The health centre in the village of Broadmayne closed and a number of people from that village have transferred to the Crossways health centre causing overload in the number of its patients.
20. A replacement health centre which was to have been built as part of CRS2, Summer Farm, has been cancelled.
21. There is now serious doubt as to whether CRS2 will incorporated a replacement village hall.
22. Thus, concurrent with proposals to expand Crossways by 140%, it has lost key facilities, as predicted in the Rural Functionality Study.
23. Development in villages (page 84)  
*A key reason for moving to West Dorset is its environmental quality*
24. Crossways is certainly a recipient of this statement though not in a favorable sense.
25. The Rural Functionality Study states on page 84, bottom paragraph that:

*...the influx of people from outside the district continues to contribute to the affordability problem.*

26. This is certainly the case for Purbeck with house prices in excess of £1m pounds in Studland according to the Viability report quoted in another comment form. The maximum affordability percentage has had to be applied to the number of houses per year for which the council must plan as a result of the unaffordability of house prices in Purbeck.

27. Relocating to a village (page 85)

*When relocating to a village, moving to be nearer to shops and facilities is not an important factor*

28. This section states;

*The least popular reasons for moving to the villages were to be near schools and facilities*

29. This is contrary to the statements made for the 490 home allocation to Redbridge Pit/Moreton Station and for the allocations to Crossways.

30. Thus the fact that Crossways has 2 shops, a first school and an overburdened health centre and little else should not be a reason for allocating 490 houses to Redbridge Pit/Moreton Station since these services and facilities are not the reason people move to villages.

31. Relocating to a village (page 85)

*There is a high reliance on the private car for journeys*

32. This section states:

*The private car was the dominant mode of transport for all journeys. For activities that take place outside the village this may be unavoidable, but even where there was a bus service available it was rarely utilized by the residents*

33. This applies to Crossways. DCC statistics showed that only about 2% of the population used the bus and as a consequent DCC has withdrawn their subsidy for the Dorchester – Crossways bus service (the only bus service in Crossways).

34. Again, the presence of a service is not a reason for moving to a village.

35. This also applies to the train service. Only 1.9% of Crossways population in the 2011 Census travelled to work by train, and 86% travelled by car.

36. Relocating to a village (page 85)

*People are willing to travel further to meet their individual needs for non-food shopping and recreation*

37. This fits with the rural – urban lifestyle that many people seek in Dorset. They want to live in the countryside but use urban areas eg Swanage, Wareham, Poole and Bournemouth.

38. Rural business sites (page 87)

*Rural business sites do not support the local area as much as they could*

## 39. The study quotes on page 77, second paragraph, the fact that at the large Piddlehinton Enterprise Park:

*The businesses do not employ any persons living within 5km of the site. Villages located within this distance include Piddlehinton, Piddletrenthide, Charlton Down, Puddletown, and Cheselbourne. Most people travel over 21km to work, from locations such as Weymouth and Bridport. All the employees listed travel to the site by car, all driving apart from one.*

## 40. Thus ,simply locating employment activities in the Innovation Park does not mean that local people will work in the Innovation Park. The Rural Functionality Study clearly shows that locating employment in the Innovation Park is very likely to mean that workers will travel from outside the Wool and Moreton area to work in the Innovation Park, whilst Redbridge Pit people will travel in the opposite direction to Dorchester, to work.

41. Crossways – a Dorchester dormitory (page 87)

## 42. This section states that:

*The villages of Puddletown, Charlton Down and Crossways are dormitory villages to Dorchester. Dorchester meets the employment and shopping needs of the majority of the residents of these villages. This is reinforced by the Functional Analysis of Settlements, which found that Dorchester was a significant in-commuting settlement. It was also noted that Dorchester draws employees evenly from a surrounding area of 15 miles..*

## 43. This illustrates, as stated in other comment forms that locating Purbeck houses effectively in Crossways means that the residents are most likely to work and access facilities and services in Dorchester.

### Conclusion

## 44. The section above on Rural Business Sites clearly shows that even if employment sites are allocated in Crossways it is highly likely that the employees on the sites will not be from within Crossways but will travel to work in Crossways, in many cases commuting long distances by car.

## 45. People in Crossways, as befits a dormitory of Dorchester, are most likely to travel by car to Dorchester to work.

## 46. Thus, it will never be possible to create a balance of homes, jobs and community facilities in a village because the likelihood is that people will commute out of the village for work.

## 47. A balance of homes, jobs and work can only be achieved in a large town or city.

48. Acceptance of the findings of the Rural Functionality Study should allow planners to plan for housing development in villages without services and facilities because their presence or otherwise are not why people move to villages.
49. Thus, Local Plan allocations could be spread around Purbeck and not concentrated in villages with declining or inadequate services and facilities such as is the case with the allocation to Redbridge Pit/Moreton Station and its proximity to Crossways.

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

50. As indicated in the comments about Crossways being a dormitory of Dorchester, the 490 houses allocated to Redbridge Pit in effect represent 490 houses donated to Dorchester in West Dorset.
51. I therefore propose that the Redbridge Pit/Moreton Station allocation be deleted.
52. I propose that the Redbridge Pit 490 houses are allocated to a site or sites east of the Worgret railway bridge with some or all being allocated to Purbeck's largest community in Swanage which only has an allocation of 60 affordable homes (at 40%) as part of its Local Plan allocation of 150 houses. This is far too small an allocation of affordable homes for a community of at least 5759 houses.
53. When considering planning applications for the small sites in Policy H2 the requirement for the relevant villages to have services and facilities need not be a factor in deciding whether the proposed site is acceptable.
54. It is not necessary for the sites selected in the east in of the district in villages to have shops and facilities since their presence are not the reason why people move to villages.
55. Adding a synopsis of the main findings to the Local Plan would introduce the views of those who live in Purbeck and not just the government's and Purbeck Council's views.
56. I have discussed the availability of sites in my response form dealing with the SHLAA.

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

Yes

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

I wish to participate in the oral part of the examination to explain that a number of planning assumptions, highlighted in the Rural Functionality study have little merit and are not borne out by the study.

I would also like to raise the fact that The Rural Functionality Study illustrates that allocating houses to Redbridge Pit means that they will serve Dorchester's housing need and not Purbeck's housing need. This emphasises that Purbeck is donating 196 affordable and 294 market houses to Dorchester and doing very little for the 79% of Purbeck residents who live east of the Worgret railway bridge, 10 miles away to the east.

I would also like to highlight that planning assumptions that villages should have facilities and service and public transport to warrant development approval is not supported by the study.

## Comment

<b>Consultee</b>	Mr Malcolm Hill (1188470)
<b>Email Address</b>	████████████████████
<b>Company / Organisation</b>	Moreton Parish Council
<b>Address</b>	12 Redbridge Road, Crossways Dorchester DT2 8DY
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Moreton Parish Council (Mr Malcolm Hill - 1188470)
<b>Comment ID</b>	PLPP655
<b>Response Date</b>	03/12/18 11:46
<b>Consultation Point</b>	Policy V1: Spatial strategy for sustainable communities ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Letter
<b>Version</b>	0.3
<b>Files</b>	<a href="#">V1-Hill-PLPP655.pdf</a>
<b>Are you responding on behalf of a group?</b>	Yes
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	V1 and H2
<b>Do you consider that the Local Plan is legally compliant?</b>	Yes
<b>Do you consider that the Local Plan is sound?</b>	No
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	No

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

See attached

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

See attached

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

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

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

See attached



## Comment Receipt

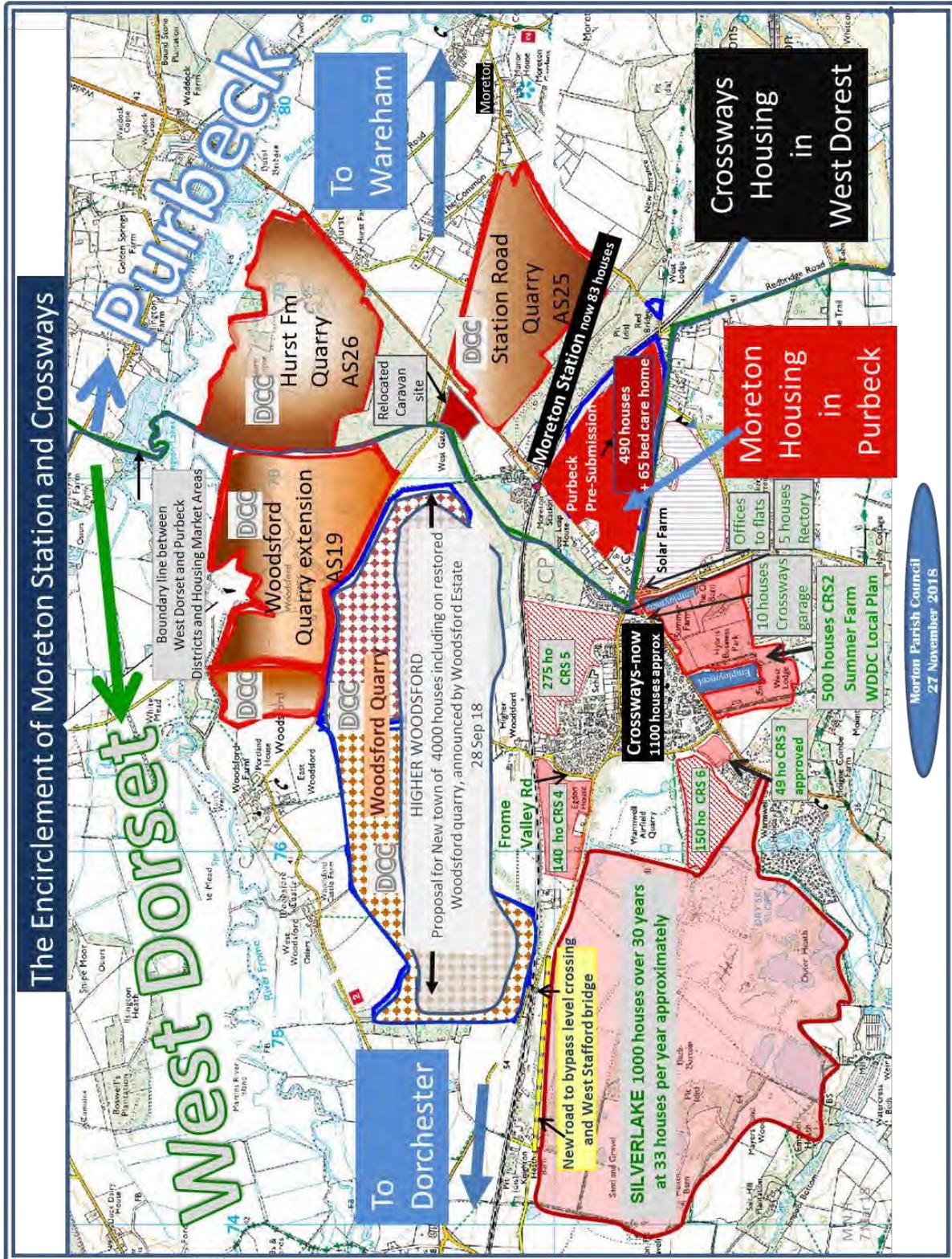
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Moreton Parish Council (Mr Malcolm Hill - 1188470)
<b>Comment ID</b>	PLPP
<b>Response Date</b>	03/12/18 16:18
<b>Consultation Point</b>	Spatial Strategy
<b>Status</b>	Final
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Are you responding on behalf of a group?</b>	Yes
<b>If yes, how many people do you represent?</b>	Moreton Parish Council- 5 + 124 Moreton household petitioners(81% of Moreton households)
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	Policy VI: Spatial Strategy Policy H2: The housing land supply
<b>Do you consider that the Local Plan is legally compliant?</b>	Yes
<b>Do you consider that the Local Plan is sound?</b>	No
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	No
<b>Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)</b>	

### Introduction

1. The Policy puts the largest allocation on Moreton/Redbridge Pit, 490 homes together with a 65 bed care home. Redbridge Pit is at the very extreme western edge of Purbeck District and effectively is in the West Dorset village of Crossways. This is confirmed by the fact that on page 53/Adobe 55 in paragraph 123 the Pre-Submission states that: *Occupants of new homes at Moreton Station / Redbridge Pit are likely to make use of existing infrastructure, services and facilities in Crossways...* and houses on Redbridge Pit will be closer to Dorchester, than some houses in Crossways. The Moreton Parish Council Encirclement Map below shows this detail. Crossways is officially a dormitory of Dorchester and hence Policy VI and Policy H2 will provide housing for Dorchester and not Purbeck.
2. Swanage is the largest community in Purbeck but does not have an allocation in Policy V1. It is included in Policy H2: The housing land supply where the Swanage Local Plan allocation of 150 houses, or 3% growth, is included. Swanage is shown in the table below.

**Right Homes in the wrong Place**

- The Plan is not sound because it locates the largest allocation of houses in Redbridge Pit whereas the 79% of Purbeck’s population lives at least 10 miles away. The houses are not being allocated to the communities who need them.
- The chart below shows that the proposed Redbridge Pit housing allocation is closer to the centre of Crossways and Dorchester than some of the houses in Crossways.



- The chart below summarises several of the key factors why the Local Plan is unsound and is explained on subsequent pages



**Key statistics shown on the above chart**

6. The chart shows in column G a list of all the settlements in Purbeck ordered in terms of their number of houses, with the largest at the top and smallest at the bottom.
7. Column K shows how much larger other Purbeck settlements are relevant to Moreton Station settlement in terms of their number of houses.
8. For example Swanage is 69 times larger and is about 20 miles east from Redbridge Pit. Wareham Town is 33 times larger and is about 10 miles to the east. Wool is the nearest large community, is 26 times larger than Moreton Station settlement and is about 5 miles east.
9. The absolute sizes of the settlements in Column G are plotted on the graph on the right of the page. The graph clearly illustrates how much larger the top 7 settlements in Column G are relative to Redbridge Pit and Moreton Station Settlement.
10. Column L lists the number of houses in communities which are east of the Worgret railway bridge on the A352 just west of Wareham. The total is given at the bottom of the column and is 79% of the total number of houses in Purbeck.
11. Column M shows that about 40% of Purbeck's current housing is in the AONB.
12. Column N shows that almost 23% of Purbeck's houses are in the Green Belt
13. It's worth bearing in mind when considering possible future development in the AONB and Green Belt in Purbeck that the Local Plan does not consider that any of the current developments in the AONB and Green Belt have any detrimental effect on the relevant designation.
14. Column O shows the allocated housing in Policy VI together with the housing allocated to Swanage in the Swanage Local Plan.
15. Column P shows the percentage increase which the allocations in column O represent in terms of the relevant communities' current approximate housing total in column J. The highest percentage increase excluding Moreton is 22% in Wool. The average increase for all allocations excluding Moreton/Redbridge Pit is 10%.
16. The 490 houses allocated to Moreton Station Settlement, the largest allocation, represents a 590% increase on the 83 houses in Moreton Station Settlement. Redbridge Pit is not attached to or is part of Moreton Station Settlement. Moreton Station settlement is merely the nearest Purbeck settlement to Redbridge Pit.
17. The table shows in Column Q that the housing allocations to Wool and Wareham represent 61% of the total housing allocations to the named settlements in Policy VI – Spatial Strategy and Policy H2 – The housing land supply.
18. The text box on top of Columns P and Q summarise the Spatial Strategy in Policy VI: 79% of Purbeck's population lives east of the Worgret railway bridge, but 61% of the housing allocations are at least 5 miles west of the bridge in Wool, Bere Regis and Moreton.

19. Moreton Station (83 houses)/Redbridge Pit(0 houses) is about 10 miles east of the bridge and has 28% of the total housing allocations. Wool (2159 houses) has 27% of the total allocations and Bere Regis (841 houses) has 6% of the allocations.
20. The small map under the graph has been copied from the Purbeck January 2018 *New Homes For Purbeck* 16 page consultation document.
21. The map illustrates the Purbeck District Council Policy VI Spatial Strategy for sustainable development. 79% of Purbeck District's population live east of the Worgret railway bridge and 61% of the housing allocations are approximately 5 miles west in Wool (27% of the total allocations) and 10 miles west of the bridge in Redbridge Pit (28% of the total allocations) with 6% of the allocations approximately 7 miles away in the north west of Purbeck in Bere Regis.

### Summary

22. The Pre-Submission has put 61% its housing allocations where only about 21% (100%-79%) of Purbeck district's population live.
23. 79% of Purbeck district's population lives east of the railway bridge at Worgret, just outside Wareham and only 39% (100%-61%) of the housing allocations are east of the Worgret bridge.
24. For the people living east of the Worgret Bridge 61% of the housing allocations will be about 5 miles away in Wool(470 homes), 7 miles away in Bere Regis (105 homes) or 10 miles away in Redbridge Pit (490 homes) which is effectively in Crossways. Crossways is officially a dormitory of Dorchester, (Inspector's Report to West Dorset, Weymouth and Portland dated 14 August 2015, page 31 paragraph 153, on the conclusion of his inspection of their extant Local Plan) and is approximately 5~6 miles east of Dorchester.
25. Policy V1 clearly fails to put the housing allocations, especially the affordable houses, in the locations where people need them most which is east of the Worgret railway bridge.

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

### What is required to make the Purbeck Plan sound

26. What is required to make the Purbeck Plan sound is to delete the allocation to Redbridge Pit and, therefore, to Dorchester, and to relocate the 490 houses and 65 bed care home to the east of the Worgret bridge where at least 79% of Purbeck's population lives.
27. Swanage is the largest community in Purbeck and should receive a large housing allocation to satisfy the needs of the people who live in Swanage. Swanage has approximately 5759 houses, Moreton Station has 83 houses.
28. It should also be borne in mind that approval has been granted for 689 houses in Crossways (not yet built) and 425 houses are proposed for Crossways in the West Dorset and Weymouth

& Portland Joint Local Plan Preferred Options Consultation August 2018 on page LPR 81/Adobe 84. Crossways currently has about 1143 house and hence the 1114 houses (689+425=1114) will approximately be a 97% increase.

29. The combined Purbeck and West Dorset total number of houses approved and planned for Crossways is 1604 which represents a 140% increase in the size of the village of Crossways.
30. The locations to which the 490 houses should allocated to serve the people east of the Worgret railway bridge are discussed in a separate Pre-Submission comment form dealing with the SHLAA.

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

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

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

It is necessary because the Local Plan housing allocation is so dramatically wrong. It is necessary to point out that Purbeck District Council are planning to effectively allocate 196 affordable houses, much needed in east Purbeck, and 294 market houses (total 490 houses) to Dorchester by locating them in the Dorchester dormitory village of Crossways. This will do almost nothing for the 79% of Purbeck's population who live over 10 miles away from Crossways east of the Worgret bridge or over 20 miles away in Purbeck's largest settlement of Swanage which is 69 times larger than Moreton Station settlement (above chart, column J).

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## Comment

<b>Consultee</b>	Mr Malcolm Hill (1188470)
<b>Email Address</b>	████████████████████
<b>Company / Organisation</b>	Moreton Parish Council
<b>Address</b>	12 Redbridge Road, Crossways Dorchester DT2 8DY
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Moreton Parish Council (Mr Malcolm Hill - 1188470)
<b>Comment ID</b>	PLPP656
<b>Response Date</b>	03/12/18 11:46
<b>Consultation Point</b>	Policy I2: Improving accessibility and transport ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Letter
<b>Version</b>	0.3
<b>Files</b>	<a href="#">I2-Hill-PLPP656.pdf</a>
<b>Are you responding on behalf of a group?</b>	Yes
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	I2
<b>Do you consider that the Local Plan is legally compliant?</b>	Yes
<b>Do you consider that the Local Plan is sound?</b>	No
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	No

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

See attached

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

See attached

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

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

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

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

See attached



## Comment Receipt

<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Moreton Parish Council (Mr Malcolm Hill - 1188470)
<b>Comment ID</b>	PLPP
<b>Response Date</b>	03/12/18
<b>Consultation Point</b>	Policy H4:Moreton Station/Redbridge Pit
<b>Status</b>	Final
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Are you responding on behalf of a group?</b>	Yes
<b>If yes, how many people do you represent?</b>	Moreton Parish Council- 5 + 124 Moreton household petitioners(81% of Moreton households)
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	Chapter 6: Infrastructure, Policy I2,
<b>Do you consider that the Local Plan is legally compliant?</b>	Yes
<b>Do you consider that the Local Plan is sound?</b>	No
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	No

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

### **Policy I2: Improving accessibility and transport**

- Policy I2: Improving accessibility and transport (page 99/Adobe 101) states mid-way:
 

*Proposals for development will be required to support the Council's priorities for transport outlined above and will be permitted where they:*

  - are located in the most accessible location*
  - maximise the use of alternative and sustainable forms of travel*

### **Methods of travel to work in Crossways**

- Redbridge Pit is effectively in Crossways since the residents will be closer to the centre of Crossways than some houses in Crossways.

- Hence the ONS Census 2011 results for Crossways provide as good a guide to the prospective Redbridge Pit residents as they do for the residents of current Crossways.
- The ONS Census 2011 results for Crossways travel to work are shown in the table below.

Crossways		
Travel to work		
	Residents	As a % of All categories
All categories	1639	
Work at or mainly at home	75	4.6%
Travel to work	1003	61.2%
Not in employment	561	34.2%
Travel to work by bus	19	1.9%
<b>Travel to work by train</b>	<b>19</b>	<b>1.9%</b>
Travel to work on foot	56	5.6%
Travel to work by car	873	87.0%

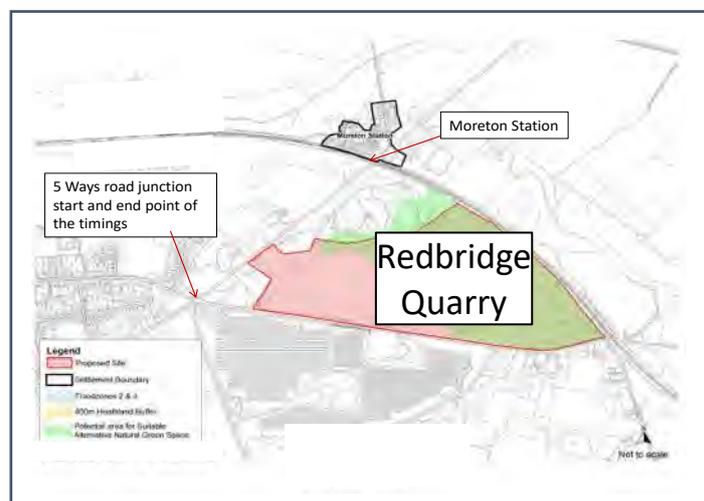
Crossways  
Source: ONS Census 2011

M N Hill

- The table shows that only 1.9% of Crossways' population travel to work by train, whereas 87% travel to work by car. The low percentage of people travelling to work on foot is indicative of the very small amount of employment available in Crossways.

### Reasons for only 1.9% of Crossways population using the train.

- The photographs on the following pages illustrate some of reasons why only 1.9% of Crossways population travel to work by train.
- The photographs show timings from the 5 ways junction on Dick O Th' Banks road to Dorchester, the main location for Crossways residents for work, shopping and access to almost all facilities. Crossways is officially a dormitory of Dorchester (Inspector's Report to West Dorset, Weymouth and Portland dated 14 August 2015, page 31 paragraph 153, on the conclusion of his inspection of their extant Local Plan).
- As the map below shows the 5 ways road junction was chosen as being reasonably representative of foot journeys from the proposed Redbridge Pit houses to the railway station. The distance is 0.48 miles.

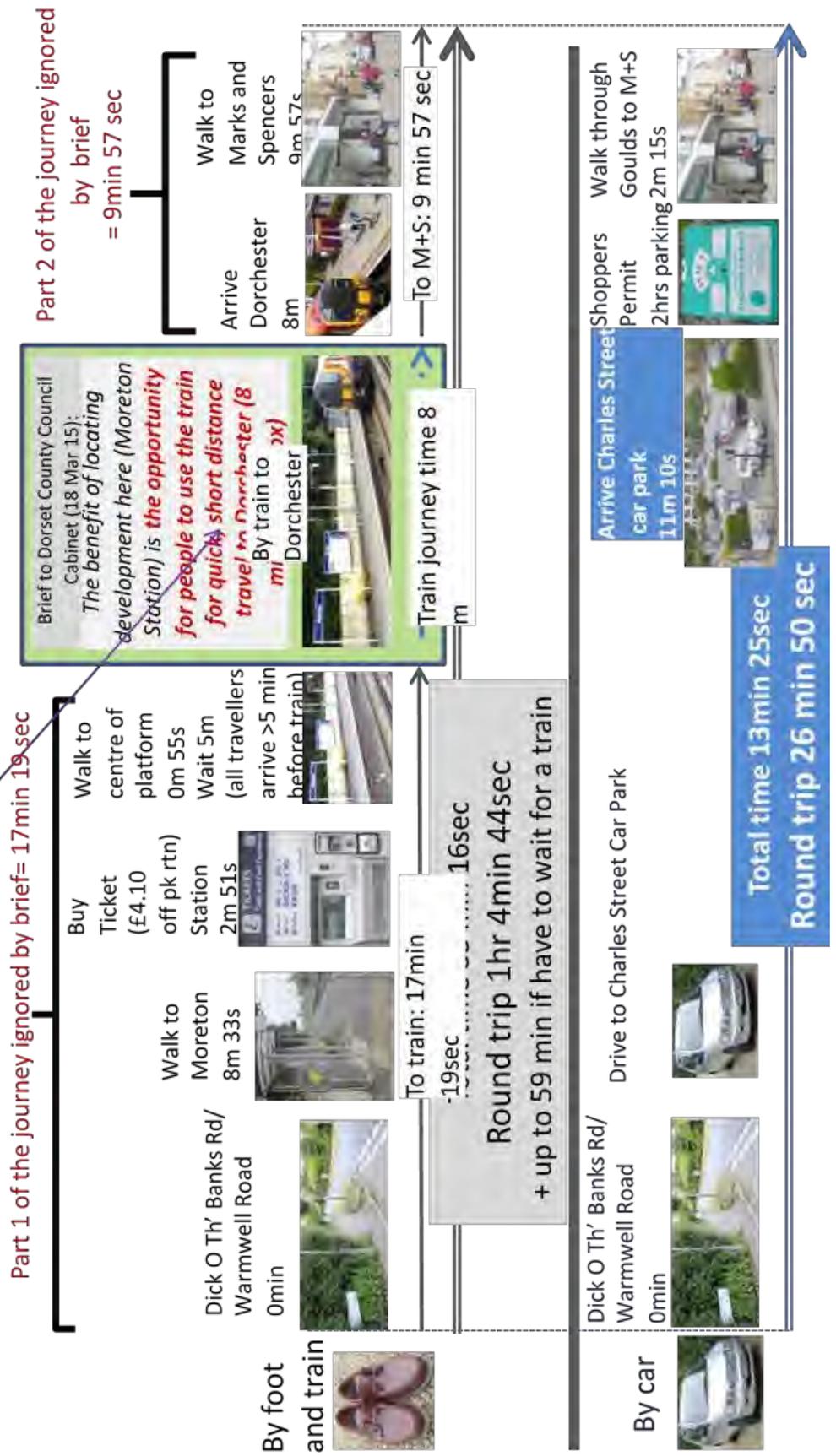


Dick O Th' Banks/Warmwell Road to Marks and Spencers

**By train**  
 To M+S: 35 min 16 sec  
 Fm M+S: 29 min 28 sec  
**Total: 1hr 5 min**

**By car**  
 To M+S: 13 min 25 sec  
 Fm M+S: 13 min 25 sec  
**Total: 27 min**

Brief says it takes 8 mins by train

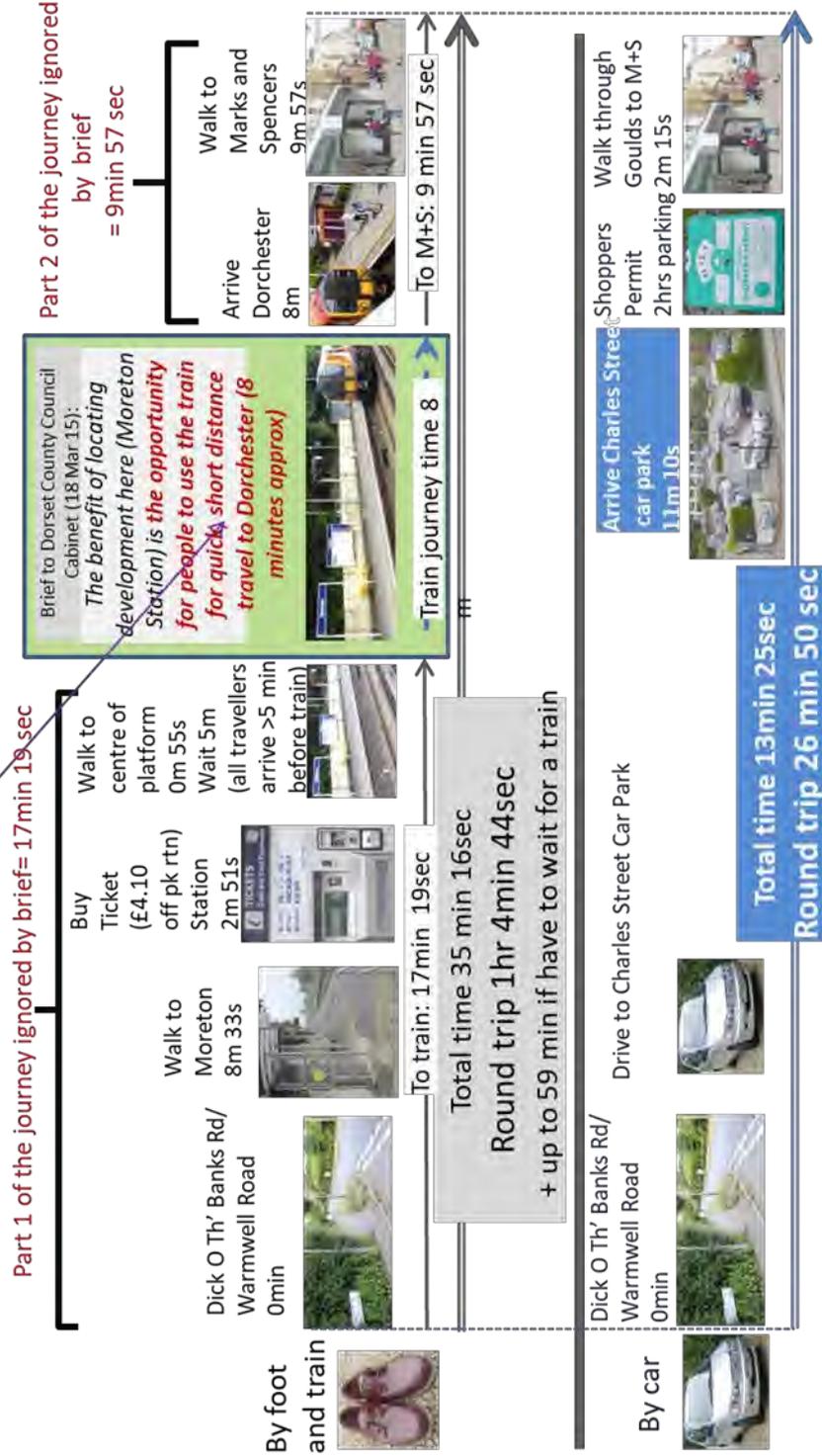


Dick O Th' Banks/Warmwell Road to Marks and Spencers

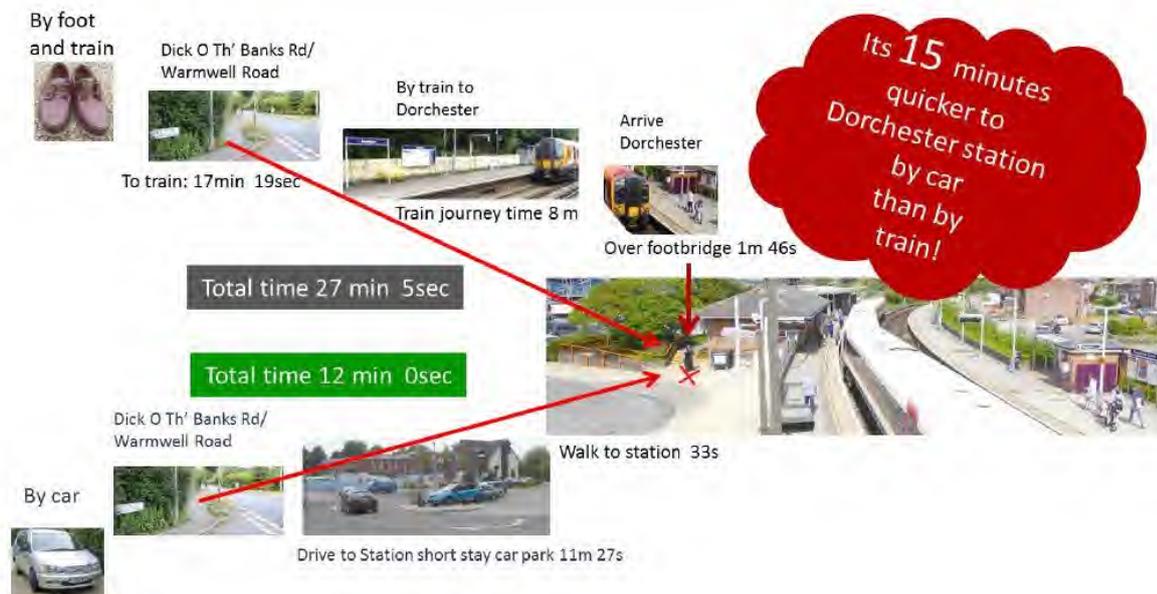
**By train**  
 To M+S: 35 min 16 sec  
 Fm M+S: 29 min 28 sec  
**Total: 1hr 5 min**

**By car**  
 To M+S: 16 sec  
 Fm M+S: 13 min 25 sec  
**Total: 27 min**

Brief says it takes 8 mins by train



### Dick O Th' Banks/Warmwell Road to Dorchester South Station



9. The diagrams show that at a minimum, the journey times to Marks and Spencers and DCC County Hall will take at least twice as long by train as by car. These timings assume the minimum wait at Moreton of 5 minutes and at Dorchester 5 minutes for the return journey. But it is very likely that the wait at Dorchester station will be longer and could be up to 59 minutes if the traveler just misses a train.
10. The train journey is also more expensive than travel by car.
11. The diagram above shows that if a Crossways resident merely wants to travel to Dorchester railway station it is still quicker by car.
12. The train is excellent for travel to London. But unless the traveler's destination is close to the destination station, it would be quicker and cheaper by car.

#### Travel by train to the Dorset Innovation Park

13. Travel by train to the Dorset Innovation Park at Winfrith would take considerably longer than the journeys illustrated above.
14. The nearest railway station to the Innovation Park is Wool. The Innovation Park is 1.6 mile approximately from Wool station. All distance have been measured using [www.freemaptools.com](http://www.freemaptools.com).
15. The walk from Dick O Th' Banks Road 5 ways junction to Moreton Station, a distance of 0.48 miles took 8 minutes 33 seconds (stated on the above charts).

The distance from Wool station to the Innovation Park is therefore 3.3 times longer and therefore on a pro-rata basis the walk will take 3.3 times longer or about 28 minutes. There is no public transport between Wool station and the Innovation Park.

16. Thus prospective Redbridge residents are just as likely to travel by car to work in the Innovation Park as they are travel by car to work in Dorchester.

### Number of weeks to travel a million miles

17. The number of weeks for the economically active members of the proposed houses on Redbridge Pit to travel a million miles in their daily car commuting to Dorchester is about 42 weeks (assuming all workers work in Dorchester). The calculation is shown below on the left. The number of weeks for all Redbridge Pit workers to travel a million miles commuting by car to the Innovation Park will be about 50 weeks. It is likely that only a few workers will commute to the Innovation Park and most will commute to Dorchester and thus the number of weeks for all workers to cover a million miles will be between 42 and 50 weeks.

#### Commuting by car to Dorchester Approximately 6 miles

<b>Number of weeks for the economically active members of allocated 490 households to travel 1 million miles (approximately) commuting to Dorchester</b>			
= <b>41</b> weeks			
-----			
Calculation of weeks / million miles			
<b>Number of houses allocated</b>	A	<b>490</b>	
2011 Census number houses	B	1143	
2011 Census population	C	2267	
Ratio people to houses	D=C/B	1.98	
<b>Number of people in allocated houses</b>	E=A*D	<b>972</b>	
2011 Census economically active	F	1078	
As a proportion of 2011 population	G=F/C	48%	
Number of 490 population working	H=G*E	462	
<b>Number of 490 households travelling to work by car</b> (2011 census = 81.1%, excluding passengers) (2011 census = 87.0% including passengers)	I=0.87*H	<b>402</b>	
Single journey to Dorchester in miles	J	6	
Return journey	K=2*J	12	
Daily miles by economically active people	L=K*I	4825	
Miles per week	M=L*5	24123	
<b>Number of weeks to travel a million miles</b>	N=1m/M	<b>41.5</b>	
M N Hill			

#### Commuting by car to the Innovation Park Approximately 5 miles

<b>Number of weeks for the economically active members of allocated 490 households to travel 1 million miles (approximately) commuting to the Innovation Park</b>			
= <b>50</b> weeks			
-----			
Calculation of weeks / million miles			
<b>Number of houses allocated</b>	A	<b>490</b>	
2011 Census number houses	B	1143	
2011 Census population	C	2267	
Ratio people to houses	D=C/B	1.98	
<b>Number of people in allocated houses</b>	E=A*D	<b>972</b>	
2011 Census economically active	F	1078	
As a proportion of 2011 population	G=F/C	48%	
Number of 490 population working	H=G*E	462	
<b>Number of 490 households travelling to work by car</b> (2011 census = 81.1%, excluding passengers) (2011 census = 87.0% including passengers)	I=0.87*H	<b>402</b>	
Single journey to Dorchester in miles	J	5	
Return journey	K=2*J	10	
Daily miles by economically active people	L=K*I	4021	
Miles per week	M=L*5	20103	
<b>Number of weeks to travel a million miles</b>	N=1m/M	<b>49.7</b>	
M N Hill			

18. It is likely that most people will travel to work in Dorchester. No growth profile is available for the Innovation Park and DCC have stated (reference in separate comment form) that employment in the Park will take time to build up. It is likely that the skill set and academic qualifications required for work on the Innovation Park may be far more demanding than is likely to be the case for most employment in Dorchester and this would be a factor in the number of residents who commute to Dorchester rather than to the Innovation Park.

### Summary

19. The ONS Census 2011 results indicate that only 1.9% of Crossways resident travel to work by train, whilst 87% travel by car.
20. Since the proposed development on Redbridge Pit is effectively in Crossways, these percentages are likely to be indicative of how workers on the proposed development will also travel to work.
21. Most workers will travel by car to work in Dorchester and the table above on the left indicates that it would only take about 41 weeks for the workers to collectively have travelled a million miles commuting.

### Why the plan is unsound

22. The plan is unsound because the allocation of 490 houses to Redbridge Pit does not maximise the use of alternative and sustainable forms of transport and therefore the houses will not be located in the most accessible location as required by Policy I2.

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

23. The train service at Moreton Station does not provide a good enough or cheap enough service to satisfy Policy I2 for work in Dorchester or the Innovation Park.
24. The census result show that the number of people who catch a train to work is so small (1.9%)that an allocation of housing to Redbridge Pit is not viable on the basis that they will catch the train.
25. Accordingly, I recommend that the allocation to Moreton Station/Redbridge Pit be deleted from the Policy V1.
26. I propose that the Redbridge Pit 490 houses are allocated to a site(s) to the east of the Worgret railway bridge with some or all being allocated to Purbeck's largest community which only has an allocation of 60 affordable homes (at 40%) as part of its Local Plan allocation of 150 houses. This is far too small an allocation of affordable homes for a community of at least 5759 houses.

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Yes

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

I wish to participate in the oral part of the examination to explain that there is a profound misconception that simply allocating houses close to Moreton railway station will result in the residents using the train and traveling to work by train. As the census results for Crossways clearly show the presence of the railway station at Moreton has virtually no impact on the way residents travel to work and therefore it is erroneous to allocate houses to Redbridge Pit on the basis that the residents will use the railway.

## Comment

<b>Consultee</b>	Mr Malcolm Hill (1188470)
<b>Email Address</b>	████████████████████
<b>Company / Organisation</b>	Moreton Parish Council
<b>Address</b>	12 Redbridge Road, Crossways Dorchester DT2 8DY
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Moreton Parish Council (Mr Malcolm Hill - 1188470)
<b>Comment ID</b>	PLPP657
<b>Response Date</b>	03/12/18 11:46
<b>Consultation Point</b>	Policy H4: Moreton Station / Redbridge Pit ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Letter
<b>Version</b>	0.3
<b>Files</b>	<a href="#">H4-Hill-PLPP657.pdf</a>
<b>Are you responding on behalf of a group?</b>	Yes
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	H4
<b>Do you consider that the Local Plan is legally compliant?</b>	Yes
<b>Do you consider that the Local Plan is sound?</b>	No
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	No

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

See attached

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

See attached

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

See attached



## Comment Receipt

<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Moreton Parish Council (Mr Malcolm Hill - 1188470)
<b>Comment ID</b>	PLPP
<b>Response Date</b>	03/12/18
<b>Consultation Point</b>	Policy H4:Moreton Station/Redbridge Pit
<b>Status</b>	Final
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Are you responding on behalf of a group?</b>	Yes
<b>If yes, how many people do you represent?</b>	Moreton Parish Council- 5 + 124 Moreton household petitioners (81% of Moreton)
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	Policy H4:Moreton Station/Redbridge Pit
<b>Do you consider that the Local Plan is legally compliant?</b>	Yes
<b>Do you consider that the Local Plan is sound?</b>	No
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	No
<b>Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)</b>	

### **PolicyH4: Redbridge Pit / Moreton Station** (page 55/Adobe57)

1. Policy H4 allocates a 65 bed care home to Redbridge Pit.
2. It is generally accepted that care homes should be located in a centre of population so that the people in the care home will receive visitors from family members and friends.
3. The population of Moreton is too small to justify a care home.
4. The population of Crossways is relatively young.

5. Large sections of the Swanage population, however are fairly old and may appreciate another care home in Swanage.
6. According to the Census 2011 results ,7 of the 15 census districts in Swanage North had a median age of over 60 years in 2011.
7. One Census area in Swanage North had a mean age of 59.4 years
8. The average median age in the 15 Census areas of Swanage North was 58.43 years and the average mean age was 54.3 years.
9. The 2011 Census population total for Swanage was 10,451 people, of whom 1,611 people were over 70 and 1090 people were over 80 years old
10. Thus approximately 26% of Swanage's population, or 2,701 people were of care home age.
11. Another indicator of Swanage's aging population is that it is gradually depopulating. In the 2001 Census its population was 11,097 and in the 2011 Census it was 10,454, a drop of 643 people. This doesn't seem much except that the populations of almost all other towns in Dorset have risen significantly.
12. Hence Swanage is an ideal place to locate a care home whereas Redbridge Pit lacks any services and facilities.
13. Swanage also has many short walks including along the sea front and a wide range of shops.
14. Crossway only has 2 shops.
15. An elderly person in a care home on Redbridge Pit would be marooned away from a lively population, interesting town and seafront. On Redbridge Pit an elderly person would need bespoke transport to take them to Dorchester. Travel by bus would be dangerous for an elderly person because of the speed at which the bus has to travel to keep to its timetable. The distance to the station and from the station in Dorchester might be to daunting for an elderly person.
16. And especially pertinent for an older person, there are no chemist shops in Crossways.

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

17. I strongly recommend that the care home allocated to Redbridge Pit is instead allocated to Swanage which has a large elderly population and has far more advantages for an elderly person than being marooned on Redbridge Pit.

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

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

Yes

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

I wish to participate in the oral part of the examination to show that an elderly person living in a care home on Redbridge Pit would be marooned.

Whereas an elderly person living in a care home in Swanage could lead an interesting life and probably maintain contact with former neighbours and friends in Swanage, a particularly important factor for an elderly person. Swanage has a large elderly population and therefore is an ideal market to establish a care home.

## Comment

<b>Consultee</b>	Mr Nick Squirrel (1186743)
<b>Email Address</b>	[REDACTED]
<b>Company / Organisation</b>	Natural England
<b>Address</b>	Unknown Unknown Unknown
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Natural England (Mr Nick Squirrel - 1186743)
<b>Comment ID</b>	PLPP473
<b>Response Date</b>	03/12/18 17:08
<b>Consultation Point</b>	Policies List ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Email
<b>Version</b>	0.4
<b>Files</b>	<a href="#">Purbeck District Council presubmission consultation NE advice.pdf</a>

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

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

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

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

see attachment

**If you have any supporting documents please upload them here.** [Purbeck District Council presubmission consultation NE advice.pdf](#)

Date: 03 December 2018  
Our ref: [Click here to enter text.](#)  
Your ref: [Click here to enter text.](#)



## BY EMAIL ONLY

Customer Services  
Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ



Dear Sir,

### **Planning consultation: Purbeck Local Plan pre-submission consultation** **Location: Purbeck, Dorset**

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

#### **The Conservation of Habitats and Species Regulations 2017**

Natural England has worked positively with the authority over a number of years advising on the various iterations which have come forward.

Para 21 The population figure for Corfe Castle seems at odds with other available information.

Para 24 The authority should consider inserting a paragraph about the AONB containing many nationally iconic features such as Old Harry Rocks, Durdle Door, Lulworth Cove and Corfe Castle.

Para 25, A substantial new area of the District is now SPA and SSSI in Poole Harbour. This paragraph should be reviewed to ensure it is accurate. It should also refer to the important features such as iconic species including Avocet, Brent geese and Black-tailed godwit with more recently occurring species such as the Little Egret and Spoonbill.

Natural England note that the Vision is to protect the districts distinctive character whilst improving the quality of life for the *local community*. The vision is welcomed by Natural England.

Objectives, Natural England advise that the third bullet may be improved by the insertion of *landscapes* given the proportion which is AONB and World Heritage site.

Policy V2, Natural England advise and the authority should confirm that the development proposed at Upton will also lead to an increased area of SANG on land formerly in private ownership.

Policy E1, this policy is welcomed. It should be strengthened by inserting "The Council will consider the objectives of the AONB Management Plan and the Special Qualities of the AONB."

Policy E3 is welcomed by Natural England.

Policy E5, Natural England welcome this policy. The policy would benefit from a requirement that applicants providing SuDs must prior to commencement establish the future and ongoing management responsibilities and maintenance obligations to be met in order for the facility to be secured in the long term.

Para 79, this list should include Ramsar sites as a matter of Government Policy in the NPPF.

Policy E6, the policy should be adjusted to include appropriate reference to *avoiding* compromising the natural processes which underpin European and internationally protected sites such as coastal erosion.

Paragraph 83, it should be noted here that the authority has carried out its own review of the 400m and 5km approach and concluded that this is robust.

Paragraph 86, Natural England advise the insertion of significant before proportion on the last line.

Paragraph 88, Insert “ the authority, working closely with Natural England and the Borough of Poole has already brought forward some projects.

Policy E7 is welcomed by Natural England.

Policy E8 is welcomed by Natural England.

Policy E9 is welcomed by Natural England.

Policy E10 the policy is welcomed. Natural England advise that a preceding paragraph should be inserted by the authority. This should confirm that the authority has developed two mechanisms to assist applicants to avoid Biodiversity losses. The Dorset Biodiversity Mitigation Plan and The Dorset Biodiversity Compensation Framework. In addition, and as is required by the NPPF 174 a) Natural England advise the authority that the Dorset’s Ecological Network and potential Ecological Networks currently shown on Dorset Explorer established by the Dorset Wildlife Trust and DCC NET should constitute the Ecological Networks referred to in the NPPF and Policy E10. Therefore these should be referred to in the preceding paragraph.

Natural England advise that the policy wording is revised to read (including nightjar and woodlark). This will allow for other SPA features to be considered eg high tide roosts.

Policy E12 is welcomed by Natural England.

Policy H3 d) This requires adjustment to include reference to the proposed Recreation Mitigation SPD for the Harbour.

Policy H3 l) This should be revised in the light of the guidance in the NPPF (175 d)) relating to delivery of Biodiversity Net Gain. Natural England can advise on suitable wording.

Policy H4 This policy should be considered for some rewording, it does not refer specifically to the need to provide heathland mitigation, a SANG nor offset its nitrogen excess. Natural England has identified a SANG area with the applicant and an area of land which provides both a greater level of certainty regarding heathland mitigation but also a substantial Nitrogen offsetting provision. Both area should either be shown on the allocation map or be the subject of a joint SOCG with the authority to ensure that suitable reliance can be made on their delivery and the promoters agreement/commitment.

Policy H5 This policy should be considered for some rewording, it does not refer specifically to the need to provide heathland mitigation, a SANG nor offset its nitrogen excess. Natural England has identified a SANG area with the applicant and an area of land which provides both a greater level of certainty regarding heathland mitigation but also a substantial Nitrogen offsetting provision. Both area should either be shown on the allocation map or be the subject of a joint SOCG with the authority to ensure that suitable reliance can be made on their delivery and the promoters agreement/commitment. Discussions with the promoter, Historic England and Natural England have led to good agreement about the protection of the historic SAM site and its incorporation into the area of land with appropriate public access.

Policy H6 This policy should be considered for some rewording, it does not refer specifically to the need to provide heathland mitigation, a SANG nor offset its nitrogen excess. Natural England has identified a SANG area with the applicant and an area of land which provides both a greater level of certainty regarding heathland mitigation but also a substantial Nitrogen offsetting provision. Both area should either be shown on the allocation map or be the subject of a joint SOCG with the authority to ensure that suitable reliance can be made on their delivery and the promoters agreement/commitment.

Policy H7 This policy should be considered for some rewording, it does not refer specifically to the need to provide heathland mitigation, a SANG nor offset its nitrogen excess. Natural England has identified a SANG area with the applicant and an area of land which provides both a greater level of certainty regarding heathland mitigation but also a substantial Nitrogen offsetting provision. Both area should either be shown on the allocation map or be the subject of a joint SOCG with the authority to ensure that suitable reliance can be made on their delivery and the promoters agreement/commitment.

Similar comments are provided for the above four policies, Natural England advise a meeting would be appropriate to agree the best way forward.

### **Small sites development**

This policy appears to be deficient in a number of respects. Firstly it does not appear to exclude several applications coming forward in one settlement over the plan period, alone below 30 but together exceeding the number 30. Natural England advise that this may be resolved by inserting reference to 30 new homes "*within any one settlement*" and "*within the plan period*".

Secondly Natural England is concerned that the policy could lead, over the plan period, to a cumulatively significant number of new homes within close proximity of one part of the European and internationally protected heathlands such that a Heathland Infrastructure Project eg SANG would otherwise have been required. Natural England advise that this concern should be made clear in the supporting text and the Local Authority commit to maintain up to date information on cumulative developments in relation to the nearest accessible heathland designated areas.

Thirdly supporting text is needed in relation to attempts to under develop or phased applications to avoid provision of mitigation.

Natural England would welcome some discussion about this matter.

Paragraph 178 reference should also be made to Policy E8 to avoid duplication within the policy. At present the policy H12 does not recognise prohibition of new dwellings with 400m.

Paragraph 181, reference should also be made to Policy E8 to avoid duplication within the policy. At present the policy H13 does not recognise prohibition of new dwellings with 400m.

Paragraph 184, reference should also be made to Policy E8 to avoid duplication within the policy. At present the policy H14 does not recognise prohibition of new dwellings with 400m.

Paragraph 191, reference should also be made to Policy E8 to avoid duplication within the policy. At present the policy H15 does not recognise prohibition of new dwellings with 400m.

## Dorset Innovation Park

Natural England has commented positively in respect of the Local Development Order proposal and has worked closely with the authorities and County Council Natural Environment Team (NET) to deliver an suitable way forward to facilitate new development in the eastern area of the park.

Natural England is also advising the authority, Dorset County Council and the site owners (MAGNOX) concerning the decommissioning of the nuclear facility at Winfrith to the west. Our advice is consistent, the nuclear facilities should be removed in full and the site should be restored to a functioning heathland ecosystem with open public access as is present at the adjoining designated sites. A significant driver is the requirement for the owner and Nuclear Decommissioning Agency to restore parts of the Dorset Heaths SAC in which the operation of the site has caused the hydrological regime to be altered such that it is unfavourable. The onus is on the authorities to secure restoration and discussions are underway.

Dorset Innovation Park achieved an Enterprise Zone status in April 2017 and covers some 56ha. The designation simply enables the retention of business rates rather than representing a considered weighing of the environmental costs and obligations on the authorities and an implication that development is appropriate.

The Purbeck Local Plan 2012, para 6.6.3 set out a clear process for assessing the nature, scale and location of employment allocations at Holton Heath and Dorset Green Technology Park. It is specific in stating that this will:

*“be determined following ecological and heritage impact assessment work, which will feed in to the Employment Land Review Part 3, subsequent plan(s), master plans and development briefs”*

Natural England is not aware of this work being carried out in the form of an Employment Land Review Part 3. Natural England has participated with the authority in developing this work around Holton Heath with Historic England and through the LDO detailed work on the eastern part of the Enterprise Zone.

The Dorset Workspace Strategy 2012 update indicated that the site should provide (PLP 1, para 6.5.1.4) for 5ha for local uses and 15 ha for inward investment purposes up to the plan period of 2027. The updated strategy Oct 2016 notes Purbeck has available 30ha at Dorset Green and a potential 27ha which may come forward in the Plan review.

Holton Heath provides 5ha of vacant or underused land with 5.9ha likely to be allocated through the new Local Plan.

The proposed LDO covers an area of 40 ha and will run for a period of 25 years whilst the Local Plan will run to 2034 and sets out a need for a minimum of 11.5ha (47 ha are available EE1) which will:

*“meet all of the District’s identified minimum need of 11.5 hectares of employment land over the plan period, together with supporting the wider national and regional economy through the continued development of the two strategic employment sites.”*

Amongst all the details above Natural England is very concerned that the authority has pursued the establishment of an Enterprise Zone, over 18 months ago and now seeks to make this area in its entirety a part of the Local Plan allocation for employment use without transparent consideration. The Employment Zone has not been scrutinised in a manner which takes into account the impacts on their duties to secure restoration of European protected sites, loss and compromise of biodiversity restoration obligations at the former Magnox site, the ongoing landscape impacts likely from a new development standing alone within an open heathland landscape in the AONB which the NDA should be addressing through site restoration, compromising the ability of the SAC to be restored both through hydrological impacts but also through compromising the prevention of new access from the Technology Park. Natural England is involved in early discussions with both parties

and it is apparent that there are other significant considerations in addition to drainage, landscape, loss of biodiversity benefits and landscape issues such as land contamination and access design which impact on the likely viability of any proposals.

These constraints and the lack of consideration as well as the actual need for the land to be made available within the plan period all argue against the identification of the land west of the Dorset Innovation Park LDO at this time.

Natural England advise that whilst the Enterprise Zone is in place the allocation of employment land, originally set out in the 2004 Local Plan has not been justified in the Councils own terms against the disbenefits which are apparent and set out above. At this time Natural England advise that policy area EE1, the western extension gives rise to more harm than benefits overall and should be modified at least in the plan period.

Paragraph 217, reference should also be made to Policy E8 to avoid duplication within the policy. At present the policy EE4 does not recognise prohibition of new dwellings with 400m.

Policy I1 b) Natural England support the policy.

Policy I3 Natural England support the policy.

Policy I5, Natural England note the policy and advise the authority that it will require additional information regarding the detailed aspects of the SANG, the area, a Masterplan, agreed biodiversity avoidance measures etc in order for a suitable assessment to be provided by Natural England to the authority because of the proximity of the area to European and internationally designated sites.

Glossary, should include reference to Heathland Infrastructure Projects (HIP), Heathland Support Area.

In the light of the recent ECJ ruling (People Over Wind & Sweetman v Coillte Teoranta (Case C-323/17)) which concluded that the avoidance/mitigation, e.g. as set out in the Dorset Heathlands Planning Framework (2015 – 2020) SPD etc, cannot be taken into consideration when considering the Likely Significant Effects of proposals on European wildlife sites (and Ramsar sites as a matter of Government policy). Natural England advise your authority to undertake an Appropriate Assessment of the application as is required under Reg 105.

In the light of the iterative nature of the Local Plan process Natural England advise that the authority carry out a refresh of the Appropriate Assessment at critical points eg before the submission document, to;

- Confirm earlier conclusions remain valid
- Consider proposed modifications to policy and allocations
- Consider new issues/proposals/allocations arising

I trust this advice will be of assistance to your authority.

Yours sincerely

Nick Squirrell  
Conservation and Planning Lead Advisor  
Dorset and Hampshire Team  
Dorset, Hampshire and Isle of Wight Area Team  
Natural England  
Mob: [REDACTED]  
Email [REDACTED]

## Comment

<b>Consultee</b>	Mr Keith Norris (996768)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Mr Keith Norris (996768)
<b>Comment ID</b>	PLPP33
<b>Response Date</b>	23/11/18 17:09
<b>Consultation Point</b>	Policy V1: Spatial strategy for sustainable communities ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.2
<b>Are you responding on behalf of a group?</b>	No
<b>If yes, how many people do you represent?</b>	1
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	POLICY VI
<b>Do you consider that the Local Plan is legally compliant?</b>	No
<b>Do you consider that the Local Plan is sound?</b>	No
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	Yes

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

Lytchett Matravers is allocated 150 greenbelt homes but no allowance has been made for the Huntick Road development (now planning for about 50 homes) shown as a "New Development Site" on page 18 of the Neighbourhood Plan. Nor has allowance been made for windfall. This is at variance with the allowance shown for Wareham.

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

At 1a Lytchett Matravers should be shown with an allocation of less than 100 homes because of the Huntick Road site being developed and because of an allowance for windfall.

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

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

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

## Comment

<b>Consultee</b>	Mr Keith Norris (996768)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Mr Keith Norris (996768)
<b>Comment ID</b>	PLPP34
<b>Response Date</b>	23/11/18 17:11
<b>Consultation Point</b>	Policy H8: Small sites next to existing settlements ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.3
<b>Are you responding on behalf of a group?</b>	No
<b>If yes, how many people do you represent?</b>	1
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	H8
<b>Do you consider that the Local Plan is legally compliant?</b>	No
<b>Do you consider that the Local Plan is sound?</b>	No
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	Yes

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

Lytchett Matravers has an adopted neighbourhood plan which identifies Huntick Road as a development site. Therefore as per the PDC New Homes For Consultation - Report of Consultation Results: April 2018, Lytchett Matravers should be exempt from this policy because the final sentence at 3.1. states "The policy would not apply in areas where there is an adopted Neighbourhood Plan that allocates land for housing."

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

The existing wording should be amended to exclude both Wareham and Lytchett Matravers.

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

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

## Comment

<b>Consultee</b>	Sir or Madam (996330)
<b>Email Address</b>	██████████
<b>Company / Organisation</b>	Nuclear Decommissioning Authority
<b>Address</b>	Herdus House Moor Row CA24 3HU
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Nuclear Decommissioning Authority ( Sir or Madam - 996330)
<b>Comment ID</b>	PLPP321
<b>Response Date</b>	03/12/18 12:35
<b>Consultation Point</b>	Policy EE1: Employment land supply ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.2
<b>Files</b>	Representations on behalf of the NDA

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

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

**Which policy / paragraph number / policies map does your comment relate to?** EE1 / 209

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

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

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

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

In reviewing the Publication Draft Local Plan, it is apparent that the Nuclear Decommissioning Authority's Winfrith site itself is the subject of no specific key policies in the emerging Local Plan. However, it is noted that the north eastern portion of the site is proposed for allocation under the 'Dorset Innovation Park Local Development Order' ('LDO') designation.

The NDA wish to confirm that they have no objection to this land being included as part of the LDO designation as this allocation accords with the long-term aspirations for the site.

The supporting text for the LDO allocation and Policy EE1: Employment Land Supply at paragraph 209 is also supported, which currently reads as follows:

"The LDO is intended to be in place for the duration of the Enterprise Zone status of 25 years, which was designated in April 2017. The LDO covers the initial 40ha of Dorset Innovation Park. The site is planned to expand after the decommissioning of the current Magnox site and a further 10ha being developed which already has Enterprise Zone status."

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

N/A

**If you have any supporting documents please upload them here.** Representations on behalf of the NDA

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

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



Your Ref: Local Plan

28 November 2018

Planning Policy Team  
Purbeck District Council  
Westport House  
Worgret Road  
Wareham  
Dorset  
BH20 4PP

*Sent via email to: [localplan@purbeck-dc.gov.uk](mailto:localplan@purbeck-dc.gov.uk)*

Dear Sir/Madam

**PURBECK LOCAL PLAN 2018-2034 PRE-SUBMISSION DRAFT CONSULTATION REPRESENTATIONS ON BEHALF OF THE NUCLEAR DECOMMISSIONING AUTHORITY**

We are writing to you in order to provide a representation to the current consultation on the Purbeck Pre-Submission Draft Local Plan, on behalf of the Nuclear Decommissioning Authority ('NDA'). GVA are the appointed property advisors for the NDA and provide planning advice across the NDA's UK-wide estate. We have made multiple representations to various local plan and other consultations across the UK, affecting various NDA sites.

**Overview**

These representations are made in respect of the Winfrith site, which is managed by Magnox Limited who are appointed to carry out decommissioning activities at the site in accordance with the site decommissioning programme. Decommissioning involves the systematic removal of plant and buildings previously associated with fuel fabrication; it is a long process expected to last a few decades.

The NDA is the strategic authority responsible for managing the effective and efficient clean-up of the UK's nuclear legacy, which includes the Winfrith site. Land within this Nuclear Licenced Site (NLS) is subject to the decommissioning of redundant facilities and, where necessary, the remediation of land. Magnox manage the site's decommissioning on behalf of the NDA in order to carry out the processing of materials and wastes from nuclear fuel fabrication and decommissioning activities at the site. Magnox continue to engage with stakeholders regarding the planned future uses of the area following conclusion of the decommissioning process.

It is worth noting that GVA previously submitted representations to the Partial Review Options Consultation stage of the emerging Local Plan on the 12<sup>th</sup> of August 2016. These current representations follow on from those submitted previously.

Central Square  
Forth Street  
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NE1 3PJ

  
**[gva.co.uk](http://gva.co.uk)**

GVA is the trading name of GVA Grimley Limited registered in England and Wales number 6382509. Registered office, 3 Brindleyplace, Birmingham B1 2JB. Regulated by RICS.

**Birmingham Bristol Cardiff Dublin  
Edinburgh Glasgow Leeds Liverpool  
London Manchester Newcastle**

## Our Representations

In reviewing the Publication Draft Local Plan, it is apparent that the NDA Winfrith site itself is the subject of no specific key policies in the emerging Local Plan. However, it is noted that the north eastern portion of the site is proposed for allocation under the 'Dorset Innovation Park Local Development Order' ('LDO') designation.

The NDA wish to confirm that they have no objection to this land being included as part of the LDO designation as this allocation accords with the long-term aspirations for the site.

The supporting text for the LDO allocation and Policy EE1: Employment Land Supply at paragraph 209 is also supported, which currently reads as follows:

*"The LDO is intended to be in place for the duration of the Enterprise Zone status of 25 years, which was designated in April 2017. The LDO covers the initial 40ha of Dorset Innovation Park. The site is planned to expand after the decommissioning of the current Magnox site and a further 10ha being developed which already has Enterprise Zone status."*

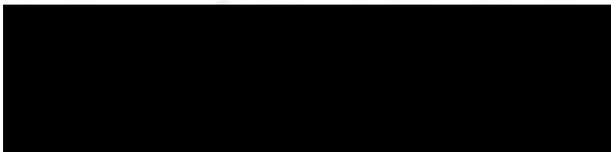
## Conclusion

This representation has been made by GVA on behalf of the NDA in response to Purbeck District Council's current consultation on the Pre-Submission Draft Local Plan.

In summary, the current policy designations proposed within the emerging Local Plan are in accordance with the NDA's aspirations for their site at Winfrith. The NDA are therefore in support of this element of the emerging Local Plan.

If you require any further clarity in respect of the above representation, then please contact me using my contact details below.

Yours sincerely



**Matt Verlander MRTPI**  
**Director**



**For and on behalf of GVA Grimley Limited**

## Comment

<b>Agent</b>	Mr Leigh Merrick (1190906)
<b>Email Address</b>	[REDACTED]
<b>Company / Organisation</b>	OMH Estate Residents
<b>Address</b>	Headbury Old Malthouse Lane Langton Matravers, Dorset BH19 3JA
<b>Consultee</b>	Mr Ian Vaughan Arbuckle (1190911)
<b>Email Address</b>	[REDACTED]
<b>Company / Organisation</b>	OMH Estate Residents
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	OMH Estate Residents (Mr Ian Vaughan Arbuckle - 1190911)
<b>Comment ID</b>	PLPP403
<b>Response Date</b>	03/12/18 15:15
<b>Consultation Point</b>	Policies List ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Are you responding on behalf of a group?</b>	Yes
<b>If yes, how many people do you represent?</b>	12+
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	Housing and Traffic

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

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

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

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

- 1 Introduction (Old Malthouse Estate (OMH)). The opportunity to comment on the soundness of the Draft Purbeck Local Plan (D/PLP) and the documents that underpin it is appreciated. Following wide consultation, this note fairly represents OMH residents' views on two points about the soundness of PDC's well presented plan; the plan is respected here as a substantial undertaking.
- 2 D/PLP Housing-SHLAA/0022 consistency? The D/PLP derives in part from its associated SHLAA/0022 whose classification for the OMH estate is "unsuitable" for "Large Site" development (over 30 homes). But the impediments therein are principally the same ones obtaining for a "Small or Rural Site" of up to 30 homes. And yet the SHLAA also regards the OMH Estate as "developable" in time. Consistency may be a challenge in this case (at OMH)?
- 3 Traffic analysis impact (SHLAA/0022)? The Local Highways Authority (LHA) believe safe access to/from the High St is possible and consistent with up to 30 new homes, coincidentally the Small Site threshold. Complained about issues of speed, incline, road width, sightlines versus residents' adjacent parking, "near misses" & Ordnance Survey listed Public Footpaths are lumped into an unspecified catch-all of "highway safety issues" and not even listed as a SHLAA Constraint. LHA's leap from the general (highway safety issues) to the specific (up to 30 homes) does not come across as sound.

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

- 1 Recognise that because of the nature of OMH, a small site initiative on it would suffer the same impediments & consequences as a large site. Treat the same.
- 2 Recognise both accesses to/from OMH Estate are particularly challenging, if not close to being lethal. They need properly independent and far more detailed work than is on view. And this despite a history of complaint about safety here.

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

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

## Comment

<b>Consultee</b>	Mr Clive Orchard (1190092)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Mr Clive Orchard (1190092)
<b>Comment ID</b>	PLPP250
<b>Response Date</b>	02/12/18 17:09
<b>Consultation Point</b>	Policy H8: Small sites next to existing settlements ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Are you responding on behalf of a group?</b>	No
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	H8
<b>Do you consider that the Local Plan is legally compliant?</b>	Yes
<b>Do you consider that the Local Plan is sound?</b>	No
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	Yes

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

There are a number of small sites identified in West Lulworth, some of these so close to each other that they should be considered a larger site. A single map of the village showing all the identified small sites would highlight this issue more clearly. While any future development of these sites could be

carried out on piecemeal basis, the final result would be a larger site. Therefore, the wording and aims of Policy H8 do not provide sufficient protection in these instances.

West Lulworth in particular is a major tourist location, providing the only access to Lulworth Cove and is a major gateway to the Jurassic Coast. Much of the community rely on this tourism for their livelihoods. There are a significant number of small accommodation providers (bed & breakfast and small hotels) in West Lulworth and a number of the identified small sites would surround some of these properties, potentially impacting the ongoing future of these businesses. The Plan does not make any provision for the protection of such businesses that are relied upon by visitors and the business community as a whole for the tourism they help to support.

Furthermore, from my understanding, certain sites in West Lulworth had been considered and were deemed unsuitable because of their potential adverse impact on the Dorset Area of Outstanding Natural Beauty. It is not clear why the small sites still included in West Lulworth are also unsuitable for the same reason. The SHLAA process has not been carried out sufficiently thoroughly for these small sites. These sites are not suitable for development because of the adverse impact on the surrounding village character, their impact on an AONB that they, together with the necessary infrastructures would impose.

For all the above reasons, the Plan is not sound.

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

Policy H8 requires amendment to provide adequate protections for areas of high designation AONB such as West Lulworth in terms of quantity, size, character and location. It should also include some provision for the protection of existing tourism businesses in areas where this would be impacted by any development.

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

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

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

## Comment

<b>Consultee</b>	Mrs Rachel Palmer (1185234)
<b>Address</b>	[REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Mrs Rachel Palmer (1185234)
<b>Comment ID</b>	PLPP292
<b>Response Date</b>	03/12/18 10:14
<b>Consultation Point</b>	Policy H5: Wool ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Other
<b>Version</b>	0.22
<b>Files</b>	<a href="#">Woolbridge Manor.pdf</a> <a href="#">Bere Regis school.pdf</a> <a href="#">Wool School.pdf</a> <a href="#">DSCI1535_Darkroom (002).jpg</a> <a href="#">Woolbridge Manor.pdf (1)</a>
<b>Are you responding on behalf of a group?</b>	No
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	<input type="checkbox"/> The submission of Local Plan to the Secretary of State for Public Examination <input type="checkbox"/> The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report) <input type="checkbox"/> The adoption of the Purbeck Local Plan
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	Policy H5
<b>Do you consider that the Local Plan is legally compliant?</b>	No
<b>Do you consider that the Local Plan is sound?</b>	No

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

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NPPF – sustainability clause section C - It also fails on the environmental objective. It has no overarching policy in dealing with the challenges in building in such a rich environment. The areas for new houses are on organic farmland and the SANG is on ancient woodland.

Policy H5 section (a) - At present the footpaths are adequate with 50% increase of Wools population these could be needed. But there could be ensuing health problems from air pollution from queuing traffic.

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(m) – explore possibilities for a new pathway – this is impossible without damaging an ancient hedgerow rich in wildlife.

(o) – how does one mitigate for the sound of the railway if there is no space?

H5 - SANG at Coombe Wood – on the ancient woodland inventory, contrary to NPPF 2018 para 175 Local Planning Dept ( c ) development resulting in the loss of deterioration of ancient habitats such as ancient woodland should be refused unless there are wholly exceptional circumstances.

The traffic infrastructure for mobility of present and new residents (with a likely increase of 1000 more cars) through and out of the village is inadequate at present with no bypass. The problems are likely to increase making it unsustainable.

There is congestion on all major roads leading from Wool both east and west on the A352. Educating people off the roads to the train will be difficult with high ticket prices and always increasing.

The A352 to Dorchester. This road is neither safe or fast. In the last couple of years 2017-2018 there have been two fatal accidents. (a) outside Wyvale, (b) on the turning to Carne Road. There has also been an incident 2017 winter, where a major accident caused road closure for many hours. Drivers were forced to find their ways home through unlit narrow winding lanes to the north of the A352 - often without signs. The A352 has the following impedimenta.

26 roads turning off it

29 farm and field entrances

3 indicators of tractors turning

3 small settlements; winfrith Newburgh, East Knighton and Broadmayne.

3 bend signs

12 businesses including a vets and business park opening onto the road.

2 laybys

2 signs indicating horseriding.

2 signs indicating pedestrians and cyclists for one mile with no footpath.

1 roundabout with tourist traffic coming from the Heritage Coast (Weymouth).

The road is prone to flooding at least one lane occurred in the last 18 months.

The east route to Poole and Bournemouth on the A351 bypassing Wareham to the Banks ARms is also subject to congestion. It goes through Sandford and Holton Heath with several traffic lights and consequent queing.

Purbeck admit the A351 from Wareham to Poole has a traffic volume problem but its solution in encouraging people to travel north to Bere Regis to join the road is totally unsound except that that the A35 road is a good mainly dual carriage way road.

Tourism is not mentioned in Policy H5 but Wool is the gateway to the key parts of the Heritage Coast - eg Lulworth. Severe congestion through the village will result in this becoming 'a closed gate' deterring visitors and having a negative impact on tourism.

Purbeck used to boast on its logo 'Purbeck an area with vibrant communities in balance with the environment'. This plan will result in beleaguered communities out of balance with an increasingly damaged natural environment certainly as regards Wool.

I urge you to look for more Brownfield sites.

LEGAL COMPLIANCE - The proposed 65 bed care home has not been consulted on or need. This is situated on the western edge of Purbeck and will draw in extra traffic. Who is going to run it? Two private care homes hav3e closed in the area recently. Certainly one due to staffing difficultie3s with low wages. There is a presumption in caring for people in their homes at present.

One wonders if it is a means of land banking as Moreton the other high allocation of housing also has one. In the face of failure, could they be converted to flats?

If this plan is passed Wool will become a commuter town instead of a viable village set in a rural parish. Wool was not allocated any houses in the 2012 plan, what has changed to make it suitable for the second largest allocation in the district? Reservations should surely have existed in 2012. What has happened is that some of the problems eg traffic and people pressure in wildlife areas has increased, possibly with the redevelopment of Purbeck Gate.

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More extensive search of brownfield sites needs to be made. Suggest replacement if needed by using Bere Regis for more housing as a more sustainable option.

It is sad that with Woolbridge Manor and the area steeped in Hardy's features that no mention of Hardy's impact on the village has been made.

There should be a statement explaining why Bere Regis is not included – as this might be a better site for increased housing numbers. The A35 connecting this to Dorchester is straight and has dual carriageway along most of its length. Goes through no settlements and the road to the east – Poole and Bakers Arms roundabout is better than A351 with regards to traffic flow. It would also be nearer to routes to Warminster and Noirth to the M4. IT has a new build capacious school with a large site appropriate for expansion, its retail facilities are limited and some increase in population could promote the building of new facilities. Bere Regis has capacity for sustainability.

**If you have any supporting documents please upload them here.**      [Bere Regis school.pdf](#)

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1. To argue the case more thoroughly. 2. To give wider evidence of residents involvement with and appreciation of the natural environment of Wool, including children. 3. Should the National Park be delivered I would like to present the opportunity of a new more sustainable future vision for Wool.



Watermeadows Landscape (Woolbridge Manor – Thomas Hardy Tess of the Durbevilles)



St John th

Elder Rd

Elder Rd

Manor Farm Rd

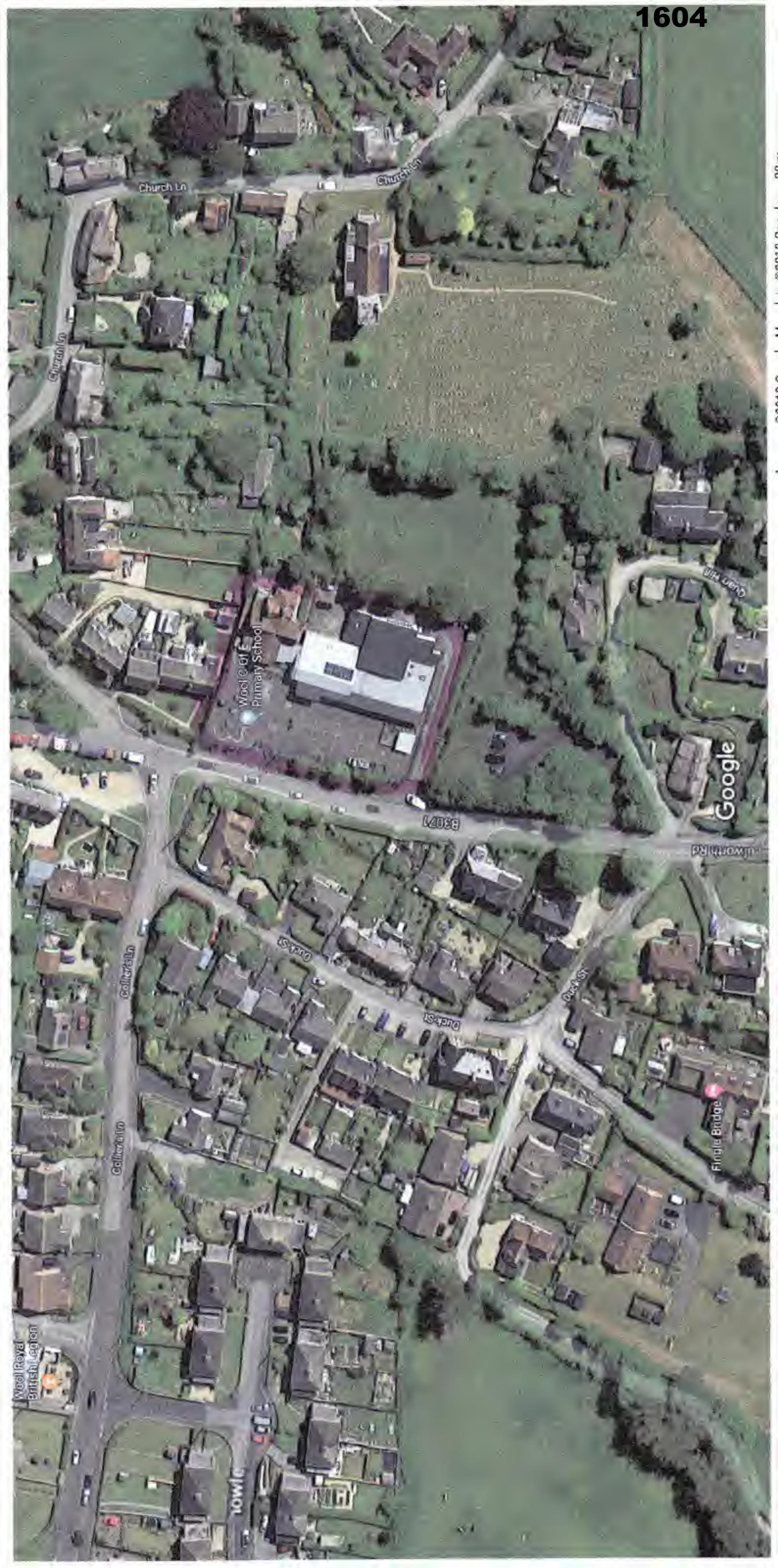
Elder Rd

Southway

Foston Ct

Bere Regis Primary & Pre-School

Google



Church Ln

Church Ln

Church Ln

Woolcote Primary School

Google

ES071

Woolworth Rd

Collier's Ln

Duck St

Duck St

Duck St

Collier's Ln

Fingle Bridge

Wool Royal British Legion

lowle





Watermeadows Landscape (Woolbridge Manor – Thomas Hardy Tess of the Durbevilles)

## Comment

**Consultee** Mrs Rachel Palmer (1185234)  
**Address** [REDACTED]  
**Event Name** Purbeck Local Plan Pre-submission Draft  
**Comment by** Mrs Rachel Palmer (1185234)  
**Comment ID** PLPP411  
**Response Date** 03/12/18 10:14  
**Consultation Point** Policy EE1: Employment land supply ([View](#))  
**Status** Processed  
**Submission Type** Other  
**Version** 0.3

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

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

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

**Which policy / paragraph number / policies map does your comment relate to?** EE1

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

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

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

Policy EE1.

No mention is made of work opportunities for new residents. The innovation building park has failed three times to attract businesses and become viable. And the number of jobs are likely to be small and of specialist nature should the park succeed.

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<b>Comment ID</b>	PLPP412
<b>Response Date</b>	03/12/18 10:14
<b>Consultation Point</b>	Policy E10: Biodiversity and geodiversity ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Other
<b>Version</b>	0.2
<b>Are you responding on behalf of a group?</b>	No
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	<input type="checkbox"/> The submission of Local Plan to the Secretary of State for Public Examination <input type="checkbox"/> The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report) <input type="checkbox"/> The adoption of the Purbeck Local Plan
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	E10
<b>Do you consider that the Local Plan is legally compliant?</b>	No
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<b>Comment by</b>	Mrs Rachel Palmer (1185234)
<b>Comment ID</b>	PLPP413
<b>Response Date</b>	03/12/18 10:14
<b>Consultation Point</b>	Policy I3: Green infrastructure, trees and hedgerows ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Other
<b>Version</b>	0.5
<b>Files</b>	<a href="#">DSCI1535_Darkroom (002).jpg</a> <a href="#">Woolbridge Manor.pdf</a>
<b>Are you responding on behalf of a group?</b>	No
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<b>Do you consider that the Local Plan is legally compliant?</b>	No
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[DSCI1535\\_Darkroom \(002\).jpg](#)

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Watermeadows Landscape (Woolbridge Manor – Thomas Hardy Tess of the Durbevilles)

## Comment

<b>Consultee</b>	Mrs Rachel Palmer (1185234)
<b>Address</b>	[REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Mrs Rachel Palmer (1185234)
<b>Comment ID</b>	PLPP485
<b>Response Date</b>	03/12/18 10:14
<b>Consultation Point</b>	Policy EE4: Supporting vibrant and attractive tourism ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Other
<b>Version</b>	0.2
<b>Are you responding on behalf of a group?</b>	No
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	<input type="checkbox"/> The submission of Local Plan to the Secretary of State for Public Examination <input type="checkbox"/> The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report) <input type="checkbox"/> The adoption of the Purbeck Local Plan
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	Tourism
<b>Do you consider that the Local Plan is sound?</b>	No

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

Tourism is not mentioned in Policy H5 but Wool is the gateway to the key parts of the Heritage Coast - eg Lulworth. Severe congestion through the village will result in this becoming 'a closed gate' deterring visitors and having a negative impact on tourism.

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

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

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

## Comment

<b>Consultee</b>	Mrs Rachel Palmer (1185234)
<b>Address</b>	[REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Mrs Rachel Palmer (1185234)
<b>Comment ID</b>	PLPP489
<b>Response Date</b>	03/12/18 10:14
<b>Consultation Point</b>	Policy E7: Conservation of protected sites ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Other
<b>Version</b>	0.2
<b>Files</b>	<a href="#">Woolbridge Manor.pdf (1)</a> <a href="#">Woolbridge Manor.pdf</a> <a href="#">Wool School.pdf</a> <a href="#">DSCI1535_Darkroom (002).jpg</a> <a href="#">Bere Regis school.pdf</a>
<b>Are you responding on behalf of a group?</b>	No
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	<input type="checkbox"/> The submission of Local Plan to the Secretary of State for Public Examination <input type="checkbox"/> The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report) <input type="checkbox"/> The adoption of the Purbeck Local Plan
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	Policy H5
<b>Do you consider that the Local Plan is legally compliant?</b>	No
<b>Do you consider that the Local Plan is sound?</b>	No

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

The policy H5 is unsound. Remove Wool from the plan for 470 houses as unsustainable / inadequate traffic infrastructure vizaviz reliance on C6.

Sewerage capacity has not been demonstrated. Therefore pollution threatens the River Frome SSSI,. Valuable wildlife, biodiversity assets - organic farmland should not be built on. Consequent loss of biodiversity. The SANG placed in Ancient Woodland is against NPPF guidelines - Loss of habitat, loss of biodiversity.

I believe this policy does not achieve sustainable development and is therefore unsound on two of the overarching objectives of sustainable development NPPF.

(b) – it does not provide accessible services, see transport section below, c and d. Nor does support the communities health but could lead to increased air and water pollution. It does not provide the facilities the community does need. – a new school, expansion of the present cramped building on a cramped site is impossible.

(h) But ‘explores’ possibilities to provide a community hub that includes community shopping facilities.

Wool has a good variety of small shops adequate for its present population. These help weld the community together and replacing them by larger facilities supermarkets, will damage the present retail opportunities which give Wool a sense of place.

(b) The doctors surgery is struggling to cope with present numbers. Hence the change from a daily open surgery to an emergency only service where patients have to make their case to see a doctor that day to receptionists. The two hospitals at Dorchester and Poole are 12-16 miles away and transport links with present traffic volumes is inadequate. The railway option involves stations which are not within easy walking distance of the hospitals.

(c) Who will pay for the mitigation measures necessary to make the railway crossing safe with the average accident of one a month.

NPPF – sustainability clause section C - It also fails on the environmental objective. It has no overarching policy in dealing with the challenges in building in such a rich environment. The areas for new houses are on organic farmland and the SANG is on ancient woodland.

Policy H5 section (a) - At present the footpaths are adequate with 50% increase of Wools population these could be needed. But there could be ensuing health problems from air pollution from queuing traffic.

(b) – additional parking but where? And secure cycle storage and electric vehicles charging permits whilst good in themselves do not address the traffic infrastructure problems.

(d) – the traffic infrastructure for the mobility of residents is unsound. With traffic flow through and out of the village to nearby towns all being consistently subject to congestion. Particularly during the tourist seasons. The volume of traffic will increase significantly with an increase of 50% of the residents - guesstimate a 1000 more cars.

The A35 on the other hand from Bere Regis to Dorchester is a new purpose built road straight with no major settlements and in the main dual carriageway. The idea of drawing traffic north to reduce traffic on the A351 (only a small part of the eastward movement traffic problem is totally unsound) The C6 is bounded by SPA heathland on both sides for approx. 1mile making road widening unacceptable. The C6 road surface in stretches approx. 2 is in a very poor condition at present. The C6 is bordered by MOD land and is used by tanks day and night (night at times). There are 2 tank turnings marked on this route and a turning to Bovington camp. It has two popular tourist attractions. Monkey World which opens directly onto the road and the Tank Museum access road. It has 2 caravan parks opening onto it. It has one slurry depot access. It has a narrow bridge. It has 2 bend signs. It has a flood warning sign. It has a sign warning blind dips over two miles. Should the plan rely on encouraging to transfer to this route? The railway crossing with trains running regularly throughout the day results in queuing at peak times particularly during the tourist season back as far as the Bovington roundabout and in the other direction to the end of the Purbeck Gate settlement.

(e) – will contributions for education provide a new school in Wool? Unlikely. Space?

(f) – Since skylarks, red data book species threatened have been lost from Purbeck Gate, they have used the field South west of Purbeck Gate – allocated building land.

(l) – Mention is made regarding buffers for the archaeological sites on land to the south east of Burton Cross roundabout, but buffers to protect any of Wools priority Habitats are not mentioned.

(j) – how can one conserve the setting of nearby listed buildings to the building site? The village is set in an ANCIENT landscape (Oliver Rackham – England's landscape and woodlands). And its rural atmosphere cannot be recreated. No mention is made of conserving Wool's considerable biodiversity. (see submission by Wool Flora and Fauna).

(m) – explore possibilities for a new pathway – this is impossible without damaging an ancient hedgerow rich in wildlife.

(o) – how does one mitigate for the sound of the railway if there is no space?

H5 - SANG at Coombe Wood – on the ancient woodland inventory, contrary to NPPF 2018 para 175 Local Planning Dept ( c ) development resulting in the loss of deterioration of ancient habitats such as ancient woodland should be refused unless there are wholly exceptional circumstances.

The traffic infrastructure for mobility of present and new residents (with a likely increase of 1000 more cars) through and out of the village is inadequate at present with no bypass. The problems are likely to increase making it unsustainable.

There is congestion on all major roads leading from Wool both east and west on the A352. Educating people off the roads to the train will be difficult with high ticket prices and always increasing.

The A352 to Dorchester. This road is neither safe or fast. In the last couple of years 2017-2018 there have been two fatal accidents. (a) outside Wyvale, (b) on the turning to Carne Road. There has also been an incident 2017 winter, where a major accident caused road closure for many hours. Drivers were forced to find their ways home through unlit narrow winding lanes to the north of the A352 - often without signs. The A352 has the following impedimenta.

26 roads turning off it

29 farm and field entrances

3 indicators of tractors turning

3 small settlements; winfrith Newburgh, East Knighton and Broadmayne.

3 bend signs

12 businesses including a vets and business park opening onto the road.

2 laybys

2 signs indicating horseriding.

2 signs indicating pedestrians and cyclists for one mile with no footpath.

1 roundabout with tourist traffic coming from the Heritage Coast (Weymouth).

The road is prone to flooding at least one lane occurred in the last 18 months.

The east route to Poole and Bournemouth on the A351 bypassing Wareham to the Banks ARms is also subject to congestion. It goes through Sandford and Holton Heath with several traffic lights and consequent queing.

Purbeck admit the A351 from Wareham to Poole has a traffic volume problem but its solution in encouraging people to travel north to Bere Regis to join the road is totally unsound except that that the A35 road is a good mainly dual carriage way road.

Tourism is not mentioned in Policy H5 but Wool is the gateway to the key parts of the Heritage Coast - eg Lulworth. Severe congestion through the village will result in this becoming 'a closed gate' deterring visitors and having a negative impact on tourism.

Purbeck used to boast on its logo 'Purbeck an area with vibrant communities in balance with the environment'. This plan will result in beleaguered communities out of balance with an increasingly damaged natural environment certainly as regards Wool.

I urge you to look for more Brownfield sites.

LEGAL COMPLIANCE - The proposed 65 bed care home has not been consulted on or need. This is situated on the western edge of Purbeck and will draw in extra traffic. Who is going to run it? Two private care homes hav3e closed in the area recently. Certainly one due to staffing difficultie3s with low wages. There is a presumption in caring for people in their homes at present.

One wonders if it is a means of land banking as Moreton the other high allocation of housing also has one. In the face of failure, could they be converted to flats?

If this plan is passed Wool will become a commuter town instead of a viable village set in a rural parish. Wool was not allocated any houses in the 2012 plan, what has changed to make it suitable for the second largest allocation in the district? Reservations should surely have existed in 2012. What has happened is that some of the problems eg traffic and people pressure in wildlife areas has increased, possibly with the redevelopment of Purbeck Gate.

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

More extensive search of brownfield sites needs to be made. Suggest replacement if needed by using Bere Regis for more housing as a more sustainable option.

It is sad that with Woolbridge Manor and the area steeped in Hardy's features that no mention of Hardy's impact on the village has been made.

There should be a statement explaining why Bere Regis is not included – as this might be a better site for increased housing numbers. The A35 connecting this to Dorchester is straight and has dual carriageway along most of its length. Goes through no settlements and the road to the east – Poole and Bakers Arms roundabout is better than A351 with regards to traffic flow. It would also be nearer to routes to Warminster and Noirth to the M4. IT has a new build capacious school with a large site appropriate for expansion, its retail facilities are limited and some increase in population could promote the building of new facilities. Bere Regis has capacity for sustainability.

**If you have any supporting documents please upload them here.**      [Bere Regis school.pdf](#)

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1. To argue the case more thoroughly. 2. To give wider evidence of residents involvement with and appreciation of the natural environment of Wool, including children. 3. Should the National Park be delivered I would like to present the opportunity of a new more sustainable future vision for Wool.



St John th

Elder Rd

Elder Rd

Manor Farm Rd

Elder Rd

Southway

Foston Ct

Bere Regis Primary & Pre-School

Google





Church Ln

Church Ln

Church Ln

Woolcote Primary School

Google

ES071

Woolworth Rd

Collier's Ln

Duck St

Duck St

Duck St

Collier's Ln

Fingle Bridge

Wool Royal British Legion

lowle



Watermeadows Landscape (Woolbridge Manor – Thomas Hardy Tess of the Durbevilles)



Watermeadows Landscape (Woolbridge Manor – Thomas Hardy Tess of the Durbevilles)

## Comment

<b>Consultee</b>	Mr Peter Bowyer (1191247)
<b>Email Address</b>	[REDACTED]
<b>Company / Organisation</b>	Pan Purbeck Action Campaign
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Pan Purbeck Action Campaign (Mr Peter Bowyer - 1191247)
<b>Comment ID</b>	PLPP477
<b>Response Date</b>	03/12/18 17:16
<b>Consultation Point</b>	Policies List ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Are you responding on behalf of a group?</b>	Yes
<b>If yes, how many people do you represent?</b>	161
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	V1
<b>Do you consider that the Local Plan is legally compliant?</b>	No
<b>Do you consider that the Local Plan is sound?</b>	No
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	Yes

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

The Plan is reliant upon decisions on viability by private individuals and companies. In view of the uncertainties surrounding these decisions little if any reliability can be placed on the approach to development in this plan. Developers decisions do not constitute a sound basis for a plan especially one that has public sector considerations.

The 2018 consultation contained a geographical bias in that residents of area A could vote for housing to be placed in area B in order to avoid housing in area A. Such a bias is against the principles of consultation.

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

Wholesale revision of the plan to ensure deliverability based on the needs and aspirations of the local residents of Purbeck. This should be a Local plan for local people based on the right number of houses, in the right places and for the right people. The Local Plan should not be a vehicle for enriching developers and landowners; neither should it be the servant of those who wish to use the housing market to increase their wealth at the expense of ignoring community concerns e.g. affordable housing, sustainability.

2018 consultation results should be disaggregated so as to show which areas voted for which options. Consultations should be designed to be fair and to be seen to be fair.

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

Elaboration

## Comment

<b>Consultee</b>	Mr Peter Bowyer (1191247)
<b>Email Address</b>	[REDACTED]
<b>Company / Organisation</b>	Pan Purbeck Action Campaign
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Pan Purbeck Action Campaign (Mr Peter Bowyer - 1191247)
<b>Comment ID</b>	PLPP483
<b>Response Date</b>	03/12/18 17:23
<b>Consultation Point</b>	Policies List ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Are you responding on behalf of a group?</b>	Yes
<b>If yes, how many people do you represent?</b>	161
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	E7
<b>Do you consider that the Local Plan is legally compliant?</b>	Yes
<b>Do you consider that the Local Plan is sound?</b>	No
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	No

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The Environmental Infrastructure Capacity Study is weak and a paper driven exercise. It shows the map yet not the territory of the areas designated.

Local residents and groups were denied the opportunity to contribute to the EICS. Local knowledge was not given consideration in the development of the EICS report.

Given the nature of the area and its designations, failure to engage with the community is a serious weakness.

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

Review the EICS ,incorporate local knowledge, and defend the designations.

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

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

Elaboration

## Comment

<b>Consultee</b>	Mr Peter Bowyer (1191247)
<b>Email Address</b>	[REDACTED]
<b>Company / Organisation</b>	Pan Purbeck Action Campaign
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Pan Purbeck Action Campaign (Mr Peter Bowyer - 1191247)
<b>Comment ID</b>	PLPP488
<b>Response Date</b>	03/12/18 17:25
<b>Consultation Point</b>	Policies List ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Are you responding on behalf of a group?</b>	Yes
<b>If yes, how many people do you represent?</b>	161
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	E8
<b>Do you consider that the Local Plan is legally compliant?</b>	Yes
<b>Do you consider that the Local Plan is sound?</b>	No
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	No

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Please see comments for E7

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

As per E7

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

Elaboration

## Comment

<b>Consultee</b>	Mr Peter Bowyer (1191247)
<b>Email Address</b>	[REDACTED]
<b>Company / Organisation</b>	Pan Purbeck Action Campaign
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Pan Purbeck Action Campaign (Mr Peter Bowyer - 1191247)
<b>Comment ID</b>	PLPP530
<b>Response Date</b>	03/12/18 19:29
<b>Consultation Point</b>	Policies List ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Are you responding on behalf of a group?</b>	Yes
<b>If yes, how many people do you represent?</b>	161
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	H1
<b>Do you consider that the Local Plan is legally compliant?</b>	Yes
<b>Do you consider that the Local Plan is sound?</b>	No
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	No

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

The weight given to the concept of Objectively Assessed Needs does not reflect the fact that this concept is not what it says. Rather it is an opinion. At no stage in the development of this plan has there been any adjustment to recognise that the concept of Objectively Assessed Need is not what it says.

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

Review to accommodate a wider range of opinions on the application of the concept of Objectively Assessed Need.

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Elaboration

## Comment

<b>Consultee</b>	Mr Peter Bowyer (1191247)
<b>Email Address</b>	[REDACTED]
<b>Company / Organisation</b>	Pan Purbeck Action Campaign
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Pan Purbeck Action Campaign (Mr Peter Bowyer - 1191247)
<b>Comment ID</b>	PLPP533
<b>Response Date</b>	03/12/18 19:46
<b>Consultation Point</b>	Policies List ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Are you responding on behalf of a group?</b>	Yes
<b>If yes, how many people do you represent?</b>	161
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	H3
<b>Do you consider that the Local Plan is legally compliant?</b>	No
<b>Do you consider that the Local Plan is sound?</b>	No
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	No

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

The method of calculating the housing numbers is flawed. Population projections are subject to uncertainties and revisions.

The numbers of houses for Purbeck is far too high given the designations. The Local Plan does not meet the needs and the aspirations of the residents of the local communities in Purbeck. The District Council have been repeatedly told of this concern.

There is no strong body of evidence to indicate that Purbeck needs any more than 120 houses per year. The current figure of 168 houses per year is too high given the restricted nature of the area. Purbeck is a rural area and not an extension of the conurbation.

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Reversion to the earlier figures of 120 houses per year. Clear evidence of infrastructure and reliable employment projections to support the proposed housing numbers.

Purbeck is not a normal area; given its designations and environment the area requires the protection afforded by housing numbers that reflect the needs of the area rather than numbers generated to meet a national formula that marginalises important national and international designations.

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

Pan Purbeck Action Campaign is a group of residents from across all of Purbeck who are concerned with the development and operation of planning in Purbeck. Members are from all walks of life - former farmers to company directors. Members request that their concerns are raised in the inspection process.

## Comment

<b>Consultee</b>	Mr Peter Bowyer (1191247)
<b>Email Address</b>	[REDACTED]
<b>Company / Organisation</b>	Pan Purbeck Action Campaign
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Pan Purbeck Action Campaign (Mr Peter Bowyer - 1191247)
<b>Comment ID</b>	PLPP538
<b>Response Date</b>	03/12/18 20:08
<b>Consultation Point</b>	Policies List ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Are you responding on behalf of a group?</b>	Yes
<b>If yes, how many people do you represent?</b>	161
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	H8
<b>Do you consider that the Local Plan is legally compliant?</b>	No
<b>Do you consider that the Local Plan is sound?</b>	No
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	No

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

The Small Sites Policy undermines the concept of development boundaries. The policy creates openings for developers to build on designated areas.

The policy is unclear in terms of allocations, and the number of sites in an area over the plan period.

There has been inadequate dialogue over the development of this policy. The communities in Purbeck were not made aware of the likely locations for sites under this policy until the first day of this pre submission consultation. Such withholding of information did not inspire confidence or transparency in the process of completing this plan.

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

Policy review via community engagement. Identification of all sites with indicative numbers.

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

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

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

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

Elaboration

## Comment

<b>Consultee</b>	Mr Peter Bowyer (1191247)
<b>Email Address</b>	[REDACTED]
<b>Company / Organisation</b>	Pan Purbeck Action Campaign
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Pan Purbeck Action Campaign (Mr Peter Bowyer - 1191247)
<b>Comment ID</b>	PLPP546
<b>Response Date</b>	03/12/18 20:20
<b>Consultation Point</b>	Policies List ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Are you responding on behalf of a group?</b>	Yes
<b>If yes, how many people do you represent?</b>	161
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	H11
<b>Do you consider that the Local Plan is legally compliant?</b>	Yes
<b>Do you consider that the Local Plan is sound?</b>	No
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	Yes

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

The policy makes no adjustments for double counting. The policy does not make adequate provision for social housing.

Reliance on private sector financial viability to deliver non market housing is no guarantee that the rhetoric associated with affordable housing will ever be delivered via this plan

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

Policy review to address double counting sand reliability of delivery.

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

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

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

Genuinely affordable housing is a community concern in Purbeck. Residents request alternative ways of meeting housing needs other than by excessive development of market houses beyond the incomes of employed persons in Purbeck.

## Comment

<b>Consultee</b>	Mr Peter Bowyer (1191247)
<b>Email Address</b>	[REDACTED]
<b>Company / Organisation</b>	Pan Purbeck Action Campaign
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Pan Purbeck Action Campaign (Mr Peter Bowyer - 1191247)
<b>Comment ID</b>	PLPP548
<b>Response Date</b>	03/12/18 20:26
<b>Consultation Point</b>	Policies List ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Are you responding on behalf of a group?</b>	Yes
<b>If yes, how many people do you represent?</b>	161
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	H12
<b>Do you consider that the Local Plan is legally compliant?</b>	Yes
<b>Do you consider that the Local Plan is sound?</b>	No
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	Yes

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

The Rural Exception Site policy undermines what rural communities need from such a policy. Including market housing in rural exception sites changes the very nature of such sites. The rural communities of Purbeck were persuaded that rural exception sites would be what they say i.e exceptions. Houses would be for rent for persons with a local connection. Houses in such sites would be for rent in perpetuity.

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

Remove market housing from rural exception sites. Remove the right to buy from tenants in houses on rural exception sites.

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

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

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

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

Elaboration

## Comment

<b>Consultee</b>	Mr Peter Bowyer (1191247)
<b>Email Address</b>	[REDACTED]
<b>Company / Organisation</b>	Pan Purbeck Action Campaign
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Pan Purbeck Action Campaign (Mr Peter Bowyer - 1191247)
<b>Comment ID</b>	PLPP549
<b>Response Date</b>	03/12/18 20:30
<b>Consultation Point</b>	Policies List ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.3
<b>Files</b>	<a href="#">H14-PPAC-additional-comments-PLPP549.pdf</a>
<b>Are you responding on behalf of a group?</b>	Yes
<b>If yes, how many people do you represent?</b>	161
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	H14
<b>Do you consider that the Local Plan is legally compliant?</b>	Yes
<b>Do you consider that the Local Plan is sound?</b>	No
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	No

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

Please include holiday lets and buy to lets in the definition of second homes.(St Ives etc),

The policy should apply throughout the district and not be restricted just to the AONB.

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

A comprehensive and inclusive definition of second homes is required to create a sound policy.

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

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

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

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

Elaboration

**The Purbeck Local Plan:**

I am responding to the Second Home Policy (H14) of the Plan on behalf of Pan Purbeck Action Campaign (PPAC).

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

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

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

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

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

Purbeck has an opportunity to include a St Ives (H2) type policy that supports HOMES for people. People in this area struggle, even those on reasonable incomes to buy market housing. The second home/holiday let impacts on working people's ability to afford housing. If a H2 full time residency policy was applied to all new builds there would be more opportunity for people to make Purbeck their HOME rather than the housing be lost to the second home/holiday let market.

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

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

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

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

market and create new opportunities for people to live and work here, to strengthen our community and the local economy...". [St Ives Area Neighbourhood Development Plan](#)

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

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

The Inspector notes that *'os second ond hoiidoy homes ore not o category of NEED for which the NPPF odvles that provision shoud be mode, the policy (H2) involves no specific conflict with national policy.'*

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

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

- A St Ives (H2) policy was discussed by Parish Councillors, PDC councillors, officers, members of the public at a Purbeck (affordable) Housing Forum meeting. It was actioned that PDC communicate with St Ives/Cornwall to explore a similar (H2) policy for Purbeck. There was support from residents, Councillors and some officers for such a policy.
- A response to the above meetings was that a second home policy written by Steve Tapscott – senior planning officer, in 2017 provided evidence to support a full time principal residence policy. Unfortunately the second home evidence paper (2018) does not go as far and is therefore weaker and therefore does not support sustainable development. Page 67 of 71 Recommendations for the Local Plan Review: 254. This report recommends that the local plan review incorporates proposed Policy PRH: Principal Residence Housing and that it be monitored over time.
- In response to an earlier consultation, PDC paused to gather further information from the community. The 2017 second home evidence paper (Steve Tapscott) provided evidence and support for a Principal Residency Housing Policy. (This paper appears to have subsequently withdrawn from the current supportive PLP evidence documents previously included on the Dorset For You website. Paper copies are available and PDC may have a link to the document. However there are supportive comments in the link to the document below, from the public that offer evidence from a range of sources that supports a full time principal residence policy.  
<https://www.dorsetforyou.gov.uk/planning-buildings-land/planning-policy/purbeck/local-plan-review-purbeck/pdfs/consultations/options/partial-review-options-consultation-report.pdf> pages 22 – 24 Purbeck Plan Partial Review January 2017.
- As mentioned above the more recent 2018 second home evidence document, whilst including much of the same text evidence as the 2017 it did not come to the same conclusion and did not suggest a PRH policy. It focusses on a partial second home policy, whilst giving many reasons to support a PRH policy. The document in some ways seems at odds with its own findings and evidence base.
- The supportive evidence documents and the final copy of the Purbeck Local Plan were not available until the 22<sup>nd</sup> October, however the public were invited to input at a prior policy group meeting and following full council meeting, where these documents were not available. This to some extent limited full public participation, as they did not have these documents available to them at the policy group or full council meeting. (ref: About Purbeck Issue 39 – November 2018).
- Lack of evidence in the second home evidence paper that supports that second homes and holiday lets compared with full time residency are more or less sustainable than full time residency. It is accepted that second homes and holiday lets do have some economic benefit, however is there any evidence to prove that they have more benefit overall than full time residents? This is where St Ives and others have 'realised' and argued that full time residents have an overall benefit when considering all aspects of 'Sustainable Development'(NPPF) ie. Benefits from living as full time residents should be considered not only the economic factors but also the social and environmental factors, which I believe that the NPPF considers should be taken into account. It is a high priority that our communities continue to exist into the future, and local knowledge supports that many of the existing market houses are being sold to the second home/holiday let market. To allow this to continue should be questioned as to whether it does in fact meet sustainable

development. The benefit of having a healthy full time resident community should be seriously be taken into account particularly when considering schools, churches, village halls, volunteers including coastguards, lifeboat, police support, local clubs, neighbourly support for the elderly, allotments, all the year round support for local shops, pubs, pub teams etc.

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

#### **Conclusion:**

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

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

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

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



## Comment

<b>Consultee</b>	Mr Peter Bowyer (1191247)
<b>Email Address</b>	[REDACTED]
<b>Company / Organisation</b>	Pan Purbeck Action Campaign
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Pan Purbeck Action Campaign (Mr Peter Bowyer - 1191247)
<b>Comment ID</b>	PLPP551
<b>Response Date</b>	03/12/18 20:44
<b>Consultation Point</b>	Policies List ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Are you responding on behalf of a group?</b>	Yes
<b>If yes, how many people do you represent?</b>	161
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	IM1
<b>Do you consider that the Local Plan is legally compliant?</b>	Yes
<b>Do you consider that the Local Plan is sound?</b>	No
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	Yes

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

The plan is inherently unreliable as the business model on which it is based relies on private sector decisions determined by financial viability. Given the nature of future uncertainties there are no guarantees that the plan can deliver what it sets out to do. To base a plan on uncertainties is unwise. Residents in the communities of Purbeck may believe that they will receive opportunities to access social or affordable housing based upon this plan. In the event of private sector decisions not being made such residents will have been misled over the ability to deliver this plan. In addition the market housing emphasis in this plan will not produce local homes for local people due to the high ratio of house prices to local incomes.

Studies show low price elasticities of supply for houses i.e. building more does not necessarily lead to lower prices e.g Poundbury.

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

A major rethink is required to increase the reliability of being able to deliver this plan.

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

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

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

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

Elaboration

## Comment

<b>Consultee</b>	Miss Josephine Parish (1188797)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Miss Josephine Parish (1188797)
<b>Comment ID</b>	PLPP280
<b>Response Date</b>	03/12/18 08:53
<b>Consultation Point</b>	Policies List ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1

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

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

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

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

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

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

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

I believe this Local Plan to be unsound as (1) it can not provide what it sets out to provide, that is homes for local people on local incomes (2) the plan and its policies do not represent the needs of the

residents of the Purbeck District on a number of levels and on the whole does not lead to sustainable development and genuinely affordable housing solutions for local people.

- The Environmental reports are inadequate. The Purbeck District is being considered as a National Park and may even be announced as such in Autumn of 2019. While a decision is awaited, the numbers of houses planned to be built should be greatly reduced relative to the actual needs of local residents. It would be such a loss to this beautiful landscape for houses to be built predominantly so that developers can make profits building more second homes and holiday lets for profit while only a minute, disrespectfully tiny proportion would be built as genuinely affordable homes for local people.

- 1 The Purbeck District has the greatest disparity between high property prices and low incomes of all districts in the country outside of London (and worse even than some London Boroughs); it follows therefore that it is impossible for those on average incomes to purchase a home. The affordable homes policy comes nowhere near providing homes which would be affordable for residents on local incomes.
- 2 This Local Plan would not provide homes for local people in need of a home. It can only provide for more holiday lets and second homes outside of the AONB and within the AONB this Local Plan would allow houses to be built for holiday lets. This second homes policy should be in line with the successful St Ives Primary Residence Policy within its Neighbourhood Plan to only allow sustainable development in line with NPPF. The question of sustainability of Holiday lets is key to the decision by PDC to permit holiday lets as part of the Local Plan; yet PDC have produced no evidence to support to prove sustainability; thus inadequate evidence has been produced in my view. The local authority could have surveyed local letting agents about the typical expectations for how many weeks per year a holiday let property could expect to generate an income over a year. This evidence is easily gained.
- 3 This Local Plan's Small Sites Policy would undermine the whole principle of a Rural Exception Site which was to only allow a small amount of genuinely affordable housing for local people. In addition recent changes to the small sites policy have not been subject to full consultation and there is great concern allowing up to 30 houses to be built on small sites.
- 4 Residents have expressed concern about the method chosen by PDC for responding to the Pre-submission consultation as they are finding it difficult to access on a number of levels. A response in another format is not permitted.

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

- 1 This second homes policy should be in line with the successful St Ives Primary Residence Policy within its Neighbourhood Plan to only allow sustainable development in line with NPPF.

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

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

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

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

It is necessary that the examiner has an opportunity to listen to local residents who have been shut out of the process by PDC's endeavour's to get the plan finalised at all cost. After all should the Local Plan not be attempting to meet the housing needs of its residents? Or is the Local Plan intended to meet the greed of developers using homes as business assets to be let as holiday lets purely for profit

and person gain. In addition, this gives the residents further time to produce evidence to support their concerns as the examiner must be reminded that the policies have been changed and inadequate time has been given for these to be studied by residents.

## Comment

<b>Consultee</b>	Ms Diana Parry (1192535)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Ms Diana Parry (1192535)
<b>Comment ID</b>	PLPP647 PLPP717

<b>Files</b>	<a href="#">H11-Parry-PLPP647-redacted.pdf</a>
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If your representation relates to how the Council has consulted with other relevant bodies during the plan making process, it is likely to relate to how the plan process has complied with the duty to co-operate in relation to the planning of sustainable development.

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

### Affordable Housing.

The affordable Housing proposed for Purbeck in the plan is unsound because of the high price of housing in Purbeck means that there are no genuinely affordable houses available for purchase for purchase whatever formula is used. The average cost of a house in Purbeck is £250,000 ie 17 times the average salary in Purbeck. No evidence is shown to prove building 470 houses in Wood will alter this, in fact past experience proves the opposite.

The 933 houses as yet unallocated to any site small or large could land up anywhere and this is a huge number if it turns out they all go to, as yet unspecified, development

There is no second homes policy or holiday homes policy such as the one similar to St Ives which is what is required to regulate prices.

The second homes numbers in Purbeck are not currently correct. The income from holiday lets goes out of the area as most owners tend not to live in the area. I personally know of six homes this applies too.

(Please continue on a separate sheet if necessary)

There has been no previous mention in any of the consultations of a 65 bed care Home alongside a busy and polluting main road the A352. With the current Dorset NHS plan to move the main A+E hospital to the far side of Bournemouth which is difficult to access by anything other than a vehicle that is not easy and with no guarantee of arriving within the magic hour, even for ambulances, if needed, puts lives at risk.

The local surgery, Social Services, Dorset NHS and CCG <sup>were NOT</sup> ~~were~~ involved in any sort of consultation. I question the legality of its inclusion. The inclusion of this suggestion, where the bulk of the housing in the previous consultation <sup>DPG</sup> ~~were~~ were to be built suggests an ulterior motive for introducing it.

There is no other building anywhere near that size in Wool so would not fit in with the local architecture or scale of the local buildings & contravenes the planning principle elsewhere in the Pre-submission Policy Document. This also applies to the proposed Community Hub on the same site as they already exist together next to the village Recreation/Playing Field, which consists of Play areas ~~the~~ Kids of Wool Building, Sports Club, D'urbervill Hall, Library, and comprehensive Surgery

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

(Please continue on a separate sheet if necessary)

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

Yes

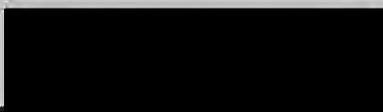
No

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

(Please continue on a separate sheet if necessary)

**Please sign and date this form:**

Signature:



Date: 02-12-2018

## Comment

<b>Consultee</b>	Ms Diana Parry (1192535)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Ms Diana Parry (1192535)
<b>Comment ID</b>	PLPP648
<b>Response Date</b>	03/12/18 12:07
<b>Consultation Point</b>	Chapter 3: Environment ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Letter
<b>Version</b>	0.3
<b>Files</b>	<a href="#">Environment-Chapter-Parry-PLPP648-redacted.pdf</a>
<b>Are you responding on behalf of a group?</b>	No
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	<input type="checkbox"/> The submission of Local Plan to the Secretary of State for Public Examination <input type="checkbox"/> The publication of the recommendations of any person appointed to carry out an the Examination of the Local Plan (the Inspector's Report) <input type="checkbox"/> The adoption of the Purbeck Local Plan
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	Environment Chapter
<b>Do you consider that the Local Plan is legally compliant?</b>	No
<b>Do you consider that the Local Plan is sound?</b>	No
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	No

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

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

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



<b>For Office Use Only</b>	
Requester ID:	008
Consultee ID:	1192535
Comment ID's:	PLPP648

## PART B

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

Policy number	Environment chapter
Policies map	
Paragraph number	

2. Do you consider that the Local Plan is:

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

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

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

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

- positively prepared - providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- justified - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- effective - deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- consistent with national policy - enabling the delivery of sustainable development in accordance with the policies in the Government's National Planning Policy Framework.

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

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

## ENVIRONMENT

The damage that will be caused by this excess of housing will result in further flooding over the years there has been fresh water springs, the water has been tested by Wessex Water, appearing in Chalk pit Lane Wool and flooding at its junction with the A352 by the local shops. Bailey's Drove has suffered flooding over the years with water draining from the hill on the south side of the A352 from the site of the proposed care home, this resulted in the Army helping local residents, who have photos to back this up. The new estate development opposite the proposed care home, Purbeck Gate, has already had flooding issues.

I have been a resident of Wool for 75 years and until the 1960 we all reside on Wells, the only time they ran dry was one year when Winfrith Atomic Energy Site was being developed, there was no flooding until more recently.

(Please continue on a separate sheet if necessary)

The field being proposed for development **1647**  
currently farmed organically, if developed all that  
biodiversity would be lost. I have seen over the years  
Lapwings, Nightingales, Owls, Buzzards, Harriers & even  
a Stork to name some of the birds that it maintains

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

(Please continue on a separate sheet if necessary)

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

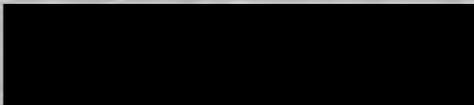
Yes

No

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

(Please continue on a separate sheet if necessary)

**Please sign and date this form:**



Signature:

Date: 09-12-2018

## Comment

<b>Consultee</b>	Ms Diana Parry (1192535)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Ms Diana Parry (1192535)
<b>Comment ID</b>	PLPP649 PLPP718

<b>Files</b>	<a href="#">Parry-PLPP649-redacted.pdf</a>
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## For Office Use Only

Requester ID: 008  
 Consultee ID: 1192535  
 Comment ID's: PLPP649



## PART B

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

Policy number	All
Policies map	
Paragraph number	

2. Do you consider that the Local Plan is:

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

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

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

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

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- justified - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- effective - deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- consistent with national policy - enabling the delivery of sustainable development in accordance with the policies in the Government's National Planning Policy Framework.

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

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

### Consultations

The 2018 January Consultation was severely flawed & pitted one area of Purbeck against another which resulted in Wool and Moreton specifically being chosen options by the rest of Purbeck but 28% chose NONE as their option.

In Wool 30% chose option A but 60% chose NONE as their option, this was a democratic decision which was ignored and is therefore unsafe.

The consultation is severely flawed, by insisting originally on only on line responses. Many people like myself were delighted a voice, eventually a paper reply was made available but not widely advertised.

As I am an aging member of the community, I am not confident with computers and also struggle with mobility which means I have only been able to access the report with the greatest difficulty & determination. (Some might call it B. Mindfulness)

All of the above makes the consultation dishonest.

(Please continue on a separate sheet if necessary)

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

(Please continue on a separate sheet if necessary)

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

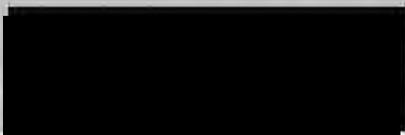
Yes

No

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

(Please continue on a separate sheet if necessary)

**Please sign and date this form:**

Signature:  Date: 03-12-2018

## Comment

<b>Consultee</b>	Mr Andrew Patrick (1190289)
<b>Email Address</b>	<span style="background-color: black; color: black;">[REDACTED]</span>
<b>Address</b>	The Swanage Railway Trust Swanage Station Swanage BH19 1HB
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Mr Andrew Patrick (1190289)
<b>Comment ID</b>	PLPP116
<b>Response Date</b>	29/11/18 17:45
<b>Consultation Point</b>	Chapter 6: Infrastructure ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Files</b>	Swanage Railway : Response and Representations
<b>Are you responding on behalf of a group?</b>	Yes
<b>If yes, how many people do you represent?</b>	4000
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	17
<b>Do you consider that the Local Plan is legally compliant?</b>	Yes
<b>Do you consider that the Local Plan is sound?</b>	No
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	Yes

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

POLICY I 7

These Representations are submitted as Agent for and behalf of the Swanage Railway Trust. The full reasons for considering I 7 unsound is set out in Section 6 of the attached document "Swanage Railway: Response & Representations". In short, I 7 is not justified and not effective because it does not allow essential railway infrastructure away from settlements . This is crucially important to the Swanage Railway and it ability to contribute to the aims and objectives of the Plan., as explained in the attached document.

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

As set out in Para 6.9, CRITERIA ii needs to be modified to read:

"Is located close to an identified settlement, or in an accessible location, and"

**If you have any supporting documents please upload them here.** Swanage Railway : Response and Representations  
Swanage Railway : Response and Representations

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

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

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

To assist the Inspector : a) by helping her or him to understand the technical issues involved. b) by contributing to any discussion of the issues, and c) enabling the EiP to continue on site if and where appropriate

## Comment

<b>Consultee</b>	Mr Andrew Patrick (1190289)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	The Swanage Railway Trust Swanage Station Swanage BH19 1HB
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Mr Andrew Patrick (1190289)
<b>Comment ID</b>	PLPP119
<b>Response Date</b>	29/11/18 17:58
<b>Consultation Point</b>	Chapter 6: Infrastructure ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Files</b>	Swanage Railway: Response and Representations
<b>Are you responding on behalf of a group?</b>	Yes
<b>If yes, how many people do you represent?</b>	4000
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	1 2
<b>Do you consider that the Local Plan is legally compliant?</b>	Yes
<b>Do you consider that the Local Plan is sound?</b>	No
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	Yes

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

POLICY I 2

This Representation is made as Agent for and on behalf of the Swanage Railway Trust. Full details are set out in Section 5 of the attached document "Swanage Railway: Response and Representations". In short, Policy I 2 is welcomed but it is unsound because it is not effective in that there is no cross reference to the Proposals Map, which needs to delineate opportunities to deliver improvements in rail connections which have already been identified.

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

See Para 5.10 of the attached document.

To add, after".....reducing reliance on the car" the following sentence:

"Opportunities to deliver rail improvements are identified on the Proposals Map by the delineation of rail routes(which offer opportunities to improve sustainable transportation) and safeguarded transport land"

**If you have any supporting documents please upload them here.** Swanage Railway: Response and Representations  
Swanage Railway: Response and Representations

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

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

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

To assist the Inspector: a) by helping in understanding of the technical issues involved b) by participating in any discussion of the issues, and c) enabling the EiP to continue on site if and where appropriate

## Comment

<b>Consultee</b>	Mr Andrew Patrick (1190289)
<b>Email Address</b>	<span style="background-color: black; color: black;">[REDACTED]</span>
<b>Address</b>	The Swanage Railway Trust Swanage Station Swanage BH19 1HB
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Mr Andrew Patrick (1190289)
<b>Comment ID</b>	PLPP184
<b>Response Date</b>	30/11/18 22:34
<b>Consultation Point</b>	Chapter 6: Infrastructure ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Files</b>	Swanage Railway: Response and Representations (1)
<b>Are you responding on behalf of a group?</b>	Yes
<b>If yes, how many people do you represent?</b>	4000
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	Policies Map
<b>Do you consider that the Local Plan is legally compliant?</b>	Yes
<b>Do you consider that the Local Plan is sound?</b>	No
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	Yes

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

**POLICIES MAP**

The Swanage Railway Trust representation on the Policies map follows on from our representation re Policy I 2 and is set out in Section 7 of the document "Swanage Railway: Response and Representations" attached

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

THE KEY: add "Strategic Rail Routes (Policy I 2)" and "Safeguarded Transport Area (Policy I 2)"

THE MAP:

Denote all rail routes as Strategic Rail Route"

Delineate "Safeguarded Transport Area" to cover the railway and sidings at Furzebrook

Delineate "Safeguarded Transport Area" to cover the Railway and Council land at Norden Park and Ride

**If you have any supporting documents please upload them here.** Swanage Railway: Response and Representations (1)

Swanage Railway: Response and Representations

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

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

To assist the Inspector: a) by enabling understanding of the technical issues involved b) to contribute to any discussion of the issues c) to enable the EiP to continue on site if and where appropriate

## Comment

<b>Agent</b>	Joe Maphosa (1185778)
<b>Email Address</b>	[REDACTED]
<b>Company / Organisation</b>	Persimmon Homes South Coast
<b>Address</b>	Park View House 100 Wickham Road Fareham PO16 7HT
<b>Consultee</b>	Joe Maphosa (1192730)
<b>Email Address</b>	[REDACTED]
<b>Company / Organisation</b>	Persimmon Homes South Coast
<b>Address</b>	Park View House 100 Wickham Road Fareham PO16 7HT
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Persimmon Homes South Coast ( Joe Maphosa - 1192730)
<b>Comment ID</b>	PLPP751
<b>Response Date</b>	03/12/18 10:41
<b>Consultation Point</b>	Policy H3: New housing development requirements ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Letter
<b>Version</b>	0.1
<b>Files</b>	<a href="#">persimmon-homes-1185778-PLPP659.pdf</a>

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

**Which policy / paragraph number / policies map does your comment relate to?** H1 H3 H9

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

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

See attached

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

See attached

**PURBECK LOCAL PLAN 2018-2034**  
**PRE SUBMISSION DRAFT PLAN**  
**RESPONSE FROM PERSIMMON HOMES (SOUTH COAST)**

Persimmon Homes (South Coast) welcomes the opportunity to comment of the Purbeck Pre-Submission Draft Plan. The company does not have any site specific interests within the plan area and as such our response is restricted to the proposed Policies.

### **Policy H1: Local housing requirement**

Policy H1 sets out the housing requirement for the plan area. This is based on the standardised methodology which indicates a local housing need of 168 dwellings per annum equating to 2,688 dwellings between 2018 and 2034. The NPPG sets out that the local housing need requirement is only the starting point for establishing the number of houses to be provided in the local plan with local authorities required to assess their capacity to address the unmet needs of neighbouring authorities.

The Statement of Common Ground between Local Planning Authorities in Dorset (October 2018) at paragraph 22 indicates that Bournemouth and Christchurch are unlikely to be able to meet their own housing needs. As such the council should be looking to allocate an additional quantum of housing to help meet the unmet needs of its neighbours.

Paragraph 109 of the Housing Background Paper indicates that 7,380 houses could be delivered from identified sites in the SHLAA. This is in comparison to a local housing requirement of 2,688 dwellings resulting in a surplus of approximately 4,692 dwellings. It is clear that Purbeck indeed has significant capacity to meet some of the housing needs of Bournemouth and Christchurch. Policy H1 therefore fails the test of soundness as it has not been *positively prepared* to take account of the unmet needs within its neighbouring authorities.

### **Policy H3: New housing development requirements**

Bullet point (f) of the policy makes reference to field in trust standards, for the avoidance of doubt the council should state the specific year of publication.

### **Policy H9: Housing mix**

#### Policy H9(a)

Bullet point (a) of the policy makes reference to the requirement for 5% of dwellings on sites of 20 units or more to be serviced plots for those wishing to build their own homes. This is set against an identified demand for 88 plots. This number may yet be greatly reduced following the council's introduction of eligibility criteria as referred to at paragraph 156 of the pre-submission plan.

This is **NOT** a '*justified*' approach as there is no evidence of need warranting a policy requirement for the incorporation of self and custom build plots particularly on sites of 100+ units.

Government guidance<sup>1</sup> sets out a requirement to meet any identified need within a 3-year period from the corresponding base date. In order to provide a '*positively prepared*' policy the Council should explore an exceptions policy for bespoke one off

<sup>1</sup> Paragraph: 023 Reference ID: 57-023-201760728

self and custom build properties or small scale allocations for serviced plots of circa 10 units which would enable the delivery of demand where it emanates without placing a policy hurdle for large scale development.

Furthermore the practical implication of the delivery of self and custom build plots on large sites is discussed in greater detail below.

### *Practical considerations*

Persimmon Homes are of the view that it is not appropriate to provide self build plots on new build development sites of 100 or more units because this has impacts on:

- Design and layout requirements of the Design and Access Statement.
- Phasing and completion of the wider site.
- Section 106 contributions due to the exemption that applies to self-build housing.
- Delivery of housing in accordance with the NPPF to boost significantly housing supply, where supply on an ad hoc basis by self builders is likely to be slow compared with the remainder of the site or even not take place at all.

This results in practical and management problems as follows:

- the reserved matters period running out and needing to be extended.
- Ad-hoc builders turning up outside specified hours of work.
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- Purchasers having to stop building due to unemployment/lack of funds.
- Purchaser dissatisfaction where building continues on a site which was expected to finish when they moved in.

Should the council still be minded to seek alternative procurement routes this should be through specific allocations within the plan for small scale (approx. 5 – 10 units) serviced plots and or a Self and Custom Build exceptions policy. Either approach offers an alternative more dynamic and "*justified*" approach to meeting the aims of the Council with regard to the provision of self and custom build to plots to meet the identified demand.

### Policy H9(b)

Bullet point b of policy H9 sets out a requirement or for 10% of dwellings on sites of 20 or more units to be single storey dwellings. The council does not specify if these are to be flats or bungalows. Having reviewed the Strategic Housing Market Assessment Update (October 2018) and SHMA 2015 there is no definitive evidence of need for single storey dwellings in particular but rather there is reference to stakeholder work which informed the assumptions of the SHMA. Given that Policy H10 requires 10% of dwellings on sites of 20+ units to be accessible and adaptable policy H9(b)'s inclusion is superfluous.

## Comment

<b>Agent</b>	Joe Maphosa (1185778)
<b>Email Address</b>	[REDACTED]
<b>Company / Organisation</b>	Persimmon Homes South Coast
<b>Address</b>	Park View House 100 Wickham Road Fareham PO16 7HT
<b>Consultee</b>	Joe Maphosa (1192730)
<b>Email Address</b>	[REDACTED]
<b>Company / Organisation</b>	Persimmon Homes South Coast
<b>Address</b>	Park View House 100 Wickham Road Fareham PO16 7HT
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Persimmon Homes South Coast ( Joe Maphosa - 1192730)
<b>Comment ID</b>	PLPP752
<b>Response Date</b>	03/12/18 10:41
<b>Consultation Point</b>	Policy H9: Housing mix ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Letter
<b>Version</b>	0.1
<b>Files</b>	<a href="#">persimmon-homes-1185778-PLPP659.pdf</a>

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

**Which policy / paragraph number / policies map does your comment relate to?** H1 H3 H9

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

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

See attached

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

See attached

**PURBECK LOCAL PLAN 2018-2034**  
**PRE SUBMISSION DRAFT PLAN**  
**RESPONSE FROM PERSIMMON HOMES (SOUTH COAST)**

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Policy H1 sets out the housing requirement for the plan area. This is based on the standardised methodology which indicates a local housing need of 168 dwellings per annum equating to 2,688 dwellings between 2018 and 2034. The NPPG sets out that the local housing need requirement is only the starting point for establishing the number of houses to be provided in the local plan with local authorities required to assess their capacity to address the unmet needs of neighbouring authorities.

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Bullet point (f) of the policy makes reference to field in trust standards, for the avoidance of doubt the council should state the specific year of publication.

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<sup>1</sup> Paragraph: 023 Reference ID: 57-023-201760728

self and custom build properties or small scale allocations for serviced plots of circa 10 units which would enable the delivery of demand where it emanates without placing a policy hurdle for large scale development.

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## Comment

<b>Agent</b>	Joe Maphosa (1185778)
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<b>Address</b>	Park View House 100 Wickham Road Fareham PO16 7HT
<b>Consultee</b>	Joe Maphosa (1192730)
<b>Email Address</b>	[REDACTED]
<b>Company / Organisation</b>	Persimmon Homes South Coast
<b>Address</b>	Park View House 100 Wickham Road Fareham PO16 7HT
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Persimmon Homes South Coast ( Joe Maphosa - 1192730)
<b>Comment ID</b>	PLPP753
<b>Response Date</b>	03/12/18 10:41
<b>Consultation Point</b>	Policy H8: Small sites next to existing settlements ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Letter
<b>Version</b>	0.1
<b>Files</b>	<a href="#">persimmon-homes-1185778-PLPP659.pdf</a>

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

**Which policy / paragraph number / policies map does your comment relate to?** H1 H3 H9

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

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See attached

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<sup>1</sup> Paragraph: 023 Reference ID: 57-023-201760728

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## Comment

Consultee	Pickard (1190535)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Pickard (1190535)
Comment ID	PLPP133
Response Date	29/11/18 20:51
Consultation Point	Lytchett Matravers - 150 homes and a SANG ( <a href="#">View</a> )
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No

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

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

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

Do you consider that the Local Plan is sound? No

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

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

The volume of houses proposed for Lytchett Matravers will have a significant impact on what is meant to be a rural village. All aspects of infrastructure will be put under immense pressure by such a large increase in housing. Any local resident who has attempted to exit the village around school and commuter busy periods will know how incredibly congested the roads already are. The development

of 95 houses on Wareham Road in particular will exacerbate the problem and the infrastructure of the adjoining roads is simply not adequate currently, without the addition of another 150 households. Both the village primary school and pre school are stretched as it is and there is concern over how such an influx of households could negatively impact upon the quality of the education delivered.

The proposed 95 houses north of Glebe Road will have a dramatic impact on the privacy of residents living in Glebe Road whose houses face head on to the proposed development site. The geography of the land is such that these existing homes would most likely be overlooked by multiple houses and from multiple angles, emphasised by the not insignificant hill, meaning ground floor rooms and entire gardens could be overlooked. Contrary to what has been described, hedgerows along the south of the site are managed by residents and are not consistent across the site. Some have no hedges at all and the hedges that do exist are not high enough to provide adequate screening. Such a large development will change the character of the area entirely, away from a field that is frequently visited by families of deer and maintains much needed green space and the rural nature of the village.

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

Greater concern needs to be given towards how the infrastructure will be affected by this development and the necessary improvements required to cope with such an increase in households. We do feel this quantity of houses is better suited to a satellite location where infrastructure can be provided from the outset rather than making adaptations to an already strained system.

If a development off Wareham Road is unquestionably necessary, consider reducing the volume of houses to allow for adequate green space and landscaping surrounding the existing homes in Glebe Road, to minimise impact on existing residents.

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

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

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

## Comment

<b>Consultee</b>	Mr Michael Powley (1190851)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Mr Michael Powley (1190851)
<b>Comment ID</b>	PLPP405
<b>Response Date</b>	03/12/18 15:19
<b>Consultation Point</b>	Policies List ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.2
<b>Are you responding on behalf of a group?</b>	No
<b>If yes, how many people do you represent?</b>	1
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	H8
<b>Do you consider that the Local Plan is legally compliant?</b>	No
<b>Do you consider that the Local Plan is sound?</b>	No
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	Yes

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

In PDC's own evidence; Deans Drove and Foxhills Road are identified as being Critical Townscape where the elements of urban townscape should remain unchanged. It states:

"... the presence of a number of distinctive informal rural lanes within and on the outskirts of the village is considered to be an important asset ... .. These lanes would be vulnerable to any highway improvements, and the removal of verges, to provide pavements or installing kerb edgings would erode their character. The retention of hedges is also important for maintaining their informality."

The properties either side of Deans Drove are identified as having a Constant Townscape. The advice for this designation is that there should only be a limited degree of change, such as the replacement of some indifferent buildings. Not wholesale and radical change.

The many past and present objections of local residents are supported by technical evidence. Any development of this site is entirely unsuitable. It is a rural location, in the green belt. The associated vehicle movements, that would come with any development here, will harm the character of the area, as well as causing highway danger. There is potential for vehicular / pedestrian conflict – particularly as Deans Drove is often used by parents dropping off and collecting their children from school. It has been proven, with supporting evidence, that a development at Deans Drove would lead to severe residual cumulative impact including the impact on pedestrian movements on a Safer Route to School, and the significant visibility deficiencies. A development here would fail all three tests contained within the National Planning Policy Framework.

This is a steep, sloping site. It is a hilltop location, any development of new housing will dominate and harm the landscape, substantially overlook the existing adjoining houses and cause loss of privacy to the occupants. The development of any housing here would have a substantial adverse visual impact. The associated vehicle movements would ruin the rural character and cause danger to other road users, including pedestrians. This site has been proven unsuitable and inappropriate as a development site time and time again, most recently by Purbeck Planning Committee in January 2018. There is no local support and should remain open countryside.

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

The Plan should stipulate:

- 1) There should only be minor infilling between existing residential properties. This infilling should comprise of individual properties to a maximum of 5.
- 2) Land that has had planning permission refused on it in the last 10 years should not be permitted to be entered on to the plan.

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

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

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

To take an active part in ensuring the plans' compliance with the NPPF

## Comment

<b>Consultee</b>	Mr Rupert Lloyd (1189892)
<b>Email Address</b>	████████████████████
<b>Company / Organisation</b>	Public Health Dorset
<b>Address</b>	Princes House Dorchester DT1 1TP
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Public Health Dorset (Mr Rupert Lloyd - 1189892)
<b>Comment ID</b>	PLPP359
<b>Response Date</b>	03/12/18 14:36
<b>Consultation Point</b>	Chapter 4: Housing ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1

**Are you responding on behalf of a group?** Yes

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

**Which policy / paragraph number / policies map does your comment relate to?** Policy H9

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

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

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

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

**Policy H9 Housing Mix**

I note that the Council considers that '*the Nationally Described Space Standards would be too prescriptive for a District with such varied townscapes as Purbeck*'. Notwithstanding this, adoption of the Nationally Described Space Standards offer an opportunity to ensure that new dwellings are of an adequate size. The quality of the home environment is an important determinant of health and PHD would support the Council in efforts to ensure that new dwellings provide adequate internal and external space.

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## Comment

<b>Consultee</b>	Mr Rupert Lloyd (1189892)
<b>Email Address</b>	████████████████████
<b>Company / Organisation</b>	Public Health Dorset
<b>Address</b>	Princes House Dorchester DT1 1TP
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Public Health Dorset (Mr Rupert Lloyd - 1189892)
<b>Comment ID</b>	PLPP360
<b>Response Date</b>	03/12/18 14:37
<b>Consultation Point</b>	Chapter 4: Housing ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1

**Are you responding on behalf of a group?** Yes

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

**Which policy / paragraph number / policies map does your comment relate to?** Policy H10

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

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

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

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

**Policy H10: Part M of the Building Regulations** (Ensure percentage of homes on developments have increased accessibility.)

PHD are supportive of this policy and measures to ensure provision of 'life time' homes that are accessible and adaptable.

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<b>Email Address</b>	[REDACTED]
<b>Company / Organisation</b>	Public Health Dorset
<b>Address</b>	Princes House Dorchester DT1 1TP
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Public Health Dorset (Mr Rupert Lloyd - 1189892)
<b>Comment ID</b>	PLPP388
<b>Response Date</b>	03/12/18 15:01
<b>Consultation Point</b>	Policy I2: Improving accessibility and transport ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Are you responding on behalf of a group?</b>	No

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

<b>Which policy / paragraph number / policies map does your comment relate to?</b>	Policy I2
--	-----------

<b>Do you consider that the Local Plan is legally compliant?</b>	Yes
--	-----

<b>Do you consider that the Local Plan is sound?</b>	No
--	----

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

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

PHD support this policy's emphasis on promoting walking and cycling and reducing, wherever possible, reliance on car use. Facilities and infrastructure that support walking and cycling enable physical

activity and are important for creating environments that support people to avoid being overweight and obese. They also provide significant wider health benefits, both mental and physical by enabling social interaction and limiting air pollution.

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

With that in mind I would suggest that the Local Plan makes clear reference to giving priority to pedestrian and cycle movement and facilitating access to public transport services in line with paragraph 110 of the National Planning Policy Framework.

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

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

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

## Comment

<b>Consultee</b>	Mr Rupert Lloyd (1189892)
<b>Email Address</b>	████████████████████
<b>Company / Organisation</b>	Public Health Dorset
<b>Address</b>	Princes House Dorchester DT1 1TP
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Public Health Dorset (Mr Rupert Lloyd - 1189892)
<b>Comment ID</b>	PLPP395
<b>Response Date</b>	03/12/18 15:07
<b>Consultation Point</b>	Policy I3: Green infrastructure, trees and hedgerows ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Are you responding on behalf of a group?</b>	Yes
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	Paragraph 248
<b>Do you consider that the Local Plan is legally compliant?</b>	Yes
<b>Do you consider that the Local Plan is sound?</b>	Yes
<b>Do you consider that the Local Plan complies with the duty to co-operate?</b>	Yes

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

Access to high quality, accessible greenspace is associated with numerous positive health outcomes including improved mental and physical health. We support the aim of policies I3 & I4 to preserve, expand and enhance green infrastructure.

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

I would note that, as well as the numerous health benefits listed in paragraph 248 of the draft Local Plan, provision of allotments, community orchards and other outdoor growing spaces should be encouraged as a means of providing access to healthy food, as well as for their potential for securing positive physical and mental health impacts.

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

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

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

## Comment

<b>Consultee</b>	Mr Rupert Lloyd (1189892)
<b>Email Address</b>	████████████████████
<b>Company / Organisation</b>	Public Health Dorset
<b>Address</b>	Princes House Dorchester DT1 1TP
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Public Health Dorset (Mr Rupert Lloyd - 1189892)
<b>Comment ID</b>	PLPP400
<b>Response Date</b>	03/12/18 15:11
<b>Consultation Point</b>	Policy I7: Community facilities and services ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Are you responding on behalf of a group?</b>	Yes

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

Which policy / paragraph number / policies map does your comment relate to? 17

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

Do you consider that the Local Plan is sound? Yes

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

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

PHD welcomes the commitment of this policy to providing adequate community facilities to serve new development, including provision of shops, cafes and restaurants. I note that the plan does not make

reference to limiting proliferation of hot food takeaways in locations where children are likely to congregate e.g. near schools, community centres or playgrounds.

National Planning Policy Guidance outlines that the planning system can help to create a healthy food environment by having particular regard to limiting proliferation of particular use classes '*in proximity to locations where children and young people congregate such as schools, community centers and playgrounds*' Evidence from Public Health England indicates that exposure to takeaway food outlets is positively associated with consumption of takeaway food and that, as part of a comprehensive approach to creating healthy environments, limiting provision of hot food takeaways close to places where children congregate can help to encourage healthier eating choices.

I suggest that the council considers the introduction of a policy limiting proliferation of hot food takeaways in such locations. PHD would be happy to support you in formulating such a policy.

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

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

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

## Comment

<b>Agent</b>	Catherine Knee (1185880)
<b>Email Address</b>	[REDACTED]
<b>Company / Organisation</b>	Collier Planning
<b>Address</b>	Unknown Unknown Unknown
<b>Consultee</b>	(1191208)
<b>Email Address</b>	[REDACTED]
<b>Company / Organisation</b>	Pug Pit Ltd
<b>Address</b>	Unit 2,Chartfield House Castle Street TAunton TA1 4AS
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Pug Pit Ltd ( - 1191208)
<b>Comment ID</b>	PLPP425
<b>Response Date</b>	03/12/18 16:02
<b>Consultation Point</b>	Policy V1: Spatial strategy for sustainable communities ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Are you responding on behalf of a group?</b>	No
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	V1
<b>Do you consider that the Local Plan is legally compliant?</b>	Yes

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

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

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

**Policy V1** sets out the housing distribution which includes 470 new homes in Wool. The proposed housing allocations for settlements include development of greenbelt land at Upton and Lytchett Matravers. We do not agree with this approach when there are suitable sites for housing available in other settlements, which are located outside of the Green Belt and are suitable to accommodate new development i.e. Wool. As stated in our earlier representations, National Planning Policy attaches great weight to the protection of Green Belt land. Consequently, Policy V1 would not be consistent with national policy, nor an appropriate strategy taking into account reasonable alternatives and would therefore fail these tests of soundness on this basis.

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

Our previously recommended alternative of concentrating residential development in fewer settlements will protect valued Green Belt land and help to provide sufficient critical mass to provide better opportunities for new and improved infrastructure.

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

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

To discuss issues raised fully with the Inspector

## Comment

<b>Agent</b>	Catherine Knee (1185880)
<b>Email Address</b>	[REDACTED]
<b>Company / Organisation</b>	Collier Planning
<b>Address</b>	Unknown Unknown Unknown
<b>Consultee</b>	(1191208)
<b>Email Address</b>	[REDACTED]
<b>Company / Organisation</b>	Pug Pit Ltd
<b>Address</b>	Unit 2,Chartfield House Castle Street TAunton TA1 4AS
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Pug Pit Ltd ( - 1191208)
<b>Comment ID</b>	PLPP427
<b>Response Date</b>	03/12/18 16:09
<b>Consultation Point</b>	Policy H5: Wool ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Files</b>	<a href="#">Site location plan</a>

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

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

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

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

Do you consider that the Local Plan is sound? No

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

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

**Policy H5** states that 470 homes together with other supporting infrastructure will be provided on the identified sites. The site controlled by Pug Pit Ltd is located to the east of Hillside Road in Wool. It had been previously earmarked for development as part of a wider allocation and meetings have been held with the Council's planning officers. The land to the south and east of the site had also been identified as a potential allocation, which could provide vehicular access to the site. We are disappointed that the Council have now chosen not to allocate these sites for residential development which are in a logical location for development and were considered in the SHLAA as suitable for development. The allocation of the site as part of the wider site identified at the options stage would facilitate the redevelopment of the site, which is considered to be an eyesore locally.

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

We recommend that the decision not to identify this as an allocation in this iteration of the Plan is reconsidered, particularly in light of our comments about the soundness of Policy V1.

**If you have any supporting documents please upload them here.** [Site location plan](#)  
Site location plan

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

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

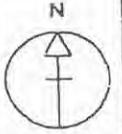
**If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination?** Yes

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

TO discuss the issues raised fully with the Inspector



# INDEX MAP PLAN



Plan prepared on 10/09/2003 at 00:00:01

ORDNANCE SURVEY MAP REFERENCE:

SY8485SW

SCALE 1:1250 Enlarged from 1/2500

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### LEGEND

This plan has been prepared for the sole purpose of showing the area in respect of which an official search has been made. The information has been taken from the index map. It is illustrative only and does not define the extent of the land in any individual title. For information about the general boundaries of a title please refer to the register and title plan.

THE LAND WITHIN THE RED BROKEN LINE IS INDEXED UNDER THE FOLLOWING TITLE NUMBERS:

PLAN REFERENCE:	TITLE NO:	TENURE:	NOTES:
Tinted Blue	DT239721	Freehold	

## Comment

<b>Agent</b>	Catherine Knee (1185880)
<b>Email Address</b>	██
<b>Company / Organisation</b>	Collier Planning
<b>Address</b>	Unknown Unknown Unknown
<b>Consultee</b>	(1191208)
<b>Email Address</b>	██
<b>Company / Organisation</b>	Pug Pit Ltd
<b>Address</b>	Unit 2,Chartfield House Castle Street TAunton TA1 4AS
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Pug Pit Ltd ( - 1191208)
<b>Comment ID</b>	PLPP428
<b>Response Date</b>	03/12/18 16:12
<b>Consultation Point</b>	Policy H11: Affordable housing ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Are you responding on behalf of a group?</b>	Yes
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	H11
<b>Do you consider that the Local Plan is legally compliant?</b>	Yes
<b>Do you consider that the Local Plan is sound?</b>	No

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

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

**Policy H11** requires 20% affordable housing provision on sites of 2 – 9 dwellings (commuted sum), and 40% on sites of more than 10 homes or larger than 0.5ha. This policy conflicts with NPPF paragraph 63 of the NPPF which states:

*‘Provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer). To support the re-use of brownfield land, where vacant buildings are being reused or redeveloped, any affordable housing contribution due should be reduced by a proportionate amount’.*

And the Planning Practice Guidance which states:

*‘in designated rural areas, local planning authorities may choose to apply a lower threshold of 5-units or less. No affordable housing or tariff-style contributions should then be sought from these developments. In addition, in a rural area where the lower 5-unit or less threshold is applied, affordable housing and tariff style contributions should be sought from developments of between 6 and 10-units in the form of cash payments which are commuted until after completion of units within the development’ (Paragraph: 031 Reference ID: 23b-031-20161116).*

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

Policy H11 should be therefore amended to require a commuted sum on sites of between 5 and 9 dwellings only.

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

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

To discuss the issues raised fully with the Inspector

## Comment

<b>Agent</b>	Catherine Knee (1185880)
<b>Email Address</b>	[REDACTED]
<b>Company / Organisation</b>	Collier Planning
<b>Address</b>	Unknown Unknown Unknown
<b>Consultee</b>	(1191208)
<b>Email Address</b>	[REDACTED]
<b>Company / Organisation</b>	Pug Pit Ltd
<b>Address</b>	Unit 2,Chartfield House Castle Street TAunton TA1 4AS
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Pug Pit Ltd ( - 1191208)
<b>Comment ID</b>	PLPP430
<b>Response Date</b>	03/12/18 16:14
<b>Consultation Point</b>	Policy H8: Small sites next to existing settlements ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Are you responding on behalf of a group?</b>	No
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	H8
<b>Do you consider that the Local Plan is legally compliant?</b>	Yes

Do you consider that the Local Plan is sound? No

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

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

-

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

We support this policy however, it should be made clear within the policy text that development of these sites should not be prevented from coming forward if settlements are on target to meet their housing allocation given the housing requirement is the minimum required. The policy should therefore be amended to make reference to this.

## Comment

<b>Agent</b>	Mr Peter Bowyer (1190938)
<b>Email Address</b>	[REDACTED]
<b>Company / Organisation</b>	The Purbeck Society
<b>Address</b>	24 The Green Studland Swanage BH193BT
<b>Consultee</b>	Mr Peter Bowyer (1190940)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	24 The Green Studland Swanage BH19 3BT
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Mr Peter Bowyer (1190940)
<b>Comment ID</b>	PLPP271
<b>Response Date</b>	02/12/18 21:33
<b>Consultation Point</b>	Policies List ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Are you responding on behalf of a group?</b>	Yes
<b>If yes, how many people do you represent?</b>	110
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	V1
<b>Do you consider that the Local Plan is legally compliant?</b>	No

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

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

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

The 2018 consultation contained a bias in that persons in one area of Purbeck could support developments in another area. Such a bias has led to "housing dumping" in that residents in area A supported housing allocations in area B just to avoid having any allocation in their area. It is against the principles of consultation to endorse such a bias.

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

Disaggregate the results of the 2018 consultation and present them on an area by area basis.

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

## Comment

<b>Agent</b>	Mr Peter Bowyer (1190938)
<b>Email Address</b>	[REDACTED]
<b>Company / Organisation</b>	The Purbeck Society
<b>Address</b>	24 The Green Studland Swanage BH193BT
<b>Consultee</b>	Mr Peter Bowyer (1190940)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	24 The Green Studland Swanage BH19 3BT
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Mr Peter Bowyer (1190940)
<b>Comment ID</b>	PLPP462
<b>Response Date</b>	03/12/18 16:43
<b>Consultation Point</b>	Chapter 4: Housing ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.2
<b>Are you responding on behalf of a group?</b>	Yes
<b>If yes, how many people do you represent?</b>	110
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	H11
<b>Do you consider that the Local Plan is legally compliant?</b>	Yes

Do you consider that the Local Plan is sound? No

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

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

The very nature of the approach to the plan and its intended delivery is based upon private sector financial market place circumstances. In view of such circumstances it is unreliable to be dependent on factors that can change. Assertions about affordable housing are worth little as they cannot be guaranteed to be delivered. Therefore the plan is unsound

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

Creation of a plan that has reliability to deliver affordable housing

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

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

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

Elaboration

## Comment

<b>Agent</b>	Mr Peter Bowyer (1190938)
<b>Email Address</b>	[REDACTED]
<b>Company / Organisation</b>	The Purbeck Society
<b>Address</b>	24 The Green Studland Swanage BH193BT
<b>Consultee</b>	Mr Peter Bowyer (1190940)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	24 The Green Studland Swanage BH19 3BT
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Mr Peter Bowyer (1190940)
<b>Comment ID</b>	PLPP634
<b>Response Date</b>	03/12/18 10:17
<b>Consultation Point</b>	Policy H14: Second homes ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Letter
<b>Version</b>	0.3
<b>Files</b>	<a href="#">H14-Purbeck-Society-PLPP634.pdf</a>
<b>Are you responding on behalf of a group?</b>	Yes
<b>If yes, how many people do you represent?</b>	110
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	H14
<b>Do you consider that the Local Plan is sound?</b>	No



## For Office Use Only

Requester ID: 018

Consultee ID: 1190938

Comment ID's: PLPP634

## PART B

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

Policy number	H.14
Policies map	
Paragraph number	

Second Home Policy.

2. Do you consider that the Local Plan is:

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

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

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

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

- positively prepared - providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- justified - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- effective - deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- consistent with national policy - enabling the delivery of sustainable development in accordance with the policies in the Government's National Planning Policy Framework.

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

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

(Please continue on a separate sheet if necessary)

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

[Empty response box for providing comments and suggested changes]

(Please continue on a separate sheet if necessary)

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

Yes

No

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

(Please continue on a separate sheet if necessary)

**Please sign and date this form:**

Signature:

Date:

The Purbeck Local Plan:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

#### Conclusion:

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

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

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

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

## Comment

<b>Agent</b>	Mr Peter Bowyer (1190938)
<b>Email Address</b>	[REDACTED]
<b>Company / Organisation</b>	The Purbeck Society
<b>Address</b>	24 The Green Studland Swanage BH193BT
<b>Consultee</b>	Mr Peter Bowyer (1190940)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	24 The Green Studland Swanage BH19 3BT
<b>Event Name</b>	Purbeck Local Plan Pre-submission Draft
<b>Comment by</b>	Mr Peter Bowyer (1190940)
<b>Comment ID</b>	PLPP667
<b>Response Date</b>	03/12/18 16:47
<b>Consultation Point</b>	Policy H8: Small sites next to existing settlements ( <a href="#">View</a> )
<b>Status</b>	Processed
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Are you responding on behalf of a group?</b>	Yes
<b>If yes, how many people do you represent?</b>	110
<b>Please tick the box(es) if you would like to be notified at an address/email address of the following:</b>	
<b>Which policy / paragraph number / policies map does your comment relate to?</b>	H8
<b>Do you consider that the Local Plan is legally compliant?</b>	No

Do you consider that the Local Plan is sound? No

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

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

The policy details are incomplete. The policy is vague. Sites are not fully allocated.

There has been inadequate engagement and public discussion of proposed sites and allocations. Settlement boundaries are dismissed despite being valid considerations. The policy drives a coach and horses through proven approaches to planning in rural areas especially where there are designations.

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

A revised specific policy. Community engagement. The disbanding of development opportunities created by an open field to development created by the policy. Clarity of the size and frequency of developments in the plan period.

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

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

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

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

Elaboration