

Comment

Consultee	Mr Alexander Ward (1190898)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Alexander Ward (1190898)
Comment ID	PLPP380
Response Date	03/12/18 14:55
Consultation Point	Wool - 470 homes, 65 bed care home, SANG, community hub and recreational space (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	132
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)

In paragraph 132 on page 57 it is acknowledged that "The fields to the south of the railway line (between East Burton and Wool) are also at risk from surface and ground water flooding." I would like to testify

that I have witnessed water bubbling through the floorboards of a house called Solitaire, at the bottom of Frome avenue, due to surface and ground water flooding in the field adjacent to this property.

As it is further acknowledged, that "Surface water from the sites that the Council has identified for new homes drain into these fields.", and "The railway embankment restricts the northward flow of surface water from these fields into the River Frome, and the ordinary water courses to the north." it is suggested that no houses be built on any of the proposed sites in Wool until a clear strategy for the continuous removal of surface and ground water collecting at the bottom of the field adjacent to Solitaire has been implemented.

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

If the implementation that is suggested above is enforced then the local plan will be both sound and comply with the duty to co-operate.

(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

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

I am prepared to testify with respects to the comments I have made above if called upon to do so.

Comment

Consultee	Mr Alexander Ward (1190898)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Alexander Ward (1190898)
Comment ID	PLPP399
Response Date	03/12/18 15:11
Consultation Point	Wool - 470 homes, 65 bed care home, SANG, community hub and recreational space (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	133
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)

In paragraph 133 on page 57 it states "The site falls inside the catchment areas for Wool CE VA Primary School and the Purbeck School." While I cannot comment on Purbeck School, my observation of Wool, CE VA Primary School suggests to me that there is little room for any extension without

building in the playground. To reduce the children's play area is in my opinion unacceptable. Of course you could extend the existing building by adding another floor to it, but I am not sure that that would be a practical solution. Perhaps a new School is needed.

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 think that provision of a new school to replace the existing school is the best long term option and would make the plan sound and compliant with the duty of co-operation.

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Comment

Consultee	Mr Alexander Ward (1190898)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Alexander Ward (1190898)
Comment ID	PLPP424
Response Date	03/12/18 15:51
Consultation Point	Policy H5: Wool (View)
Status	Processed
Submission Type	Web
Version	0.1

Are you responding on behalf of a group? No

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

Which policy / paragraph number / policies map does your comment relate to? Policy H5: Wool

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

Do you consider that the Local Plan is sound? No

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

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In Policy H5: Wool, there is no statement regarding either the provision of a new surgery and or additional support for the existing surgery.

Before I continue there are two points to which I would like to draw your attention. (i) When Purbeck Gate was built in Wool it was intended that it would consist of 140 houses and a doctor's surgery. This was eventually changed to,190 houses and no surgery. This change was made without any consultation with residents of Wool. Such changes should not take place without consultation with residents, (ii) The Wellbridge practice catchment covers the following:

Wool, Bovington (excluding military personnel and I believe their families), East Burton, East Stoke, East and West Lulworth, East Knighton, Winfrith Neburgh, East and West Chaldon and Owermoigne.

To continue; my personal experience of the existing surgery is that it appears to be working at full capacity with waiting times for routine appointments running into weeks to see ones registered doctor. Given that in Policy I1 paragraph c on page 96 " A contribution of £80 per house will be collected towards extending GP facilities, where the local surgery is at capacity."; this would amount to £37,600 for Wool surgery or surgeries. I suggest that a statement supporting our surgery and GP's together with the action to be taken be included in Policy H5: Wool.

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

If reference to the support of Wool surgery are included in Policy H5: Wool the local plan will be sound a will comply with the duty of co-operation.

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Comment

Consultee	Mr Alexander Ward (1190898)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Alexander Ward (1190898)
Comment ID	PLPP431
Response Date	03/12/18 16:18
Consultation Point	Policy H5: Wool (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No

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

Which policy / paragraph number / policies map does your comment relate to? Policy H5: Wool

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

Do you consider that the Local Plan is sound? 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)

In the opening statement of Policy H5: Wool it is stated that "Land at Wool as shown on the policies map will help meet the Districts development needs by providing a total of 470 new homes, a 65 bed care home, community facilities and supporting infrastructure." At a time when National Government is proposing that everything should be done to enable the elderly to stay put in their own homes

suggests that a 65 bed care home in the village of Wool is unnecessary. The proposed 65 bed care home was not included in the consultation and has been presented in the plan without any public involvement or consultation and so the proposal of a 65 bed care home 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)

The removal of the 65 bed care home from the plan will make the plan sound and will comply with the duty to co-operate,

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Comment

Consultee	Mr Alexander Ward (1190898)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Alexander Ward (1190898)
Comment ID	PLPP486
Response Date	03/12/18 17:24
Consultation Point	Policy H5: Wool (View)
Status	Processed
Submission Type	Web
Version	0.1

Are you responding on behalf of a group? No

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

Which policy / paragraph number / policies map does your comment relate to? Policy H5: Wool b.

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)

An improvement that should be added to your list in paragraph b. is the inclusion of public toilets in the vicinity of Wool station. The toilets to be open from the time that the first train leaves Wool station until the time of the last train arriving in Wool station.

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)

Inclusion of toilets as described above would make the plan sound and would also comply with the duty to co-operate.

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

Comment

Consultee	Mr Alexander Ward (1190898)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Alexander Ward (1190898)
Comment ID	PLPP499
Response Date	03/12/18 17:48
Consultation Point	Policy H5: Wool (View)
Status	Processed
Submission Type	Web
Version	0.2

Are you responding on behalf of a group? No

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

Which policy / paragraph number / policies map does your comment relate to? Policy H5: Wool d.

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

Do you consider that the Local Plan is sound? No

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

While I can see some advantage in using the C6 rather than the A351 it has to be said that it is really depends on where one is travelling to or from. If one is travelling to or from Wareham or Swanage or any of the villages on that route the A351 is the obvious choice. If travelling to or from Wool the C6 route is a good alternative to the A351. Travelling further afield, to or from, say Weymouth or Dorchester

the A35 is a better choice bypassing both the A351 and the A352. However to maximise use of the C6 I suggest that the Bere Regis bypass should be extended from the A35 to beyond Rye Hill on the C6. It may also be necessary to bypass Wool with a bypass from the C6 to beyond Winfrith Newburgh on the A352. Of course great care would be required in the detailed siting of such bypasses as consideration would have to be given to the potential damage to the environment that these bypasses pass through. One additional advantage of such bypasses is that it may be possible to place restrictions on through traffic in the villages of Bere Regis and Wool

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

The local plan can only be sound and comply with duty to co-operate once the precise details of the changes to the routes that involve the C6 are known.

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Comment

Consultee	Mr Alexander Ward (1190898)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Alexander Ward (1190898)
Comment ID	PLPP504
Response Date	03/12/18 18:03
Consultation Point	Policy H5: Wool (View)
Status	Processed
Submission Type	Web
Version	0.1

Are you responding on behalf of a group? No

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

Which policy / paragraph number / policies map does your comment relate to? Policy H5:Wool

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

Do you consider that the Local Plan is sound? 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)

In the opening statement of "Land to the west of Chalk Pit Lane and Oakdene Road" it is stated that "Land as shown on the policies map will help meet the districts housing needs by providing up tp 320 new homes, a 65 bed care home, community facilities and infrastructure." The proposed 65 bed care

home was not included in the consultation and has been presented in the plan without any public involvement or consultation and so the proposal of the 65 bed care home 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)

If the 65 bed care home is removed from the plan the plan will become sound and compliant with the duty to co-operate.

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Comment

Consultee	Mr Alexander Ward (1190898)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Alexander Ward (1190898)
Comment ID	PLPP508
Response Date	03/12/18 18:22
Consultation Point	Policy H5: Wool (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No

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

Which policy / paragraph number / policies map does your comment relate to?	Policy H5: Wool h.
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Do you consider that the Local Plan is legally compliant?	Yes
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Do you consider that the Local Plan is sound?	No
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Do you consider that the Local Plan complies with the duty to co-operate?	No
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Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

In paragraph h. it states that "explore opportunities to provide a community hub, that includes community and shopping facilities, on the land; and" There is a community hub located at the D'Urberville Centre in Wool. To provide a second community hub in the village will have the effect of duplicating expenses and splitting resources at a time when financial constraint is so important. To plan for a second

community hub is inexcusable. The proposed community hub was not included in the consultation and has been presented in the plan without any public involvement or consultation and so the proposal of the community hub 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)

If the proposal of the community hub is removed from the plan the plan will become sound and comply with duties to co-operate.

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Comment

Consultee	Miss M D Weller (996253)
Email Address	[REDACTED]
Company / Organisation	Wareham St Martin Parish Council
Address	5 Border Drive Upton Poole BH16 5DU
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Wareham St Martin Parish Council (Miss M D Weller - 996253)
Comment ID	PLPP148
Response Date	30/11/18 16:34
Consultation Point	Policy H3: New housing development requirements (View)
Status	Processed
Submission Type	Web
Version	0.2
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	11
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?	H3
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)

It has been proved that current developments have insufficient parking areas for householders hoping they will use public transport or share cars and this tactic has failed miserably. Public transport is being consistently reduced with the result that residents are turning to their own cars to ensure they are able to get to work, school or other facilities.

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)

Increase the number of parking spaces allotted to each housing unit, at least 2 spaces and if a 4 bedroom place, there should be 3 spaces.

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Comment

Consultee	Miss M D Weller (996253)
Email Address	[REDACTED]
Company / Organisation	Wareham St Martin Parish Council
Address	5 Border Drive Upton Poole BH16 5DU
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Wareham St Martin Parish Council (Miss M D Weller - 996253)
Comment ID	PLPP154
Response Date	30/11/18 16:51
Consultation Point	Ensuring a sufficient supply of homes (View)
Status	Processed
Submission Type	Web
Version	0.3
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	11
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	H2
Do you consider that the Local Plan is legally compliant?	Yes
Do you consider that the Local Plan is sound?	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)

Concern that the small site settlements have changed in policy. Originally they were up to 30 units and for local people so had to be affordable. It was assumed only one site to each settlement. Now the policy appears to be mixture of affordable and market houses and more than one small site could be attached to a settlement meaning a housing development that would not normally be allowed, can be built up in sections through this policy.

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)

Reduce the percentage of market housing or remove altogether, ensure only local families can access the housing with strong local connections and no more than 2 small site settlements to any one settlement is allowed. Also include the policy of no new housing to be sold for second homes.

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Comment

Consultee	Miss M D Weller (996253)
Email Address	[REDACTED]
Company / Organisation	Wareham St Martin Parish Council
Address	5 Border Drive Upton Poole BH16 5DU
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Wareham St Martin Parish Council (Miss M D Weller - 996253)
Comment ID	PLPP158
Response Date	30/11/18 17:06
Consultation Point	Policy H8: Small sites next to existing settlements (View)
Status	Processed
Submission Type	Web
Version	0.4
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	11
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	H8
Do you consider that the Local Plan is legally compliant?	Yes
Do you consider that the Local Plan is sound?	No
Do you consider that the Local Plan complies with the duty to co-operate?	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)

Given the number of houses being allocated to small site settlements (933), this equates to over 30 sites and therefore there should be some indication in the Local Plan as to where these sites might be considered. NO site in Green Belt. NO site within area of Neighbourhood Plan. NO site within AONB or adjacent to it. This policy should be for local families/individuals with strong local connections and affordable housing only. NO new build should be allowed to be purchased or made into a second home.

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)

NO site in Green Belt. NO site within area of Neighbourhood Plan. NO site within AONB or adjacent to it. This policy should be for local families/individuals with strong local connections and affordable housing only. NO new build should be allowed to be purchased or made into a second home.

Settlements that could be considered given the above constraints are although this does not pre-determine approval for the development. Only one small site per settlement.

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Comment

Consultee	Miss M D Weller (996253)
Email Address	[REDACTED]
Company / Organisation	Wareham St Martin Parish Council
Address	5 Border Drive Upton Poole BH16 5DU
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Wareham St Martin Parish Council (Miss M D Weller - 996253)
Comment ID	PLPP165
Response Date	30/11/18 17:14
Consultation Point	Climate change (View)
Status	Processed
Submission Type	Web
Version	0.2
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	11
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?	67
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)

Any housing development should be considered opting for solar roof panels wherever possible. If this is built in at the beginning, the cost is not going to increase as much as the houseowner having to opt in later.

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Housing design should include the use of solar roof panels and any other green energy.

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

Although supportive of the new hub on the middle school site, we are very disappointed that the beds at Wareham Hospital were closed without any alternative provision being offered, suggested or provided. Bed blocking is an enormous issue in the larger hospitals and removing these beds will only make that situation worse. It was very short sighted all those years ago to close the cottage hospitals as they removed the danger of bed blocking and those in hospital were there for operations and treatment only. Expecting local care homes to take in local patients will cost the county and district councils as they will not be offering those services freely. Some care homes are not designed to take in patients for short term treatment but cater for long term residents. Another short sighted idea.

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)

No closure of wards or removal of beds in local hospitals until alternative provision is satisfactorily found.

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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	Miss M D Weller (996253)
Email Address	[REDACTED]
Company / Organisation	Wareham St Martin Parish Council
Address	5 Border Drive Upton Poole BH16 5DU
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Wareham St Martin Parish Council (Miss M D Weller - 996253)
Comment ID	PLPP171
Response Date	30/11/18 17:41
Consultation Point	Policies List (View)
Status	Processed
Submission Type	Web
Version	0.2
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	11
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)

Second homes is a contentious issue with advantages and disadvantages. However, they do not help the local rural economy or the local rural communities. Those who purchase the houses for second homes come from areas with a higher average salary and as more buy in our area, so the prices increase and local people cannot buy homes in their own villages.

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 must be strongly worded to show that NO new housing units (includes flats) are to be used, purchased or built as second homes in rural areas.

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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	Miss M D Weller (996253)
Email Address	[REDACTED]
Company / Organisation	Wareham St Martin Parish Council
Address	5 Border Drive Upton Poole BH16 5DU
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Wareham St Martin Parish Council (Miss M D Weller - 996253)
Comment ID	PLPP172
Response Date	30/11/18 17:43
Consultation Point	The green belt (View)
Status	Processed
Submission Type	Web
Version	0.3
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	11
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	V2
Do you consider that the Local Plan is legally compliant?	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 policy is not sound as the methods of creating SANGS has caused extra traffic, damage to farming economy, use of inappropriate land or land that was better used for farming and there is no right of defence against the proposal for tenants of the land in question.

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 the moment SANGS must be land in the ownership of the landowner whose land is being used for a large development. Wording should be changed to allow the landowner to put forward other land that is not detrimental to his tenants, local farming industry and that is actually connected to the development. This may mean the landowner purchasing this land or leasing it.

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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

Agent	Ms Jo Witherden (1188327)
Email Address	[REDACTED]
Company / Organisation	Dorset Planning Consultant Limited
Address	8 Orchard Rise Milborne St Andrew Blandford Forum DT11 0LL
Consultee	Mrs Hilary Evans (1188328)
Email Address	[REDACTED]
Company / Organisation	Wareham the Neighbourhood Plan Steering Group
Address	c/o Wareham Town Council East Street Wareham BH20 4NS
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Wareham the Neighbourhood Plan Steering Group (Mrs Hilary Evans - 1188328)
Comment ID	PLPP6
Response Date	17/11/18 13:09
Consultation Point	Policy V2: Green belt (View)
Status	Processed
Submission Type	Web
Version	0.1
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	V2
Do you consider that the Local Plan is legally compliant?	Yes
Do you consider that the Local Plan is sound?	No

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

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

The main issue of concern is the proposed method for changing the Green Belt Boundary under Policy V2. The Local Plan has adopted a relatively restrictive stance in that it does not clearly allow for further moderate changes to be made to the boundary through the Neighbourhood Plan, and has not (for example) included the land to the rear of the Household Recycling Centre linking the proposed allocation with the Bere Road. As shown this would prevent an early review of the Neighbourhood Plan from making any further changes, despite recognising the in principle strategic need for the Green Belt to be changed and that the location west of the Bere Road north of Wareham is an appropriate location where development could be accommodated.

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

It is therefore suggested that an objection is made in regard to Policy V2 with the preferred way forward being that the Local Plan makes the strategic decision regarding the principle of altering the Green Belt but recognises that it is the role of the Neighbourhood Plan to define the revised boundary of the Green Belt. The first sentence of the policy should be changed to read that "Green belt boundaries have been amended at Lytchett Matravers and Upton, and will be amended at Wareham through the Neighbourhood Plan, to support sustainable development." The approach taken by Herefordshire County Council, where they have blanked out areas in their core strategy referring to where neighbourhood plan policies apply, would have the added benefit of avoiding overlap/confusion regarding such matters (see https://www.herefordshire.gov.uk/download/downloads/id/1799/core_strategy_policies_map.pdf). However, if it is decided that a change needs to be shown on the Policies Map, then it is important that the plan show this as indicative and makes clear that the exact Green Belt Boundary amendment are to be determined through the Neighbourhood Plan process.

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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?

In order to fully explain the position on the Neighbourhood Plan and relevant issues

Comment

Agent	Ms Jo Witherden (118832)
Email Address	[REDACTED]
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Address	8 Orchard Rise Milborne St Andrew Blandford Forum DT11 0LL
Consultee	Mrs Hilary Evans (118832)
Email Address	[REDACTED]
Company / Organisation	Wareham the Neighbourh
Address	c/o Wareham Town Council East Street Wareham BH20 4NS
Event Name	Purbeck Local Plan Pre-su
Comment by	Wareham the Neighbourh
Comment ID	PLPP7
Response Date	17/11/18 13:15
Consultation Point	Glossary (View)
Status	Processed
Submission Type	Web
Version	0.1

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

Which policy / paragraph number / policies map does your comment relate to?	Definition of Strategic Poli
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 (if possible)

There is no clear identification of which elements of the plan are the 'strategic policies' – the glossary defines these but the latter is not clearly defined. It would therefore be helpful for a clearer statement to be made as to what is or is not a consistent basis for Neighbourhood Planning.

Having regard to your previous comments, please set out what change(s) you consider necessary to make the Local Plan sound. This change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your own proposals where appropriate provide evidence necessary to support / justify the representation. (Please be as precise as possible)

The proposed approach in West Dorset and Weymouth is commended (Appendix 1 of the draft plan) - <https://www.dorsetforyou.gov.uk/planning-buildings-land/planning-policy/west-dorset-and-weymouth-portland/local-plan>

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

In order to fully explain the position on the Neighbourhood Plan and relevant issues

“

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

Definition of Strategic 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?

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 is no clear identification of which elements of the plan are the 'strategic policies' – the glossary defines these as “Policies and site allocations which address strategic priorities” but the latter is not clearly defined. It would therefore be helpful for a clearer statement to be made as to what is or is not a strategic policy or priority in order to provide a clear and consistent basis for Neighbourhood Planning.

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 proposed approach in West Dorset and Weymouth is commended ([Appendix 1 of the draft plan](https://www.dorsetforyou.gov.uk/planning-buildings-land/planning-policy/west-dorset-and-weymouth-portland/local-plan-review/pdf/20180802-lpr-preferred-options-main-document-final.pdf)) - <https://www.dorsetforyou.gov.uk/planning-buildings-land/planning-policy/west-dorset-and-weymouth-portland/local-plan-review/pdf/20180802-lpr-preferred-options-main-document-final.pdf>

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Yes

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In order to fully explain the position on the Neighbourhood Plan and relevant issues

”

Comment

Agent	Ms Jo Witherden (1188327)
Email Address	[REDACTED]
Company / Organisation	Dorset Planning Consultant Limited
Address	8 Orchard Rise Milborne St Andrew Blandford Forum DT11 0LL
Consultee	Mrs Hilary Evans (1188328)
Email Address	[REDACTED]
Company / Organisation	Wareham the Neighbourhood Plan Steering Group
Address	c/o Wareham Town Council East Street Wareham BH20 4NS
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Wareham the Neighbourhood Plan Steering Group (Mrs Hilary Evans - 1188328)
Comment ID	PLPP8
Response Date	17/11/18 13:18
Consultation Point	Policy H8: Small sites next to existing settlements (View)
Status	Processed
Submission Type	Web
Version	0.1
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	H8
Do you consider that the Local Plan is legally compliant?	Yes

Do you consider that the Local Plan is sound? No

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

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

Policy H8 introduces the potential for further housing (of up to 30 dwellings) to come forward through the normal planning process on sites adjoining the settlement boundary that have not been allocated through a development plan. This includes land within the AONB and Green Belt land (although the latter is limited to infill sites between existing buildings). This makes no recognition of Neighbourhood Planning's role in identifying and allocating appropriate small and medium sized sites, goes against the concept of a plan-led system in which the local community have genuine involvement, and could significantly undermine community support for Neighbourhood Planning.

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

To overcome this objection the policy could be amended to include a further criteria "(d) the site does not lie within a Neighbourhood Plan area where small sites have been either been allocated to meet identified housing needs, or where site allocations are being proposed and the plan has reached pre-submission consultation stage."

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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?

In order to fully explain the position on the Neighbourhood Plan and relevant issues

Comment

Agent	Ms Jo Witherden (1188327)
Email Address	[REDACTED]
Company / Organisation	Dorset Planning Consultant Limited
Address	8 Orchard Rise Milborne St Andrew Blandford Forum DT11 0LL
Consultee	Mrs Hilary Evans (1188328)
Email Address	[REDACTED]
Company / Organisation	Wareham the Neighbourhood Plan Steering Group
Address	c/o Wareham Town Council East Street Wareham BH20 4NS
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Wareham the Neighbourhood Plan Steering Group (Mrs Hilary Evans - 1188328)
Comment ID	PLPP9
Response Date	17/11/18 13:22
Consultation Point	Policy H9: Housing mix (View)
Status	Processed
Submission Type	Web
Version	0.1
Files	Wareham Neighbourhood Plan Housing Needs Assessment

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?	H9, H10 and H11
Do you consider that the Local Plan is legally compliant?	Yes

Do you consider that the Local Plan is sound? No

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

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

Policy H9 include guidance on housing mix and is based on the district wide housing need assessment. This includes a requirement for 5% self-build and 10% bungalows on sites of 20 or more dwellings, and a general requirement that new market housing should support delivery of the household requirements identified through the Strategic Housing Market Assessment (which is primarily 2 and 3 bedroom homes, and only 20-25% 4 or more bedroom homes). Policy H10 introduces a requirement that 10% of the new homes proposed on sites of 10 or more homes / 0.5ha must meet the Building Regulation optional requirement M4(2): 'Category 2 - accessible and adaptable homes'. Policy H11 opts for 40% affordable housing on open market sites (of 10 or more dwellings / 0.5ha) and a lower margin of 30% on brownfield sites. This is lower than the adopted Plan, where the affordable housing target has been 50%.

All these policies are broadly compatible with the proposed approach in the Wareham Neighbourhood Plan and do not appear to raise any significant conflicts. The lower affordable housing target (30%) for brownfield sites is supported as being appropriate by the viability appraisal undertaken for the Local Plan, and would potentially incentivise a brownfield first approach.

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

It would be useful for the Plan to clarify that the exact requirements may be modified through Neighbourhood Plans where local research identifies a different requirement.

If you have any supporting documents please upload them here.

Wareham Neighbourhood Plan Housing Needs Assessment
Wareham Neighbourhood Plan Housing Needs Assessment

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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?

In order to fully explain the position on the Neighbourhood Plan and relevant issues

Final Version



Wareham Housing Needs Assessment (HNA)

May 2018

Quality information

Prepared by

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Checked by

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Stuart Woodin
Director

Revision History

Revision	Revision date	Details	Authorized	Name	Position
1	February 2018	Drafting	LAF	Lachlan Anderson-Frank	Assistant Consultant
2	February 2018	Internal Review	IT	Ivan Tennant	Principal Planner
3	March 2018	Internal Review	SW	Stuart Woodin	Director
4	April 2018	Group Review	JW	Jo Witherden	Planning Consultant, Wareham Neighbourhood Plan Steering Group

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Wareham Town Council

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List of acronyms used in the text:

AH	Affordable Housing (NPPF definition)
DC	District Council
MHCLG	Ministry for Housing, Communities and Local Government
DEP17	Dorset Economic Projections 2017: Background Paper - Purbeck
HNA	Housing Needs Assessment
LDS	Purbeck District Local Plan Local Development Scheme, March 2017
LP	Local Plan
LP2012	Purbeck Local Plan Part 1, Adopted November 2012
LPA	Local Planning Authority
LPPRN	Purbeck District Council Local Plan Partial Review Full Note 2017
NDP	Neighbourhood Development Plan
NP	Neighbourhood Plan
NA	Neighbourhood Area
NPPF	National Planning Policy Framework
OANU17	Purbeck OAN Update 2017
OANUR	Purbeck District Council Review Note OAN Update 2017
ONS	Office for National Statistics
PDC	Purbeck District Council
PPG	Planning Practice Guidance
PROC17	Purbeck Partial Review Options Consultation Report, 2017
PRS	Private Rented Sector
SHBP17	Purbeck Local Plan Review Second Homes Background Paper, November 2017
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SHMA15	Eastern Dorset 2015 Strategic Housing Market Assessment
SHRP17	Restrictive Second Homes Policy Impacts Study
WTC	Wareham Town Council

1. Executive Summary

Headlines

1. There is an assessed need for **small and medium sized housing of 2-3 bedrooms in the future**, which may be provided as terraced houses, in particular to accommodate the **existing trend** towards older people downsizing into appropriately sized homes as they age, and **smaller households** going forward. One bedroom homes may also meet the needs of elderly people, although these are likely to be provided as flats.
2. There are significant **gaps in housing provision** between market and social rented housing, with entry level house prices particularly inaccessible, and many households turning to **the private rented sector**. Given the range of housing affordability issues across all tenures, it is recommended that affordable housing be delivered across **all tenures (i.e. for rent and for shared equity)**.
3. Low rates of turnover in the housing stock overall may be **constraining demand** for specialist housing in Wareham Town, and given the significant ageing population in the last five years and going forward, it is likely this type of provision will need to **increase significantly**. Whilst HLIN recommendations could indicate the need for 135 additional specialist dwellings for the elderly in Wareham Town up to 2031, this HNA recommends a figure of **39 specialist housing units** based on local circumstances.

Introduction

4. Wareham Town Council (WTC) is designated as a Qualifying Body (QB) for the purposes of preparing a Neighbourhood Plan for the entire Parish area, referred to here as the Neighbourhood Area (NA). The 2011 Localism Act introduced neighbourhood planning, allowing parish and town councils or neighbourhood forums across England to develop and adopt legally binding development plans for their neighbourhood area. We have been asked to prepare a Housing Needs Assessment by the Town Council, based on a robust methodology, local data, and focussing on a number of research questions agreed with the Town Council.
5. As more and more town and parish councils and forums seek to address housing growth, including tenure and type of new housing, it has become evident that developing policies need to be underpinned by robust, objectively assessed housing data.
6. In the words of the national Planning Practice Guidance (PPG), establishing future need for housing is not an exact science, and no single approach will provide a definitive answer¹. The process involves making balanced judgements based on the qualitative and statistical evidence gathered as well as having regard for relevant national and local planning policies and guidance.
7. At a neighbourhood planning level, one important consideration is determining the extent to which the neighbourhood diverges from the local authority average, reflecting the fact that a single town, village, or neighbourhood almost never constitutes a housing market area on its own and must therefore be assessed in its wider context.
8. The guidance quoted above on housing needs assessment is primarily aimed at local planning authorities preparing Strategic Housing Market Assessments (SHMAs), which are used to determine housing need at a local authority level. However, it helpfully states that those preparing neighbourhood plans can use the guidance to identify specific local needs that may be relevant to a neighbourhood, but that any assessment at such a local neighbourhood level should be proportionate.
9. Our brief was to advise on data at this more local level to help WTC understand the tenure, type, and size of housing needed to inform neighbourhood plan policies.

Summary of Methodology

10. Housing Needs Assessment (HNA) at neighbourhood plan level can be focused either on quantity of housing needed, type of housing needed, or both. In most cases, there is a need to focus on quantity where the housing target for the settlement being assessed is unclear, for example where the local authority has not set a specific target for the settlement, or where there is no local plan in place.
11. In the case of Wareham however, **Purbeck District Council's (PDC)** current adopted local plan, 'Planning Purbeck's Future', adopted November 2012, makes provision for 2,520 homes to be built in the district between 2006 and 2027, or 120 dwellings per annum. In 2015, a Strategic Housing Market Assessment was published which suggested that the total housing needed was in fact 238 dwellings per annum (between 2013 and 2033), a

¹ PPG Paragraph: 014 Reference ID: 2a-014-20140306 Revision date: 06 03 2014

significant uplift taking into account positive economic growth prospects for Purbeck. However, an October 2017 update to this was revised this figure back downwards to 3,460 dwellings for the period 2013-2033, or 173 dwellings per annum. Furthermore, the emerging local plan is likely to set a specific housing figure to be met by Wareham Town – with a potential figure of 200 homes suggested in the latest consultation (January 2018). In this context, the task of this HNA is to consider what types, tenures and sizes of housing are needed by the local population living in Wareham Town, rather than the overall level of housing required.

12. The rationale for this approach is that neighbourhood plans need to meet the basic conditions, the fulfilment of which is tested through an independent examination.
13. In terms of the types of housing needed, there is generally more flexibility on what neighbourhood plans can cover, subject to viability constraints. In order to understand the types of housing needed in Wareham we have gathered a wide range of local evidence and summarised it into policy recommendations designed to inform decisions on housing characteristics.
14. This objective and independent housing needs advice note follows the PPG approach where relevant. This requires our findings to be appropriately evidenced. The PPG advises that assessment of development needs should be thorough but proportionate and does not require planners to consider purely hypothetical future scenarios, only future scenarios that could be reasonably expected to occur.
15. Our approach is to provide advice on the housing required, based on evidence of need, and not constrained by possible limitations on supply. This is in line with the PPG, which states that *'the assessment of development needs should be an objective assessment of need based on facts and unbiased evidence. Plan makers should not apply constraints to the overall assessment of need, such as limitations imposed by the supply of land for new development, historic under performance, viability, infrastructure or environmental constraints.'*
16. For this reason, we advise that the conclusions of this report should be assessed against supply-side considerations (including, for example, factors such as site availability, transport infrastructure, landscape constraints, flood risk and so on) as a separate and follow-on exercise².

Summary of Conclusions

Factor	Source(s) (see relevant chapters for more details)	Possible impact on housing needed	Conclusions
Type and Size of Housing Needed	SHMA15, Census 2001/2011, MHCLG 2014-based household projections, WTC Housing Needs Study	<p>Whilst Wareham has slightly fewer flats than the district and significantly more terraced homes, the size of housing in Wareham was broadly similar to that across Purbeck. There have been significant increases, of about 34% (2001-11), in the number of larger homes, which is of concern given ongoing demographic shifts towards smaller households.</p> <p>There is a clear trend of older people downsizing in both the affordable and market housing sectors in Purbeck, with those in affordable housing having on average 1.5 bedrooms towards the end of their lives and those in market sector having 2.5 bedrooms on average.</p> <p>This trend across the district is almost exclusively as a result of older people moving into flats, with no apparent trend toward downsizing into other house</p>	<p>There is likely to be a significant need for small and medium sized housing, and our recommendation is for 50% of all new homes to be two bedrooms in Wareham to help to fill an identified market gap and in particular to accommodate the existing trend towards older people downsizing into appropriately sized homes as they move through retirement, and smaller households going forward. One bedroom homes may also meet the needs of elderly people, although developing space standards could help to ensure that these meet the expectations of downsizers.</p> <p>A key question is whether developing other housing types for the elderly other than flats would incentivise more older people to move, or whether flats will continue to meet their needs. Given the downsizing trend identified, it is</p>

² Such an approach, clearly separating housing need assessment from dwelling capacity assessment, was endorsed by the Government for calculating housing need at local authority level in the ministerial statement and press release 'Councils must protect our precious green belt land' (DCLG, 4 October 2014, available at <https://www.gov.uk/government/news/councils-must-protect-our-precious-green-belt-land>)

		types as yet. In general however, households in Wareham are more likely to under occupy housing than across the district, with approximately 35% maintaining two extra bedrooms.	reasonable to suggest that one bedroom properties would not be particularly ideal in the market sector in Wareham, unless these encompass specialist housing for the elderly with some form of support, as households choosing additional bedrooms may be doing so to ensure their care, social & family visiting needs are met in later years. Furthermore, smaller new build homes may be less flexible in their design than larger homes according to some research ³ , making downsizing not as attractive.
Tenure of Housing Needed	SHMA15, Census 2001/2011, MHCLG Live Tables, Land Registry PPD, Core Lettings data, ONS Property Affordability Calculator, WTC Housing Needs Study	<p>Affordability ratios suggest that for-sale housing is accessible to less than 50% of the population, whilst entry level rents exclude the bottom 25% of earners. There has been a significant uplift of 35% experienced in the private rental sector in Wareham Town in recent years, suggesting many households earning around the median income have turned to the private rental sector to satisfy their needs.</p> <p>Entry level house prices are particularly inaccessible at £188,750 in 2014, which also explains the growth in the private rental sector. A reduction in the younger working age population is likely to be exacerbated by a lack of suitable housing at suitable prices. The Housing Waiting List data provided by PDC suggests there are 89 households with a local connection to Wareham in need of affordable homes, with more than twice as many considering need in the wider district.</p> <p>Affordability issues will continue to be exacerbated by further increases in house prices in the area, should trends in recent years continue, and may also negatively impact new household formation rates. As a result, there is likely to be a decline in the working age population of the district, particularly those between 25 - 44.</p>	<p>There are significant gaps in housing provision between market and social rented housing. Bringing these households onto the ownership ladder has the potential to liberate rented-dwellings for young and newly forming households looking to remain in the area.</p> <p>Given the range of housing affordability issues across all tenures, it is recommended that affordable housing be delivered across all tenures (social rented housing, affordable rented housing, shared ownership etc.). Current district policies should enable this housing to be delivered as a proportion of market development.</p> <p>Moreover, in order to address demographic trends identified in this report it is appropriate to provide a larger proportion of smaller affordable homes for young forming households and households stuck in the private rental sector and who desire access to ownership. On that basis we would recommend that forms of 'intermediate' affordable housing such as Shared Equity, Discounted Market for Sale Housing (DMSH) as well as rental models such as Affordable Rent should be considered as part of the affordable housing quota within the NA.</p>
Specialist Housing Needed	HLIN, SHMA15, EAC, Census 2011, Land Registry PPD, ONS Housing Summary Measures	As a result of a near doubling of the elderly population projected by the ONS for Purbeck from 2011- 2031, there is likely to be a very significant increase in the number of elderly people in Wareham, which could be up to 450	Whilst demand for specialist dwellings clearly varies across different parts of the planning district, with many older residents remaining in their family homes and not in specialist accommodation, it is for the parish to decide whether it wishes to provide

³ https://www.southsomerset.gov.uk/media/862544/somerset_final_shma_oct2016_revised.pdf

	<p>Analysis 2015, MHCLG 2014-based Sub-national population projections, Dementia Services Development Centre</p>	<p>people.</p> <p>Comparatively low rates of turnover in the housing stock across the district may be constraining demand for specialist housing in Wareham.</p> <p>The elderly population of Wareham aged 50+ has relatively higher levels of mobility limitations (approximately 2% greater), than the district average, at current rates this would equate to 16 additional units of specialist housing, whilst County Council and industry body recommendations could indicate need for up to 135 additional specialist dwellings for the elderly up to 2031.</p>	<p>specialist accommodation above the levels currently provided across the local authority area.</p> <p>However, AECOM's recommendation is that a figure of 39 additional specialist dwellings be carried forward by the Wareham Town Neighbourhood Plan, based on a range of estimates and adjusted to take account of local factors such as health and mobility in the local population.</p> <p>Dorset County Council currently runs a pioneering programme called Dorset Early Help/POPP, a partnership between the council and the local NHS body, the Dorset Clinical Commissioning Group (CCG), alongside the third sector. It would be prudent to work together with such a body and local providers to consider the trajectory of care and how the housing stock can accommodate such care in the future.</p>
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Policy recommendations

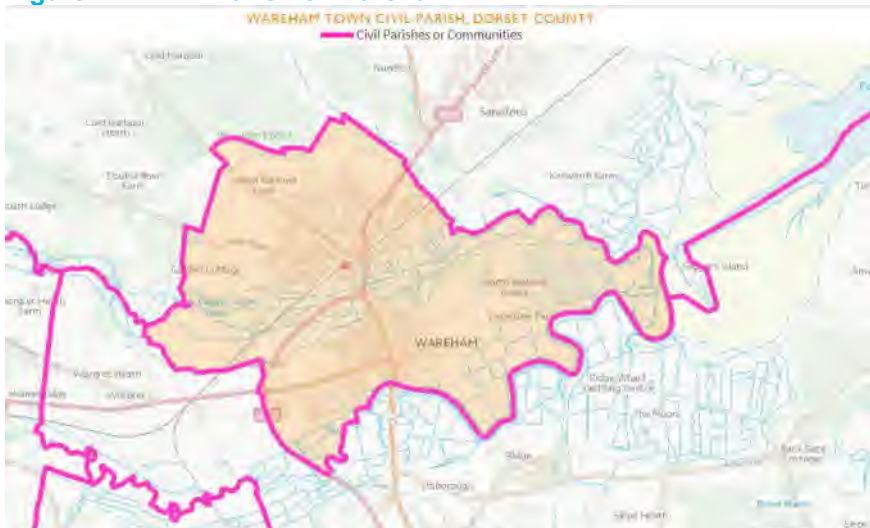
17. This neighbourhood plan housing needs advice has aimed to provide Wareham Town Council with evidence on housing trends from a range of sources. We recommend that the Town Council should, as a next step, discuss the contents and conclusions with PDC.
18. This advice note has been provided in good faith by AECOM consultants on the basis of housing data and national guidance current at the time of writing (alongside other relevant and available information).
19. It is important under review any implications arising from forthcoming changes which have been published in the new draft NPPF, as well as the implementation of the Housing and Planning Act 2016, which will continue to affect housing policies at a local authority and, by extension, a neighbourhood level.
20. Bearing this in mind, we recommend that the steering group should monitor carefully strategies and documents with an impact on housing policy produced by the District Council or any other relevant body and review the neighbourhood plan accordingly to ensure that general conformity with the adopted Local Plan is maintained.
21. At the same time, we recommend the group monitor available data on demographic or other trends over the period in which the neighbourhood plan is being developed to help ensure relevance and credibility of its policies.
22. We have summarised our policy recommendations in more detail in Chapter 7

2. Context

2.1 Local context

23. The civil parish of Wareham Town encompasses the walled town of Wareham, a thriving historic market town, together with the settlement of Northport and a small amount of the surrounding rural area. The parish forms part of Purbeck district within the county of Dorset in South West England. The town is located eight miles southwest of Poole, and eight miles to the South is the English Channel.
24. The walled town of Wareham is built on a strategic site (low dry islands) between marshy rivers plains, the rivers Piddle to the North and Frome to the South. The area of Northport, which is part of the parish, is situated to the north of the River Piddle.
25. The parish is bounded South-West by the A351 connecting to Swanage, which links to the eastern terminus of the A352, connecting to Dorchester. The southern boundary of the parish is the River Frome which runs into the head of the Wareham Channel of Poole Harbour, a natural harbour (a *ria*) which constitutes the eastern limit of the parish. The northern boundary is a large conifer plantation, Wareham forest, north of Northport. The north-east boundary runs along the Wareham Forest Stream that flows into the River Piddle, and the A351 heads north-east through Sandford connecting to the A35.
26. Note: The sister civil parish of Wareham St. Martin covers much of the rural area to the north of Wareham, including the village of Sandford. Arne Parish covers much of the rural area to the south and west, and includes the village of Stoborough.

Figure 2-1: Civil Parish of Wareham



Source: Ordnance Survey

2.2 Planning policy context

27. In line with the basic conditions of Neighbourhood Planning, Neighbourhood Development Plans (NDPs) are required to be in general conformity with the adopted strategic local policies. Consequently, there is a requirement for the relevant Local Plan to be reviewed as part of this HNA.
28. The current local development policy comprises of the Purbeck Local Plan Part 1: Planning Purbeck's Future (PLP1) and adopted in November 2012. As the PLP1 was adopted in 2012, and the Inspector made clear that a review should commence in 2013 with adoption by late 2017, it can now be considered out of date. The Council's February 2018 local development scheme anticipates adopting the new Local Plan in autumn 2019. The emerging Local Plan is still in its consultation phase and is not mature enough to be fully reviewed as part of this HNA. The PLP1 provides the following policies:
 29. **Policy HS (Housing Supply)** – sets out a housing target for **2,520 dwellings over the plan period 2006-2027** directed in the most sustainable locations in accordance with **Policy LD (General Location of Development)** shown in the figure below:

Figure 2-2: Settlement Hierarchy



Source: Purbeck Local Plan Part 1

30. The policy also allocates Settlement Extensions that require change to the South East Dorset Green Belt, including one in Wareham (of approximately 200 dwellings on land at Worgret Road)
31. **Policy CEN (Central Purbeck)** – which states that “In Central Purbeck, the settlements of Wareham, Sandford and Stoborough will provide the focus for service provision, where development will be managed through the use of settlement boundaries. Around 475 dwellings are required to meet housing supply needs for the period 2006-2027, of which around 170 dwellings should be affordable for local people.”
32. **Policy AHT (Affordable Housing Tenure)** – which states that the tenure of affordable housing (negotiated on a site-by-site basis to reflect identified local need) is likely to be split between 90% of social rented/affordable rented housing and 10% intermediate housing to rent or purchase.
33. **Policy AH (Affordable Housing)** – which states that all new residential development that result in a net increase of 2 or more dwellings, or are on a site area of 0.05 hectares or more will be required to provide at least 40% of affordable housing contribution. The Council will take account of:
 - Current identified local need in the district;
 - Economic viability of provision;
 - Other overriding planning objectives for the site; and
 - Other considerations deemed relevant to the delivery of affordable housing.
34. The policy also specifies that affordable housing should be provided on site. If not possible, off site provision or the payment of a commuted sum is allowed, providing the applicant provides robust justification. The policy further states that there will be no exceptions to on-site provision of affordable housing in settlement extensions. Moreover, any part units (for example, where six dwellings are proposed in Upton and 40% affordable housing would be required this amounts to 2.4 affordable units.) will be met through a commuted sum.
35. The adoption of an ‘open book’ approach: Economic viability constraints may constitute an exceptional circumstance preventing the provision of affordable housing. However, applicants must provide full justification of exceptional circumstances to the Council’s satisfaction. This justification may include a financial viability appraisal, site suitability appraisal and development mix appraisal, subject to independent verification at the expense of the applicant.
36. **Policy GT (Gypsies, Travellers and Travelling Show People)** – which states that provision of transit and permanent pitches will be addressed in accordance with the Gypsy and Traveller Site Allocations Plan.
37. Policy Guidance also insists on supporting planning for an ageing population and provision of specialist housing (sheltered housing, extra care housing, care homes and nursing homes).

3. Approach

3.1 Research Questions

38. Below we set out the RQs relevant to this study, as discussed and agreed with WTC.
39. Research Questions, abbreviated to 'RQ;' are arrived at the start of the project through discussion with the Town Council. They serve to direct our research and provide the structure for the HNA.

3.1.1 Quantity

40. The current adopted local plan, Planning Purbeck's Future, adopted November 2012, makes provision for 2,520 homes to be built in the district between 2006 and 2027, or 126 dwellings per annum. In 2015, a Strategic Housing Market Assessment was published which suggested that the total housing needed was in fact 238 dwellings per annum (between 2013 and 2033), a significant uplift taking into account positive economic growth prospects for Purbeck. However, an update to this was published in October 2017 which revised this figure to 3,460 dwellings from 2013-2033, or 173 dwellings per annum. Furthermore, the emerging local plan is likely to set a specific housing figure to be met by Wareham. Given that this plan is already significantly developed, and has been consulted on twice, this HNA will not consider the issue of quantity of housing needed in the Wareham Neighbourhood Plan Area (NA).

3.1.2 Type and Size

41. WTC has indicated that there may be a mismatch between the sizes and types of the existing stock of housing, and what may be needed by the community in future. In this context, neighbourhood plan policies could help to influence the mix of new housing that is built, and any policies will need to be supported by robust evidence relating to local need. It is therefore necessary for this HNA to examine both the type and size of dwellings needed to meet housing need in future years.
42. RQ1. What mix of type (terrace, semi, bungalows, flats and detached) and size (number of habitable rooms) of housing is appropriate?

3.1.3 Tenure

43. Community engagement activity and surveys of local agents undertaken by WTC indicate a significant interest in affordable housing of various tenures in Wareham, particularly as much of the available open market stock seems to be bought by older people with significant housing equity moving into the area outside of Dorset. The Town Council is concerned about whether local incomes can support people to actually live locally. As such, an investigation of appropriate tenures of housing would be of value.
44. RQ2. What affordable housing (social housing, affordable rented, shared ownership, intermediate rented) and market tenures should be included in the housing mix?

3.1.4 Housing for Specialist Groups

45. WTC has suggested that the town may be experiencing an ageing population, which may be relatively static in terms of housing choices in spite of changing housing needs. Anecdotal evidence provided to WTC also suggests that the overall level of movements and sales within the housing stock is low, which may be affecting younger people and those with families. In this context, a consideration of specialist housing for the elderly, and how this may be connected to improving housing options, is appropriate.
46. RQ3. What provision should be made for specialist housing for older people within the NA, particularly given that there may be low rates of turnover in the housing market overall?

3.2 Study Objectives

47. The objectives of this report can be summarised as:
 - Collation of a range of data with relevance to housing need in Wareham relative to Purbeck as a whole;
 - Analysis of that data to determine patterns of housing need and demand; and

- Setting out recommendations based on our data analysis that can be used to inform the Neighbourhood Plan's housing policies.

48. The following sections of this report are structured around the research questions set out above, while Chapter 7 sets out our conclusions and recommendations based on our data analysis that can be used to inform the Neighbourhood Plan's housing policies.

3.3 Relevant Data

3.3.1 SHMA

49. The PPG states that neighbourhood plans can refer to existing needs assessment prepared by the local planning authority as a starting point. As Wareham is located within Eastern Dorset Housing Market Area, we therefore turned to the Eastern Dorset Strategic Housing Market Assessment (October 2015, henceforth SHMA15), prepared by GL Hearn, which covers the housing market area and informs emerging housing policies at a local authority level, including affordable housing policy. The sections of this document relevant specifically to Purbeck were summarized in the Purbeck District Summary document published alongside the main report. More recently, there have been two further documents relevant to Purbeck published by Purbeck District Council alone, the Purbeck OAN Update 2017 (OANU17), prepared by GL Hearn, and the Purbeck District Council Review Note OAN Update 2017 (OANUR) prepared by Intelligent Plans and Examinations on 10 October 2017. These represent significant updates to the SHMA, and therefore have been considered alongside the original document as more recent pieces in the evidence hierarchy.
50. These studies draw upon a range of data including population and demographic projections, housing market transactions and employment scenarios to derive the objectively-assessed housing need for the district. As such, they contain a number of points of relevance when determining housing need within the NA. They have yet to be tested at examination, but nonetheless provide a useful starting point for policy development that aims to build on and add local specificity to the strategic policies of the Local Planning Authority, by enabling a comparison to be made between the NA data (gathered as part of the preparation of this study) and the district data, given that such an exercise reveals contrasts as well as similarities.

3.3.2 Other relevant data

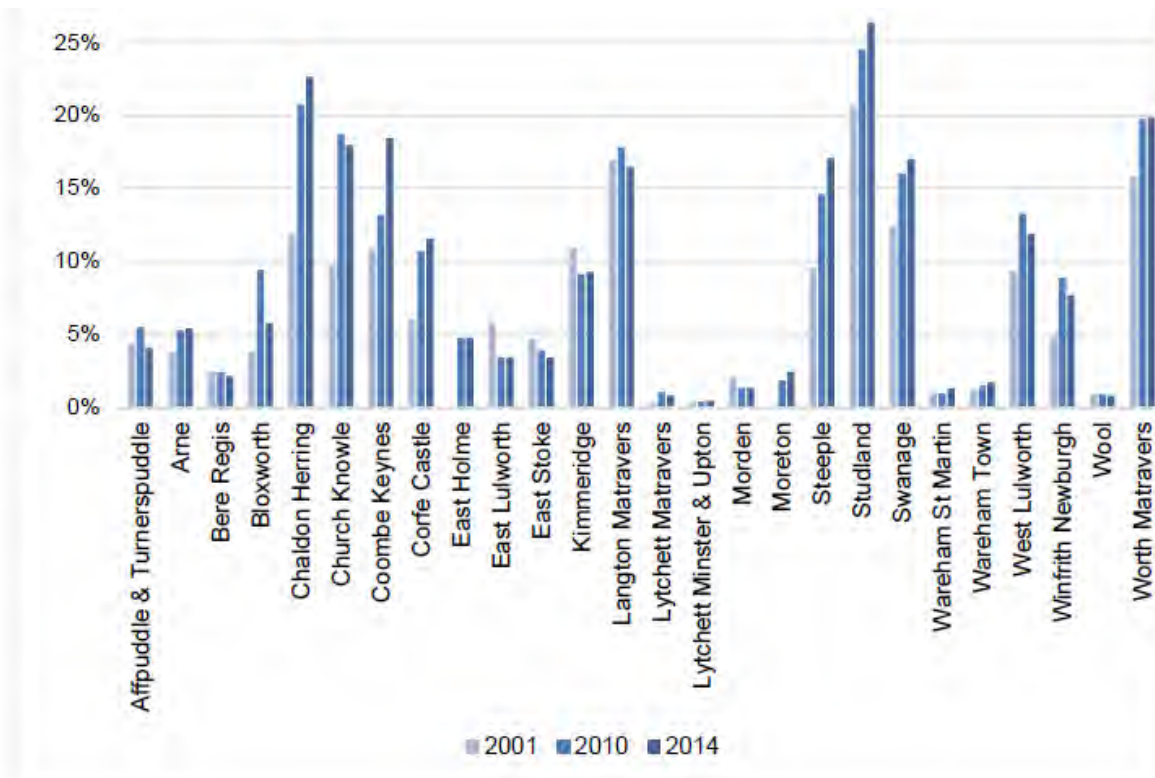
51. As part of its Local Plan Review Process, PDC has published a significant number of individual evidence studies and background notes on a range of topics that are relevant to this HNA, including the issues of second homes (Purbeck Local Plan Review Second Homes Background Paper, November 2017, referred to as SHBP17) as discussed below, economic projections (Dorset Economic Projections 2017: Background Paper – Purbeck, referred to as DEP17), as well as a further background note on the process of the partial review itself, prepared by Intelligent Plans and Examinations on 8 February, 2017 (referred to as LPPRN).
52. Further information was provided by Wareham Town Council, including research undertaken on their behalf by a consultant on the topic of housing that informed a Housing Needs Study (HNS), and information provided to them by PDC from the housing register.

3.4 Second Homes

53. In response to local concerns regarding the levels of second home ownership in the district, and whether this might be restricting access to home ownership for local people, in October 2017, Purbeck District Council produced a Background Paper on second homes as part of their Local Plan review. This found high rates of second home ownership across the district, totalling approximately 8% of all homes at the beginning of 2017. These figures were calculated using a range of different techniques, including reviewing council tax records and the electoral role, and sense checking these by consulting local people on levels of second home ownership in the village.
54. The results show how in Purbeck in 2001, out of the total housing stock of 20,625 dwellings, fully 1,821 (8.3%) were not occupied by a resident household. Furthermore, by 2011, out of a housing stock of 22,140 dwellings, fully 2,557 (11.55%) were not occupied by a resident household. So, between 2001 and 2011, the housing stock in Purbeck grew by 7.3% (1,515), but the actual population resident in the area grew by only 1.3% (557), with the number of resident households increasing by 4.1% (779). Overall, the level of unoccupied household spaces rose from 1,821 in 2001 to 2,557 in 2011, an increase of 40.4%.

- 55. However, levels of second home ownership for Wareham were significantly lower than other areas of Purbeck, as shown in the figure below. The study concluded that just 2.11% of homes in Wareham Town were second homes, 20th of all 26 parishes in the district (the highest of which was 27.96% in Studland, with the lowest figure 0.56% in Lytchett Minster & Upton). The study also makes clear that the effects of second homes may not be entirely negative, and that it is possible to conflate any such effects with the wider seasonal tourism economy based in this part of England.
- 56. Based on this evidence, and in discussion with WTC, this HNA does not consider further the issue of Second Homes in Wareham.

Figure 3-1: Data on second homes in Purbeck



Source: SHBP17

4. Type and size

RQ1. What type (terrace, semi, bungalows, flats and detached) and size (number of habitable rooms) of housing is appropriate?

57. As identified earlier in this study, PPG recommends consideration of the existing housing provision and its suitability to address future as well as current community need, having regard for demographic shifts in age and household composition. For this reason, we start with analysing the type and size of the existing housing stock in Wareham, and then consider factors affecting the size of housing needed, namely the household composition and age structure of the population, and how these are likely to change in future. We then put these in the context of the wider housing market and its dynamics to arrive at recommendations for the types and sizes of housing that will be needed in Wareham.

4.1 Background and definitions

58. Before beginning our consideration of type and size, it is important to understand how different types of households occupy their homes. Crucially, household 'consumption' of housing space (size) tends to increase alongside wages, with the highest earning households consuming relatively more (i.e. larger) housing than those on lower incomes. Similarly, housing consumption tends to increase, alongside wealth and income, with age, such that older households tend to have larger homes than younger households, often as a result of cost and affordability⁴.
59. In this context, even smaller households (those with smaller numbers of inhabitants, including just one or two people) may be able to choose to live in larger homes than their needs would suggest, and would be defined in census terms as 'under occupying' their homes. This is a natural feature of the housing market, and can distort considerations of future housing needs, with market dynamics and signals giving a very different picture than demographics and household type and size projections suggest for future years.
60. In order to understand the terminology surrounding size of dwellings, it is important to note the number of rooms recorded in Census data excludes some rooms such as bathrooms, toilets and halls; and to be clear that data on dwelling size is collected on the number of rooms being occupied by each household⁵. In the section that follows, 'dwelling sizes' can be translated as follows, although in practice there may be some minor variation outside of these parameters:
- 1 room = bedsit
 - 2 rooms = flat/house with 1 bedroom and a combined reception room/kitchen
 - 3 rooms = flat/house with 1-2 bedrooms and one reception room and/or kitchen
 - 4 rooms = flat/house with 2 bedroom, one reception room and one kitchen
 - 5 rooms = flat/house with 3 bedrooms, one reception room and one kitchen
 - 6 rooms = house with 3-4 bedrooms and 1-2 reception rooms and a kitchen
 - 7+ rooms = house with 4 or more bedrooms
61. It is also useful to clarify somewhat the census terminology around dwellings and households spaces dwellings are classified into two types, unshared and shared. The 2011 Census defines a dwelling as a single self-contained household space (an unshared dwelling) or two or more household spaces at the same address that are not self-contained but combines to form a shared dwelling that is self-contained. A household space is the accommodation that a household occupies, and self-containment means that all rooms can only be used by that household. In most cases, a single household space will be an unshared dwelling.⁶
62. A household is defined as "One person living alone or a group of people (not necessarily related) living at the same address who share cooking facilities and share a living room or sitting room or dining area."⁷ On this basis, where unrelated residents of a dwelling share rooms other than a kitchen, this would be considered a single household in an unshared dwelling, whilst where only a kitchen is shared, each resident would be considered their own household, and the dwelling would be considered shared.
63. Whilst it is unlikely that these issues are of particular relevance to Wareham, given that their main applicability is to students and other people likely to be sharing homes, it is still helpful to understand the terms as a background to the data in this chapter.

⁴SHMA15, pp.130, para 8.5

⁵<https://www.nomisweb.co.uk/census/2011/qs407ew>

⁶https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/23928/120301_Derivation_of_Dwelling_count_from_2011_Census_-_separate_doc_for_web_publication.pdf

⁷Ibid.

4.2 Existing types and sizes

64. Below we consider the existing types and sizes of dwellings in Wareham. It should be noted that the census data does not capture the housing stock in its entirety, as only those households that are usually resident and return the census are captured. Therefore, a small percentage of homes are not accounted for. The table below shows the relative split between types of houses, as defined by the census in Wareham, with data for Purbeck and England for comparison.

Table 4-1: Types of dwellings, 2011

Dwelling Type (excluding caravan and other temporary structures)	Wareham Town	Purbeck	England
Whole house or bungalow: Detached	28.9%	38.2%	22.3%
Whole house or bungalow: Semi-detached	27.3%	24.2%	30.7%
Whole house or bungalow: Terraced (including end-terrace)	27.1%	18.7%	24.5%
Flat, maisonette or apartment: Purpose-built block of flats or tenement	10.4%	12.0%	16.7%
Flat, maisonette or apartment: Part of a converted or shared house (including bed-sits)	2.6%	4.0%	4.3%
Flat, maisonette or apartment: In a commercial building	2.3%	1.4%	1.1%

Source: Census 2011

65. This data shows the extent to which the housing stock in Wareham Town differs from that of Purbeck as a whole and indeed across England, most obviously in that there are slightly fewer flats and apartments. The mix of detached, semi-detached and terrace properties and similar, with terraced houses being over-represented compared to the local and national average.
66. It is probable that the higher proportion of terraced properties reflects the main building periods and historical constraints including the town walls.
67. The data below allows us to consider a broad picture of the size of the housing stock in Wareham Town and Purbeck. Again, this data only covers homes and dwelling spaces (i.e. homes in a shared dwelling) that are occupied and does not cover vacant or second homes.

Table 4-2: Household spaces by number of rooms, 2011

Number of Rooms	Wareham Town			Purbeck		
	Count	Percentage	Cumulative	Count	Percentage	Cumulative
1 Room	7	0.3%	cumulative	43	0.2%	cumulative
2 Rooms	46	1.8%	2.1%	327	1.7%	1.9%
3 Rooms	188	7.4%	9.4%	1356	6.9%	8.8%
4 Rooms	495	19.4%	28.8%	3882	19.8%	28.6%
5 Rooms	739	28.9%	57.7%	5023	25.6%	54.3%
6 Rooms	568	22.2%	79.9%	3903	19.9%	74.2%
7 Rooms	271	10.6%	90.5%	2275	11.6%	85.8%
8 Rooms	130	5.1%	95.6%	1387	7.1%	92.9%
9 Rooms or more	113	4.4%	100%	1387	7.1%	100%

Source: Census 2001/2011, AECOM Calculations

68. This data considers the total number of rooms in each household, that is, the self-reported count of the number of rooms available to each household in the census, including kitchens but excluding bathrooms. By this measure, the size of homes in Wareham is quite similar to those across Purbeck. The most notable differences are the slightly smaller proportion of very large homes of 7 rooms or more in Wareham in comparison with the district, approximately 5.7% less, and the slightly higher proportion of 5 and 6 room properties in the town, which together make up approximately 5.5% more. This further reinforces the view that, whilst the size of dwellings is determined more at the broad market level, specific typologies of dwelling are a relatively local phenomenon affected by local preferences and traditions.
69. It is particularly interesting to compare this data with census estimates of the number of bedrooms for each household in Wareham and Purbeck, using data published laterally by the ONS, based on estimates from the 2011

Census. The table below summarises the proportion of households occupying each size of home in terms of number of bedrooms only.

Table 4-3: Number of bedrooms in household spaces, 2011

Number of bedrooms	Wareham Town		Purbeck	
Bedsit	0.2%	cumulative	0.1%	cumulative
1 bedroom	8.3%	8.4%	7.8%	7.9%
2 bedrooms	28.3%	36.7%	29.6%	37.5%
3 bedrooms	50.2%	86.9%	42.4%	79.9%
4 bedrooms	10.3%	97.3%	15.4%	95.2%
5 or more bedrooms	2.7%	100.0%	4.8%	100.0%

Source: Census 2011, AECOM Calculations

70. The data shows that 3 bedroom properties are the most common in Wareham, and it is likely that most of the 5 and 6 room properties seen in the data above are in fact 3 bedroom properties, with the difference in rooms overall being accounted for by different numbers of reception rooms, conservatories and other living spaces. It is clear from the data above that, when translated into rooms used as bedrooms; Wareham has relatively more 3 bedroom properties than Purbeck, and less of all other sizes save one bedroom properties. Given the lower number of flats and apartments, yet similar number of 1 bedroom household spaces, it would also seem that the relative lack of flats and apartments may relate to a deficit of larger 2 bedroom apartments.
71. In terms of housing need however, it is relevant to consider whether it is the number of rooms overall that is the more important measure of housing size, or the number of bedrooms. On the one hand, additional reception rooms may be converted for use as extra bedrooms where necessary. However, this is more likely to be true in larger homes where there is more flexibility, and the cumulative data above suggests that the vast majority of 1-3 room homes have only one bedroom, with relatively greater constraints on potential conversion to accommodate a second bedroom in a purpose built living room for example.
72. On a cautionary note, recent research by the ONS suggests that this data may not be particularly accurate due to a lack of understanding by census respondents as to which rooms should be included in the count, with the Census Quality survey suggesting that up to 30% of responses may not have been accurate⁸. For this reason, the ONS is trialling new methods of collecting this data, namely based on Valuations Office Data (VOA, collected for the purposes of calculating council tax), in preparation for the 2021 Census.
73. Given the relative difficulty in understanding the characteristics of the housing stock from a single census, as well as the fact that bedrooms data is not available for the 2001 census because estimates were not produced in that year, it is useful to consider how the number of rooms occupied by households changed between the 2001 and 2011 censuses.
74. This data is presented on the following page and shows quite clearly that there has been a decrease over the census period in 4 and 5 room homes in Wareham. This broadly mirrors a similar trend in Purbeck, although to a greater extent. This change is not insignificant, with the overall reduction in such dwellings totalling 7.4% of the housing stock.

⁸<https://www.ons.gov.uk/census/censustransformationprogramme/progressanddevelopment/questiondevelopment/estimatingthenumberofroomsandbedroomsinthe2021censusinenglandandwalesanalternativeapproachusingvaluationofficeagencydata>

Table 4-4: Households by number of rooms (including living spaces), and rates of change, 2001-2011

Number of Rooms	Wareham Town 2001	Purbeck 2001	Wareham Town 2011	Purbeck 2011	Wareham Town % Change	Purbeck % Change
1 Room	6	63	7	43	16.7%	-31.7%
2 Rooms	45	338	46	327	2.2%	-3.3%
3 Rooms	167	1103	188	1356	12.6%	22.9%
4 Rooms	563	4068	495	3882	-12.1%	-4.6%
5 Rooms	851	5328	739	5023	-13.2%	-5.7%
6 Rooms	527	3543	568	3903	7.8%	10.2%
7 Rooms	211	2003	271	2275	28.4%	13.6%
8 Rooms or more	173	2358	243	2774	40.5%	17.6%
Total	2545	18804	2557	19583	0.5%	4.1%

Source: Census 2001/2011, AECOM Calculations

75. It is crucial to remember however that these changes describe the way that households occupy or modify their dwellings. It would suggest that there may have been a general trend to enlarging properties to 5 or more rooms, with the stock of smaller properties being lost as a result of additions and conservatories being built. In this way the enlarging of properties by one generation has a long term impact on those from another generation seeking homes. However, it is worth recalling the cautionary note above that the way people categorised rooms has been prone to errors and may explain, at least in part, the differences seen above.
76. Even so, it is still potentially significant that the smaller properties (4 and 5 rooms) are the only sizes of homes that declined in Wareham over the period. What is also clear is that the most significant shift over the period has been an increase in very large homes with 6 or more rooms (likely to be 3-4 bedroom homes), as shown in the table below. This is likely as a result of an increase in market demand for such homes.

Table 4-5: Net change, households by number of rooms

Number of Rooms	Net Change 2001-2011
1 Room	1
2 Rooms	-1
3 Rooms	21
4 Rooms	-68
5 Rooms	-112
6 Rooms	41
7 Rooms	60
8 Rooms or more	70

Source: Census 2001/2011, AECOM Calculations

77. In summary, Wareham has fewer flats and apartments – particularly with 2 or more bedrooms - in comparison with the district and England, and in contrast a higher number of terraced homes. There also appears to be a trend where smaller properties have been enlarged (either for economic gain or as a more affordable means of attaining the type of home desired).
78. Between the two censuses, households in Wareham occupied fewer mid-sized homes, with a gap widening between smaller and large homes, broadly mirroring similar trends across Purbeck. However, the most significant increase over the period, totalling approximately 34%, was in very large homes of 7 or more rooms.
79. It is helpful then to turn to actual demographic factors affecting housing needs to better understand how the future needs of Wareham's population might be met in terms of new housing. The evidence assembled below seeks to populate a series of 'key indicators'; these are the household composition and age structure of the population both now and how they are likely to change in future years.
80. Through a consideration of these trends and how they interrelate to each other, it is possible to arrive at recommendations as to how the type and size of housing in Wareham should be influenced through planning policy.

4.3 Factors affecting size of housing needed: household composition

81. Household composition is a key factor driving the size of housing that will be needed in Wareham in future. As such, in Table 4-6 below we set out data from the Census that records household composition in Wareham, with data for the district and England for comparison. Data for the parish differs from that of the district in a variety of key areas.

Table 4-6: Household composition in Wareham, 2011

Type		Wareham	Purbeck	England
One person household	Total	33.6%	29.1%	30.2%
	Aged 65 and over	20.1%	16.6%	12.4%
	Other	13.6%	12.5%	17.9%
One family only	Total	60.3%	65.7%	61.8%
	All aged 65 and over	13.5%	13.1%	8.1%
	With no children	18.5%	20.5%	17.6%
	With dependent children	19.4%	22.3%	26.5%
	All children Non-Dependent	8.9%	9.8%	9.6%
Other household types	Total	6.0%	5.2%	8.0%
Average Household Size		2.15 people	2.30 people	2.40 people

Source: Census 2011, AECOM calculations

82. Most notable is the higher percentage of one person households in Wareham than Purbeck, and consequently, the lower proportion of dwellings occupied by a single family. This explains the significantly smaller average household size in the town. In practical terms, this implies that, were Wareham to have the same proportion of single person households as the average for Purbeck, there would be 116 fewer single person households in the town ($33.6\% - 29.1\% = 4.5\%$, $4.5\% \times 2557 = 116$).
83. The percentage of single person households is also significantly higher than the total for England, and it is clear from the data that this is primarily made up of those aged 65 or over, rather than households of other ages. This provides a picture of Wareham as an attractive place for older people, who are more likely than other household types to live alone.
84. However, it is important to remember that the housing needs of one and two person households are relatively similar, except in the context of specialist housing for the elderly, which is discussed in more detail in Chapter 6.
85. It is thus particularly interesting to note that Wareham does not have a significantly higher proportion of family households, i.e. those containing more than one person, who are aged 65 and above, than Purbeck as a whole, though the rate for both is significantly higher than in England. This suggests a clustering of single person households aged 65 and over in Wareham, which could be a result of multiple factors, not least on the existing availability of specialist elderly housing.
86. Indeed, the table above also shows that Wareham has fewer households with dependent children than Purbeck, but also fewer households with no children. So, the relative deficit in one family households in comparison to Purbeck applies to both families with and without children, but not to those over 65. This appears to align with what has been discussed above about the relative age of the population in Wareham.
87. It is also revealing to consider changes in household composition in Wareham between the 2001 and 2011 census; as the PPG makes clear, changes should be used to determine whether, should such trends continue, future housing needs will be met by the existing housing stock.
88. Table 4-7 on the following page shows this data for Wareham in comparison with the district and England. The single most significant increase over the period was in single person households under 65, although this reflected similar increases in both the district and England and is therefore not of particular local significance. More notable

was the significant decrease in those with non-dependent children, versus increases in both the district and England.

Table 4-7: Rates of change in household composition in Wareham 2001-2011

Type		2001	+10yr	Wareham	Purbeck	England
One person household	Total	819	41	5.0%	10.0%	8.4%
	Aged 65 and over	513	0	0.0%	2.7%	-7.3%
	Other	306	41	13.4%	21.6%	22.7%
One family only	Total	1,582	-39	-2.2%	1.7%	5.4%
	All aged 65 and over	353	-8	-2.3%	-1.6%	-2.0%
	With no children	465	9	1.9%	5.2%	7.1%
	With dependent children	504	-7	-1.4%	-4.4%	5.0%
	All children Non-Dependent	260	-33	-12.7%	16.0%	10.6%
Other types	Total	144	10	6.9%	4.1%	28.9%

Source: Census 2001/2011, AECOM calculations

89. This decrease in families with non-dependent children is likely as a result of children becoming adults and leaving the family home, with the lower than average (both nationally and in the district) percentage of households in this category, 8.9% as mentioned above, an indicator of relative ability of such children to leave the family home and form their own households⁹. The data would suggest that at least some of those young adults stayed within the area to set up home – and this can be tested by examining the age structure of the population (see section 4.4).
90. It is helpful then to consider how the population of Wareham is projected to change in the future. Unfortunately, detailed projections of future populations are not available for individual towns or parishes, so it is necessary to turn to projections for Purbeck as a whole and to refine them based on other local data.
91. The Ministry for Housing, Communities and Local Government (MHCLG) publishes bi-annual household projections for all local authorities in England and Wales, broken down by Household Type, and also providing projections of the average household size. It is notable that by 2034, the closest year to the end of the plan period for the Neighbourhood Plan (2033) for which projections are available, the average household size across the district will have dropped to 2.17 people, close to the current average for Wareham. Based on these and current trends therefore, it is likely that the average household size in Wareham will also decline.
92. The projections for Purbeck also consider increases in each type of household up to 2039, as well as a projection of the number of families with one, two and three or more dependent children. Clearly the greatest numerical increases projected for the district are of one person households, with much smaller absolute growth in households with dependent children and couples living with other adults.

Table 4-8: MHCLG Household Projections for Purbeck by household type

	One person	Couple and no other adult	Couple and one or more other adult	Households with dependent children	Other
2014	5,808	6,707	1,607	4,793	1,087
2039	6,805	7,542	1,926	5,255	1,354
Change	997	835	319	462	267
% Change	17.2%	12.4%	19.9%	9.6%	24.6%

Source: MHCLG 2014-based household projections

93. Similarly, the household projections show that the main change in households in Purbeck with dependent children will be for those with one dependent child, more than double the increase in those with two dependent children. The number of households with three or more dependent children is expected to decrease. These changes point towards a significant need to prioritise smaller homes in Wareham, and no obvious need for large family homes, to accommodate these changes, which over the 25 year period are likely to be broadly similar given their relative correlation in the years between 2001 and 2011.

⁹<https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/families/articles/householdsandhouseholdcompositioninenglandandwales/2014-05-29>

Table 4-9: MHCLG Household Projections for Purbeck by number of dependent children

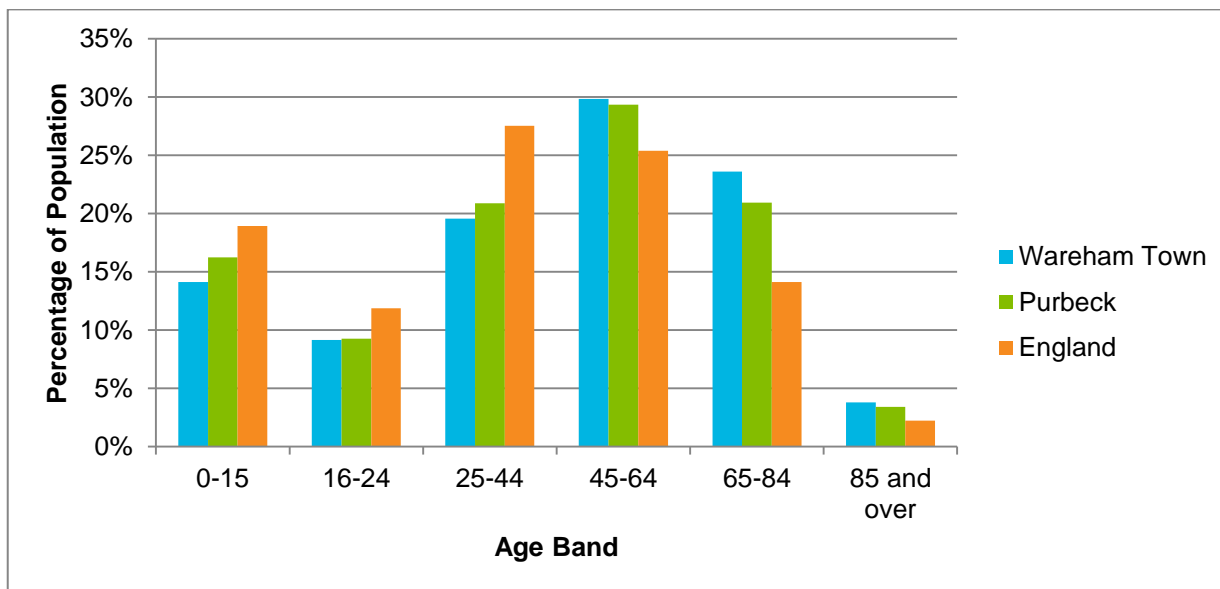
	With no dependent children	With one dependent child	With two dependent children	With three or more dependent children
2014	15,210	2,070	1,983	741
2039	17,626	2,450	2,124	681
Change	2,416	380	141	-60
% Change	15.9%	18.4%	7.1%	-8.1%

Source: MHCLG 2014-based household projections

4.4 Factors affecting size of housing needed: age structure

94. Given that the way the census considers household composition is clearly related in part to age and different stages in life, it is also relevant to consider the age structure of the population in Wareham. In this context, it is important to be clear that the PPG states, "When considering future need for different types of housing, plan makers will need to consider whether they plan to attract a different age profile e.g. increasing the number of working age people."¹⁰
95. That is to say that whilst projections, not least those produced by the ONS itself, will inevitably be based on past demographic trends, policy makers may wish to think strategically about the demographics of the area given that, as the PPG states, "Where the supply of working age population that is economically active (labour force supply) is less than the projected job growth, this could result in unsustainable commuting patterns."¹¹ Indeed, research undertaken by WTC has already shown that the labour force for some of the employment land in the town primarily comes from larger settlements such as Poole.
96. Turning to our analysis of the age structure of Wareham currently, Figure 4-1 below shows clearly that Wareham's population is relatively older than that of both Purbeck, and much more significantly so than England, focused on those aged 45 and over. Conversely, younger people are underrepresented in comparison with both the district and the country, although rates are broadly similar, particularly for those aged 16-24.

Figure 4-1: Age Structure in Wareham



Source: Census 2001/2011, AECOM Calculations

97. The most significant difference then between Wareham and Purbeck is in the 65-84 age group, with 143 more people of this age than would be expected than the district average. Clearly there is a correlation between these older people and the larger number of single person households, as well as larger homes, noted above. Indeed,

¹⁰ PPG Paragraph: 021 Reference ID: 2a-021-20160401

¹¹ Ibid.

the 1504 people in Wareham aged 65+ in 2011 made up a total of 866 households where the head of the household was aged 65 or over (not including those falling into the 'Other' household category, which could include those living in communal facilities and those living in multi-family households).

- 98. Very approximately then, this figure breaks down into 513 households aged 65+ with a single person, and 353 households aged 65+ with more than one person. This implies that there are significantly more elderly households with people living alone than there are living as a couple, translating into approximately 3 elderly people living alone for every 2 households living as a couple, although in practical terms there are more elderly people overall living as a couple (2*353 couples=706, verses 513 living alone).
- 99. Table 4-10 below provides an understanding of how the age structure has changed between the 2001 and 2011 Census. Wareham Town and Purbeck as a whole saw a decrease in the 0-15 age group, but whereas Purbeck had a corresponding increase in the 16-24 age group, this was mirrored in Wareham where numbers remained broadly static. There was also a significant fall in the 25-44 age groups (greater in Wareham than Purbeck). Indeed, in relation to England, the trend seems to be clearly that any difference in trends between England and Purbeck is even more the case for Wareham, e.g. the increase in all those aged 65+ being greater in Purbeck than England, and being greater in Wareham even than in Purbeck. The increase in the oldest age group was also large, although this was from a relatively small base of 167 people in 2001, making up just 3% of the total population.

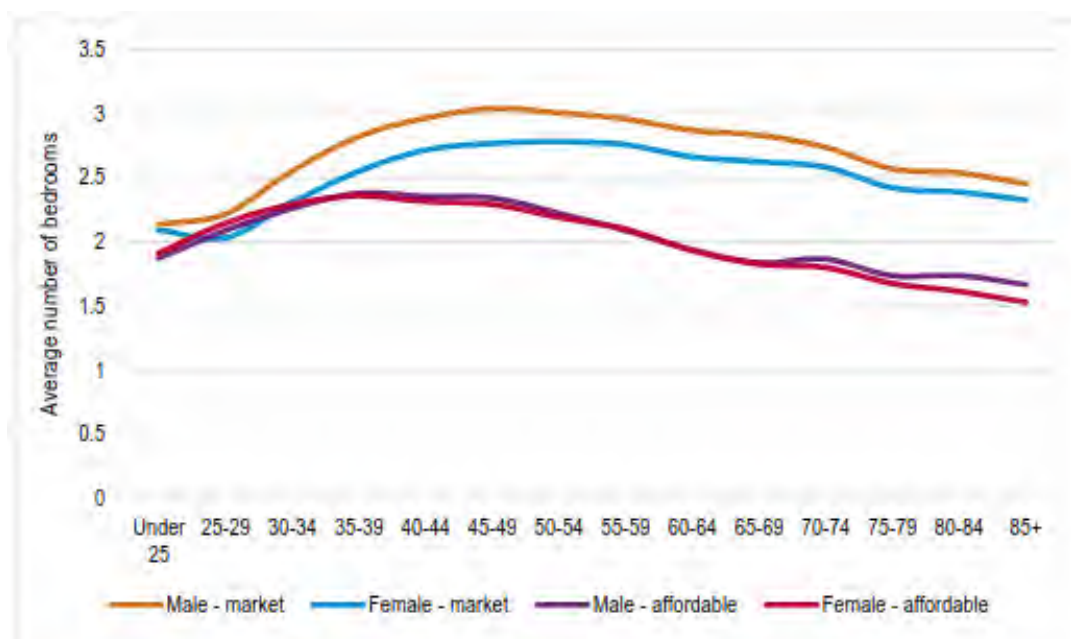
Table 4-10: Rate of change in the age structure of the population of Wareham, 2001-2011

Age group	2001	+ 10yr	Wareham Town	Purbeck	England
0-15	872	-97	-11.1%	-10.1%	1.2%
16-24	494	9	1.8%	14.2%	17.2%
25-44	1310	-236	-18.0%	-12.9%	1.4%
45-64	1673	-33	-2.0%	8.0%	15.2%
65-84	1149	147	12.8%	11.6%	9.1%
85 and over	167	41	24.6%	24.0%	23.7%

Source: Census 2011, AECOM Calculations

- 100. The significance of these changes for the housing stock and the extent to which it meets local needs is demonstrated by the figure below, which reproduces Figure 64 from SHMA15, using data for the whole of Purbeck. Due to data protection rules, data of this kind for smaller geographies (e.g. Wareham) is not produced as part of the census. The figure shows clearly how housing of different sizes is occupied by those in different age groups, with households headed by someone in the 45-49 age group occupying the largest homes on average in the market sector, whilst in the affordable sector those in the 35-39 group occupied the largest homes.

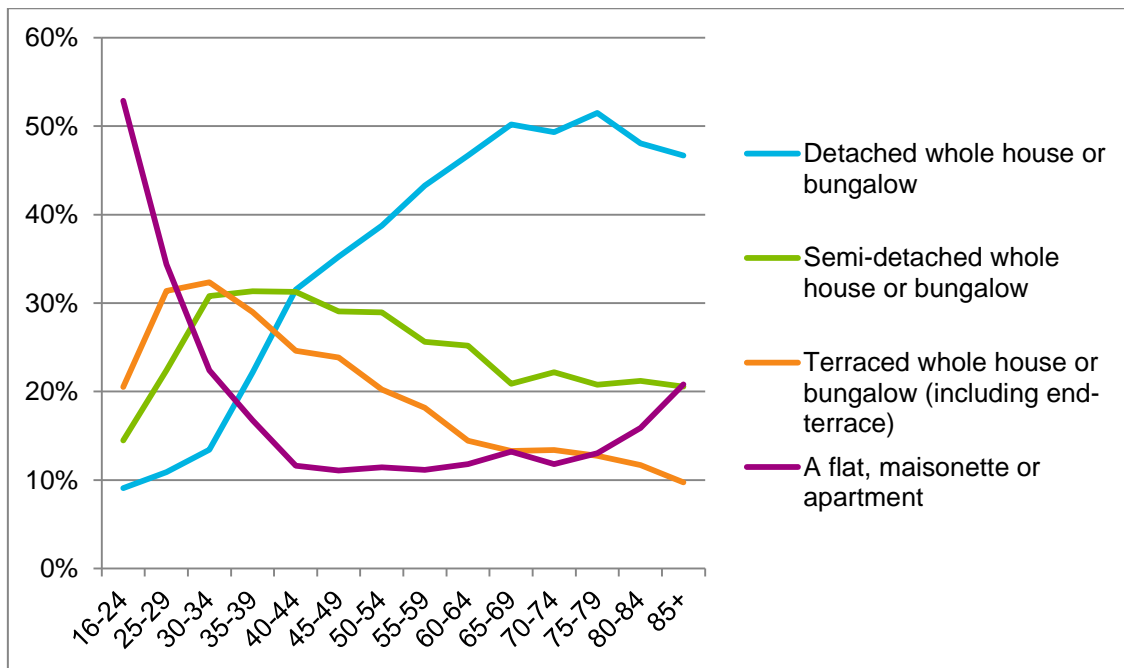
Figure 4-2: Average Bedrooms by Age, Sex and Tenure



Source: SHMA15

- 101. Also notable is that homes in the affordable sector are on average smaller, as might be expected, although the average difference between the two sectors amounted to just a single bedroom for most age groups. It is important to note that the data shows only the average number of bedrooms, and as such masks extremes, particularly in the market sector where a significant number of two and three room properties may balance out some of the larger properties.
- 102. Indeed, this data can be supplemented with census data shown in the figure below, of how different age groups occupy different types of homes in Purbeck. Most significant here is the shift, for those aged 70 and over, towards flats, and away from larger housing types, particularly detached homes.
- 103. It is interesting also to note that flats and apartments are particularly popular with younger people, but overtaken by terraced and semi-detached homes by the time these adults reach the 30-34 age group, with detached houses becoming popular for those aged 40 and over right through to old age (with a small resurgence in the desire for flats and apartments for those aged 75+).

Figure 4-3: Types of homes occupied by different age groups in Purbeck, 2011



Source: Census 2011, AECOM Calculations

4.5 The housing market context

- 104. Given recent shifts in age structure and household composition in Wareham, it is necessary to understand the wider housing market context and how this relates to the future housing needs of the NA.
- 105. SHMA15 puts forward the following mix of homes in the market and affordable sectors for the whole of the HMA. This suggests broadly that affordable dwellings should be focused on smaller housing types, particularly 1 and 2 bed properties, and that market dwellings should be focused on mid-sized housing types, particularly 2 and 3 bed properties. Overall, the most significant focus across both sectors should be 2 bedroom properties.

Figure 4-4: Recommended Housing Mix for the Eastern Dorset Housing Market Area

	1-bed	2-bed	3-bed	4+ bed
Market	10%	45%	35%	10%
Affordable	35-40%	30-35%	20-25%	5-10%
All dwellings	20%	40%	30%	10%

Source: SHMA15

- 106. However, looking in more detail at the estimates presented by SHMA15, we can see that the market housing specified for Purbeck alone tends to be somewhat more focused on 3 bedroom properties than for the rest of the

HMA, whilst for affordable dwellings there is slightly less emphasis on 1 bedroom homes and more emphasis on 3 bedroom homes. This reflects differences in housing need at the local authority level.

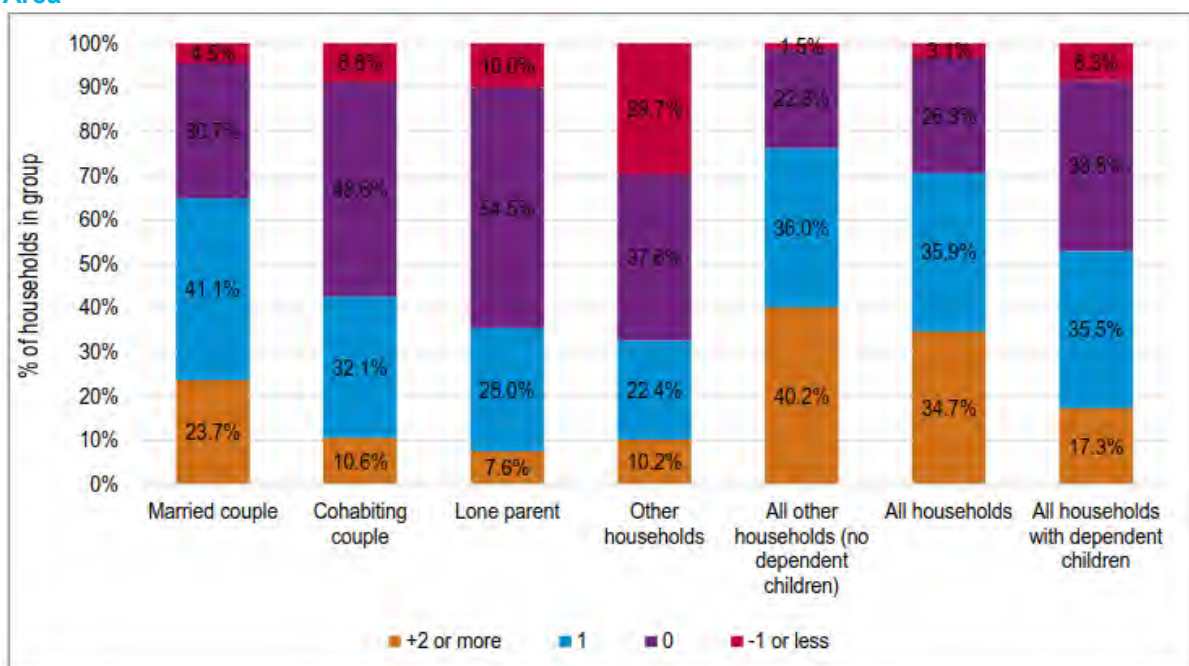
Figure 4-5: Recommended Housing Mix for Purbeck

	1-bed	2-bed	3-bed	4+ bed
Market	5%	25%	45%	25%
Affordable	25-30%	30-35%	30-35%	5-10%
All dwellings	15%	30%	40%	15%

Source: SHMA15

- 107. Part of the task of this HNA is to consider whether, based on local data for Wareham, there is clear evidence of how the recommendations put forward for by the SHMA can be refined according to local characteristics, in this case with regards to the type and size of housing that will be needed in future in Wareham. Whilst much of the data used by the SHMA to calculate these estimates is only available down to local authority level and not available at the level of individual parishes, it is certainly possible to consider in broad terms the extent to which these recommendations are appropriate for Wareham.
- 108. Clearly, different types of households can occupy the same housing quite differently, as discussed in the beginning of this chapter. The figure on the following page reproduces Figure 81 from SHMA15, which shows data on different household types and their occupancy rating, that is, the number of rooms per person. The occupancy rating is derived by subtracting the notional number of rooms deemed to be required by a household (according to its age and composition), from the actual number of rooms they occupy.
- 109. This is helpful because it begins to explain the growth in households occupying larger dwellings discussed above, as the figure shows that approximately 36% of all households have an 'extra' bedroom, and a similar percentage, 35%, have 2 or more extra bedrooms. It is important to again emphasize that this is a completely natural feature of the housing market, as people tend to consume as much housing as they can afford and it is clear that people do not 'down-size' simply because their children are no longer dependent and have moved out of the family home.
- 110. It is particularly interesting to note that the percentage of households with one extra bedroom is broadly the same between those households with dependent children and those with no dependent children, with the difference mainly being that there are far more people with no extra bedrooms in households with dependent children, and far more households with two extra bedrooms in those without.

Figure 4-6: Occupancy rating (bedrooms) for households in the Eastern Dorset Housing Market Area



Occupancy Rating (extra bedrooms)

Source: SHMA15

111. Census data on occupancy ratings for Wareham itself suggest that 57% of all households have two or more extra bedrooms¹², a significantly slightly higher level of under-occupancy than across the housing market area. It is interesting to break these down by household type¹³, considering only those with 2+ rooms as shown in the table below.

Table 4-11: Patterns of Over-Occupancy in Wareham, 2+ occupancy rating (rooms) by household type

Type of Household	Sub-Category of Household	Percentage of All Households
One person households	Under 65	11%
	Over 65	7%
Couples with children	Dependent	9%
	Non Dependent	4%
Couples with no children living at home		14%
Couples over 65		11%
Other Households		1%
All households under occupying		57%

Source: Census 2011

112. The table confirms that it is couples with *no* children living at home who make up the largest share of households under occupying, followed closely by older person households (one person households under 65 and couples over 65)
113. Clearly such levels of over occupancy do not relate to housing need, but rather to market preferences and economics (for housebuilders and homeowners), and represents the real-world market dynamics that the housing market operates within.

4.6 Conclusion: types and sizes of housing needed

114. Bringing together the evidence from our consideration of household composition and age structure in Wareham in comparison to Purbeck, as well as the understanding of the housing market context, our findings suggest there is likely to be a significant need for mid-sized homes of two and three bedrooms. It may be appropriate that a reasonable proportion are provided as apartments or flats, to provide more of this stock type (and lesson the scope for these smaller dwelling types to be extended). Our reasoning is set out below:
115. There are fewer flats and apartments in Wareham than in the district, particularly more spacious two bedroom apartments.
116. There has been a significant increase in larger (8 or more room) homes in Wareham (from 6.8% to 9.5%), and alongside this an actual decrease in the number of mid-sized homes of 4-5 rooms (from 48.3% to 45.5%), which are typically 2-3 bedroom homes within the stock. This is of concern given the demographic shifts described below.
117. The town has fewer households with children than the district and far more one person households, mainly aged 65 and over, such that Wareham's average household is significantly smaller than that of Purbeck. Trends and projections suggest there will be significant increases in such households across the district, alongside possible decreases in households with children overall, particularly those with multiple children, as well as further increases in single person households of all ages.
118. These features are typical of an ageing population, and indeed the elderly population is forecast to increase the most across of any group within the district. However there is also a forecast increase in households without children, which could present challenges in policy terms as such households are more likely to under occupy housing. In general however, there is a clear need for 2-3 bedroom homes appropriate for smaller households, with the average household in the district forecast to fall further in future years.
119. In terms of the housing market across Purbeck, there is a clear trend of older people downsizing, with a greater tendency to choose a flat or apartment, in both the affordable and market housing sectors, with those in affordable housing having on average 1.5 bedrooms towards the end of their lives (implying a ratio of 50/50 1 and 2 bedroom properties) and those in market sector having 2.5 bedrooms on average (implying a ratio of 50/50 2 and 3 bed).

¹² <https://www.nomisweb.co.uk/census/2011/qs412ew>

¹³ <https://www.nomisweb.co.uk/census/2011/LC4105EW>

120. It is worth considering whether developing other housing types for the elderly other than flats could incentivise more older people to move, or whether an increased number of flats and apartments, potentially including larger 2 bedroom properties, could meet the needs of a growing older population who may wish to downsize into smaller properties.
121. Given this trend, it is reasonable to suggest that one bedroom properties would not be particularly appropriate in the market sector in Wareham, unless these encompass specialist housing for the elderly with some form of support, as households choosing additional bedrooms may be doing so to ensure their care and social needs are met in later years.
122. As such, reflecting on the recommendations for housing mix put forward by the SHMA15, this HNA would recommend that Wareham may have a greater need for 2 bedroom flats and houses across both tenures than is suggested by the SHMA, given the characteristics of the existing households, housing stock, and market dynamics discussed above, with the exception of specialist dwellings for the elderly, as addressed in Chapter 6. Our recommendation is that 50% of all new dwellings should be 2 bedrooms, versus the 45% suggested across both affordable and market tenures for the SHMA.

5. Tenure

RQ2. Which affordable housing (social housing, affordable rented, shared ownership, intermediate rented) and market housing tenures should be included in the housing mix?

123. The provision of affordable housing is critical to the continuation of most communities as viable settlements; it needs, however, to be understood in relation to other tenures. The PPG states that HNAs should investigate household tenure in the current stock and recent supply, and make an assessment, based on a reasonable interpretation of the evidence gathered, whether continuation of these trends would meet future needs or whether, on account of significant misalignments between supply of housing falling into different tenure types and local need/demand, policies should support a change to the profile of tenure within the NA's housing stock.¹⁴

5.1 Background and definitions

124. It is necessary at this stage of the study to make clear the distinction between affordable homes as a piece of planning terminology and the colloquial meaning of the phrase. In the course of this study, we refer to Affordable Housing, abbreviated to 'AH'. We mean by this those forms of housing tenure that fall within the definition of Affordable Housing set out in the National Planning Policy Framework (NPPF): social, affordable rented and various forms of intermediate housing. To distinguish this from the colloquial definition, we refer to the latter as Affordable Market Housing (AMH).
125. In this paragraph, we briefly review the proposed reforms to the definition of AH set out in the Government's Housing White Paper published in February 2017. These reforms make clear its commitment to home ownership but recognise the important role of affordable rent for those not currently seeking home ownership. The changes proposed would broaden the definition of affordable housing, supporting 'present and future innovation by housing providers in meeting the needs of a wide range of households who are unable to access market housing'. This would include 'products that are analogous to low-cost market housing or intermediate rent, such as discount market sales or innovative rent to buy housing. Some of these products may not be subject to 'in perpetuity' restrictions or have recycled subsidy'.
126. The Housing and Planning Act 2016 made provision for a new simplified definition of affordable housing as 'new dwellings...to be made available for people whose needs are not adequately served by the commercial housing market'¹⁵. Secondary legislation is required to implement this definition, necessitating further parliamentary debate¹⁶.
127. The Housing White Paper¹⁷ confirms that a revised definition of AH will be brought forward through changes to the NPPF in early 2018. The draft revised NPPF has now been published (March 2018), proposing a definition as 'housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following criteria¹⁸:
- **Affordable housing for rent:** meets all of the following conditions: (a) the rent is set in accordance with the Government's rent policy, or is at least 20% below local market rents (including service charges where applicable); (b) the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider); and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent).
 - **b) Starter homes:** is as specified in Sections 2 and 3 of the Housing and Planning Act 2016 and any secondary legislation made under these sections. The definition of a starter home should reflect the meaning set out in statute at the time of plan-preparation or decision-making. Income restrictions should be

¹⁴ PPG Paragraph: 021 Reference ID: 2a-021-20160401

¹⁵ Housing and Planning Act 2016, part 6, section 159 (4)

¹⁶ Section 159(2) of the Act inserts '(3ZB) No regulations may be made under section 106ZB [which contains the updated definition of affordable housing] unless a draft of the instrument containing the regulations has been laid before, and approved by a resolution of, each House of Parliament'

¹⁷ DCLG (2017) Fixing our Broken Housing Market (para A.120)

¹⁸

used to limit a household's eligibility to purchase a starter home to those who have maximum household incomes of £80,000 a year or less (or £90,000 a year or less in Greater London)

- **c) Discounted market sales housing:** is that sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households.
 - **d) Other affordable routes to home ownership:** is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low cost homes for sale and rent to buy (which includes a period of intermediate rent). Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision, or refunded to Government or the relevant authority specified in the funding agreement.

128. A transition period is proposed to enable a review of local policies, with the policies in the previous framework applying for the purpose of examining plans, where those plans are submitted within six months of the date of the final framework's publication. I. The draft NPPF also includes a requirement for sites of 10 units or more to ensure that at least 10% of all homes are affordable home ownership products, including Starter Homes, shared ownership homes and homes available for discount market sale.

5.2 Current tenure profile

129. The PPG states that HNAs should investigate household tenure in the current stock and recent supply, and make an assessment, based on a reasonable interpretation of the evidence gathered, whether continuation of these trends would meet future needs or whether, on account of significant misalignments between supply of housing and local need/demand, policies should support a change to the profile of tenure within the NA's housing stock.¹⁹

Table 5-1: Tenure (households) in Wareham Town, 2011

Tenure	Wareham Town	Purbeck	England
Owned; total	68.1%	69.5%	63.3%
Shared ownership	0.5%	0.8%	0.8%
Social rented; total	15.9%	12.5%	17.7%
Private rented; total	14.4%	15.3%	16.8%
Living rent free	1.0%	1.8%	1.3%

Source: Census 2011, AECOM Calculations

130. Table 5-1 above presents Census data from 2011 that shows that overall Wareham and Purbeck follow national trends to a certain extent, with the exception of home ownership and social rent. While the proportion of socially rented dwellings in Wareham Town is smaller than national trends (but above district levels), home ownership is prevalent, with 5% more home ownership in Wareham Town than in the rest of the country (and slightly more in Purbeck). This is matched by rates of private renting that are somewhat lower than in the district and the nation. Shared ownership is also significantly lower than in either Purbeck or England, though overall volumes are low in all cases.

Table 5-2: Rates of tenure change in Wareham Town, 2001-2011

Tenure	Wareham Town	Purbeck	England
Owned; total	-3.4%	-0.5%	0.4%
Shared ownership	-36.4%	35.2%	30.0%
Social rented; total	10.9%	9.8%	-0.9%
Private rented; total	34.8%	77.0%	106.6%

Source: Census 2001/2011, AECOM Calculations

¹⁹ PPG Paragraph: 021 Reference ID: 2a-021-20160401

Table 5-2 on the previous page and Table 5-3 below allow us to take a longitudinal perspective, identifying how the tenure profile of the NA has changed between the two last Censuses. From this, it is possible to detect a significant trend towards more social housing compared to England as a whole, and a reduction in shared ownership properties not reflected locally or nationally and weaker growth in private rented stock. It should be noted however that this data does not include unoccupied household spaces such as second homes, of which there were approximately 54 in the parish in 2017²⁰, as tenure is not reported for these; nor does it include any dwellings completed since 2011.

Table 5-3: Households by tenure in Wareham Town, 2001-2011

	2001 Wareham Town	2001 Purbeck	2011 Wareham Town	2011 Purbeck	2001-2011 Wareham Town	2001-2011 Purbeck
All categories: Tenure	2545	18804	2557	19583	12	779
Owned: Total	1803	13675	1742	13613	-61	-62
Shared ownership (part owned and part rented)	19	122	14	165	-5	43
Social rented: Total	367	2227	407	2446	40	219
Private rented: Total	273	1698	368	3005	95	1307

Source: Census 2001/2011, AECOM Calculations

131. In both the NA and the district, there has been a significant increase (of about 10%) in the number of socially rented tenures between 2001 and 2011, whilst the tenure was decreasing as a share of all dwellings in England as a whole. On the other hand, in Wareham, home ownership has declined, by 3.4%, which is more than the decline observed at regional and national levels. Despite both the increase and decrease described above, home ownership remained the prevalent tenure in Wareham Town in 2011.
132. Shared ownership is a type of tenure that rose nationally and at the district level, although it has plummeted in WT. This decrease of 5 shared ownership-types of tenures could be explained by households becoming full owners after buying the remaining shares needed to own their homes fully.
133. Finally, the rate of change in the private rented sector in WT also differs significantly from the regional and national trend; despite being on the rise in Wareham Town, they grew about 50% less than in the district or England.
134. Bringing the evidence relating to the current tenure profile together, three key trends emerge:
- i. the dominance of owner-occupation;
 - ii. for rented dwellings: the dominance of social rent, with much more growth in the private rental sector during the last 10 years (although less significant than observed in the district and in England); and
 - iii. The relative lack of shared ownership properties in the context of the significant growth in this sector in the district and nationally.
135. We are now in a position to consider evidence relating to the affordability of housing and what this tells us about whether the current trends in tenure profile are likely to satisfy current and future community needs.

5.3 Factors affecting affordable housing needs: Affordability

136. Affordability considers the relationship between the price of a good, and the resources available to purchase it. By using different indicators which look at the relationship between income and prices, it is possible to understand the relative affordability of housing in the NA.
137. Whilst local income data is difficult to obtain for small geographical areas such as individual parishes, it is still possible to make an assessment of local needs and how it might be misaligned with the supply of housing, and bring evidence on which to build housing policies. Planning policy can seek to influence tenure of new build homes so as to, over time, bring the NA's housing stock into closer alignment with current and future demands.
138. In assessing affordability, we present two primary indicators, firstly affordability of housing expressed as a multiple of household income, known as the 'Affordability Ratio'. Secondly 'Income Thresholds'. The latter denotes the

²⁰ SHBP17, pp.32

maximum share of a family's income that should be spent on accommodation costs if enough resources are to remain to cover other needs, as well as discretionary spending.

5.3.1 Affordability Ratios

139. To assess the affordability ratio in Wareham, we first consider home ownership (which has been declining slightly in the NA). To do so, and in line with Planning Practice Guidance, we reviewed evidence of affordability by looking specifically at the relationship between lower quartile house prices and incomes, using the Lower Quartile Affordability Ratio (LQAR). This is helpful both as a way of understanding the extent to which those on lower incomes can access entry-level houses for sale and the relative affordability of housing in the NA compared to other places.

140. The SHMA15 calculated both the LQAR and Median Affordability Ratio (MAR) for Purbeck and compared it with other districts in the sub-region in 2013, shown in Figure 5-1. Of the ten areas that appear in the Figure 5-1, Christchurch, East Dorset and Purbeck have the largest LQAR, suggesting those households on lower quartile incomes have greatest difficulty in accessing dwellings suited to their needs in these areas. Purbeck is the third most unaffordable area with house prices 9.87 times lower quartile earnings. The LQAR in the area is higher than the MAR by 1.15 point, which suggests more affordability pressures for the 25% of the population at the lower end of the income scale.

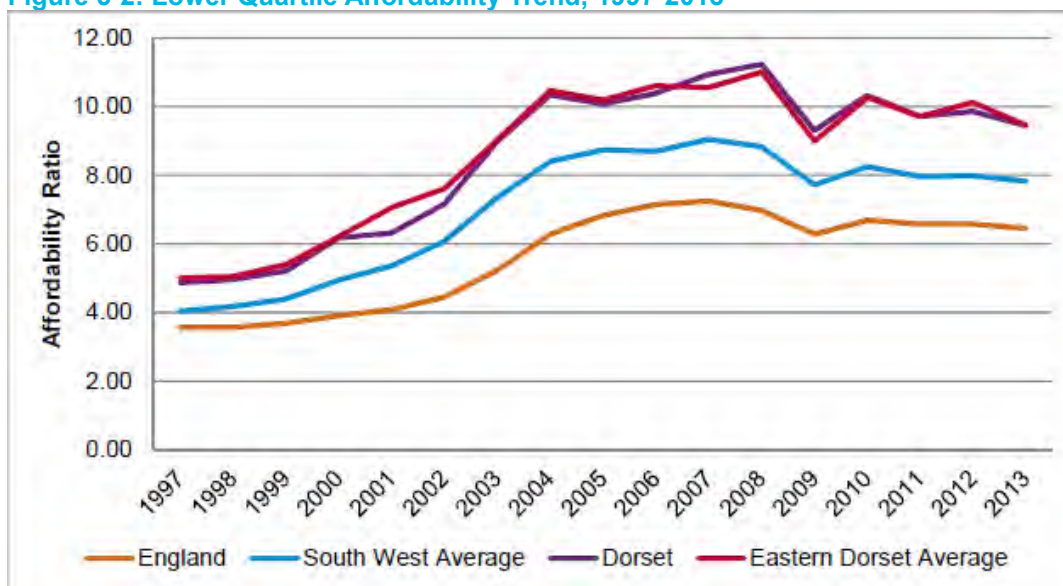
Figure 5-1: Affordability Ratios, 2013

	Lower Quartile Ratio	Median Ratio	Difference
Bournemouth	7.64	7.52	-0.12
Poole	9.18	8.36	-0.82
Christchurch	9.89	9.69	-0.20
East Dorset	10.87	10.77	-0.10
North Dorset	9.29	10.15	0.85
Purbeck	9.87	8.72	-1.15
Eastern Dorset	9.46	9.20	-0.26
Dorset	9.44	9.45	0.01
South West	7.82	7.33	-0.49
England	6.45	6.72	0.27

Source: SHMA15, MHCLG Live Tables: Land Registry Data

141. There is evidence in Figure 5-2 to suggest that these affordability ratios have worsened quite markedly over the past 15 years, although they have somewhat stabilised since 2008. Affordability pressures remain acute in Eastern Dorset compared to the South West and even more critical relative to England as a whole.

Figure 5-2: Lower Quartile Affordability Trend, 1997-2013



Source: SHMA15, MHCLG Live Tables: Land Registry Data

142. In Table 5-4 below, we have used Land Registry data to calculate the LQAR for Wareham between 2013 and 2015. It must be highlighted that the Lower Quartile Income used to calculate that ratio, used that of Purbeck as a proxy, as the ONS does not publish lower quartile incomes data at the parish-level. The LQAR for Wareham is compared to that of Purbeck, neighbouring districts and England²¹.
143. The evidence suggests that affordability levels in Wareham worsened more rapidly than in Purbeck and the rest of the HMA (with the exception of Christchurch). Affordability pressures are particularly acute in the NA; however, in 2013 and 2014 they did not differ much from that of the district – the gap became more notable in 2015 but this may in part by the new-build homes released on the market that year, that account for 33 of 131 sales. Indeed, whilst the average price for new-builds in 2015 was actually £312,254, less than the average for existing properties (£327,618), it is interesting to note that the median price was much higher for new builds (£346,000) verses £260,000 for existing homes in 2015, thus somewhat explaining the jump in LQAR seen below.

Table 5-4: Lower Quartile Affordability Trend

	Lower Quartile Ratio			Increase
	2013	2014	2015	2013-2015
Bournemouth	7.71	8.52	8.41	9.08%
Poole	9.19	9.55	9.78	6.42%
Christchurch	10.75	10.91	12.65	17.67%
East Dorset	11.63	11.78	12.42	6.79%
North Dorset	9	9.17	9.47	5.22%
Purbeck	10.12	11.22	10.52	3.95%
Wareham	10.01	11.15	11.27	12.59%
England	6.57	6.91	7.11	8.22%

Source: ONS (2017), AECOM Calculations

144. Bringing the evidence together, fewer households are able to become homeowners because of an increasing affordability ratio, i.e. a marked move towards housing being less affordable. This has resulted in a substantial growth in PRS as noted above. Moreover, the SHMA15 states that: “A combination of the deteriorating affordability of market homes, restricted access to mortgage products and a lack of social housing supply over the 2001-11 decade has resulted in fewer households being able to buy and increased pressures on the existing affordable housing stock. This has resulted in strong growth in the private rented sector as households are being forced to rent longer²².” Given acute levels of affordability pressures, it could be seen as surprising that this has only resulted in a 34.8% growth in the PRS in Wareham Town compared to 77% in Purbeck. It is not yet clear whether the recent reduction in tax reliefs for the PRS will further subdue growth in this sector in the local area.

5.3.2 Income and purchase thresholds

145. The relative decrease in home ownership might be explained by acute affordability pressures, pushing people to move to the PRS. The PRS has therefore grown substantially in the NA but much less so than in the rest of the district. This might be explained by increasing affordability pressures in the PRS as well, and constraints on the supply of stock suitable for rental.
146. To develop an understanding of the affordability of rental properties, the notion of ‘income thresholds’ is used. The notion suggests that only a certain proportion of a household’s income should be spent on accommodation so as to retain enough money for other essential items, as well as for discretionary spending.
147. The SHMA15 comments that “whilst 25% of income is the threshold suggested by 2007 SHMA Guidance, it is recognised that what is considered affordable can vary and that local circumstances may justify an alternative figure.” In the case of the SHMA15, a 30% threshold has been used²³.

²¹ ONS (2017), ‘Ratio of house price to residence-based earnings (lower quartile and median), 2002 to 2016’, [online] available to download via <<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/adhocs/006557ratioofhousepricetoearningslowerquartileandmedianbylocalauthoritydistrictenglandandwales1997to2015>>

²² SHMA p.116

²³ Ibid.

148. As shown in the previous section, approximately 20% of housing in Wareham is for private or social rent. The figure below shows lower quartile rent for different house sizes. It indicates that Purbeck ranks joint third highest out of six in terms of rents.

Figure 5-3: Lower quartile private rents (year to March 2014)

Dwelling size	Bournemouth	Christchurch	East Dorset	North Dorset	Poole	Purbeck
Room only	£303	-	-	£336	£295	-
Studio	£410	£400	£400	£325	£420	-
1 bedroom	£525	£545	£545	£425	£545	£500
2 bedrooms	£650	£675	£675	£550	£650	£625
3 bedrooms	£850	£850	£800	£675	£800	£750
4+ bedrooms	£1,100	£1,095	£1,150	£895	£1,005	£925
All dwellings	£550	£650	£675	£525	£625	£625

Source: SHMA15/Valuation Office Agency

149. Based on these figures and the affordability threshold discussed above, it is possible to calculate the income that would have been required in 2014 to afford such rents, as shown in Table 5-5 below.

150. To establish affordability, we identify an entry level dwelling as a dwelling suited to a newly forming household consisting of 1-3 individuals. Such a home would require 3-4 habitable rooms (a flat or house with two bedrooms). The income needed annually to be able to rent this type of dwelling in the private sector would be £25,000.

Table 5-5: Income required to afford entry-level rents by number of bedrooms, 2014

	1 bedroom	2 bedroom	3 bedroom	4 bedroom	All dwellings
Rent/month (£)	500	625	750	925	625
Annual income required based on 30% threshold (£)	20,000	25,000	30,000	37,000	25,000

Source: SHMA2015, AECOM Calculations

151. We then compare the findings of Table 5-5 with lower quarter incomes in 2014 in Purbeck²⁴. The lower quartile annual income is £16,931 which is not enough to afford to rent an 'entry level' dwelling.

152. More recent data about monthly rents allows comparison of the evolution in price between different districts. From this, it emerges that Purbeck has experienced the most substantial growth in rates, suggesting that fewer people can afford market housing and illustrates strong demand contributing to driving prices up.

Table 5-6: Monthly rent growth between 2014 and 2017

	Purbeck	Bournemouth	Christchurch	East Dorset	North Dorset	Poole
1 bedroom	5.00%	4.76%	5.50%	5.50%	5.88%	5.50%
2 bedrooms	8.00%	7.69%	7.11%	7.41%	4.55%	7.69%
3 bedrooms	6.00%	5.29%	5.88%	12.50%	7.41%	9.38%
4+ bedrooms	6.27%	18.18%	-4.11%	7.65%	4.47%	9.45%
All dwellings	11.20%	7.27%	9.23%	4.44%	9.52%	8.00%

Source: MHCLG Live Tables, AECOM Calculations

153. The same approach can also be applied to understand the relative affordability of level-entry social rents and house prices.

²⁴ ONS (2017), 'Ratio of house price to residence-based earnings (lower quartile and median), 2002 to 2016', [online] available to download via <https://www.ons.gov.uk/peoplepopulationandcommunity/housing/adhocs/006557ratioofhousepricetoearningslowerquartileandmedianbylocalauthoritydistrictenglandandwales1997to2015>

154. Traditionally the main type of affordable housing available in an area is socially rented housing. The cost of social rented accommodation by dwelling size can be obtained from Continuous Recording (CORE) – a national information source on socially rented lettings.
155. Below we reproduce Table 27 from the SHMA15, as it is not possible to retrieve this data at the NA level. There is a difference of £248 between entry-level rents in the private sector and social rent levels rents.

Table 5-7: Monthly social rent levels

Dwelling size	Bourne-mouth	Christ-church	East Dorset	North Dorset	Poole	Purbeck
1 bedroom – average	£364	£371	£361	£385	£354	£354
2 bedrooms – average	£373	£433	£427	£420	£391	£447
3+ bedrooms – average	£485	£500	£472	£483	£423	£429
Lower quartile (all sizes)	£362	£381	£367	£397	£359	£377

Source: SHMA, CoRe (2014)

156. In Table 5-8 below, we have used the data from the SHMA15 to calculate the income required to afford social rents. Households with lower quartile incomes will struggle to afford rent for dwellings bigger than 1-bedroom. It is also worth noting that 2-bedroom flats are more expensive to rent than 3-bedroom flats. As we have seen in Chapter 4, given that the trend in the NA is for smaller and older households, most socially-rented dwellings should be 1 to 2 bedroom dwellings to satisfy the needs.

Table 5-8: Income required to afford social rents, by number of bedrooms, 2014

	1 bedroom	2 bedroom	3 bedroom	All dwellings
Rent/month	354	447	429	377
Annual income required based on 30% threshold	14,160	17,880	17,160	15,080

Source: SHMA15, AECOM Calculations

157. The annual cost of home ownership can also be estimated using the 'purchase threshold'. We have reproduced Table 24 from the SHMA15 as Figure 5-4 to understand the position of Purbeck relative to other districts regarding entry-level costs. From looking at the lower quartile across all dwellings types, the analysis shows a figure between £152,000 (Bournemouth) and £225,000 (East Dorset). Purbeck is in between with a lower quartile sale price of £190,000. Terraced house would be the closest proxy to what we have defined as an entry-level dwelling. It shows a figure of between £199,900 (Christchurch) and £142,000 (North Dorset). The price for the second highest lower quartile price of terraced housing is £185,000 for Purbeck, which has the second highest lower quartile price of terraced housing.

Figure 5-4: Lower quartile sales prices by type, 2014

Dwelling type	Bourne-mouth	Christ-church	East Dorset	North Dorset	Poole	Purbeck
Flat	£123,500	£131,400	£120,000	£78,500	£135,000	£136,000
Terraced	£172,800	£199,900	£174,500	£142,000	£172,100	£185,000
Semi-detached	£190,000	£224,000	£217,400	£175,500	£190,000	£198,500
Detached	£240,000	£285,100	£288,000	£240,000	£236,400	£271,000
All dwellings	£152,000	£198,000	£225,000	£162,500	£180,000	£190,000

Source: SHMA15, Land Registry PPD

158. We then calculated what would be the lower quartile sale price for Wareham based on 2014 Price Paid Data from the Land Registry to understand how it compared to the district. Overall Wareham has lower entry-level costs, except for terraced types and semi-detached. It is worth-noting that terraced dwellings in Wareham have much higher entry-level costs than in other districts of the South-West, higher even than Christchurch where entry-level prices are the highest of any district in Dorset. Considering that terraced housing is the closest proxy to entry-level dwellings, this illustrates high affordability pressures for households on lower quartile incomes.

Table 5-9: Lower quartile sales prices by type, 2014

Dwelling type	Wareham Town	Purbeck
Flat	131,000	136,000
Terraced	205,000	185,000
Semi-detached	205,750	198,500
Detached	268,000	271,000
All dwellings	188,750	190,000

Source: Land Registry PPD, AECOM Calculation

159. Using the ONS' property affordability calculator, an entry level property²⁵ costed on average £234,000 as of 2018 in Wareham. Assuming a 10% deposit and a lending criterion (how many times income a mortgage provider is prepared to lend you in) of 3.5, the Purchase Threshold for an entry-level property in Wareham is £60,171. Considering the average annual household income was £32,872 (see Figure 5-5) and assuming the median is slightly lower, this might explain growing demand for PRS. Indeed, the shortage of property for local first-time buyers at an affordable price was highlighted in surveys of local estate agents undertaken on behalf of WTC as part of their Housing Needs Study.
160. Intermediate forms of home ownership would, therefore, have the potential to help these median income households accessing home ownership. For example, the purchase threshold for Starter Homes can be calculated. Starter Homes should be offered for sale at a minimum of 20% below its open market value of the property²⁶. We have seen that an entry level property costed on average £234,000 as of 2018 in Wareham. Allowing for a 10% deposit would reduce the value of a Lower Quartile property to £210,600. We then apply a further discount of 20% to arrive at the approximate selling price of a Starter Home of £163,800. Dividing this figure by 3.5 produces a threshold of £46,800. This is still above the annual average household income of £32,872, but contributes to lowering the affordability ratio and is within reach of first-time home buyers earning more than the average income.
161. In order to generate an understanding of affordability among newly forming households (NFH) specifically, relying on the Survey of English Homes [SEH], newly forming households have approximately 66% of the average income of all households²⁷. If the mean income in Wareham is £32,872, the average income of NFH will therefore be £21,696. This suggests that NFH would be unable to afford Starter Homes.

²⁵ The term 'entry level' or 'low to mid-priced property' here refers to the lower quartile price paid for residential properties. If all properties sold in a year were ranked from highest to lowest, this would be the value half-way between the bottom and the middle.

²⁶ Guidance Starter Homes. Paragraph: 003 Reference ID: 55-003-20150318

²⁷ SHMA, page91

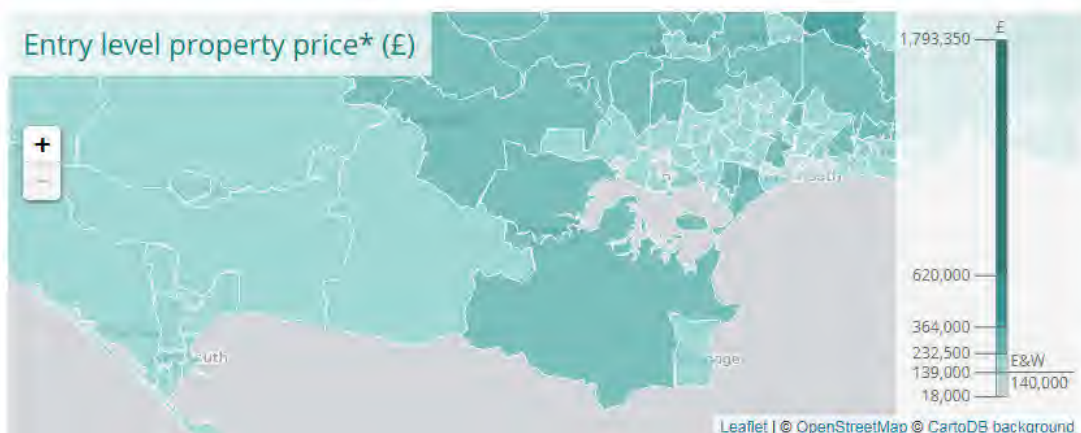
Figure 5-5: Property affordability in Wareham

For an entry level* property in this **Purbeck** neighbourhood, you will need an annual household income of around:

£44,200



You'll also need savings of around:	An entry level* property cost on average:	Average annual household income was:
£39,280	£234,000	£32,872



Source: <https://visual.ons.gov.uk/prospective-homeowners-struggling-to-get-onto-the-property-ladder/#calculator>

5.4 Other indicators of affordable housing need

5.4.1 Housing Waiting List

- 162. So far, we have considered housing need based on a statistical understanding of affordability based on household income. A necessary additional component to quantify the need for affordable housing (AH) in the NA is identifiable demand expressed through entries on the housing needs register.
- 163. A summary of the housing register data (as extracted September 2016 and April 2018) held by Purbeck District Council for households with an interest in locating to Wareham is set out below – the change in the figures is largely due to the change of the policy where the Council no longer operate a Bronze local sustainability banding).

Figure 5-6: Summary of housing register data (September 2016 and April 2018)

Purbeck Housing Register	09/2016				04/2018			
	1 bed	2 bed	3 bed	4+ bed	1 bed	2 bed	3 bed	4+ bed
Affordable / Social Rented								
Living in Wareham	40	20	7	1	30	16	6	1
Other connection to Wareham	12	10	2	0	7	3	4	0
No connection	105	34	18	4	44	16	9	6
Affordable intermediate								
Living in Wareham	6	5	2	0	10	3	5	0
Other connection to Wareham	1	2	1	0	1	3	0	0
No connection	10	9	6	1	19	21	7	1

Source: Purbeck District Council – Housing Enabling Officer

- 164. Figure 5-6 above shows that most claimants need access to smaller dwellings that are either affordable or social-rented, with one bedroom dwellings of both tenures seemingly in most demand, particularly considering those already living in Wareham. It is important to remember that housing register may include people who are not strictly in need, and indeed, the change in banding policies shown in the data above. Similarly, some households may be

in housing need but maybe discouraged from registering, not least because they may feel that their application is unlikely to be accepted.

165. The data above also suggests a significant trend over the period, likely as a result of the change in policy: whilst in 2016, approximately 85% of applicants (both considering all those in need and only those with a connection to Wareham) required social rented dwellings, with the remainder in need of intermediate dwellings. However, in 2018, just 75% of those with a local connection required this tenure, verses 67% when taking those without a connection into account. Furthermore, as a result of the change in policy, the overall housing need dropped very significantly from 296 to 212, with those with a local connection dropping from 109 to 89 (for both tenures).
166. This represents about 3.3% of the total number of dwellings in the NA in 2011. The affordable housing stock should increase to accommodate these households, given that the current stock does not accommodate their needs. As, we have seen, Policy AH of the PLP1 seeks a target of 40% affordable housing all new residential development that result in a net increase of 2 or more dwellings. This percentage can be used to estimate whether, assuming Wareham meets its housing target, this policy will be sufficient to meet its needs for Affordable Housing. The viability research informing the Local Plan Review²⁸ has identified that these levels may not be sustainable without a reduction in the Community Infrastructure Levy, and therefore any conclusions based on the PLP1 targets will need to be kept under review.

5.4.2 Overcrowded households

167. Other indicators are also helpful in gaining a clear understanding of affordable housing need in the NA. These include overcrowded households, those households experiencing a mismatch between the housing needed and the actual dwelling they occupy, and concealed households, that is those households who do not have sole use of basic facilities such as kitchen or bathroom, either living with a host household, often made up of family members, or living with other households, who would prefer to occupy their own home, but cannot do so for reasons of affordability²⁹.
168. The 2011 Census showed Wareham as having 20 households experiencing overcrowding defined here as those households with an occupancy rating of more than one person per room. The same data also identified 23 households considered to be concealed, defined by the census as “a multi-family household...such as young couple living with parents”. There is likely to be some overlap between these ‘concealed’ households and those experiencing overcrowding, although this is not necessarily the case. Whilst this data merely presents a snapshot in time from 2011 and is thus somewhat outdated, it still provides a benchmark figure with which to compare the situation in the wider district.
169. Although overall these make up a small proportion of all households in Wareham (1.4%), and that this number has been decreasing, it is important to note that these households represent a growing generation of young people reaching maturity and seeking to leave the family home. If they are unable to access suitable housing within Wareham, they are likely to move elsewhere, most moving within one year. The 20-23 households can, therefore, be seen as the most visible indicator of households who would perhaps prefer to form their own households.
170. A more accurate picture of ‘concealed households’ can be seen in data for households with non-dependent children, i.e. those with children living in the household over the age of 18, and some aged 16-18. For Wareham, at the time of the last Census, 8.9% of all households fell into this type, 227 households, suggesting the phenomenon of adult children living with their parents is not uncommon in the parish. Whilst not all of these children are considered ‘concealed households’ clearly the vast majority have the potential to form their own household, and thus represent a significant source of local housing need in Wareham. Furthermore, these findings should be considered together with a decrease by 18% of the 25-44 age band between 2001 and 2011 and with the higher number of claimants in the social housing register for smaller socially rented dwellings.
171. Furthermore, the SHMA provides a percentage of households in “unsuitable housing” detailed in Figure 5-7 on the following page which can be benchmarked against our findings for overcrowded and concealed households.

²⁸ <https://www.dorsetforyou.gov.uk/media/214777/viability-assessment/pdf/viability-assessment.pdf>

²⁹ <http://webarchive.nationalarchives.gov.uk/2016010522237/http://www.ons.gov.uk/ons/rel/census/2011-census-analysis/what-does-the-2011-census-tell-us-about-concealed-families-living-in-multi-family-households-in-england-and-wales-/summary.html>

Figure 5-7: Estimated Households in Unsuitable Housing

Area	In unsuitable housing	Total number of households	% in unsuitable housing
Bournemouth	3,864	84,769	4.6%
Christchurch	373	21,754	1.7%
East Dorset	540	38,003	1.4%
North Dorset	587	29,361	2.0%
Poole	1,612	64,506	2.5%
Purbeck	454	19,806	2.3%
Eastern Dorset	7,429	258,199	2.9%

Source: SHMA15

172. The number of households living in unsuitable housing is lower in Purbeck than the county average and represents 2.3% of the population. This number can be compared with the total of 43 households that are either overcrowded or concealed (being aware that there may be overlap between the two groups) in 2011 or 1.7% of the total number of households.

5.5 Conclusion: tenures of housing needed

173. The LQAR for Wareham was 11.27 in 2015. This compares with a LQAR was Purbeck of around 10.52, suggesting that entry-level dwellings are slightly less affordable in Wareham compared with the district. Whilst this was not true in the previous two years, the decreasing affordability of Wareham was more pronounced than in Purbeck, with the LQAR having increased by more than 12% in three years. Based on the new ONS property affordability calculator, an entry-level property cost on average £234,000, which requires an annual household income of around £60,171. Considering the average annual household income was £32,872 and assuming the median is slightly lower, more than 50% of households cannot purchase entry-level properties without subsidy. Indeed, the significant uplift experienced by the PRS in Wareham between 2001 and 2011 suggests that many households earning around the median income may in recent years have turned to the PRS to satisfy their needs. Bringing these households onto the ownership ladder has the potential to free-up rented-dwellings for young and newly forming households looking to remain in Wareham, and reduce reliance on the PRS where recent tax relief changes may have subdued growth. On that basis, we would recommend that forms of 'intermediate' AH such as shared Equity, Discounted Market for Sale Housing (DMSH), or Rent-to-Buy housing be considered as part of the AH quota within the NA.
174. As regards access to the private rental market, rents are relatively affordable in Purbeck compared with other districts in the region, and entry-level rents require an average annual income of £25,000. However, this is still beyond the reach of households earning around the lower quartile annual income of £16,931 and newly-forming households earning an average income of £21,696. On that basis we recommend that forms of Affordable Rent should be considered as part of the AH quota within the NA.
175. Affordability issues will be exacerbated by further increases in house prices in the area, should trends in recent years continue, and may dampen household formation. Moreover, in order to address demographic trends that have seen a decline in those aged between 25-44 and the forecast loss of people of working age in the district, it is appropriate for planning policy to support the provision of entry-level dwellings that are more affordable for newly forming households and access to affordable forms of home ownership for households stuck in the PRS and who desire access to ownership.
176. As a final remark, the SHMA15 explains that it is difficult to pin down what proportion of additional affordable homes should be provided though different affordable tenure categories as there is a degree of overlap between different affordable housing tenures.
177. The SHMA15 recommends that 23% of housing should be intermediate with the remaining 77% being either social or affordable rented. Given the evidence above, we recommend a slightly higher level of intermediate products. A more detailed analysis by tenure type is available in Appendix A.

6. Specialist Housing

RQ3. What provision should be made for specialist housing for older people within the NA, particularly given that there may be low rates of turnover in the housing market overall?

6.1 Background and definitions

178. Before considering the data on Wareham specifically in more detail, it is useful to understand the national context for specialist housing for the elderly across England (e.g. sheltered and extra care, see Appendix B for definitions). Between 1974 and 2015, the population aged 65 and over in England grew 47% and the population aged 75 and over grew by 89%.³⁰
179. A Demos survey of over 60s conducted in 2013 found a “considerable appetite” amongst this age group to move to a new property, with one quarter of all those surveyed suggesting they would be interested in buying a specialist property, and one quarter considering renting³¹.
180. Indeed, the same survey found that 76% of those in homes of three or more bedrooms wished to downsize into smaller properties and this rose to 99% of those in homes of five or more bedrooms, with two bedrooms the preferred choice for both³².
181. However, in spite of evidence of high demand, currently only 5% of elderly people’s housing is made up of specialist homes³³, with Demos suggesting that “the chronic undersupply of appropriate housing for older people is the UK’s next housing crisis”³⁴, and local authorities often “accused of reluctance to approve development plans for specialist housing....out of fear of increased care costs”.³⁵
182. In 2014 there were approximately 450,000 units of sheltered social rented and private sector retirement housing in the England, with approximately one quarter of these in private sector and the rest provided at social rent levels³⁶. However, this balance is likely to be as a result of constraints on the supply of private sector retirement housing rather than a lack of demand.
183. Indeed, whilst older people are increasingly healthier for longer than in the past, often staying in their own homes rather than moving into care, it is clear that the supply of specialist housing for the elderly has not responded significantly in the face of increasing demand. For example, the population aged 65 and over in England grew by 11% in England between 2001 and 2011, but the population living in actual residential care homes, those providing comprehensive care out with the sheltered housing sector, grew by just 0.3%, to about 291,000 people³⁷.
184. The following sections consider the existing provision of specialist housing for the elderly in Purbeck as a whole, and for Wareham, and make projections of how needs might change in the future based on existing provision rates and demographic projections. These are then compared with rates of provision that have been recommended by the Housing Learning and Improvement Network (HLIN).

6.2 Existing provision of elderly housing

185. Data on the existing provision of elderly housing is difficult to obtain at the local level for individual parishes; however the Eastern Dorset SHMA does record the current supply across the Housing Market Area, as shown in the table below. The SHMA also makes clear that such specialist housing figures do not include the provision of registered care homes.

³⁰ <http://researchbriefings.files.parliament.uk/documents/CBP-7423/CBP-7423.pdf>

³¹ <https://www.demos.co.uk/files/TopoftheLadder-web.pdf?1378922386>

³² Ibid.

³³ https://www.housinglin.org.uk/_assets/Resources/Housing/OtherOrganisation/for-future-living_Oct2014.pdf

³⁴ <https://www.demos.co.uk/files/TopoftheLadder-web.pdf?1378922386>

³⁵ <http://researchbriefings.files.parliament.uk/documents/CBP-7423/CBP-7423.pdf>

³⁶ https://www.ageuk.org.uk/globalassets/age-uk/documents/reports-and-publications/reports-and-briefings/safe-at-home/rb_july14_housing_later_life_report.pdf

³⁷ <https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/ageing/articles/changesintheolderresidentcarehomepopulationbetween2001and2011/2014-08-01>

Table 6-1: Current Supply of Specialist Housing for Older People in Eastern Dorset

Type of housing	Affordable	Market	Total
Sheltered	4,806	3,452	8,258
Enhanced sheltered	84	196	280
Extra Care	441	133	574
Total	5,331	3,781	9,112

Source: HLIN

186. This data is most helpful when broken down into the standard metric of units of specialist housing per 1000 75+ population. This provides a more detailed view of actual specialist housing provision in relation to need within that group, based on 2013 figures, which are also provided by the SHMA showing a population of 67,188 people aged 75+ for the entire HMA.

Table 6-2: Rates of specialist elderly housing provision in the Eastern Dorset HMA, 2013

Type of housing	Affordable	Market	Total	Rate per 1000 75+ population
<i>Sheltered</i>	4,806	3,452	8,258	123
<i>Enhanced sheltered</i>	84	196	280	4
<i>Extra Care</i>	441	133	574	9
<i>Total</i>	5,331	3,781	9,112	136

Source: SHMA15

187. However, the SHMA also makes clear that these figures should be treated as indicative, given that they were provided by sector specialists Housing Learning and Improvement Network (HLIN), rather than a statutory body such as the ONS. HLIN is a specialist research hub for knowledge on housing for our ageing population, who have conducted extensive research on the topic for the public and third sectors including Public Health England and the Local Government Association
188. In the absence of official data on the topic of elderly housing provision, we have turned to the Elderly Accommodation Counsel's (EAC) database of specialist housing, to consider levels of provision in Wareham alone. This data, though not necessarily more complete than that provided by HLIN, does allow us to geographically pinpoint specific facilities to Wareham. The data has been collected manually and may not represent the entire specialist housing available in Wareham.

Table 6-3: Summary of specialist housing available in Wareham Town, 2017

In Wareham	Type	Provider	No. Units
Church Street, Wyatts Lane	Retirement/sheltered housing	Aster Living	14
Hemsbach Court	Age exclusive	Stonewater	14
Fleur de Lis	Age exclusive	Renaissance Retirement	21
Hillyard Court	Retirement/sheltered housing	FirstPort	22
Mellstock Crescent, Carey Road	Retirement/sheltered housing	Aster Living	18
Moretons Court	Retirement/sheltered housing	Aster Living	74
Total specialist (excl. Care home)			163

Source: EAC

189. This data suggests that residents of Wareham may have access to significant numbers of specialist housing units within the town itself, whilst these facilities must undoubtedly also meet the needs of the surrounding areas where such housing would be less viable, the main population served, and thus the need, derives in the main from Wareham.
190. It is then interesting to consider how this provision of 163 units translated into a rate of provision per 1,000 population aged 75+ (145/1000), and how this compares to provision rates across the wider HMA (136/1000). This is presented in the table below, which uses the ONS' 2016 Mid-Year Population Estimate of 849 people aged 75+ in Wareham (up from 777 in 2011) as the basis for the calculations. Also included is the expected rate of provision provided by the SHMA itself, which is 170 units per 1,000 75+ people. This allows us to understand whether there

are and will be residents in need of specialist housing in Wareham that are either not having their needs met, or are having to meet them outside the area.

Table 6-4: Actual and projected rates of provision of specialist elderly housing provision in Wareham Town

	Current rate of provision in Wareham	Expected provision based on 2013 HMA average	Total need based on SHMA proposed rate
Specialist Housing Units	163	$136 \times 849 / 1000 = 115$	$170 \times 849 / 1000 = 144$
Rate Per 1000 Population Aged 75+ (849 in Wareham in 2016)	$163 \times 1000 / 849 = 192$	136	170

Source: EAC, SHMA15

191. This data suggests that Wareham has very high levels of provision for specialist housing for the elderly already, being higher than the district average for Purbeck, and indeed than the national average.
192. Below we consider factors likely to affect need for specialist housing, given that the percentage of Wareham's population over 65 is 27%, which is approximately on par with that of Japan³⁸, a country which has long struggled to accommodate its ageing population. Whilst the standard measure of specialist accommodation provision is per 1000 population aged 75+, it is likely that those aged 65 may also have specialist needs, as discussed in more detail below.

6.3 Factors affecting older people's housing need: health and mobility

193. As discussed above, the actual proportion of elderly people that can be considered in need of specialist housing is affected both by overall levels of health at the population scale as well as by individual lifestyle choices, given that the vast majority of elderly people currently choose to continue to live in their homes into their old age. The charity Age UK suggests that "inaccessible housing should not force anyone out of their home or local community against their wishes. It's much better to have 'pull factors' that attract older people towards housing alternatives."³⁹
194. Still, it is interesting to consider long term rates of limitations to mobility within individual districts in the HMA, which the census records as the extent to which people reported that their day to day activities were limited "because of a health problem or disability which has lasted, or is expected to last, at least 12 months"⁴⁰. The table below, reproducing Table 64 from the SHMA, shows that Purbeck will see higher than average increase in the number of older people with dementia, and a similar increase in those with disability problems.

Table 6-5: Estimated population change for range of health issues (2013-33)

	Type of illness/disability	2013	2033	Change	% increase
Bournemouth	Dementia	2,765	4,379	1,614	58.4%
	Mobility problems	6,756	10,280	3,524	52.2%
Christchurch	Dementia	1,203	1,886	684	56.9%
	Mobility problems	2,967	4,388	1,421	47.9%
East Dorset	Dementia	1,977	3,421	1,444	73.0%
	Mobility problems	5,000	7,955	2,955	59.1%
North Dorset	Dementia	1,139	2,147	1,008	88.5%
	Mobility problems	2,964	5,104	2,141	72.2%
Poole	Dementia	2,454	4,288	1,834	74.7%
	Mobility problems	6,177	10,040	3,863	62.5%
Purbeck	Dementia	821	1,417	596	72.7%
	Mobility problems	2,136	3,385	1,249	58.5%
HMA	Dementia	10,359	17,538	7,180	69.3%
	Mobility problems	26,000	41,152	15,153	58.3%

Source: SHMA15

195. It is helpful then to turn to similar data on mobility limitations for Wareham in comparison to Purbeck. The figure below shows this data for the 65+ and 75+ populations of Wareham with Purbeck and England for comparison. It should be noted that as the data is self-reported, some types of illness such as dementia may not be accounted for.

³⁸ <https://www.economist.com/news/asia/21734405-authorities-are-focusing-keeping-centre-alive-small-japanese-city-shrinks-dignity>

³⁹ <https://www.ageuk.org.uk/documents/EN-GB/Political/Age%20UK%20ID201813%20Housing%20Later%20Life%20Report%20-%20final.pdf?dtrk=true>

⁴⁰ <https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/disability/articles/disabilityinenglandandwales/2013-01-30>

Table 6-6: Rates of mobility limitations amongst elderly people in Wareham Town, 2011

Size of Elderly Population	Wareham Town		Purbeck	
	% population	% with activities limited (as % of all residents)	% population	% with activities limited (as % of all residents)
All aged 65+	27.4%	12.8%	24.3%	11.2%
All aged 75+	14.1%	8.8%	11.8%	7.3%

Source: Census 2011

196. This data shows that even amongst those 75+ in Wareham, residents experience marginally higher levels of disability than those in Purbeck, with approximately 1.5% more people experiencing some limitations to their day to day activities than the district average. This suggests that demand for specialist housing for the elderly may in fact be higher in Wareham than the average for the district, based on the view that such housing may be better able to meet the needs of those with disabilities.
197. It is also relevant to consider mobility limitations among younger age groups to understand how this need might change in future as these cohorts age. This data is presented in the table on the following page, which shows a particularly high rate of mobility limitations in those aged 50-64 in Wareham (9.11%) in comparison to Purbeck (7.23%). This 2.12% difference in practical terms translates into approximately 11 additional residents whose day to day activities are limited a lot than would be expected from the district-wide rate of disability in this age category ($2.12\% \times 1262 \text{ people aged 50-64 in 2011} = 27$). Across all age categories the difference against the district average is equivalent to 58 people. This would suggest the need for higher than average provision in Wareham of specialist housing with a range of care options available.

Figure 6-1: Residents with significant disabilities in Wareham and Purbeck by age group, 2011

Age Group	Residents with day-to-day activities limited a lot (as % of all residents in that age range)	
	Wareham	Purbeck
Age 0 to 15	0.52%	1.49%
Age 16 to 24	1.79%	2.14%
Age 25 to 34	1.71%	2.17%
Age 35 to 49	4.81%	4.30%
Age 50 to 64	9.11%	7.23%
Age 65 to 74	10.33%	10.30%
Age 75 to 84	23.39%	23.17%
Age 85 and over	51.31%	48.58%

Source: Census 2011

198. Indeed, the SHMA15's figures show that there will be very significant increases in those with both dementia and mobility problems across Purbeck to 2033, with increases of more than 50% in both categories. Given how the data discussed above suggests that levels of mobility limitations in Wareham are higher than the average for Purbeck in all age groups over 35, it is likely that these shifts will affect Wareham disproportionately, thereby further increasing the need for specialist housing for the elderly in future.

Table 6-7: Estimated Population Change for Range of Health Issues (2013 to 2033)

Type of illness/disability		2013	2033	Change	% increase
Purbeck	Dementia	821	1,417	596	72.7%
	Mobility problems	2,136	3,385	1,249	58.5%
Eastern Dorset	Dementia	10,359	17,538	7,180	69.3%
	Mobility problems	26,000	41,152	15,153	58.3%

Source: SHMA15

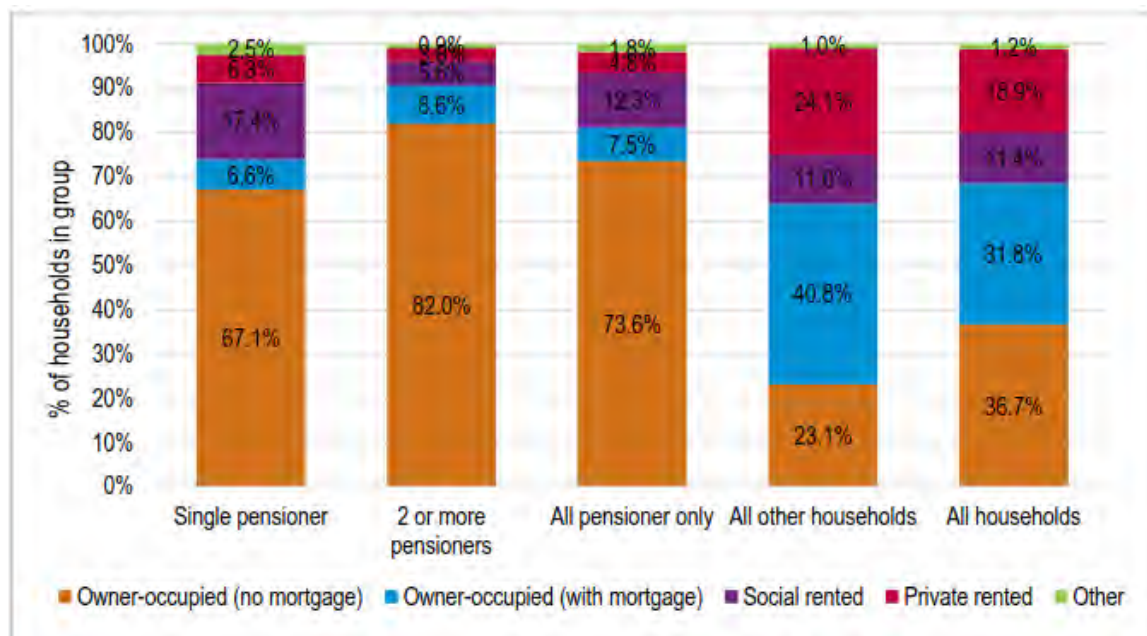
199. Bringing the evidence relating to specialist housing for older people together so far, we have established that the existing provision of elderly housing is good in Wareham in comparison to the district average, it is likely that need in Wareham may continue to be greater than in other parts of the district due to increasing relative levels of mobility

problems in the elderly population of the town. It is helpful then to turn to a consideration of the housing market context, and how it might meet the needs of those with such limitations.

6.4 Housing Market Factors: Housing Turnover

- 200. The analysis provided by the SHMA15 suggests there may be a significant gap in housing options for the elderly across Purbeck, and notes that the vast majority of specialist housing is in the social rented sector, in marked contrast to the actual tenure make-up for households in this age group.
- 201. The figure on the following page, which reproduces Figure 68 from the SHMA15, shows housing tenure across different types of households in Purbeck.
- 202. Indeed, while 59% of specialist housing across the HMA was in the Affordable Housing sector, only 26.4% of people in the age group did not own their own home. This is significantly fewer than for other types of households, of whom only 23.1% did own.
- 203. However, when considering all pensioner households, this group were more likely to be in social rented housing than all other households, although this was disproportionately true for single pensioner households, and not at all the case for those with two or more pensioners.

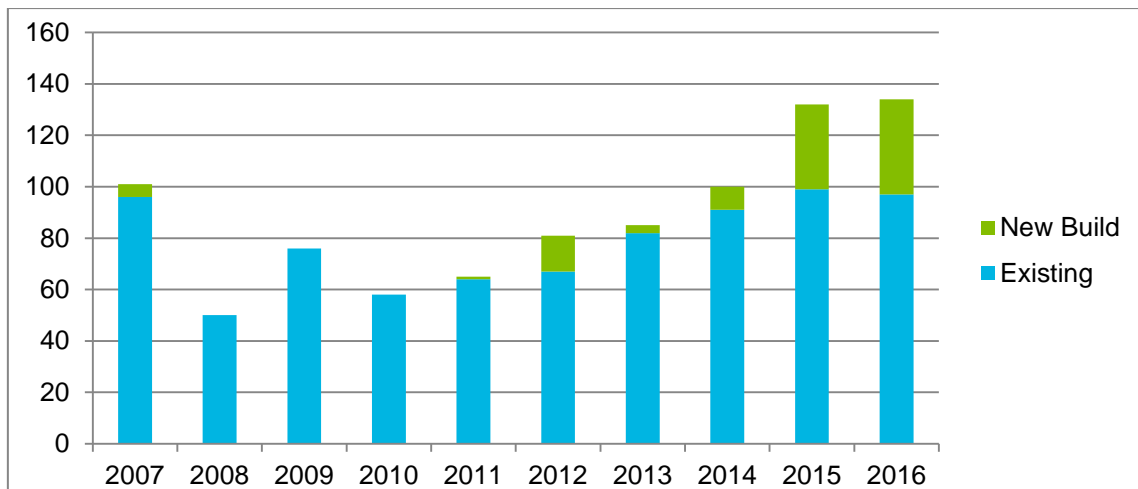
Figure 6-2: Housing tenure of different types of households in Purbeck



Source: SHMA15

- 204. This data hints at the contradiction noted above between supply and demand of specialist housing across the country, particularly in the market sector: there are significant proportions of the population ageing, but only relatively small increases in the supply of specialist housing designed specifically to meet their housing needs.
- 205. One explanatory factor could be that low rates of housing turnover, i.e. the frequency with which homes are bought and sold measured as the percentage of the existing stock sold in each calendar year, affects older households disproportionately.
- 206. Data on housing turnover can prove challenging to compile, because although the Land Registry records sales of most dwellings, not all sales are recorded (including auctions), and it is difficult to know what the exact stock of housing was for any given year. Similarly, new build sales are excluded from any count, as these would skew the data in favour of years where more housing was delivered.
- 207. The chart on the following page breaks down all sales of existing homes (802, between January 2007 and December 2016) in Wareham from Land Registry Price Paid Data (PPDC). This makes clear that the vast majority of homes bought and sold are existing, although in more recent years, new build homes have also made a significant contribution. Whilst clearly, rental and other tenures of housing have a significant contribution to make in terms of meeting overall housing demand, here we consider only turnover in housing for sale, as the vast majority of older people, indeed 73% across the district, owned their own home in 2011.

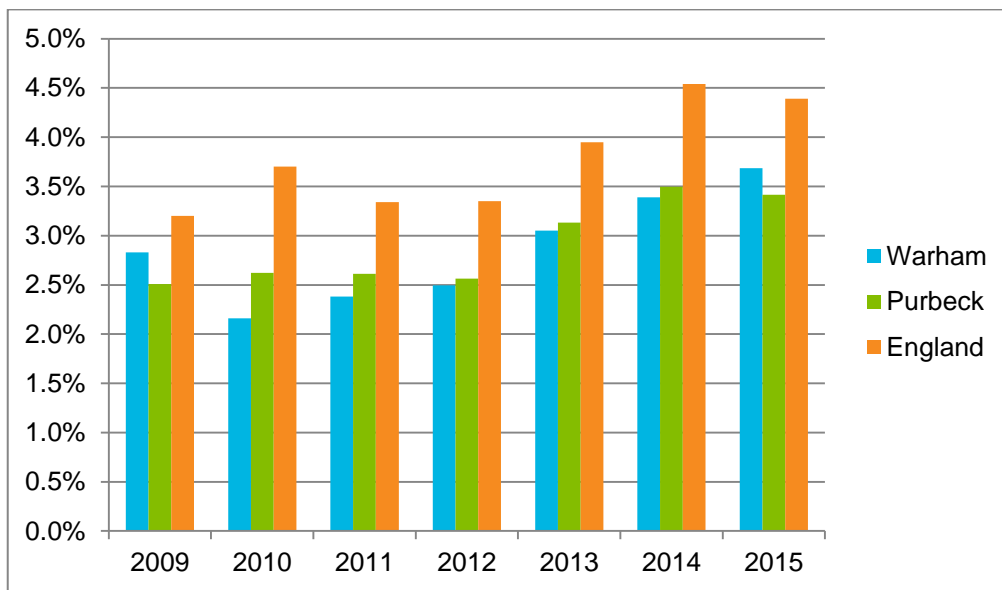
Figure 6-3: Breakdown of existing and new build property sales in Wareham Town, 2007-2016



Source: Land Registry PPD

208. It is then interesting to compare levels of housing turnover for Wareham, Purbeck and across England. Given the relative difficulty in determining exactly how many ‘existing dwellings’ there are for any given year (as some dwellings may be bought and immediately resold, but these would no longer be considered new dwellings in Land Registry Data), we have used the total dwelling stock at the 2011 census for both Wareham and Purbeck to produce the figure below. Data at the national level, available from the ONS’ Housing Summary Measure Analysis, was discontinued in 2015.

Figure 6-4: Rates of housing turnover as a percentage of 2011 stock, Wareham



Source: Land Registry PPD, ONS Housing Summary Measures Analysis 2015, AECOM Calculations

209. This figure makes clear that rates of housing turnover are relatively low in both Wareham and Purbeck in comparison to England as a whole. In most of the years considered however, Wareham had slightly lower rates of turnover than the whole of Purbeck, except in 2009 and 2015. Indeed, this data reflects the views of local estate agents interviewed as part of work undertaken on behalf of WTC as part of their Housing Needs Study. In the view of agents, this comparatively low turnover has made Wareham an attractive and stable place to live.

210. On this basis, there may be a small, specifically local effect of low housing turnover impacting older people’s moves into specialist housing in Wareham, and across Purbeck. This may have the effect of reducing the need for specialist housing as people stay in their homes for longer than the national average, however the difference between Wareham and Purbeck is negligible. Indeed, agents also noted the desire of older people to move into “accessible ground floor flats/bungalows, ideally with a garden and off street parking”, however these properties are likely to be relatively rare.

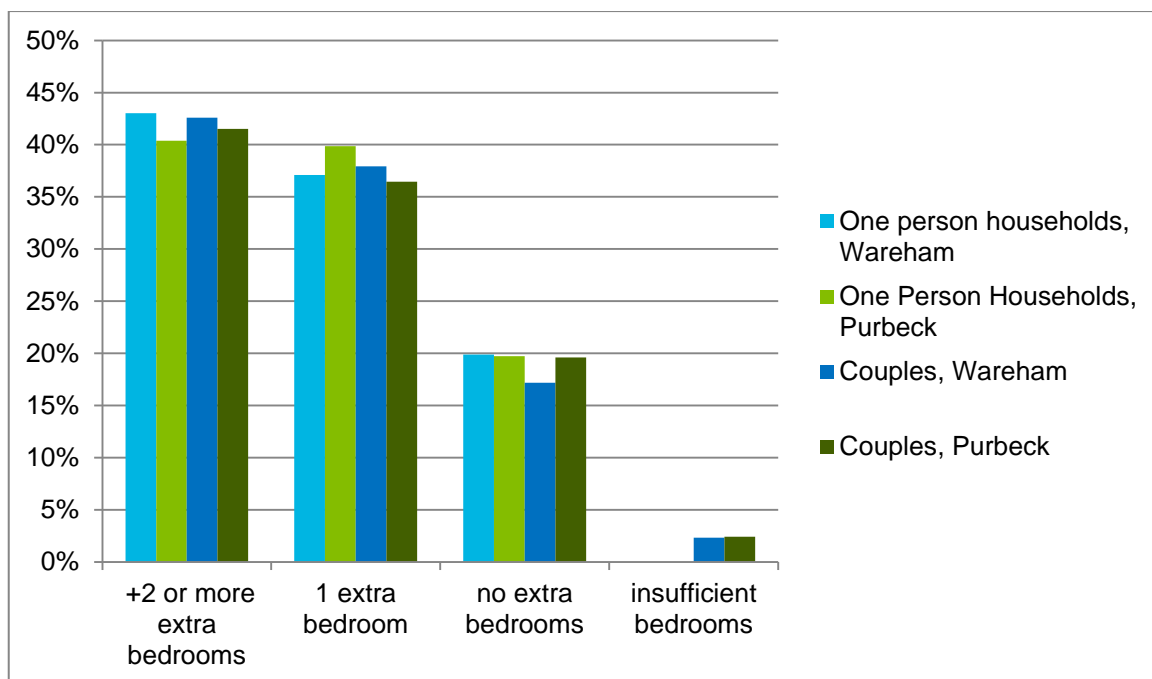
211. The implications of such findings are not clear-cut, particularly for specialist housing, although over the past few decades, housing turnover measured as a proportion of supply has declined significantly, which may have contributed to a notable rise in house prices nationwide⁴¹.

6.5 Housing Market Factors: Rates of Occupation

212. In addition to housing turnover, it is relevant to consider levels of under occupation amongst the elderly population, as this is a factor which may induce older people to choose to downsize into smaller homes, as noted above in research by Demos, particularly for those in homes of four or more bedrooms.

213. As noted above, research shows that those with larger homes are much more likely to wish to move into specialist accommodation for the elderly, given the challenges of maintaining such homes.

Figure 6-5: Levels of under-occupation in Wareham and Purbeck, households over 65 by type



Source: Census 2011

214. The figure above shows that slightly more elderly people in Wareham have two or more extra bedrooms than the average across Purbeck. This was true both for those living alone and those in couples. Particularly interesting is the fact that one person households were slightly more likely than couples to have two or more extra bedrooms in Wareham, whereas the reverse was true across Purbeck.

215. Whilst it would be difficult to evidence whether single person households or couples aged 65 or over were more in need of specialist housing, common sense would suggest that single people are more likely to benefit from enhanced social surroundings and care opportunities this might provide.

216. Based on this view, the data suggests that on balance, there may be greater need for properties which are appropriate to downsize into in Wareham than the average for Purbeck.

6.6 Conclusions: estimates of future specialist housing need

217. The Government’s recent consultation on housing need asked specifically for, “suggestions on how to streamline the process for identifying housing need for individual groups”, particularly in reference to older people. This demonstrates the relative difficulty in estimating the housing needs of elderly people, particularly given that there may be significant variations in the existing provision of such housing, not least because it crosses a range of sectors including housing, health and social care, the responsibilities for which are devolved at different geographical scales.

⁴¹ <http://residential.jll.co.uk/new-residential-thinking-home/news/uk-housing-turnover-leading-to-higher-prices>

218. Below, we consider how the impact of the ageing population, i.e. the shift in the balance of the population so that there will be more older people as a proportion of the population (and indeed in terms of overall numbers of people) is likely to change demand for older people's housing.

Table 6-8: Change in the population of over 75s between 2011 and 2033

Age band	2011 Population Wareham (Census)	Population Purbeck (Census)	2031 Projected Population Purbeck (ONS SNPP 2014)	Projected Population Wareham (AECOM Calculation)
All ages	5,496 (12.2% of the district total)	44,973	48,700	
75+	777 (14.7% of the district total)	5,299	8,100	1,188 (14.7% of the district total)

Source: MHCLG 2014-based Sub-national population projections, Census 2011

219. The table 6.8 on the previous page shows how the elderly population aged 75+ of Wareham is likely to increase in future from 777 (in 2011) to 1188 (in 2033) based on a simple fair share calculation, i.e. based on Wareham maintaining the current proportion of all elderly people living in the district in the town. As we have already seen, the ONS already estimates that by 2016, the elderly population of Wareham stood at 849, up approximately 9% from 2011.

220. As such, as a result of 52% increase of the elderly population projected by the ONS for Purbeck from 2011- 2031, it is clear that there is likely to be a very significant increase in the number of elderly people in Wareham, although this will be dependent on older people's lifestyle choices which are shaped by a variety of factors.

221. Still, given that Wareham contained 14.7% of older people in the district in 2011, whilst having just 12.2% of the population of the district overall, it is likely that Wareham will continue to be an attractive place for older people to live.

222. It is useful then to consider how this relatively dramatic increase in the population of older people might affect the need for specialist housing. As we have seen however, actual rates of provision for specialist housing can vary widely as a result of supply factors discussed above. As such, the table below considers the implications of a range of different rates of provision on specialist housing need in Wareham based on an increase in the elderly population of 339 from 2016-2031.

Table 6-9: Potential additional specialist housing units required at differing rates of provision to 2031

	Current rate of provision in Wareham	Projected need at 2013 HMA average rate of provision	Projected need at SHMA15 proposed rate of provision	Projected need at HLIN recommended rate of provision
Rate Per 1000 Population Aged 75+ (849 in Wareham)	192/1000	136/1000	170/1000	251/1000
Total Additional Housing Units Required to 2031 (based on 339 additional people aged 75+)	65	(no additional need)	39	135

Source: HLIN, AECOM Calculations

223. The evidence assembled above in terms of health and mobility suggests that an uplift on the average rate of provision across the HMA would be justified to take account of local factors specific to Wareham. On this basis, we would recommend that a figure of 39 additional specialist dwellings be taken forward by the neighbourhood planning group to the end of the Plan period.

224. Whilst demand for specialist dwellings clearly varies between different parts of the district, with many older residents remaining in their family homes and not in specialist accommodation, it is for the Town to decide whether it wishes to continue to provide specialist accommodation at the current rate, given the district average, or at a higher rate, given the proposed provision in the SHMA.

225. Relatively lower rates of provision across Purbeck reflect long-held care in the community policies, the importance to elderly people of familiarity and access to occupational therapists to reduce risks within the home – all enabling elderly people to remain at home for as long as possible. However, conversely, preventative interventions in elderly

people's housing, such as adaptations, can help to reduce the likelihood of health crises such as falls, or other events leading to hospital visits. Anecdotal evidence also suggests that elderly people can leave a move into specialist accommodation too late resulting in a higher dependency on nursing and residential homes, disorientation, and an acceleration of dementia.

226. Dorset County Council currently runs a pioneering programme called Dorset Early Help/POPP, a partnership between the council and the local NHS body, the Dorset Clinical Commissioning Group (CCG), alongside the third sector. It would be prudent to work together with such a body and local providers to consider the trajectory of care and how the housing stock can accommodate such care in the future.
227. The following section discusses in brief some of the other potential housing options for the elderly, and is included for information only.

6.7 Other housing options for the elderly

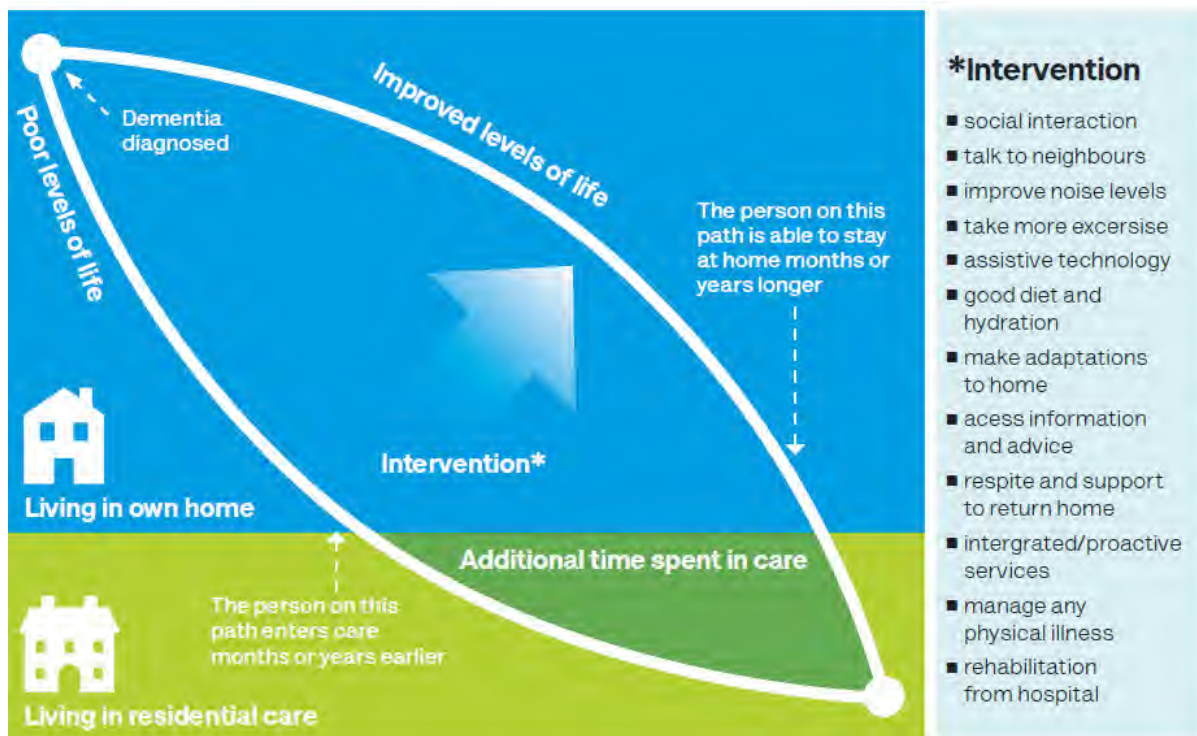
111. **Retirement villages** are developments that involve the delivery of multiple homes satisfy the desire on the part of many older people to live in an environment with people facing similar challenges; retirement villages are often a cost-effective means of delivering sheltered and extra care housing together with the facilities and services these settlements imply. Given the numbers of units that result from the analysis above, it seems unlikely that this would be appropriate for Wareham Town.
112. **Senior co-housing** has been identified as being particularly suited to the needs of older residents. It offers a way for a group of people with similar interests and needs to come together to create an environment suited specifically to their requirements. Moreover, it can be designed to help address one of the most important issues for older people: isolation and loneliness. A number of successful case studies exist of projects developed specifically with the needs of older people in mind; including the creation of public areas that encourage social interaction between members of the community (see <https://cohousing.org.uk>).
113. **Multi-generational homes** have been identified as a possible solution not only for older people, but all generations where it makes financial sense to share accommodation, particularly younger people who are struggling to set up their own households. This gives rise not only to designs for new homes, but conversions to existing dwellings, introducing internal subdivisions and peripheral extensions to create internal layouts that balance the private needs of different generations with the benefits of over-lapping, shared communal spaces.
114. **Lifetime homes** are created via LPA policies in Local Plans that a proportion of new homes should be built according to 'lifetime homes' principles; these are ordinary homes incorporating a number of design criteria that can be universally applied to new homes at minimal cost, for example parking that makes getting in and out of the car as simple and convenient as possible and ensuring movement in hallways and through doorways should be as convenient to the widest range of people, including those using mobility aids or wheelchairs, and those moving furniture or other objects.⁴²
115. **Right sized dwellings** are dwellings that may be specifically built for older people in mind, but are not necessarily marketed as such. It is important to note, this does not necessarily imply moving to a smaller home. Many older people have the wealth (and the choice that comes with it) to create a home suited to having visitors and accommodating care staff, who may need to make over-night stays. For this reason, it is important to recognise that different ages have different needs, thus in the provision of housing, choice is critical, catering for those with relatively modest requirements, to those who are more dependent on help. The provision of choice that responds to need is part of creating a smoothly operating local housing market in which older people are able move out of family homes when they wish, thus freeing up these properties for others.⁴³
116. **Housing for people with dementia** may consist of specialist housing, but needs, like the housing needs older people, can be met within their own home. Enabling people with dementia to live in their own homes for longer is critical to their quality of life as a result of the familiarity of surroundings and the help with retaining memories this facilitates⁴⁴. The challenge with this is two-fold; firstly the lack of appropriate adaptations in properties and, secondly, the support required to ensure a home is safe and suitable. In Figure 6-6 on the following page we reproduce a chart showing the impact that early and appropriate intervention can have on the prospect of people with dementia remaining in their own home for longer.

⁴² <http://www.lifetimehomes.org.uk/pages/about-us.html>

⁴³ Housing LIN, *New Approaches to Housing for Older People*, June 2014, page 6

⁴⁴ Alzheimer's Society, *Dementia-friendly housing charter*, page 13

Figure 6-6: Dementia care chart



Source: Dementia Services Development Centre, 2013

117. As suggested above, it is appropriate for the neighbourhood group to work closely with the LPA and other bodies to develop policy and approaches to addressing the need for housing for elderly people in the area. The LPA is under an obligation through national policy to address the needs of older people,⁴⁵ it is therefore appropriate they should play the strategic role in co-ordinating new efforts by housing providers, adult care services, primary care and health trusts, private and third sector organisations to meet the housing needs of older people across the district.

⁴⁵ NPPF, para 50

7. Conclusion

7.1 Overview

Factor	Source(s) (see relevant chapters for more details)	Possible impact on housing needed	Conclusions
Type and Size of Housing Needed	SHMA15, Census 2001/2011, MHCLG 2014-based household projections, WTC Housing Needs Study	<p>Whilst Wareham has slightly fewer flats than the district and significantly more terraced homes, the size of housing in Wareham was broadly similar to that across Purbeck. There have been significant increases, of about 34% (2001-11), in the number of larger homes, which is of concern given ongoing demographic shifts towards smaller households.</p> <p>There is a clear trend of older people downsizing in both the affordable and market housing sectors in Purbeck, with those in affordable housing having on average 1.5 bedrooms towards the end of their lives and those in market sector having 2.5 bedrooms on average.</p> <p>This trend across the district is almost exclusively as a result of older people moving into flats, with no apparent trend toward downsizing into other house types as yet. In general however, households in Wareham are more likely to under occupy housing than across the district, with approximately 35% maintaining two extra bedrooms.</p>	<p>There is likely to be a significant need for small and medium sized housing, and our recommendation is for 50% of all new homes to be two bedrooms in Wareham to help to fill an identified market gap and in particular to accommodate the existing trend towards older people downsizing into appropriately sized homes as they move through retirement, and smaller households going forward. One bedroom homes may also meet the needs of elderly people, although developing space standards could help to ensure that these meet the expectations of downsizers.</p> <p>A key question is whether developing other housing types for the elderly other than flats would incentivise more older people to move, or whether flats will continue to meet their needs. Given the downsizing trend identified, it is reasonable to suggest that one bedroom properties would not be particularly ideal in the market sector in Wareham, unless these encompass specialist housing for the elderly with some form of support, as households choosing additional bedrooms may be doing so to ensure their care, social & family visiting needs are met in later years. Furthermore, smaller new build homes may be less flexible in their design than larger homes according to some research⁴⁶, making downsizing not as attractive.</p>
Tenure of Housing Needed	SHMA15, Census 2001/2011, MHCLG Live Tables, Land Registry PPD, Core Lettings data, ONS Property Affordability Calculator, WTC Housing Needs	<p>Affordability ratios suggest that for-sale housing is accessible to less than 50% of the population, whilst entry level rents exclude the bottom 25% of earners. There has been a significant uplift of 35% experienced in the private rental sector in Wareham Town in recent years, suggesting many households earning around the median income have turned to the private rental sector</p>	<p>There are significant gaps in housing provision between market and social rented housing. Bringing these households onto the ownership ladder has the potential to liberate rented-dwellings for young and newly forming households looking to remain in the area.</p> <p>Given the range of housing affordability issues across all tenures, it is</p>

⁴⁶ https://www.southsomerset.gov.uk/media/862544/somerset_final_shma_oct2016_revised.pdf

	<p>Study</p>	<p>to satisfy their needs.</p> <p>Entry level house prices are particularly inaccessible at £188,750 in 2014, which also explains the growth in the private rental sector. A reduction in the younger working age population are likely to be exacerbated by a lack of suitable housing at suitable prices.</p> <p>The Housing Waiting List data provided by PDC suggests there are 89 households with a local connection to Wareham in need of affordable homes, with more than twice as many considering need in the wider district.</p> <p>Affordability issues will continue to be exacerbated by further increases in house prices in the area, should trends in recent years continue, and may also negatively impact new household formation rates. As a result, there is likely to be a decline in the working age population of the district, particularly those between 25 - 44.</p>	<p>recommended that affordable housing be delivered across all tenures (social rented housing, affordable rented housing, shared ownership etc.). Current district policies should enable this housing to be delivered as a proportion of market development.</p> <p>Moreover, in order to address demographic trends identified in this report it is appropriate to provide a larger proportion of smaller affordable homes for young forming households and households stuck in the private rental sector and who desire access to ownership. On that basis we would recommend that forms of ‘intermediate’ affordable housing such as Shared Equity, Discounted Market for Sale Housing (DMSH) as well as rental models such as Affordable Rent should be considered as part of the affordable housing quota within the NA.</p>
<p>Specialist Housing Needed</p>	<p>HLIN, SHMA15, EAC, Census 2011, Land Registry PPD, ONS Housing Summary Measures Analysis 2015, MHCLG 2014-based Sub-national population projections, Dementia Services Development Centre</p>	<p>As a result of a near doubling of the elderly population projected by the ONS for Purbeck from 2011- 2031, there is likely to be a very significant increase in the number of elderly people in Wareham, which could be up to 450 people.</p> <p>Comparatively low rates of turnover in the housing stock across the district may be constraining demand for specialist housing in Wareham.</p> <p>The elderly population of Wareham aged 50+ has relatively higher levels of mobility limitations (approximately 2% greater), than the district average, At current rates this would equate to 16 additional units of specialist housing, whilst County Council and industry body recommendations could indicate need for up to 135 additional specialist dwellings for the elderly up to 2031.</p>	<p>Whilst demand for specialist dwellings clearly varies across different parts of the planning district, with many older residents remaining in their family homes and not in specialist accommodation, it is for the parish to decide whether it wishes to provide specialist accommodation above the levels currently provided across the local authority area.</p> <p>However, AECOM’s recommendation is that a figure of 39 additional specialist dwellings be carried forward by the Wareham Town Neighbourhood Plan, based on a range of estimates and adjusted to take account of local factors such as health and mobility in the local population.</p> <p>Dorset County Council currently runs a pioneering programme called Dorset Early Help/POPP, a partnership between the council and the local NHS body, the Dorset Clinical Commissioning Group (CCG), alongside the third sector. It would be prudent to work together with such a body and local providers to consider the trajectory of care and how the housing stock can accommodate such care in the future.</p>

7.2 Recommendations for next steps

228. This neighbourhood plan housing needs advice has aimed to provide Wareham Town Council with evidence on housing trends from a range of sources. We recommend that the Town Council should, as a next step, discuss the contents and conclusions with PDC.
229. This advice note has been provided in good faith by AECOM consultants on the basis of housing data and national guidance current at the time of writing (alongside other relevant and available information).
230. It is important under review any implications arising from forthcoming changes which have been published in the new draft NPPF, as well as the implementation of the Housing and Planning Act 2016, which will continue to affect housing policies at a local authority and, by extension, a neighbourhood level.
231. Bearing this in mind, we recommend that the steering group should monitor carefully strategies and documents with an impact on housing policy produced by the District Council or any other relevant body and review the neighbourhood plan accordingly to ensure that general conformity with the adopted Local Plan is maintained.
232. At the same time, we recommend the group monitor available data on demographic or other trends over the period in which the neighbourhood plan is being developed to help ensure relevance and credibility of its policies.
233. Below we summarise our recommendations regarding policies on the specific issues considered as part of this HNA. Such recommendations clearly relate to the future supply, rather than the future need or indeed demand for housing in Wareham.

Policies on Tenure

234. We have set out recommendations as to the most appropriate tenures of affordable housing in the NA in Appendix A. However requiring developers to provide a set proportion of affordable housing (or indeed any specific tenure of home) will likely be subject to viability considerations at applications stage as enshrined in the current NPPF, Paragraph 173.
235. Indeed, in rural areas, 68% of affordable homes are delivered via Section 106 agreements,⁴⁷ although smaller sites, typically those under 10 units, are usually less likely to support the provision of affordable housing on site.
236. Whilst we support ambitious neighbourhood planning groups to set challenging affordable housing policies to meet local need, a degree of pragmatism is also required to ensure that affordable homes are delivered rather than remaining a policy aspiration.
237. In particular, Local Plan policies on affordable housing may already provide for the framework under which contributions towards affordable housing will be negotiated with developers and landowners, with little value added by additional neighbourhood plan policies.
238. On this basis, we would recommend that policies on tenure consider specifically what types and sizes of development they apply to, and ideally which sites they will relate to. This will allow a targeted approach to negotiations with developers regarding affordable housing contributions, whether these are on-site delivery of affordable housing units, or off-site payments.
239. The specific tenures delivered on specific sites is likely to relate as much to the nature of the site and its design and access as to issues of viability and land prices. More detailed advice can be found in the PAS Neighbourhood Planning Advice Note on Housing Needs Assessment for Neighbourhood Plans⁴⁸

Policies on Type and size

240. This HNA has set out AECOM's recommendations for the types and sizes of housing needed in future. Neighbourhood plan policies can specify types and sizes of homes that should be developed, however the extent to which these specifications will, much like the tenures of homes to be delivered, will be subject to the viability of individual housing schemes.
241. An alternative and often more effective approach than general policies on the type and size of dwelling applying to all development within the NA would be for neighbourhood planners to design specific guidance on the characteristics of housing on specific development sites which are allocated in the plan.
242. These should be developed according to the views of local residents, and also in consultation with other local stakeholders including developers and your local authority.

⁴⁷ HAPPI 4, pp. 41

⁴⁸ <https://www.local.gov.uk/sites/default/files/documents/view-advice-note-here-cb3.pdf>

243. Such guidance would ideally be informed by both design code/masterplanning work exploring the impact of the proposals on the overall capacity of the sites, as well as by viability evidence underpinning that the requirements would not place undue burdens on developers seeking to deliver housing.
244. In developing more detailed guidance for specific sites, neighbourhood planners will be able to provide certainty and evidence in discussions with both the public and private sector as to the future of development sites. In addition, emerging Draft Planning Practice Guidance states that “Neighbourhood plan policies on the size or type of housing required should be informed by other local authority evidence as far as possible”.⁴⁹

Policies on Housing for Specialist Groups

245. Specialist housing for the elderly is typically delivered either by specialist developers (who mainly provide market sale and rented products), and housing associations, who typically provide rented products. This market is still relatively underdeveloped in the UK, with the result being that such providers tend to buy only specific types of land in specific parts of the country.
246. Wareham already has a well-developed market for retirement and elderly people’s housing, with both market and affordable provision. This provides a strong basis for the further development of this market, including to provide greater choice for older people, particularly in terms of different tenures, which may also help to deliver more affordable options for those elderly people in need.
247. In particular, elderly people who do not own their own home outright (i.e. those who continue to have a mortgage), as well as those in the private rented sector, may not be able to access the vast majority of private sector specialist housing, and may need alternative tenures of home should they wish to move.
248. The evidence presented to the All Party Parliamentary Group on Housing and Care for Older People’s inquiry HAPPI4 suggested that a policy link between Rural Exceptions Sites and specialist dwellings for the elderly could be made in Local Plan, and by extension Neighbourhood Plan policy⁵⁰.
249. Similarly the inquiry called for Local Plans to allocate sites for specialist housing for the elderly, and this could undoubtedly also be extended to neighbourhood plans⁵¹. We would encourage groups to explore the possibilities of such a policy, and whether it would be in conformity with the relevant Local Plan’s Strategic Policies, with your Local Planning Authority.
250. We also note that the revised NPPF suggests that such developments could be exempt from some types of affordable housing requirements, and this may impact both on their viability and their ability to deliver different tenures of specialist accommodation for the elderly⁵².

⁴⁹https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/687239/Draft_planning_practice_guidance.pdf

⁵⁰ http://www.housingandcare21.co.uk/files/8515/2508/3531/APPG_Rural_HAPPI_4_Housing_Care_Report...pdf

⁵¹ Ibid.

⁵²https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/685289/Draft_revised_National_Planning_Policy_Framework.pdf

Appendix A: Housing tenure

251. Earlier in this study, we identified the various different tenures that constitute Affordable Housing (AH): social rented housing, affordable rented housing, shared ownership, discounted market sales housing (Starter Homes) and affordable private rent housing.
252. This variety of AH tenures reflects an ambition by the Government to introduce market principles into the provision of subsidised housing. The aim is to divide AH into a series of products designed to appeal to different sectors of the market and, by changing eligibility criteria, bring rents closer in line with people's ability to pay.
253. A good example is, in 2012, the introduction of affordable rented dwellings, rent for this tenure would be set at up to 80% of market rent, with the additional income being used to help fund the development of new homes. Labelled an 'intermediate' product, this would be suitable for people with an income that precludes them from eligibility for the social rented dwellings, but who cannot afford to access the private market.
254. The overall aim is to reduce the group who are eligible for social rented dwellings to those who have, relatively speaking, very low household income. However, within this segment, market principles also apply given the link between rents and size of dwelling, with a strong financial incentive for households to only occupy a dwelling deemed suited to their composition, based on an 'occupancy rating' formula set by the Government.

A.1 Social rented housing

255. Rents in socially rented properties reflect a 'formula rent' based on a combination of individual property values and average earnings in each area, maintaining substantial discounts to market rents. As such, it is suitable for the needs of those on low incomes, and is subject to strict eligibility criteria.
256. As we have seen, the majority of households in Wareham are able to afford market dwellings for rent. However, the evidence we have gathered suggests there is a significant minority who experience great difficulty in accessing housing suited to their needs. The evidence comprises of:
- A LQAR higher than the council (11.27%) and which is worsening.
 - Households on lower quartile income can only afford existing social rent levels with housing benefit for dwellings of 2 bedrooms or more.
 - A substantial proportion of households with non-dependent children (8.9% of all households) suggesting the importance of the phenomenon of adult children living with their parents.
 - Data from the 2011 Census identifying 20 households experiencing overcrowding and 23 households considered to be concealed.
 - The 109 households in priority need for affordable homes in the NA (most of them requested smaller dwellings of 1 or 2 beds).
257. The need for social housing will be exacerbated by the reported increase in house prices in the area in recent years and the decline in those aged between 25-44 combined with the forecast loss of people of working age.
258. It is therefore appropriate for social rented housing to form the majority of affordable homes provided, with the number of 77% being either social or affordable rented given by the SHMA being appropriate for the NA.

A.2 Discounted market housing (starter homes)

259. As we have seen, Housing and Planning Act 2016 (HPA) includes provisions to introduce a general duty on planning authorities in England to promote the supply of 'starter homes,' and a specific duty to require a minimum number or proportion of 'starter homes' on certain residential development sites. The relevant legislative provisions are, however, not yet in force and no specific proportion or minimum has been put forward.
260. The Housing White Paper sheds further light on the government's intentions in this area. It states that, 'in keeping with our approach to deliver a range of affordable homes to buy, rather than a mandatory requirement for 'starter homes,' we intend to amend the NPPF to introduce a clear policy expectation that housing sites deliver a minimum of 10% affordable home ownership units. It will be for local areas to work with developers to agree an appropriate level of delivery of 'starter homes', alongside other affordable home ownership and rented tenures.'
261. This is a substantial watering-down of the 'starter home' requirement as envisaged when policy contained in the Housing and Planning Act was first conceived. In effect, it leaves it to local groups, including neighbourhood plans,

to decide an appropriate level of affordable home ownership products, while taking note of the 10% policy expectation.

262. The decision whether to treat Discounted Market Sale Homes (DMSH) as affordable housing should be determined by whether lowering the asking price of new build homes of a size and type suitable to first time buyers by 20% would bring them within reach of people currently unable to access AMH for purchase.
263. So as to provide a conservative assessment of suitability of DMSH, we consider the value of £234,000 in Wareham for an entry-level dwelling. Allowing for a 10% deposit would reduce the value of a Lower Quartile property to £210,600. We then apply a further discount of 20% to arrive at the approximate selling price of a Starter Home of £163,800. Dividing this figure by 3.5 produces a threshold of £46,800. This is still above the annual average household income of £32,872, but contributes to lowering the affordability ratio for first-time buyers whose income is around the median. This type of tenure is therefore most appropriate for first-time buyers who earn slightly above the median and can therefore afford 80% of the market price for entry-level dwellings.
264. This evidence must be considered together with the high number of adult children living with their parents and the decrease by 18% of the 25-44 age bands between 2001 and 2011. This suggests that many newly-forming households cannot afford entry-level dwellings for sale. As they result they will either be 'displaced' of the area, live with their parents, or choose the PRS.
265. On the basis of the evidence we have gathered, we would therefore recommend DMSH form part of the AH quota within the NA.

A.3 Shared ownership

266. As we have seen, there are very few shared ownership dwellings in Wareham (0.5% at the time of the last Census). Nevertheless, it is worth considering its future role in the town. Shared ownership involves the purchaser buying an initial share in a property typically of between 25% and 75% and paying rent on the share retained by the provider. Shared ownership is flexible in two respects, in the share which can be purchased and in the rental payable on the share retained by the provider. Both of these are variable.
267. The share owned by the leaseholder can be varied by 'stair-casing'. Generally, stair-casing will be upward, thereby increasing the share owned. In exceptional circumstances (as a result of financial difficulties, and where the alternative is repossession), and at the discretion of the provider, shared owners may staircase down, thereby reducing the share they own.
268. Shared equity constitutes a form of AH, targeting those on incomes around the mean; as such, it is termed 'intermediate' and is available to both first-time buyers, people who have owned a home previously and council and housing association tenants with a good credit rating whose household income does not exceed £60,000. Given these conditions, on the basis of the affordability analysis discussed above, it should form part of the AH mix in the NA. Provided its total annual cost is lower than that of Starter Homes, it could help NFH to become homeowners.

A.4 Affordable rent

269. Commentators have repeatedly raised concerns about affordable rent not constituting a realistic form of AH given that in many areas this reduces rent to levels that are still beyond the means of the target group: those on incomes substantially below the mean.
270. Affordable rent is controlled at no more than 80% of the local market rent; as we have seen the annual rent for a two bedroom dwelling in Purbeck is £7500. This remains beyond the reach of those whose income falls into the lower quartile but is within the reach of those whose income are around the mean, explaining the growth in the PRS. In the event of an 20% reduction in rent, the Income Threshold would come down to £20,000, potentially bringing rents within reach of newly formed households with an average income of £21,696 and almost that of households with a lower quartile income of £16,931. We therefore recommend that the affordable rented tenure form a component within AH.

A.5 Market housing

271. Given the limited quantity of AH in the NA, the needs of the great majority of the people will be served by the market. People on higher incomes will be able to access a variety of market dwellings; their choices will be driven principally by how much they can afford to spend, the extent to which old age is driving their choice of home as well as personal taste.

272. The operation of the market is the best means of addressing the demand for different types of housing for sale. It is important planning policy does not place unnecessary burdens on the market preventing its ability to respond to demand; this is after all the principal way equilibrium is achieved in the housing market and house price growth kept in check. In this way the notion of viability is essential. It is important not to deter development in the context of clear housing need; to do so will not only frustrate the delivery of new housing but also may deprive the community of resources for infrastructure improvements.

A.6 Built to rent

273. As we have seen, there is strong evidence of growing demand for private rent accommodation in the NA. On-going changes to the benefit system, in particular 'Universal Credit',⁵³ and the way social housing is allocated, for example restrictions imposed by eligibility criteria, are likely to increase demand on the private rented sector, especially at the lower-cost end of the market. Given the very substantial increases in PRS revealed by Census data, this trend is one shared by Wareham.

274. The reason for the strength of this demand is that, for those households unable to access market housing to buy, and who do not qualify for affordable housing, private rented housing is the only remaining option. Given the trends identified in this HNA, Wareham should seek build to rent (BTR) development, a percentage of which may be 'intermediate rented housing' so as to address the need to affordable market housing for younger age groups.

⁵³ Reforms to the benefits system are likely to see payments made directly into recipients' bank accounts rather than housing benefit paid to landlords thus granting the individual greater choice in the nature of their housing arrangements.

Appendix B Definitions of Specialist Housing

B.1 Sheltered Housing

Sheltered housing (also known as retirement housing) means having your own flat or bungalow in a block, or on a small estate, where all the other residents are older people (usually over 55). With a few exceptions, all developments (or 'schemes') provide independent, self-contained homes with their own front doors. There are many different types of scheme, both to rent and to buy. They usually contain between 15 and 40 properties, and range in size from studio flats (or 'bedsits') through to 2 and 3 bedroomed. Properties in most schemes are designed to make life a little easier for older people - with features like raised electric sockets, lowered worktops, walk-in showers, and so on. Some will usually be designed to accommodate wheelchair users. And they are usually linked to an emergency alarm service (sometimes called 'community alarm service') to call help if needed. Many schemes also have their own 'manager' or 'warden', either living on-site or nearby, whose job is to manage the scheme and help arrange any services residents need. Managed schemes will also usually have some shared or communal facilities such as a lounge for residents to meet, a laundry, a guest flat and a garden. Source: <http://www.housingcare.org/jargon-sheltered-housing.aspx> (accessed 11/11/17)

B.2 Extra Care Housing

New forms of sheltered housing and retirement housing have been pioneered in recent years, to cater for older people who are becoming more frail and less able to do everything for themselves. Extra Care Housing is housing designed with the needs of frailer older people in mind and with varying levels of care and support available on site. People who live in Extra Care Housing have their own self-contained homes, their own front doors and a legal right to occupy the property. Extra Care Housing is also known as very or enhanced sheltered housing, assisted living, or simply as 'housing with care'. It comes in many built forms, including blocks of flats, bungalow estates and retirement villages. It is a popular choice among older people because it can sometimes provide an alternative to a care home. In addition to the communal facilities often found in sheltered housing (residents' lounge, guest suite, laundry), Extra Care often includes a restaurant or dining room, health & fitness facilities, hobby rooms and even computer rooms. Domestic support and personal care are available, usually provided by on-site staff. Properties can be rented, owned or part owned/part rented. There is a limited (though increasing) amount of Extra Care Housing in most areas and most providers set eligibility criteria which prospective residents have to meet. <http://www.housingcare.org/jargon-extra-care-housing.aspx> (accessed 11/11/17)

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Comment by	Wareham the Neighbourhood Plan Steering Group (Mrs Hilary Evans - 1188328)
Comment ID	PLPP10
Response Date	17/11/18 13:24
Consultation Point	Policy EE1: Employment land supply (View)
Status	Processed
Submission Type	Web
Version	0.1
Files	Wareham Employment Needs Review

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

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)

The Local Plan no longer seeks to protect Westminster Road or St John's Industrial estates as key employment sites, but retains protection in relation to Sandford Lane. This supports the Neighbourhood Plan's findings on these locations. Policy EE1 is therefore supported.

If you have any supporting documents please upload them here.

Wareham Employment Needs Review
Wareham Employment Needs Review

Employment Needs Assessment

Wareham Neighbourhood Plan

July 2018

Executive Summary

This assessment has been prepared as part of the evidence base supporting the Wareham Neighbourhood Plan. Wareham Neighbourhood Plan is well placed to consider the extent to which new employment land may be required, and existing land safeguarded. Key findings are summarized as follows:

- > The national policy context, whilst seeking to support economic growth through the planning system, recognises that this is better achieved through flexible policies that aim to proactively meet the development needs of businesses. It places less emphasis on the long-term protection of employment sites, and has introduced permitted development rights to this effect.
- > The strategic assessment of employment land provision suggests supply exceeds demand, even taking into account likely turnover, with the possible exception of B1 office use in Bournemouth and Poole. Evidence of enquiries shows a significant decline in local enquiries post-2009, with demand shifting to smaller units.
- > Most of the workforce resident in Wareham commute out to Bournemouth and Poole, and the majority of those employed in Wareham commute in from Bournemouth and Poole. As such the retention or provision of workspace in Wareham is unlikely to have a significant influence on commuting patterns.
- > There are three main employment estates in Wareham, the largest being Sandford Road. All three provide a variety of business needs primarily used for workshops, open storage and warehouse accommodation with a lesser degree of factory and office premises. St John's Road and Westminster Road are more likely to require modernisation, and Westminster Road has units sizes larger than typically demanded since 2009. The survey data suggests that both Westminster Road Industrial Estate and Johns Road are seriously under-occupied in terms of employment density.
 - The Sandford Lane Industrial Estate is comparatively modern, and its status as protected employment land appears to be justified. There is scope to extend the site at its eastern end to provide for future needs (in an area where housing would not be acceptable).
 - The Westminster Road industrial estate is not configured to meet typical demand. The decision by Daler-Rowney to relocate all of their operations from the site has created an opportunity to consider the long-term future of the estate, although businesses are moving in to the vacated units. Any net loss of employment land would not appear to be strategically significant or have any notable impact on commuting patterns.
 - Johns Road industrial estate occupies a key location on the entrance into Wareham by the railway station. Like the Westminster Road estate, it has become rundown with premises requiring modernisation. A more flexible approach to redevelopment in this location, to enhance this gateway location, would similarly be justified.

1. Purpose of this assessment

- 1.1 This assessment has been undertaken to provide the evidence base in relation to employment and business needs to inform the Wareham Neighbourhood Plan. This report does not include an appraisal of the town centre and associated uses, as this has been covered in the separate retail assessment.

2. Policy Context

National Planning Policy

- 2.1 National Planning Policy is set out in the National Planning Policy Framework (NPPF), published in 2012. This is likely to be updated in 2018 (and a draft for consultation has been issued). One of the core planning principles in the NPPF is to “proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs.” This depends on objectively assessing of the housing, business and other development needs of an area, and responding positively to wider opportunities for growth. The NPPF adds that “Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities”
- 2.2 The NPPF seeks to support economic growth through the planning system. This is through proactively meeting the development needs of businesses, and ensuring that the planning policies recognise and seek to address potential barriers to investment, including any lack of infrastructure, services or housing. It also makes clear that planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose.
- 2.3 The Government has also implemented a number of changes to permitted development rights in the last 5 years, to enhance flexibility in the planning system in order to support business growth. This has included (subject to certain conditions / approvals):
- business (B1) to storage or distribution (B8)
 - business: office (B1a) to residential
 - business: light industry (B1c) to residential (set to expire in October 2020)
 - general industrial (B2) to storage or distribution (B8)
 - general industrial (B2) to business (B1)
 - storage or distribution (B8) to residential (set to expire in June 2019)
- 2.4 It is clear that whilst new employment areas are supported, the retention of existing employment areas is balanced against the need to retain that use, and other needs (such as for housing or regeneration). Para 51 states that local planning authorities “should normally approve planning applications for change to residential use and any associated development from commercial buildings (currently in the B use classes) where there is an identified need for additional housing in that area, provided that there are not strong economic reasons why such development would be inappropriate.”

Local Planning Policy

- 2.5 The current local plan for the area is the Purbeck Local Plan Part 1, 2012. This has a Policy ELS covers employment land supply, and Policy E covers employment. These policies were based on the 2008 SWRDA workplace strategy, and 2012 updated employment land projections.

- 2.6 The Local Plan (Table 2, reproduced below) recognises three major employment areas in Wareham, all of which at the time of the Local Plan were fully developed

Existing employment Lane (April 2011)	Parish	Total Site area (ha)	% Total Provision	Available area (ha)
Westminster Road	Wareham	5 ⁽¹⁾	3.46%	0
Sandford Lane	Wareham	9 ⁽²⁾	6.22%	0
John's Road	Wareham	0.3 ⁽³⁾	0.21%	0

(1) includes the Household Waste and Electricity distribution sites – excluding these as measured 2018 is approx. 3.2ha

(2) area as measured 2018 is approx. 8.8ha

(3) area as measured 2018 is approx. 0.8ha

- 2.7 The evidence indicated that for 2011-2031 the existing supply for Bournemouth, Dorset and Poole exceeded demand by approximately 17ha, and as such no further allocations were included in the plan. Policy ELS recognises that further assessment of supply is required, and that this will be carried out through a future review or individual neighbourhood plans, with existing employment sites to be safeguarded in the interim.
- 2.8 Policy E allows for new employment provision for B class uses in accordance with Policy LD (which refers to Wareham as one of the most sustainable locations for development), and at existing employment sites outside established settlements (citing examples such as Holton Heath). It also seeks to safeguard existing employment land (for B1, B2 or B8 uses, or for other employment-generating uses subject to certain criteria).

3. Local Plan evidence base

- 3.1 Since the Local Plan was adopted, its review has commenced and with it a number of new evidence reports have been produced. Possibly the most significant of these, in terms of employment, is the 2016 Workplace Strategy. This looks at the requirements for Eastern and Western Dorset separately, aligning with the defined Housing Market Areas. Purbeck falls within Eastern Dorset (which also includes North and East Dorset, and the conurbation of Poole, Bournemouth and Christchurch).
- 3.2 Appendix A of the 2016 Workplace Strategy includes a review of available land in relation to the main strategic sites. This identifies some 2.8ha of available employment land in Wareham (comprising 0.3ha at John's Road in Wareham (medium term) and 2.48ha at Sandford Lane (short / medium term)). The Westminster Road site is not listed (presumably due to no land being foreseen and becoming available at the time of the survey).
- 3.3 The strategy recommends taking forward the 'Step Change growth scenario at 20% Flexibility' - which of the four options tested provided for the most growth. For Eastern Dorset this means an employment land requirement of 222.7ha balanced against an employment land supply of 276ha in this area, indicating a 53.3ha surplus of supply, without any further employment land allocations and (or even despite of) including 20% flexibility to provide further choice to the market over and above baseline employment land projection figures. Such data suggests that the need to safeguard against the loss of existing employment land is not as paramount as the data supporting the current Local Plan suggested. The main focus of the recommendations on 'avoiding loss' is in relation to employment land suitable to meet market requirements for B1 office use, particularly in Bournemouth and Poole (where the main market lies).

Wareham Neighbourhood Plan – Supporting Evidence

3.4 The Strategic Economic Land Availability Assessment paper (June 2016) includes a breakdown of the employment sites which are safeguarded through the adopted Local Plan:

Status	Site	Parish	Total Site area (ha)	Used area (ha)	Available area (ha)
Allocation	Land N of North St	Bere Regis	0.7	0.0	0.7
Safeguarded site	North Street	Bere Regis	0.8	0.8	0.0
Allocation	Adj Old Milk Factory	Corfe Castle	1.0	0.0	1.0
Safeguarded site	Milk Depot	Corfe Castle	0.4	0.1	0.3
Allocation	Land off Huntick Road	Lytchett Matravers	0.5	0.0	0.5
Safeguarded site	Wareham Road	Lytchett Matravers	0.6	0.6	0.0
Safeguarded site	Axiom Centre	Lytchett Minster & Upton	0.5	0.5	0.0
Safeguarded site	Factory Road	Lytchett Minster & Upton	3.9	3.9	0.0
Safeguarded site	Prospect Business Park	Swanage	2.2	2.0	0.2
Safeguarded site	Victoria Avenue	Swanage	2.4	2.4	0.0
Safeguarded site	John's Road	Wareham	0.3	0.3	0.0
Safeguarded site	Sandford Lane	Wareham	9.0	6.5	2.5
Safeguarded site	Westminster Road	Wareham	5.0	5.0	0.0
Cert. Lawful Use	Admiralty Park Holton Heath	Wareham St Martin	12.0	9.0	3.0
Safeguarded site	Holton Heath Ind. Estate	Wareham St Martin	35.0	28.0	7.0
Safeguarded site	Romany Works	Wareham St Martin	1.6	1.1	0.5
Safeguarded site	Dorset Green Tech Park	Wool & Winfrith Newburgh	50.0	10.0	40.0
TOTAL			125.9	70.2	55.7
Wareham subtotal*			14.3	11.8	2.5

* see previous tables regarding re-measured site areas

- 3.5 This shows a total of 70.2ha of employment land in active employment use on the main employment sites, and a further 55.7ha of available employment land. The main employment areas are at Holton Heath and Wool. Within Wareham, the three employment sites provide 14.3ha of land for employment use, of which 2.5ha is recorded as available.
- 3.6 The report also notes that within Wareham, land to the west of Westminster Road has been promoted for development which could include some employment (SHLAA ref 6/23/1314). This site is also identified in the most recent (January 2018) SHLAA report as potentially suitable for residential use.
- 3.7 The Local Plan Review options paper (June 2016) is consulting on potential changes which include the expansion of Sandford Lane Industrial Estate in Wareham by a further 1ha, and further employment land allocations at Holton Heath and Corfe Castle, amounting to an additional 7.5ha in total.

4. Government Business Rate data

- 4.1 Data on business rates valuation (April 2018) has been analysed to understand the current registered business uses in the three main employment areas by floorspace. The full data list is supplied in Appendix 1. This suggests there is in excess of 56,200m² of business floorspace within these three main estates, with Sandford Lane accounting for about two-thirds of the supply, Westminster Road accounting for just over a quarter, and Johns Road about one-twentieth.

Rateable units by area - comparison chart



- 4.2 The size of units varies considerably, from as little as 10m² (a small office on Sandford Lane) to over 3,000m² (Edenhall Concrete Ltd factory and premises on Sandford Lane and a cluster of 4 workshop units on Westminster Road). The average (mean) unit size is about 290m² in Johns Road, 500m² at Sandford Lane and 860m² in Westminster Road.
- 4.3 The main use comprises workshops (which accounts for 41% of total floorspace, with average floorspace of 390m²), followed by storage and warehousing (35% combined), factory (18%, with average floorspace of 900m²) and offices (6%, with average floorspace of 280m²). The spread of floorspace and uses by area is shown diagrammatically as follows:

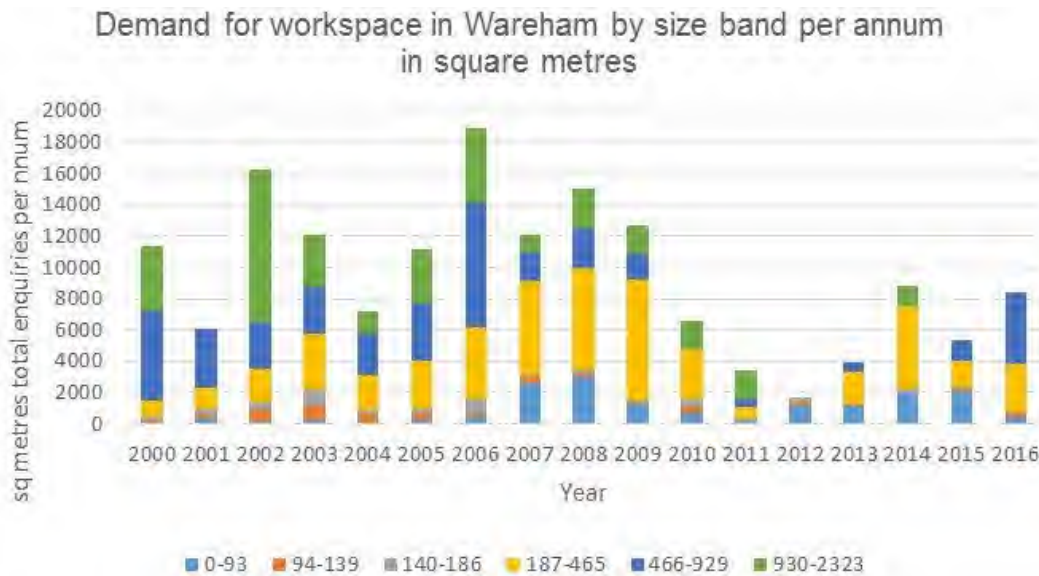
5. Population and Census data evidence

- 5.1 Census data on the distance travelled to work indicates that just over a third (36%) of the local workforce work locally, which would include those working from home (12%), in the town centre, local services (such as the schools) and in the main employment areas. The majority of the workforce commute outside of the area, with the Poole / Bournemouth conurbation likely to be the main destination.

QS702EW - Distance travelled to work - E05003733 : Wareham (ward)				
All usual residents aged 16 to 74 in employment				
Work mainly at or from home	293	12%	36%	Wareham
Less than 2km	610	24%		
2km to less than 5km	165	7%	7%	Sandford / Holton Heath
5km to less than 10km	362	14%	30%	Hamworthy / Winfrith
10km to less than 20km	623	25%		Poole / Bournemouth
20km to less than 30km	137	5%		Christchurch / Dorchester
30km and over	131	5%	5%	Edge / outside Dorset
Other	217	9%		
Average distance (km)	15.3			

6. Annual level of enquiries for industrial units in Wareham parish

- 6.1 In April 2017 the Economic Development Manager of the District Council reported on his findings regarding the potential implications of redeveloping Westminster Road, Wareham employment site for housing. His review includes evidence of the annual level of enquiries for industrial units in the Wareham parish, as replicated in the graph below



- 6.2 This shows that there tends to be fluctuation in demand over time, but a significant drop in the level of enquiries occurred post-2009, relating to the national economic downturn at this time, since when demand has concentrated more on smaller units (under 465m² floorspace).

7. Survey of the Main Industrial Sites (Spring 2017)

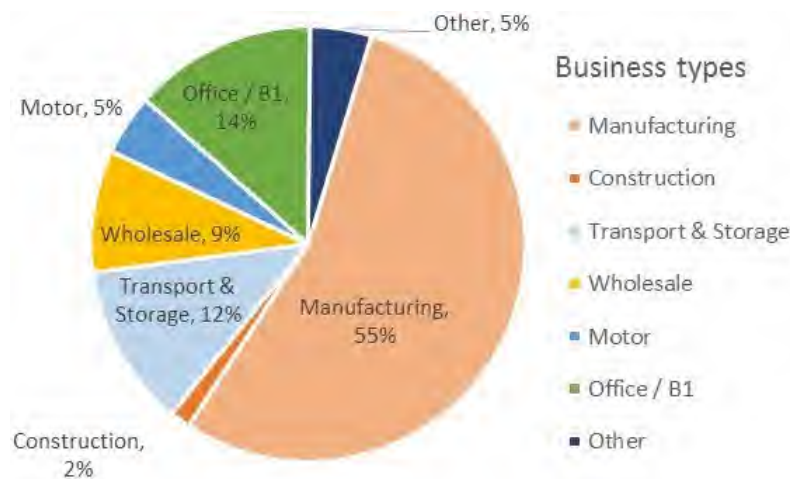
- 7.1 In order to obtain a better understanding of the functioning of the various employment areas, a survey of occupants was undertaken in Spring 2017. The survey form is shown in Appendix 2. The survey was hand-delivered to 78 premises, with follow-up contact made where possible in order to maximise returns. A total of 42 responses were received, representing a total of 63 occupied units (5 from Johns Road, 9 from Westminster Road and 49 from Sandford Lane). 20 vacant premises were noted at the time of the survey.
- 7.2 Nearly half (46%) of the responses were from businesses that had been established for over 20 years, with businesses started up in the last 5 years accounting for just under a fifth (17%) of responses. About half were in freehold premises, and half in leasehold. Unit size ranged from 30m² (about 325sqft) to 1,100m² (12,000sqft)
- 7.3 In answer to the main question as to why they located in Wareham, the answered varied but the most common answers were based on convenience (to the business owner and to customers), and generally lower prices and availability of larger units (compared to Swanage etc)
- Close to home (business owner) (10)
 - Local customer base (8)
 - Cheaper accommodation than conurbation (6)

Wareham Neighbourhood Plan – Supporting Evidence

- Availability of large premises / site (5)
- Business was based here when acquired (4)
- Availability of staff (2)
- Other (1)

7.4 Over half (55%) of the businesses were involved in production / manufacturing. About 1 in 10 businesses considered they generated noise / pollution as part of their work – either due to the manufacturing processes or transport movements.

7.5 Most (63%) considered that they used the space they had efficiently and had not need for more space with slightly more (26%) under-occupying than being over-capacity (11%). The tendency to be under-occupying was more marked in the responses from the Westminster Road units. Few respondents (10%) in the Sandford Lane premises considered that their premises needed modernising, whereas half (50%) of respondents in the two other estates felt that their premises needed modernising.



7.6 In terms of local links, just under 20% of the customers were Wareham based, and a similar proportion of the staff. Over a half of the business customer base was from outside the county, and three-quarters of staff travelled more than 3 miles (and would therefore most likely be commuting into Wareham by car). At the time of the 2017 survey, the staff base was slightly more Wareham-focused on the older industrial estates (Johns Road and Westminster Road) where local residents accounted for about a third of their staff – the data was particularly influenced by the response from Daler Rowney (where a high proportion of staff were from the local area). The 2018 update for Westminster Road shows a much reduced level of Wareham-based employees (reducing the overall figure shown in the 2017 pie chart (below) to 12%, and over 3 miles increasing to 81%). None of the businesses responding had a difficulty recruiting staff.



8. Westminster Road Industrial Estate – Detailed Appraisal



- 8.1 In February 2016 Daler Rowney were acquired by the FILA Group, a Milan based producer of art and writing supplies. Following a review of the operation they announced in Spring 2017 that they would close their Wareham manufacturing operation which would be transferred to Bracknell over a period of 2 years. They occupy a significant area of the estate (Units 2-7 and 16-17). The suggestion that Westminster Road be regenerated for housing came from local residents during the early consultation stages of the Wareham Neighbourhood Plan. With the recent decision by Daler Rowney to relocate from its premises, the opportunity to consider the long term future of the estate is timely for the Neighbourhood Plan.
- 8.2 The premises in Westminster Road were revisited in May 2018 to record the main changes that had occurred, in light of the relocation of Daler Rowney.

Site History and Current Occupants

- 8.3 The Westminster Road Industrial Estate was granted outline planning permission for light industrial use in Dec 1963 (ref 309410) and November 1964 (ref 310308) with detailed consent being granted subsequently. Development of industrial units commenced in 1966 and proceeded slowly from Carey Road in a northwards direction. The estate was completed by the mid-1970s. On completion, the units were occupied by a number of manufacturing businesses including metal plating, textiles and electronics.
- 8.4 Although described in 1962 as light industrial use, many of the subsequent processes carried out mean that most units may well have established a lawful B2 (general industrial) use, and the lack of specific conditions also means that factors such as normal working hours are not controlled. In an application on Unit 18 for a Certificate of Lawfulness (ref. 6/2016/0780) this issue was considered and it was accepted that a B2 use had been established.

Wareham Neighbourhood Plan – Supporting Evidence

8.5 The two largest businesses on the estate were Daler Rowney who manufacture materials in Units 2-7 and 16-17 and Westminster Wire who manufacture the sale of greetings cards, books etc in and 13-14. Unit 1 is used for storage by Ice Cream (previous split into 5 sub-units), Unit 8 is used for storage of vehicles for Waste Partnership, with the front portion as a dance studio) currently vacant, Unit Chococo for chocolate manufacturing, occupied by Olympia Triumph who manufacture safety equipment and Unit occupied by Eaton Stonemasons who manufacture kitchen worktops etc. County Council has a Household Recycling Highways depot at the northern corner of and there is an electricity distribution site opposite.



in 2017
artists
stands for
Units 9-10
Purbeck
the rear of
Dorset
(last rated
12 is let to
Unit 15 is
18 is
Dorset
Centre and
the estate

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8.6 By May 2018 a number of the premises vacated by Daler Rowney have been occupied, although Units 2, 3, 16 and 17 remain vacant. Units 4 and 5 have been occupied by Polar Glaze, who manufacture doors, windows and conservatories used locally (Dorset). They also have premises at Holton Heath (where they have been for over 20 years) but required a larger site. Unit 6 has been occupied by Evo Design, who manufacture flat-pack furniture for modern camper vans, with a mainly UK-focused customer base. Unit 7 is split between National Tube Straightening Service Ltd (using the ground floor) and Cater Cost Ltd (using the upper floor). National Tube Straightening Service Ltd repair and manufacture scaffolding products, and Cater Cost Ltd who provide software solutions for the catering industry, both of which whose customer-base is UK-focused.

Employment Levels and Employee Place of Residence

8.7 The Survey of the Main Industrial Sites (Spring 2017) was completed by 5 of the occupants of the Westminster Road Estate (Chococo, Daler Rowney, Eaton Stonemasons Ltd, Olympia Triumph and Westminster Wireworks) – representing 12,500m² of floorspace (according to the business rate data). No data was obtained from either Purbeck Ice cream (occupying the unit adjoining Carey Road) or Dorset County Council / the Dorset Waste Partnership, although Purbeck Ice cream have confirmed that there are no employees working from the premises.

8.8 The responses indicated that there were at least 138 full-time and 3 part-time staff employed on the Estate, giving an average of 1 FTE per 89 sq metres (compared to an industry average rate of 1 FTE per 36 sq metres for B2, and 1 FTE per 47 sq metres for B1¹). This illustrates that the site has been seriously under-utilised at around 47% of its theoretical occupancy, and is recognised by the occupants in the

¹ based on HCA "Employment densities guide 2010"

Spring 2017 survey.

- 8.9 Of the 44 employees who live in Wareham and work on the Estate, 40 work for Daler-Rowney who are closing their Wareham operation. With their departure, this leaves 4 out of the remaining 91 jobs taken by employees based in Wareham (4%).
- 8.10 One of the major employers (Westminster Wire) have said they would seriously consider relocating to Holton Heath to be closer for most of their employees to get to work.
- 8.11 The May 2018 update showed a reduction in employment (down to 112 full-time and 3 part-time staff) although it is noted that Polar Glaze stated that they would be recruiting some 20-25 additional people at the end of the year, bringing the figure broadly back to the 2017 levels. The new influx of businesses has also brought in further employees commuting from Poole / Bournemouth, with only 11% of current employees living in Wareham.

Fit for purpose

- 8.12 The Westminster Road Industrial Estate was developed in the 1960s and early 1970s and has provided useful employment space for some 50 years. The units are of similar design comprising long narrow plots with two storey flat roofed office accommodation at the front and a low asbestos cement roofed workshop at the rear.
- 8.13 Servicing is generally down a narrow, shared access between units allowing only side on rather than end on loading facilities. Parking on site is limited, resulting in considerable pressure for the on-street parking spaces by employees, which in turn makes manoeuvring of large goods vehicles very difficult.
- 8.14 The workshop units at the rear have relatively low eaves height which hampers stacking of pallets and efficient working. The office accommodation at the front of the units is cellular compared with more modern open plan and is very dated in its layout and appearance. Many of the buildings need considerable investment to improve weathertightness and achieve better energy efficiency, and the asbestos cement roofs are generally in need of renewal. The outdated nature of the accommodation and general need for modernisation is highlighted in the responses to the Spring 2017 survey. A number of the incoming businesses surveyed in May 2018 recognised this need to modernise their premises, reflected in the comparably lower cost of the units.

Purbeck District Council's Economic Development Manager's Report

- 8.15 In April 2017 the Economic Development Manager of the District Council reported on his findings regarding the potential implications of redeveloping Westminster Road, Wareham employment site for housing.
- 8.16 He notes the total built ground floor space at Westminster Road being 13,900m², and that the Westminster Road site helps provide a range and choice of site sizes. He estimated that, based on standard densities², the likely number of jobs supported would be in the region of 296 – 386 jobs (although the survey findings in 2017 and 2018 suggest in reality this is considerably lower at around 115 jobs). He lists 8 companies known to be located on the estate – although since then there have been

² 1 FTE per 36 sq metres B2, 1 FTE per 47 sq metres B1

further changes³.

8.17 His review included evidence of known site vacancy records for that site over the last 18 years, as replicated in the table below:

Property	Floor area m ²	Advertised on Evolutive	Date of offer or letting	Months on market
13 Westminster Road	425	7 October 2003	18 May 2005	19
6 Westminster Road	1760	7 January 2009	23 July 2009	6
15 Westminster Road	660	7 October 2009	3 January 2013	39
12 Westminster Road	475	22 July 2010	19 August 2010	1
8 Westminster Road	190	4 March 2010	9 September 2013	42
1 Westminster Road	1210	22 January 2013	30 April 2013	3
18 Westminster Road	865	20 May 2016	Remains available	11 (to date)

8.18 His report raises concerns about:

- The cost of replacing any lost employment land (taking into account current build costs and site values) as part of any ‘package’ for redeveloping the site
- The uncertainty regarding available and suitable land at Holton Heath and Dorset Innovation Park to cater for any displaced businesses
- The potential impact on job losses which may affect the local workforce and access to employment (particularly those walking to work)

Commercial analysis

8.19 Feedback from Jonathan Sibbett of Sibbett Gregory, the main commercial agent in the area, indicates that rental values in Wareham for industrial units of this type are low, about £4.00 per sq ft. At this level, significant investment or redevelopment of existing estates is not likely to be a viable proposition. The likely scenario over the next twenty or so years is therefore one of “patch and repair” with an increase in units used for storage and distribution but providing very limited if any employment.

9. Johns Road Industrial Estate – Appraisal



³ His notes refer to Jade-Aden Services Ltd being present, this firm have relocated their business to Holton Heath Trading Park and their unit acquired by Westminster Wireworks

- 9.1 Johns Road is a small industrial site established in the 1960s primarily used by businesses involved in the motor trade. It adjoins the railway station and is a gateway site into North Wareham. A major fire in two of the units has created an opportunity to rethink the future of the area.
- 9.2 Business rate data suggests that there is approximately 2,600m² of employment floorspace, split between 5 premises (some of which have been sub-divided to create 9 units in total). Responses to the Spring 2017 survey were received from 5 of the 9 units (accounting for about three-quarters of the workspace), employing about 9 staff in total (7 FTE). The majority of those responding considered that their premises were in need of modernisation. One unit was recorded as vacant.
- 9.3 As with Westminster Road, significant investment or redevelopment is not likely to be a viable proposition based on likely rental returns. As such, there is a real risk that this gateway location site will become more run-down.
10. **Sandford Lane Industrial Estate – Appraisal**



- 10.1 The Sandford Lane Industrial Estate is the largest industrial estate in the Neighbourhood Plan area, extending to 9ha and home to over 70 business units. It is bordered by the railway line to the north and floodplain of the River Piddle to the south although there are a few residential properties alongside the entrance road and residential development north of the railway. A significant proportion of the Industrial Estate is within the 400m heathland consultation zone, where housing would not be permitted due to the potential adverse impact on the European wildlife site.
- 10.2 Responses to the Spring 2017 survey indicate that the site is home to a mix of mainly manufacturing and office uses, however a review of the business rates data also highlights significant land areas used for storage (which appears to be manufacturing related). Approximately 15% of the units were recorded as vacant. The proportion of respondents suggesting that their premises required modernisation was much lower than the other estates, at just 10%.
- 10.3 A review of premises for sale / let in the industrial estate (May 2018) showed 2,255m² floorspace available for sale or to let, based on the following availability:
- Units 6 - 9 available for sale (1,485 m²) and vacant
 - Unit 10 available to let (80m²) and vacant
 - Unit 19 available for sale or to let (52m²) – not currently vacant (Bradfords)

- Units 20 and 21 available for sale (638m²) and vacant

11. Study conclusions / recommendations

- The policy context aims to strike an appropriate balance between the retention of existing employment areas and other needs (such as for housing or regeneration). Whilst Wareham is considered one of the most sustainable locations for employment growth, the adopted Local Plan recognises that further assessment of the supply is required, and that this can be carried out through a future review of the Local Plan or through individual neighbourhood plans, with existing employment sites to be safeguarded in the interim. As such, Wareham Neighbourhood Plan is well placed to consider the extent to which new employment land may be required, and existing land safeguarded.
- The most recent workspace strategy indicates that there is already a surplus of employment land supply within Eastern Dorset. This implies that the need to safeguard against the loss of existing employment land has lessened since the Local Plan was adopted. The main concern about potential loss of employment land is in relation to B1 office use, particularly in Bournemouth and Poole (where the main market lies).
- The demand for employment land in Wareham does fluctuate, but was notably impacted by the national economic downturn post-2009, since when demand has concentrated more on smaller units (under 465m² floorspace). The main reasons as to why existing businesses locate in Wareham relate mainly to convenience (being close to where the business owner lives and/or to its local customer base), generally lower prices than found in the conurbation, and the availability of larger units (compared to Swanage etc).
- The majority of the workforce commute outside of the area, with the Poole / Bournemouth conurbation considered to be the main destination. The majority of staff employed on the industrial estates in Wareham live outside the parish and commute into the area. This suggests that although opportunities to work locally may exist, in reality the availability of both job opportunities and workforce within the nearby conurbation of Poole and Bournemouth are the dominant factor. As such the retention of existing, or provision of new, workspace in Wareham is unlikely to have a significant influence on commuting patterns.
- Sandford Lane Industrial Estate accounts for over two-thirds of the employment land supply in Wareham, and includes a significant portion of storage land and premises and scope for expansion. Westminster Road accounts for about a quarter of the employment land a floorspace, with John's Road about one-sixteenth. There is a range of unit sizes, tenures and types on all three estates.
- There has not been any detailed consideration of the role that existing employment sites play in Wareham as part of the Local Plan review, but there is 2.5ha of available employment land recorded on the Sandford Lane Industrial Estate (equivalent to 17.5%), and the Local Plan Review options paper (June 2016) is consulting on potential changes which include the expansion of this estate by a further 1ha (bringing the amount of employment land available to 22.9%).
- The Sandford Lane Industrial Estate is comparatively modern, and its status as protected employment land appears to be justified. There is scope to extend the site at its eastern end to provide for future needs, as recognised in the Local Plan review, in a location where housing would not be considered acceptable due to the proximity to European wildlife sites.

- h) The Westminster Road industrial estate is now 50 years old and has become rundown with premises not ideally suited to modern uses, and as a result has been seriously underutilised in recent years (compared with its theoretical employment capacity). The decision by Daler-Rowney to relocate all of their operations from the site has created an opportunity to consider the long-term future of the estate, although businesses are moving in to the vacated units. This could be done on a phased basis in accordance with a master plan, to suit the timescales and future plans of the existing occupants. The net loss of employment land would not appear to be strategically significant or have any notable impact on commuting patterns.
- i) Johns Road industrial estate occupies a key location on the entrance into Wareham by the railway station. Like the Westminster Road estate, it has become rundown with premises requiring modernisation. A more flexible approach to redevelopment in this location, to enhance this gateway location, would similarly be justified.

APPENDIX 1 - Business Rates data list

Site	Address	Description	Unit area (m ²)	Rateable value
Westminster Rd	18	Factory and premises	833.29	£29,500
Westminster Rd	2-3	Workshop and premises	1,818.35	£39,250
Westminster Rd	6	Workshop and premises	839.95	£29,500
Westminster Rd	15	Factory and premises	665.4	£25,500
Westminster Rd	4-5	Workshop and premises	1,792.85	£38,000
Westminster Rd	DCC Depot	Workshop and premises	726.66	£24,250
Westminster Rd	Recycling Centre	Civic amenity site	Not published	£23,000
Westminster Rd	DWP Education & Resource Centre	Offices and premises	84.14	£2,450
Westminster Rd	Unit E At 1	Workshop / premises	151.43	£6,700
Westminster Rd	Unit C At 1	Workshop and premises	152.8	£6,700
Westminster Rd	Unit D At 1	Workshop and premises	415.08	£16,500
Westminster Rd	Unit A and B 1	Workshop / premises	465.4	£22,250
Westminster Rd	7	Workshop and premises	1,088.42	£34,750
Westminster Rd	Purbeck District Council 8	Storage depot / premises	902.4	£34,000
Westminster Rd	Front Pt 8	Dance school / premises	103.28	£6,200
Westminster Rd	Rear Pt 8	Offices and premises	329.35	£20,250
Westminster Rd	9 -10 And 13-14	Workshop and premises	3,424.67	£65,000
Westminster Rd	12	Factory and premises	466.5	£19,000
Westminster Rd	16 -17	Workshop and premises	1,220.46	£35,750
Westminster Rd	Orange Telecom Masts Site No 139	Communication station	Not published	£14,750
Sandford Lane	2 Designer House, Anglebury BP	Offices and premises	126.56	£8,200
Sandford Lane	1st F 1 Designer House, Anglebury	Workshop and premises	92.44	£5,100
Sandford Lane	Gnd F 1 Designer House, Anglebury	Workshop and premises	93.89	£7,900
Sandford Lane	N E Davis, Sandford Lane	Factory and premises	844.2	£28,750
Sandford Lane	Acetip Ltd, Old Sandford Woodmill	Storage land / premises	3,300	£18,250
Sandford Lane	J T Sydenham, Old Sandford W'ml	Storage land	8,370	£29,250
Sandford Lane	Unit C Anglebury Business Park	Workshop and premises	450.9	£25,500
Sandford Lane	Social Services, Anglebury BP	Offices and premises	1,086.23	£32,000
Sandford Lane	Edenhall Concrete Ltd	Factory and premises	3,126.06	£74,500
Sandford Lane	1 & 2, Sandford Farm Ind Est	Workshop and premises	544.71	£31,750
Sandford Lane	5, Sandford Farm Ind Est	Store and premises	149.4	£9,600
Sandford Lane	6 & 7, Sandford Farm Ind Est	Workshop and premises	326.45	£19,750
Sandford Lane	8, Sandford Farm Ind Est	Workshop and premises	112.29	£6,700
Sandford Lane	9, Sandford Farm Ind Est	Workshop and premises	114.79	£6,300
Sandford Lane	3 Designer House, Anglebury BP	Workshop and premises	146.96	£13,500

Wareham Neighbourhood Plan – Supporting Evidence

Site	Address	Description	Unit area (m ²)	Rateable value
Sandford Lane	3, Sandford Farm Ind Est	Store and premises	112.3	£7,500
Sandford Lane	4, Sandford Farm Ind Est	Workshop and premises	238.39	£9,600
Sandford Lane	Quay House	Land used for storage	2,495.30	£25,000
Sandford Lane	10a Sandford Farm Ind Est	Workshop and premises	79.63	£5,700
Sandford Lane	10b Sandford Farm Ind Est	Workshop and premises	77.89	£5,300
Sandford Lane	Unit 1, Sandford Lane Ind Est	Workshop and premises	208.26	£13,750
Sandford Lane	Unit 2, Sandford Lane Ind Est	Warehouse and premises	208.22	£13,500
Sandford Lane	Unit 3, Sandford Lane Ind Est	Warehouse and premises	268.88	£14,750
Sandford Lane	Units 4-5, Sandford Lane Ind Est	Workshop and premises	880.34	£42,250
Sandford Lane	Units 6-9, Sandford Lane Ind Est	Workshop and premises	1,288.42	£47,750
Sandford Lane	Unit 11, Sandford Lane Ind Est	Workshop and premises	521.98	£35,250
Sandford Lane	Units 12-13, Sandford Lane Ind Est	Workshop and premises	302.06	£14,000
Sandford Lane	Unit 12a, Sandford Lane Ind Est	Workshop and premises	154.19	£12,000
Sandford Lane	Unit 14, Sandford Lane Ind Est	Workshop and premises	137.45	£7,100
Sandford Lane	Unit 15, Sandford Lane Ind Est	Workshop and premises	171.52	£9,100
Sandford Lane	Unit 15a, Sandford Lane Ind Est	Workshop and premises	73.4	£4,950
Sandford Lane	Unit 16a, Sandford Lane Ind Est	Warehouse and premises	313.61	£20,500
Sandford Lane	Unit 16, Sandford Lane Ind Est	Workshop and premises	577.07	£26,500
Sandford Lane	Units 17-18, Sandford Lane Ind Est	Workshop and premises	421.7	£29,500
Sandford Lane	19, Sandford Lane Ind Est	Workshop and premises	481.1	£32,250
Sandford Lane	Units 20-21, Sandford Lane Ind Est	Warehouse and premises	557.99	£34,750
Sandford Lane	Units 22-24, Sandford Lane Ind Est	Factory and premises	1,014.35	£47,250
Sandford Lane	Prospect House	Offices and premises	754.54	£57,500
Sandford Lane	10, Ryan Business Park	Warehouse and premises	917.41	£37,750
Sandford Lane	Units F2 & F6 1st Flr Ryan House	Offices and premises	272.15	£19,000
Sandford Lane	6 -9, Ryan Business Park	Factory and premises	485.26	£24,000
Sandford Lane	1, Ryan Business Park	Factory and premises	833.29	£29,500
Sandford Lane	Spea House & Unit 2, Ryan BP	Workshop and premises	1,818.35	£39,250
Sandford Lane	3, Ryan Business Park	Workshop and premises	839.95	£29,500
Sandford Lane	Gnd Flr Unit 4, Ryan Business Park	Factory and premises	665.4	£25,500
Sandford Lane	Suite F3, Ryan Business Park	Workshop and premises	1,792.85	£38,000
Sandford Lane	Suite F4, Ryan Business Park	Workshop and premises	726.66	£24,250
Sandford Lane	5, Ryan Business Park	Civic amenity site	Not published	£23,000
Sandford Lane	5 A, Ryan Business Park	Offices and premises	84.14	£2,450
Sandford Lane	1st F 4, Anglebury Business Park	Workshop and premises	151.43	£6,700
Sandford Lane	Gnd F 4, Anglebury Business Park	Workshop and premises	152.8	£6,700
Sandford Lane	1 -2, Omega Centre	Workshop and premises	415.08	£16,500

Wareham Neighbourhood Plan – Supporting Evidence

Site	Address	Description	Unit area (m ²)	Rateable value
Sandford Lane	3, Omega Centre	Workshop and premises	465.4	£22,250
Sandford Lane	4 -5, Omega Centre	Workshop and premises	1,088.42	£34,750
Sandford Lane	6 -7, Omega Centre	Storage land / premises	902.4	£34,000
Sandford Lane	Units 1-3, Justin Business Park	Dance school / premises	103.28	£6,200
Sandford Lane	Unit 4, Justin Business Park	Offices and premises	329.35	£20,250
Sandford Lane	Unit 5, Justin Business Park	Workshop and premises	3,424.67	£65,000
Sandford Lane	Unit 6, Justin Business Park	Factory and premises	466.5	£19,000
Sandford Lane	Units 7-8, Justin Business Park	Workshop and premises	1,220.46	£35,750
Sandford Lane	Unit 9, Justin Business Park	Communication station	Not published	£14,750
Sandford Lane	Units 10-11, Justin Business Park	Offices and premises	126.56	£8,200
Sandford Lane	1, Leanne Business Centre	Workshop and premises	92.44	£5,100
Sandford Lane	2, Leanne Business Centre	Workshop and premises	93.89	£7,900
Sandford Lane	2 A, Leanne Business Centre	Factory and premises	844.2	£28,750
Sandford Lane	3 -3a, Leanne Business Centre	Storage land / premises	3,300	£18,250
Sandford Lane	4, Leanne Business Centre	Storage land / premises	8,370	£29,250
Sandford Lane	5, Leanne Business Centre	Workshop and premises	450.9	£25,500
Sandford Lane	7, Leanne Business Centre	Offices and premises	1,086.23	£32,000
Sandford Lane	6, Leanne Business Centre	Factory and premises	3,126.06	£74,500
Sandford Lane	8 -8a, Leanne Business Centre	Workshop and premises	544.71	£31,750
Sandford Lane	9, Leanne Business Centre	Warehouse and premises	149.4	£9,600
Sandford Lane	13, Leanne Business Centre	Workshop and premises	326.45	£19,750
Sandford Lane	10 & 12-12a, Leanne Business Ctre	Workshop and premises	112.29	£6,700
Sandford Lane	11 -11a, Leanne Business Centre	Workshop and premises	114.79	£6,300
Sandford Lane	17, Leanne Business Centre	Workshop and premises	146.96	£13,500
Johns Road	Unit 5	Warehouse and premises	112.3	£7,500
Johns Road	Unit 5b	Workshop and premises	238.39	£9,600
Johns Road	Unit 6	Storage land / premises	2,495.30	£25,000
Johns Road	Unit 6c	Workshop and premises	79.63	£5,700
Johns Road	Unit 6d	Workshop and premises	77.89	£5,300
Johns Road	Unit 6a	Workshop and premises	208.26	£13,750
Johns Road	Unit 4	Warehouse and premises	208.22	£13,500
Johns Road	Saltfire Stoves Ltd Station Works	Warehouse and premises	268.88	£14,750
Johns Road	Unit 2	Workshop and premises	880.34	£42,250



Employment Fact-finding Survey – Feb 2017

This survey is directed at businesses operating on the main industrial estates in the Wareham area, to understand current and future business needs for premises and labour. This will provide important evidence to underpin proposals in the Neighbourhood Plan, so thank you for taking part. The Neighbourhood Plan involves residents and businesses working together with landowners and developers to help shape future development in the Wareham Parish. More information can be found on our website www.warehamplan.co.uk.

Completing the survey should take no more than 15 minutes – if you are unable to answer a question please move onto the next. Individual survey responses will remain confidential, with any findings only reported at an aggregate level or not otherwise attributable to a single business.

Name of respondent: _____

Name of business: _____

Address of business: _____

Contact e-mail: _____

Contact telephone: _____

Q: Can you tell us how long your business has been running?

- | | |
|---|--|
| <input type="checkbox"/> Less than a year | <input type="checkbox"/> 6 – 10 years |
| <input type="checkbox"/> 1 – 2 years | <input type="checkbox"/> 11 - 20 years |
| <input type="checkbox"/> 3 – 5 years | <input type="checkbox"/> over 20 years |

Q: Can you tell us why you located your business in the Wareham area?

Q: Can you describe the type of business that you run:

- | | |
|--|--|
| <input type="checkbox"/> Production / Manufacturing | <input type="checkbox"/> Transport & Storage |
| <input type="checkbox"/> Construction | <input type="checkbox"/> Wholesale |
| <input type="checkbox"/> Other (please describe) _____ | |

Q: Does your business create noise, pollution etc that make it incompatible with a residential area?

- No
- Yes (please describe) _____

Q: Can you confirm the address of the units you use in the Wareham area, their approximate size, whether owned or leased, and if leased it would also be useful to indicate current rent levels:

Unit address	Size	Basis	Rent costs
		Leasehold / Freehold	
		Leasehold / Freehold	
		Leasehold / Freehold	
		Leasehold / Freehold	

Q: can you tell us whether the premises you use at the current time are -

- under capacity (there is considerable under use)
- broadly at capacity (you are using most areas efficiently and have no need for more space)
- over capacity (you require larger premises)

Q: can you tell us whether the premises you use at the current time are in need of modernising?

- No
- Yes (please describe) _____

Q: If you are looking to change premises in the next 5 – 10 years, please explain here the sort of premises you need, how soon and whether you need to be locally based to Wareham:

Type and size of premises needed: _____

Timescale for move: _____

Locational requirements: _____

Q: Where do most of your "customers" (market) come from? (approximate estimates)

	% from Wareham parish
	% from outside of Wareham but within Dorset
	% from elsewhere in the UK
	% from outside the UK

Comment

Agent	Ms Jo Witherden (1188327)
Email Address	[REDACTED]
Company / Organisation	Dorset Planning Consultant Limited
Address	8 Orchard Rise Milborne St Andrew Blandford Forum DT11 0LL
Consultee	Mrs Hilary Evans (1188328)
Email Address	[REDACTED]
Company / Organisation	Wareham the Neighbourhood Plan Steering Group
Address	c/o Wareham Town Council East Street Wareham BH20 4NS
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Wareham the Neighbourhood Plan Steering Group (Mrs Hilary Evans - 1188328)
Comment ID	PLPP11
Response Date	17/11/18 13:29
Consultation Point	Policy EE3:Vibrant town and local centres (View)
Status	Processed
Submission Type	Web
Version	0.1
Files	Submission draft of the Wareham Neighbourhood Plan

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?	EE3
Do you consider that the Local Plan is legally compliant?	Yes

Do you consider that the Local Plan is sound? No

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

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

The proposed town centre boundary is based on the 2012 Local Plan and does not appear to have been amended (presumably because of the mixed support in relation to the earlier consultation). As explained in 4.3.3 of the submission draft of the Wareham Neighbourhood Plan, the proposed minor revisions to the Town Centre boundary consulted on as part of the Local Plan Review were considered and discussed with stakeholders. There was general support for the revised boundary (which removes some properties in the vicinity of The Quay and St John's Hill that are now predominantly in residential use and redraws the remaining boundary to reflect the extent of the existing premises as opposed to plot boundaries), with the exception of the car park to the rear of the Co-op in North Street, which is proposed for inclusion to facilitate the future expansion of the unit if so desired.

The 200m² threshold for requiring a retail impact assessment for out-of-centre sites proposed in the Neighbourhood Plan is now reflected in the Local Plan policy and this is supported.

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 town centre boundary is amended to reflect that proposed in the submission draft of the Neighbourhood Plan (if the NP is made in advance of the Local Plan) and to clarify that minor changes to the town centre boundary can be made through the Neighbourhood Plan process.

If you have any supporting documents please upload them here.

Submission draft of the Wareham Neighbourhood Plan

Submission draft of the Wareham Neighbourhood 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?

In order to fully explain the position on the Neighbourhood Plan and relevant issues



Wareham Neighbourhood Plan
Plan Area



Foreword

In 2015 Wareham Town Council decided that it would prepare a Neighbourhood Development Plan so that major decisions on the location of development and related matters could be made locally. A Steering Group made up of Town and District Councillors and representatives of local organisations or sectors, chaired by Cllr Keith Critchley, and supported by the hard work of a dedicated team of volunteers, have produced this Plan.

In the Summer of 2016 the District Council consulted on site options for their Local Plan Review. These included 205 homes north and west of Northmoor Park and 500 homes west of the Bypass at Worgret. The Steering Group consulted local residents and found widespread opposition to these proposals. Rather than just object, the Group decided to adopt a positive approach and formulate alternative proposals which had greater support.

Throughout the process of preparing this Plan there has been a concerted drive to consult all who live in Wareham and to involve the whole community through drop ins, presentations, exhibitions and formal consultations. The Plan reflects the aspirations and concerns of local residents.



The initial consultation identified five key issues facing the town. These were:

- Providing housing and development to meet local needs
- Maintaining a thriving town centre
- Ensuring a pedestrian and cycle friendly town
- Protecting valued green spaces and community facilities
- Keeping a locally distinctive place

These issues led to five key objectives for the Plan to achieve and these provide the structure for this document. It provides a vision and objectives for the future of Wareham, and planning policies and development guidelines for our preferred sites for new housing and other development to be built over the next 15 years.

We are grateful for the support of Purbeck District Council, Wareham Town Council and the Ministry of Housing, Communities and Local Government (MHCLG) in preparing this Plan. MHCLG appointed consultants AECOM to provide technical support on Housing Needs Assessment, Site Selection, Environmental Assessment, Master Planning and Development Viability for which we are very grateful. Sasha White QC and Anjoli Foster from Landmark Chambers, London, have provided legal advice.

The Pre-Submission draft Plan was published for consultation between the 1st June and the 13th July 2018. Eighty-five comments were received, the majority in support of the Plan as drafted. All have been carefully considered and a number of amendments have been made to create this Submission Draft Plan. Following submission to Purbeck District Council, who will publish it for comment, the Plan will then be submitted to an independent examiner. He/she will consider whether the Plan, with any modifications, should be put to the Town residents for decision by a referendum.

I commend this Plan to you and thank all who have contributed to this major undertaking. Following the extensive consultation which has taken place, I believe that the Plan reflects the will of the majority of the local community and should allow our Town to develop in a measured and positive direction.

Cllr Carol Turner, Town Mayor 2018-19

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Abbreviations used in this Plan:

AONB - Area of Outstanding Natural Beauty

CIL - Community Infrastructure Levy

DCC - Dorset County Council

HRA - Habitats Regulation Assessment

MHCLG - Ministry of Housing, Communities and Local Government

NPPF - National Planning Policy Framework

PDC - Purbeck District Council

SAC - Special Area of Conservation (international nature conservation site)

SANG - Suitable Alternative Natural Greenspace

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Fig 30: Copyright: Alamy Stock Photo

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1 Introduction

1.1 The Neighbourhood Plan Area

1.1.1 The Neighbourhood Plan area establishes the area in which this Neighbourhood Plan will have effect. The area was agreed by Purbeck District Council in September 2015 and covers the whole of Wareham Parish (see Fig. 1 below).



Figure 1 Designated Neighbourhood Plan Area

1.2 The Plan Period

1.2.1 At the time of writing this Plan, the Purbeck Local Plan Part 1: Planning Purbeck's Future (2012) was the adopted plan for the area, setting out the strategic vision and planning policies for the period 2006 - 2027. A review of

the Local Plan is underway, looking further ahead to 2033. It has been through an early Issues and Options Consultation, followed by a consultation on options in the Summer of 2016. In response to the concerns raised a further consultation on options for housing was undertaken in January - March 2018. This proposed delivering around 200 homes in Wareham over the period up to 2033 in addition to normal planning applications to be planned through this Neighbourhood Plan. Subsequently the Government published a revised National Planning Policy Framework (NPPF) which requires strategic policies (including local plans) to look ahead a minimum of 15 years from adoption. The District Council has therefore decided to extend their Local Plan end date to 2034. To align with this, the Neighbourhood Plan covers the period 2019-2034.

1.2.2 This does not mean that this Plan cannot be revised in the interim - and changes to the Local Plan or local circumstances may trigger the need for the Plan to be reviewed and updated before then. Should this be necessary there will be full local consultation before any changes are made.

1.3 Historic Development of Wareham

1.3.1 Wareham has a long history which spans some two thousand years. The presence of high quality minerals in the area including clay, stone and shale was exploited by the Romans. The "black burnished" pottery ware produced here is found throughout Britain in places occupied by the Legions. The location of Wareham on a south facing ridge between the two rivers Frome and Piddle was well chosen and the Town developed as a small market centre and port. In about 700 St Aldhelm, first bishop of the West Saxons, founded a nunnery and imposing stone-built church.

- 1.3.2 In the ninth century Viking raids led Alfred, King of Wessex, to fortify the Town by building earthen ramparts 2,200 yards in extent which surrounded the Town to the west, north and east, the south side being defended by the river. The rectilinear street pattern of the Town dates from this period and together with the Walls, gives the historic Town a very distinctive character.
- 1.3.3 By the time of the Norman invasion in 1066 Wareham was Dorset's largest borough with three hundred houses, a population of over 1,000 and two mints producing coinage. The Normans built a motte and bailey castle in the south west quadrant of the Saxon town and the present curved streets of Trinity and Pound Lane follow the castle inner and outer baileys.
- 1.3.4 However, Wareham's fortune changed due to the silting of the river and the growth of Poole which received a royal charter in 1248. This led to a decline in the Town's fortunes to a modest medieval market centre.
- 1.3.5 In 1762 a disastrous fire started at the Bull's Head Inn in South Street leading to the devastation of the Town and the loss of 133 buildings. The rebuilding that subsequently took place was of brick-built houses in the Georgian style which gives a strong homogeneity to the buildings along the main streets today.
- 1.3.6 In 1847 the railway arrived linking Wareham with Dorchester, Southampton and London. Development grew up around the station with Victorian houses, lodgings and the Railway Hotel.
- 1.3.7 The flood plains to north and south of the historic town have restricted development to the ridge to the east and west and to the area north of the Railway Station.

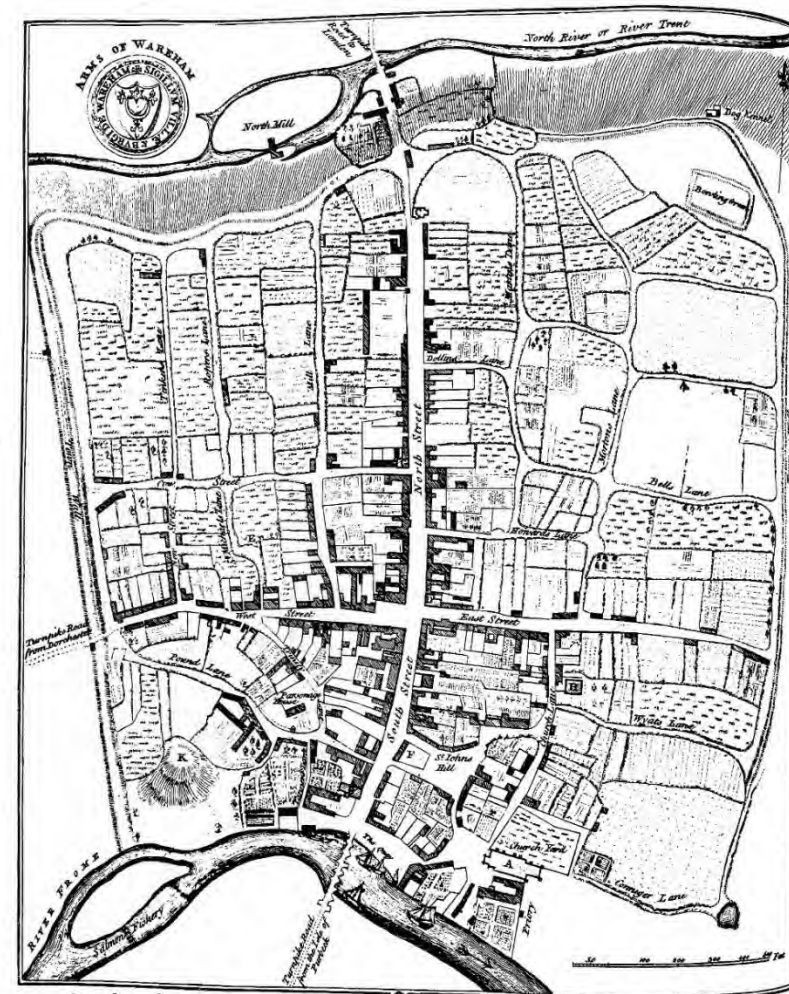


Figure 2 Plan of Wareham from "The History and Antiquities of the County of Dorset" by John Hutchins 1774

1.3.8 Development in the first half of the 20th Century was very limited. Within the Walls the Borough Council built council housing at Bells Orchard, Nundico and Edward Crescent and private ribbon development occurred along Sandford Road, Bestwall Road and Worgret Road.



Figure 3 Wareham 1938 OS Map

1.3.9 The major growth period occurred in the 1950s to 1970s partly fuelled by the growth of employment at nearby Poole and partly by the Government decision in 1956 to build an experimental nuclear reactor site at Winfrith Heath to the west. This led to the need for more housing

for the rapidly expanding workforce. The Winfrith site opened in 1961.

1.3.10 Development of bungalows and detached private houses in Bestwall Road commenced in the late 1930s and in Stowell Crescent in the 1950s and 1960s.

1.3.11 North of the railway line there was rapid expansion with the Kingsbere Estate of Council houses in the late 1940s and 1950s, and Walls View Road, Wessex Oval, Northport Drive and Drax Avenue in the 1960s. Northmoor Park, a large housing estate, commenced in the late 1960s.

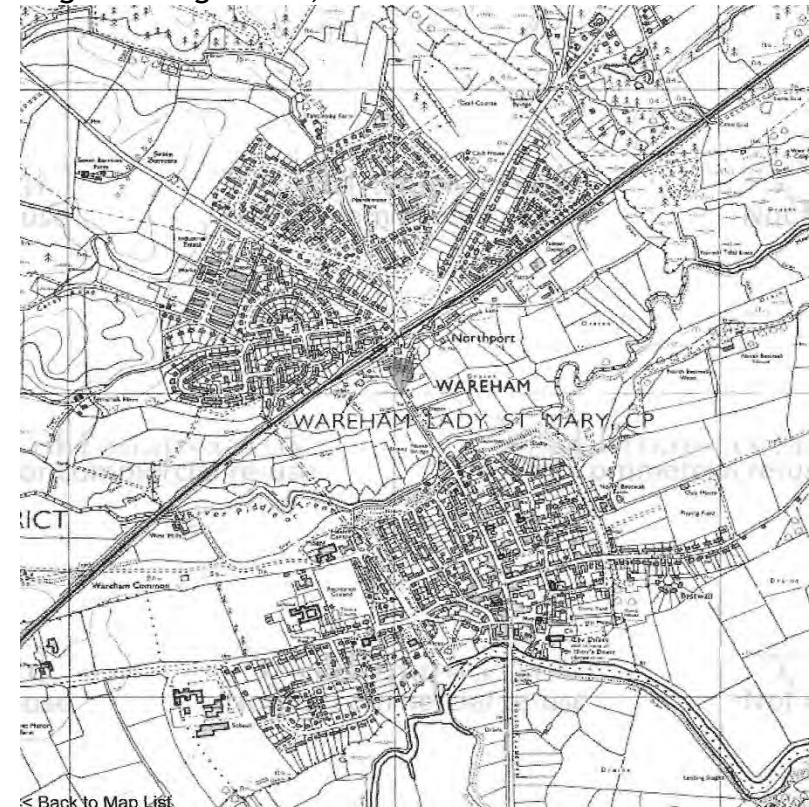


Figure 4 Wareham 1980 OS Map

1.3.12 Since then development has been incremental infilling, around an average of about 10 dwellings per year other than in 2015-17 when the Westgate development was completed to the west of the town with 153 homes.

1.3.13 The presence of the floodplain of the River Piddle together with the railway line and, since 1980, the bypass, has resulted in a town divided into two parts with a single foot and cycle path connecting the two.

1.4 Wareham Today

1.4.1 Today the Town functions as an administrative and service centre for the Purbeck area with the District Council offices, primary and secondary schools, library, sports and health centres for the area together with local shops and other services. The current population of the Town is 5,827 (2016 ONS mid-year estimate) and the Town has a total catchment population of about 28,000. The close proximity of Poole and Bournemouth (combined population 350,000) 8 miles to the east and the good communications by rail and road mean that inevitably many residents will choose to work, shop and enjoy leisure facilities in the conurbation.

1.4.2 The Town, like many in rural Dorset, has an ageing population as illustrated in Fig 5. Fourteen percent of the population are aged between 0-15 (19% in England and Wales) and 30% are aged 65+ (18% in England and Wales). This is set to increase.

1.4.3 The Town comprises some 2,557 households (ONS 2011). Sixty-eight percent are owner occupiers, 16% rent from the public sector and 14% from the private sector. There are 52 second homes comprising 1.9% of the housing stock. Median house prices are high - £450,000 for a detached

house, £270,000 for a semi-detached, £260,000 for a terraced and £180,000 for a flat (Land Registry 2016).

1.4.4 In Purbeck District lower quartile house prices are 10.8 times earnings (ONS 2017).

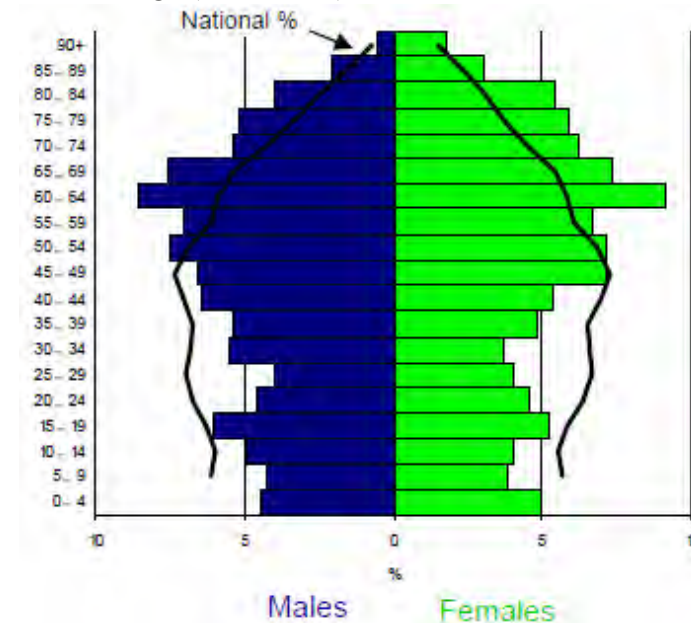


Figure 5 Wareham Parish Population Pyramid 2011



Figure 6 1970s Housing at Northmoor Park

2 Our Vision, Objectives and Themes

2.1 The Purbeck Local Plan Review and the Housing Requirement

- 2.1.1 During the preparation of the Neighbourhood Plan discussions took place with Purbeck District Council over the amount of housing that the Plan should seek to provide. It was recognised that any figure should take into account the constraints and opportunities in and around Wareham and the opportunities to meet the wider District needs elsewhere.
- 2.1.2 The District Council **has consulted** on the provision of 200 new homes in addition to normal planning applications over the period to 2033 to be delivered through the Wareham Neighbourhood Plan.

2.2 What people told us...

- 2.2.1 Our first consultation was to find out what local people thought were the key issues and opportunities for Wareham. The main issues that came forward from the early consultations highlighted:
- the desire for more housing that would help local people and young families buy or rent homes. However, the large-scale proposals for development being promoted in 2016 through the Local Plan Review, to the north (205 houses) and west of the town (500 houses), were not supported
 - general support for more jobs for local people
 - the importance of improving local healthcare facilities and bringing these into one place
 - the benefits of good walking and cycling links and

concerns that these were not well planned or maintained -

- the vital importance for accessibility to the Town Centre shops, post office, schools and facilities of retaining the ground level railway crossing for pedestrians and cyclists
- the importance of a thriving Town Centre - and the need for good access and parking, and a clear role and identity for the town
- the high value placed on the strong and distinctive character of the Town and its buildings
- the area's green spaces and recreation facilities - in particular the Purbeck School, former Middle School and Wareham St Mary Primary School playing fields, Wareham Recreation Ground, Hauses Field, the Sward north of the Station, the allotments (Bestwall and Northmoor), The Quay, the Common and the water meadows should be protected from development.



Figure 7 West Walls Scheduled Ancient Monument

2.3 The overarching Vision and main Objectives

2.3.1 Based on the issues and opportunities that were most important to local people, the following vision for the Town was agreed.

A charming, historic Saxon walled town, with a thriving retail centre and a strong and united community, located in a unique natural setting as the gateway to the Isle of Purbeck

2.3.2 Following from this, five objectives were identified to guide the Plan and decisions on planning applications.

2.3.3 These were:

- * **HOUSING AND DEVELOPMENT TO MEET LOCAL NEEDS**

Identify the main sites to be developed to deliver the housing needed between 2019 - 2034

- * **A THRIVING TOWN CENTRE**

Protect the vitality of the Town Centre, by retaining the diversity of shops and leisure facilities and having accessible car parking and public toilets. Outside of the town centre, the local shopping parade in Carey Road should continue to meet the day-to-day needs of local residents in north Wareham

- * **A PEDESTRIAN AND CYCLING FRIENDLY TOWN**

Retain and improve the key routes linking the various parts of the Town with the Town Centre, for pedestrians and cyclists

- * **VALUED GREEN SPACES & COMMUNITY FACILITIES**

Protect and enhance the valued green spaces within the Neighbourhood Plan area. Ensure that the community facilities for local residents can be provided locally, where such needs arise

- * **A LOCALLY DESTINCTIVE PLACE**

Protect local character, by making sure the design of new development reflects the local traditions and materials, or develops in new ways which complement the existing styles

2.3.4 Each of the themes are covered in turn in the sections of the Plan that follow.



Figure 8 The Quay

3 Housing and Development

3.1 How much housing development is needed?

- 3.1.1 There is no definite housing target for Wareham in the adopted 2012 Local Plan, but there is a target of 475 dwellings, or 22 - 23 dwellings / annum for 2006 to 2027 for the Central Area which includes Wareham, Sandford and Stoborough. As of March 2017, 307 dwellings had been completed and a further 39 dwellings with consent, leaving sites for a further 129 dwellings to be found in this wider area. The Local Plan is currently under review and when revised will cover the period 2018 - 2034.
- 3.1.2 Monitoring records going back to 2001 indicate that the average build rate in Wareham has been around 18 dwellings a year including a significant period of growth in the last few years. Projecting this rate of growth forward would indicate the need for about 270 dwellings in the 15-year period. Applying a simple 'pro-rata' share of the MHCLG proposed annual target of 168 dwellings for the whole of Purbeck (based on Wareham's share of the population) would suggest a level of development of about 21 dwellings a year, or just under 320 dwellings in the 15-year period. It is likely that a housing target somewhere within this range (270 - 320 dwellings) would be appropriate, providing a significant level of affordable housing and supporting economic growth.
- 3.1.3 National Planning Policy Framework (NPPF) 2018 proposes that local plans should set out a housing requirement for designated neighbourhood plan areas (paras 65 and 66). Following discussions, Purbeck District Council has provided an indicative housing requirement for Wareham over the period 2019 - 2034) of 300 new homes (including windfall) equating to an average of 20 per year. The

District Council has consulted the public on this through the "New Homes for Purbeck" consultation January - March 2018 with the intention of including this requirement within the District Local Plan currently in preparation.

- 3.1.4 Over the past 15 years, excluding 153 homes at the Westgate development, 149 homes were completed on small unallocated sites under 10 units, making an average "windfall" development of 10 dwellings pa. An assessment has been made of potential infilling sites and this confirms that there is potential for this rate to continue. However, it is considered prudent to assume a 66% discount rate to the past average to provide a robust assumption on windfall housing deliverability.

Policy H1 - Housing Requirement

Over a period of fifteen years from 2019 to 2034 about 300 new dwellings (on average 20 per year) are proposed for the Neighbourhood Plan Area. This level of growth is expected to meet the housing requirement for the Plan Area, meaning that no further greenfield sites should need to be released unless exceptional circumstances exist.

3.2 Type and size of housing

- 3.2.1 Within the overall number of dwellings built, planning policy can influence the mix in terms of type, tenure and size. The 2012 Local Plan seeks at least 40% of homes to be built as affordable housing types (and at least 50% in any extensions to the settlement), primarily for rent. There is no specific policy regarding the mix of dwelling sizes needed, although the most recent Strategic Housing Market Assessment suggests nearly all market housing should be 2 or 3 bedrooms, with a greater emphasis on 1-

bedroom homes in the affordable housing provision (that should make up about a third of that provision).

- 3.2.2 The need for affordable housing in the Neighbourhood Plan area is clear. The affordable housing register shows a strong demand for affordable homes, particularly 1 and 2 bedroom rented properties, with over 100 households in housing need either living in or having a connection to Wareham (and many more with no current local connection). Nearly all the existing affordable housing stock in Wareham is for rent, with very few shared ownership or similar properties available locally. Affordability levels in Wareham have worsened in recent years, as a result placing greater pressure on the private rental sector to meet local needs.
- 3.2.3 Estate agents said that they had few enquiries from first time buyers as properties are largely beyond the price that people on local wages at the beginning of their career can afford. Alternative affordable housing products, such as shared equity, discounted market sales housing and starter homes, could provide an opportunity for first-time home buyers to get on the housing ladder, although the level of discount would need to be more than the minimum 20% to be affordable to local households on an average income. An analysis of the existing housing stock highlights the fact that Wareham has fewer flats and apartments, particularly with 2 bedrooms, than typical of the area, and in contrast a higher number of terraced homes.
- 3.2.4 The household trends and projections point towards much higher growth in one-person households and the proportion of elderly residents, and far fewer households with three or more dependent children. There is a clear trend of older people downsizing, with a greater tendency to

choose a flat or apartment, in both the affordable and market housing sectors.

- 3.2.5 The estate agents operating in the area told us that there is a largely untapped demand from local people looking to downsize into the Town Centre due to age and mobility issues, who typically need two bedroomed ground floor flats or bungalows with parking and small gardens at an affordable price. Although Wareham has a reasonable range of older people's housing (such as sheltered housing for those of retirement age), the evidence suggests that more provision of this type of accommodation will be required by the end of the plan period.



Figure 9 Recent cottage style housing on West Walls

- 3.2.6 The housing needs assessment recommends that at least 50% of new homes are two bedroomed and that larger

homes with four or more bedrooms are not required. Within the affordable housing mix, the Neighbourhood Plan allows for a higher proportion of intermediate housing, to support local households trying to get onto the housing ladder, than the Local Plan anticipates.

Policy H2 - Housing Mix

New residential development should comprise predominantly smaller dwellings with 1, 2 or 3 bedrooms.

On larger sites providing 10 or more new dwellings, there should be a mix of dwelling sizes and types, and at least 10% of any open market provision should be suitable for residents with limited mobility or who may require a degree of care.

On sites of 10 or more dwellings, or which have a combined gross internal floorspace of more than 0.5Ha, 40% affordable housing will be sought. The inclusion of other affordable routes to affordable home ownership can comprise up to 40% of the total affordable housing requirement, if a local need for such tenures can be evidenced.

- 3.2.7 Given the over-supply of larger homes (with four or more bedrooms) the sub-division of such properties into two or more smaller homes would be beneficial. However, care needs to be taken that there is sufficient external space for both parking (in line with Policy H11) and amenity space to allow for day to day needs such as drying space and bin stores.

3.2.8 Policy H3 - Stock of Smaller Dwellings

The subdivision of larger homes will be supported provided that there is adequate parking and private amenity space for future occupants.



Figure 10 Housing in St Johns Hill

3.3 Where is the Town going to expand?

3.3.1 Finding suitable sites for development in and around Wareham is not easy because the area is highly constrained by various environmental designations.

Flood risk zones, with extensive areas at risk of flooding along the plains of the Rivers Piddle and Frome and draining in from Wareham Forest.



Figure 11 EA Flood Risk Areas



Figure 12 Flooding of South Causeway 2014

Nationally and internationally importance wildlife sites, particularly focused on the heathlands, water meadows and Poole Harbour. The area is extremely rich in protected species. Within 400m of a protected heathland site (SAC) residential development that would involve a net increase in dwellings, tourist accommodation and

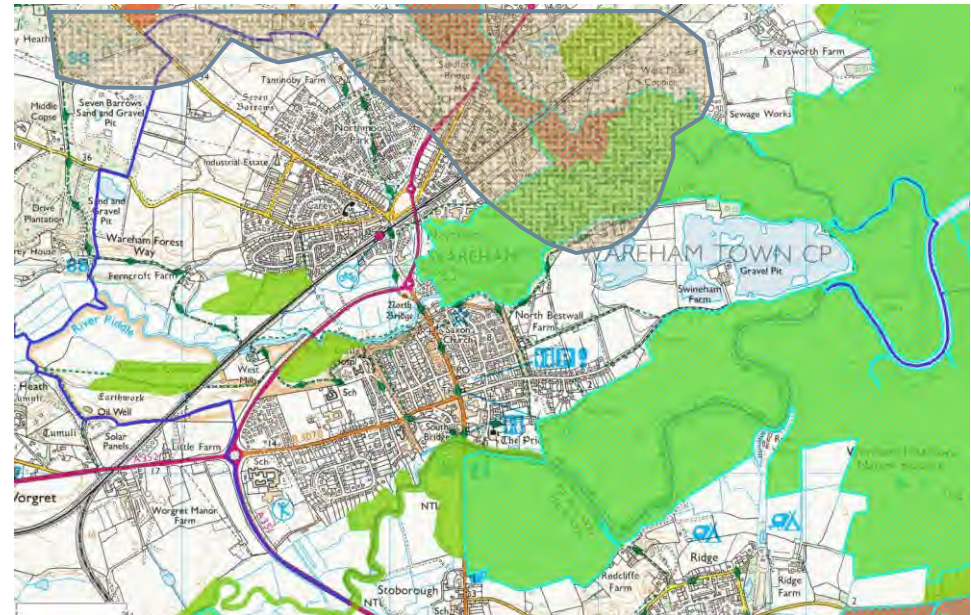


Figure 13 Nature Conservation Sites (SSSIs, SACs & RAMSAR sites) and 400m Heathland Zone south of Wareham Forest

equestrian related development will not be permitted. Between 400m and 5km of a heathland site mitigation measures are likely to be required to mitigate the adverse effects on the sites' integrity. These can take the form of Suitable Alternative Natural Greenspace (SANG). Developments will also be required to mitigate the impact of any increase in nitrogen produced by sewage from new homes that may adversely affect Poole

Harbour, in line with the Local Plan policy. The details of how this will be assessed is set out in supplementary guidance, and applicants will be expected to provide mitigation directly as part of their application.

Protected species and locally important habitats are not confined to designated sites. At an application level these interests will be protected through the Dorset County Council Biodiversity Mitigation Protocol and Dorset Biodiversity Compensation Framework. This could, for example, provide for significant environmental enhancements along the River Frome.

Dorset Area of Outstanding Natural Beauty (AONB) covers the area west, south and east of the built-up area of Wareham Town (and the area to the east is also Heritage Coast). This is a nationally important landscape, and national planning policy is very clear that great



Figure 14 The Dorset AONB covers the area west, south and east of the Town

weight should be given to conserving its landscape and scenic beauty, and that only in exceptional circumstances should major development be allowed and only where it is in the public interest. Dorset is currently a candidate for designation as a National Park. This is strongly supported, and the boundary should include the whole of Wareham Parish in view of its outstanding landscape character, ecological value and heritage assets.

Green Belt designation covers much of the remaining area outside the town boundary to the north, east and west, and the fundamental aim of this designation is to prevent urban sprawl by keeping land permanently open. National policy prevents inappropriate development (that is harmful to the Green Belt) except in very special circumstances. Major housing development or a new employment site on greenfield sites would be inappropriate, though limited affordable housing for local

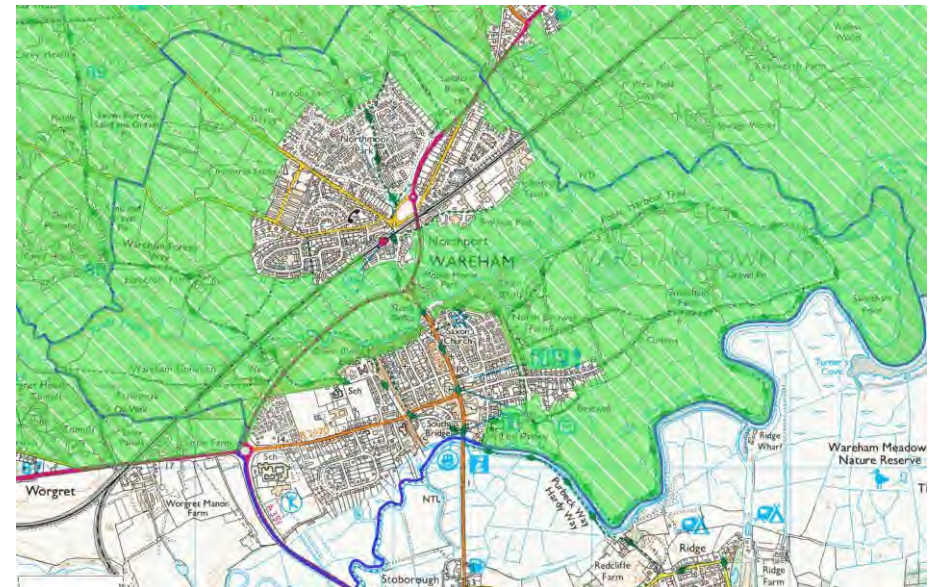


Figure 15 Designated Green Belt

community needs can be considered. Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. The consultation draft of NPPF proposes that where a need for changes to Green Belt boundaries has been demonstrated through a local plan, detailed amendments to those boundaries may be made through local policies, including neighbourhood plans (para. 135).

The Conservation Area, historic Listed Buildings and Scheduled Monuments, in particular the ancient Saxon walls, motte & bailey castle and Seven Barrows. National planning policy is very clear that great weight should be given to these assets' conservation, and substantial harm to their significance (which includes any impact on their setting) must be avoided.



Fig 16 Ancient Monuments and Listed Buildings

3.3.2 A 360-degree appraisal of all possible development sites around the Town plus vacant and under used land within

the Town has been undertaken by consultants AECOM. This confirmed the very constrained nature of the settlement and that the most suitable area for new development was northwest of the Town between Bere Road and Carey Road.

3.3.3 Although no specific infrastructure capacity issues have been identified in the preparation of this Plan, it is expected that funding towards improvements will be made through the Community Infrastructure Levy. Similarly transport assessments will be required for major developments which have significant transport implications, and advice on the likely requirements can be obtained from Highways England and the Highways Authority.

3.4 Westminster Road Area between Bere Road and Carey Road

3.4.1 Local residents have suggested that the Westminster Road Industrial Estate built in the 1960s and early 1970s is under used and that the accommodation there no longer meets modern business needs. Following the decision in summer 2017 of Daler Roney the main employer on the estate to relocate to Bracknell, a survey of employers found that very few local residents worked in the remaining businesses and the majority drove in from the Poole area. Some owners and professional advisors confirmed that the configuration of the units no longer met modern standards for delivery vehicles, parking or yard space, that the buildings had poor insulation and needed considerable investment and that the eaves heights were too low for modern forklift trucks and pallet stacking. The estate had a rundown appearance. The electricity distribution site has an unattractive appearance and needs to be screened. The

Household Recycling Centre will require a buffer zone where it abuts future housing.

- 3.4.2 Government policy encourages reuse of underused brownfield land for housing (Housing White Paper 2017 paras. 1.24, 1.25, 1.39 and NPPF paras. 117 and 118). It also proposes that before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, all other reasonable options for meeting the need for housing development should have been examined including making as much use as possible of suitable brownfield sites and underutilised land (NPPF consultation para. 137).
- 3.4.3 The site selection work also identified available land to the west of Westminster Road Industrial Estate as having the greatest suitability for housing development. Land at the lower part of the slope and on the north side of Carey Road could accommodate about 60 houses, is tucked into the topography and would not intrude into views from across the Town. There is potential to integrate this site with the regeneration of the adjoining industrial estate, enabling a

more intensive use for a mix of housing and possibly small scale B1 employment. Provided there is a master plan to coordinate development, this could take place over the Plan period.

- 3.4.4 Bearing in mind the points above, this is the opportune time to consider the long-term future of the site. The 2016 Dorset Workplace Strategy and 2012 updated employment land projections identify a surplus of employment land in the area. There are vacant units at Holton Heath Trading Park and Sandford Lane Industrial Estate where there is also space for intensification of the employment uses that could off-set the potential loss of employment land at Westminster Road and Johns Road.
- 3.4.5 Careful consideration was given to the possible extension of Northmoor Park to the north, but this was rejected for a number of sound planning reasons set out below.
- 3.4.6 The townscape analysis undertaken by the Matrix Partnership (see figure 39 on page 42) identifies countryside on the northern edge of Northmoor Park as



Figure 17 Westminster Road Industrial Estate

“High quality landscape adjacent to the Town” with the minor scarp where development would be more prominent coming to the edge of the estate. Development would be very visible from the Northport Greenway footpath and cycle route into Wareham Forest past Tantinoby Farm and from the Golf Course. In comparison, the countryside west of Westminster Road is not shown as high quality and the minor scarp would allow development to take place which would not intrude into views across the Town from the south.

- 3.4.7 Northmoor Park is much closer to and accessible to the internationally important nature conservation sites in Wareham Forest. There is no intervening land which could be used as an effective Suitable Alternative Natural Greenspace and there is therefore a likelihood that development here would lead to increased pressure and disturbance to these important nature conservation sites. In comparison, there is sufficient suitable land to provide alternative natural greenspace directly adjoining the sites west of Westminster Road to provide a very effective alternative for dog walking, informal children’s play etc.
- 3.4.8 The land north of Northmoor Park includes well used allotments that are highly valued by the local community. They are secure, with low levels of theft. They are very well established and would take many years to re-establish were they to be moved. West of Westminster Road there are no such community uses.
- 3.4.9 In conclusion, the technical work undertaken clearly demonstrates that the most suitable area for the expansion of the Town is in the Westminster Road area between Carey Road and Bere Road. Development here could be integrated with the regeneration of the Westminster Road Industrial Estate. A masterplan needs to be in place to

coordinate development across land in different ownerships. Because the industrial estate is in multiple ownerships, it is recognised that not all of the sites may come forward within the plan period.

- 3.4.10 The revised National Planning Policy Framework. Para 136 states that “Where a need for changes to Green Belt boundaries has been demonstrated through a strategic plan, detailed amendments to those boundaries may be made through local policies, including neighbourhood plans.” In January 2018 Purbeck District Council consulted on “New Homes for Purbeck” on the revision of the Green Belt west of Westminster Road. Once the revised Local Plan has been adopted, expected to be in Autumn 2019, the Town Council intends to review the Neighbourhood Plan to consider amending the boundary of the Green Belt and allocating the land to the west of Westminster Road between Bere Road and Carey Road for housing together with a SANG.
- 3.4.11 Currently both the Westminster Road and Johns Road Industrial Estates are safeguarded as employment land within the current (2012) Local Plan. However, the 2016 Dorset Workplace Strategy indicates that there is a surplus of employment land in the District and the Council is proposing in their emerging revised Local Plan to lift this policy. There is a defensible argument that policies on employment land safeguarding are “non-strategic policies”, which means that the Neighbourhood Plan is able to determine policies for these areas.
- 3.4.12 Almost the entire area surrounding the Town is designated as a Minerals Safeguarding Area. The Pre-Submission Mineral Sites Plan proposes an eastward extension to Tatchells Quarry (which is not currently operational), to the north-west of north Wareham for sand and gravel

extraction. There is a 250m consultation zone proposed so that measures can be taken to avoid development within that zone constraining the extraction of the minerals resource.

Policy H4. Land West of Westminster Road

Consideration be given to adding a Policy when the Neighbourhood Plan is revised following adoption of the revised Purbeck Local Plan.

Policy H5. Westminster Road Industrial Estate

The mixed-use redevelopment of the Westminster Road Industrial Estate for up to about 90 dwellings plus employment will be supported. The main vehicular access should be from Bere Road. The site should be developed in accordance with a masterplan, which should make provision for the possible development of land to the west, to be agreed by the Local Planning Authority in consultation with the Town Council.



Figure 18 Johns Road Industrial Estate

Provision should be made in accordance with the Dorset Heathlands Planning Framework. The electricity distribution site should be planted with native shrubs on its north and west boundaries to screen the site from the highway. A buffer zone and/or adequate measures should be provided to ensure any adverse impacts from the Household Recycling Centre on the future occupants of any new housing are suitably mitigated in consultation with the Waste Planning Authority.

3.5 Johns Road

3.5.1 Johns Road is a small industrial site established in the 1960s although it has previously been used as a yard since the 1920s. It is currently given over primarily to the motor trade. It adjoins the Railway Station and is a gateway site into north Wareham. There is a shortage of community facilities in northern Wareham and the site adjoining the Railway Station and main footpath/cycle route would be

suitable for the provision of a new café. The industrial site has an unattractive rundown appearance at a key location in northern Wareham. The trees and hedgerows on the edge of the site are important features to be retained.

- 3.5.2 As the site adjoins operational railway land, consideration will need to be given to the impact of both construction works on the railway and ensuring that future occupants are not unduly disturbed by the railway operations. It is recommended that Network Rail is consulted at an early stage to ensure that these factors are taken into account in the final layout and design.

Policy H6 Johns Road

The redevelopment of the industrial land at Johns Road for about 30 new homes and a new café in the vicinity of the Railway Station will be supported, subject to the inclusion of a pedestrian link between the site and the station and the retention of the trees and hedgerows adjoining Carey Road and Bere Road. Network Rail should be consulted to ensure that future occupants are not unduly disturbed by railway operations.

3.6 Wareham Town Northern Gateway

- 3.6.1 The former Town gasworks and showroom site has been vacant for many years and has been subject to a lapsed planning permission for 11 new units plus a flat above the former gas showroom. National Grid are currently undertaking remedial works prior to disposal of the site for development.
- 3.6.2 The Autopoint garage site occupies the other half of the gateway into the Town. There is potential here to redevelop the site for housing with a building opposite the gas showroom to create a gateway and houses or flats overlooking the river and Common to create an attractive

edge to the Town and the Common. A good quality design will be required at this prominent location. There is a demand for a launching point for canoes to access the River Piddle at this point but no facility at present exists on this section of river. The potential harm by aquatic pollution and disturbance to Poole Harbour SPA/Ramsar would need to be considered in consultation with Natural England.

- 3.6.3 A small part of both sites is within the Environment Agency Flood Risk area and consideration must be given to mitigation measures as part of any redevelopment scheme.

H7 - Wareham Town Northern Gateway (Gasworks and Autopoint sites)

The redevelopment of the former gasworks site and Autopoint garage site for about 10 dwellings each will be supported subject to providing a high quality design at this northern entry point to the original Saxon town. Regard must be given to potential flood risk. A canoe launching point would be supported on this site subject to consideration of impact on nature conservation in consultation with Natural England. No new dwellings should be built within the areas at risk of flooding, and regard must be given to minimising potential flood risk both within the site and to adjoining properties.

3.7 Former Hospital and Health Centre Site

- 3.7.1 The proposed relocation of the health and ambulance facilities to the site of the Middle School buildings (Policy GS 2) creates an opportunity to redevelop the hospital and health centre site for housing purposes. This site adjoins the Listed former workhouse, the Town Walls Ancient Monument, the Common and backs onto mature trees along the northern boundary which form an important

feature in the local landscape and should be retained. This site lends itself for flats and terraced housing.

H8 - Former Hospital and Health Centre site

Provided that the GP surgery and ambulance station is relocated, the redevelopment of the former Wareham Health Centre (GP Surgery), Ambulance Station and Wareham Hospital for about 40 homes will be supported. Appropriate mitigation in relation to the impact on European wildlife sites should be provided through the Heathland Infrastructure Project in accordance with the Dorset Heathlands Planning Framework.

3.8 Former Cottees Market Site

- 3.8.1 This site is currently vacant and is suitable for residential development. At a key location in the Conservation Area, any proposed development should recreate the traditional street scene in East Street, with two storey buildings which are small in scale and have a ground floor level near to that of the roadway so as not to dominate the buildings nearby. The large sycamore tree which is protected by a TPO is a key feature in the street scene and must be retained. Sufficient parking should be provided within the site to avoid adding to existing on-street parking congestion. The maximum on-street parking in East Street should be retained by only providing one vehicular access point to the site from East Street. Basement parking will not be supported as it is unlikely to be used and will add to existing parking pressure in the locality. Development should not exceed two storeys in height to respect the character of the area and should avoid overlooking or overshadowing adjoining gardens and dwellings. The frontage onto Wyatts Lane may have a more contemporary appearance but should respect the character of the Lane.

H9 - Former Cottees Market Site

Residential redevelopment of the former Cottees Market site will be supported subject to providing a design of high quality which fits within the context of the adjacent properties in East Street, East Walls and Wyatts Lane within the Conservation Area. The large sycamore tree on the East Street frontage must be retained. Particular care must be taken to ensure the privacy of properties in Knightstone Close is protected. Such development should have only one vehicular access point from East Street and one from Wyatts Lane.

3.9 General Infill

- 3.9.1 Within the settlement boundary set out on the policies map residential development will be permitted subject to criteria below and the other policies in the Plan.

H10 - General Infill Policy within Settlement Boundary

Residential infilling will be supported providing development exhibits a high quality of design respectful of its townscape context and any impact on designated or undesignated heritage assets, and providing it complies with the other policies in the Plan.

3.10 Potential Housing Delivery

3.10.1 An assessment has been undertaken of the realistic likelihood of the various sites coming forward to deliver the housing requirement within the Plan period. The brownfield sites at Westminster Road and Johns Road are in multiple ownership and bringing these forward will take time and may in some instances take beyond the Plan period. A lower estimate of delivery has therefore been made for these sites. The estimate for windfall has been similarly discounted.

Potential Housing Delivery		
Site	Dwellings	Notes
West of Westminster Road (H4)	60	Subject to change in Green Belt boundary in Purbeck Local Plan
Westminster Rd Industrial Estate (H5)	30	Whole site may not come forward in Plan period - assume 33% of 90 dwell.
Johns Road (H6)	15	Whole site may not come forward in Plan period - assume 50% of 30 dwell.
Hospital/Health Centre site (H8)	40	Subject to relocation of health facilities
Former Middle School site (GS2)	35	Extra care housing / keyworker housing / care home in association with proposed health hub
Cottees site (H9)	10	
Former Gasworks site (H7)	10	
Windfall	100	Assume 66% of average small sites windfall development of 10 dwellings p.a. over 2003-17
Total	300	

Table 1. Summary of Potential Housing Delivery

3.11 Parking Space

3.11.1 Within the Town Walls, other than the four main streets, the lanes are generally narrow with parking where allowed on one side only. Many of the older properties have no garage or on-plot parking space. This combined with pressure from workers in the Town looking for a free on-street parking space creates pressure on the available on-street parking. Recent new development with very limited or no on-site parking has exacerbated the situation. It is therefore proposed that all new residential development other than for care homes provides at least one dedicated parking space ideally on-plot or conveniently located within the site.

H11 - Parking Space

New residential development within the Conservation Area will be required to provide at least one dedicated parking space provided on-plot or nearby within the site. New residential development elsewhere should meet the Highway Authority's normal parking standards.

3.12 Sandford Lane Employment Estate

3.12.1 Sandford Lane is the Town's largest and most modern employment estate. It is well located in terms of rail and road access. Although there are a number of vacant units at the present time there is scope to intensify development to provide for future needs. Although mostly within the 400m heathland zone, development for employment purposes is acceptable. On-street parking along Sandford Lane leads to congestion and is due to inadequate provision within some existing premises. To avoid exacerbating the problem adequate parking should be provided on-site for new development.

H12 - Sandford Lane Employment Estate

The Sandford Lane area defined on the Policies Map should be safeguarded for employment use. New buildings and roofs should be low in profile, dark in colour and non-reflective to blend into the landscape when viewed from the AONB and Town Walls to the east and south. A comprehensive scheme of planting of native species along the southern and eastern sides of the Estate is required to further assimilate new development into the landscape. Developments should have sufficient on-site parking to avoid the need to park on Sandford Lane itself.



Figure 19 Sandford Lane Employment Estate viewed from Town Walls

4 A Thriving Town Centre

4.1 Introduction

- 4.1.1 Wareham Town Centre benefits from a highly attractive historic environment that is the bedrock to its function as a visitor destination. The quality of the built environment and protection of heritage assets is central to the Town Centre's appeal. It is a characterful centre derived from a diverse mix of independent retailers and service uses.
- 4.1.2 The compact Town Centre is structured around the historic street pattern that makes up the core of the market town. Town Centre uses are concentrated along the main streets (North, South, and West) and extend to the southeast onto The Quay, an attractive riverside feature of the historic town popular with residents and visitors. It has a varied mix of retail and service outlets, including many independent traders, that meets the needs of the local community whilst also attracting many visitors.
- 4.1.3 As the second largest centre in Purbeck it contains around 120 units. Its proximity to Poole, Bournemouth, and to a much lesser extent Swanage means that there is inevitable leakage of locally-generated shopping expenditure to these competing centres. This is due particularly to the good road access to Poole and Bournemouth and opportunities for combined trips to the conurbation, including work-related journeys.
- 4.1.4 Wareham has had a street market since the Charter of 1211. The market has been located in a variety of different places and on different days of the week. The current weekly market which operates on The Quay on Saturdays is a vital part of Wareham's offer for both residents and visitors.

- 4.1.5 The historic character of the Town Centre, lying at the heart of the Town's Conservation Area, is an essential part of its attraction. Care is needed to ensure that the street scene continues to be maintained and enhanced in keeping with the Town's unique heritage. Shopfront design, shop signs, street signage, street furniture, lighting, paving and other features in the public realm are vital elements in maintaining the Town's attractiveness.



Figure 20 South Street Shopping

4.2 Town Centre Health Check

- 4.2.1 The proximity to the Poole and Bournemouth conurbation with its much greater population and employment opportunities means that the Town cannot compete on a like-for-like basis and some people will continue to do their main shopping there, whatever local provision is made.
- 4.2.2 Wareham Town Centre has performed comparatively well over recent times, with very few vacant units. This was

particularly notable during the economic recession in 2008/9 that saw many businesses close in other town centres and remains true in the most recent (2017) survey. The Town Centre offer reflects the importance of Wareham as a visitor destination. However, there are genuine concerns that if some of the key attractions, such as the range of 'local' independent / specialist stores and good access to parking, and the essential role played by Sainsbury's and the Coop in attracting shopping trips to the Town Centre, were to be lost, this could lead to a spiralling decline. The rise of internet shopping and national trends in retailing certainly highlight how town centres are having to adapt to move with the times.

4.2.3 The 2012 Local Plan seeks to enhance the Town's current role as a shopping, service and employment centre for the District. This is done through policies that

- define the Town Centre area
- within that area resist change of use away from shops, service and dining / drinking establishments, particularly if the change would harm the vitality and viability of the Town Centre
- suggest that provision for new retail floor space in Wareham Town Centre could be included in this Neighbourhood Plan (subject to finding any suitable and available sites within or adjacent to the Town Centre)

4.2.4 The Local Plan also identifies the parade of shops on Carey Road in north Wareham as an important Local Centre. Originally there was a parade of shops on the Northmoor Park Estate and a shop in Northport Drive but over the years these have closed and been converted to other uses.

Only the Carey Road shops remain to provide local shopping for north Wareham and these should be retained.



Figure 21 Carey Road Shops - Important Local Centre

4.3 The Town Centre Area - Securing its Future

- 4.3.1 Retail planning specialists Cushman and Wakefield provided advice to the Town Council on a range of specific issues relevant to the future planning and management of the Town Centre. They reviewed the available evidence and undertook some additional research.
- 4.3.2 This recent Retail Study indicates that generally there is a healthy balance of retail and service uses within the Town Centre which reflects the importance of Wareham as a visitor destination. The bias towards service uses (food and drink uses specifically) is not considered to detract from the ability of the Town Centre to provide for the day-to-day needs of the local population. The very low vacancy rate and recent introduction of several high-quality

independent retailers is an indication of continuing confidence in the viability of Wareham Town Centre as a trading destination.

- 4.3.3 In terms of defining the Town Centre area, the proposed minor revisions to the Town Centre boundary consulted on as part of the Local Plan Review were considered and discussed with stakeholders. There was general support for the revised boundary (which removes some properties in the vicinity of The Quay and St John's Hill that are now predominantly in residential use and redraws the remaining boundary to reflect the extent of the existing premises as opposed to plot boundaries), with the exception of the car park to the rear of the Co-op in North Street, which is proposed for inclusion to facilitate the future expansion of the unit if so desired. The boundary of the local centre on Carey Road in north Wareham has been reviewed and considered appropriate as shown.
- 4.3.4 Although there were no confirmed retailer requirements identified, current trends indicate that possible demand for new convenience floorspace is likely to be in the form of small convenience stores as opposed to large foodstores. The evident need arising from expenditure growth, leakage, and overtrading does not provide a basis to plan positively for new out-of-centre retail floorspace, which in reality would be likely to have an adverse effect on the Town Centre.
- 4.3.5 Whilst there may be sites on the edge of the Town Centre that present scope for redevelopment, the opportunities reviewed by Cushman and Wakefield were considered to be unsuitable by virtue of their lack of prominence, isolated position relative to current frontages, or poor access for deliveries/servicing. The main scope for growth is likely to be through the piecemeal change of use, modernisation or

enhancement of individual premises within the existing centre, potentially including the amalgamation of plots to provide larger units where there are no heritage constraints. One such opportunity identified is the Library site and associated parking on South Street, where redevelopment could conceivably provide new commercial floorspace on a prominent corner plot. The library function should be suitably accommodated as part of any redevelopment or otherwise relocated within the Town Centre.

- 4.3.6 With underlying trends pointing towards the need to retain flexibility for town centres to evolve with the times, there needs to be some flexibility in the general approach to protecting A Class uses, by allowing changes to alternative uses that will clearly support the vitality and viability of the Town Centre. As such, it may not always be necessary or appropriate to insist on a 9-month period of unsuccessful marketing or otherwise demonstrate that the current A Class Use is unviable.
- 4.3.7 The Wareham Library building and associated car park fronting South Street is an example of where, in the long term, redevelopment might be possible as a means of enhancing the Conservation Area and the health of the Town Centre through the provision of new commercial space, provided that the Library is maintained on-site or otherwise re-provided within the Town Centre.

TC1 - The Town Centre Boundary

The Town Centre boundary is defined as shown on the Policies Map Inset 2.

TC2 - Safeguarding Retail Provision in the Town Centre

Development leading to loss of ground-floor Class A uses within the Town Centre boundary will only be supported if all of the following criteria are met:

- a) the proposed ground floor use falls within the NPPF definition of a main town centre use;
- b) the proposed use and any associated physical alterations would maintain an active and publicly-accessible ground floor use that enlivens the streetscene;
- c) the proposed use would not result in a concentration of three adjoining non-A Class uses within the immediate area undermining the character and diversity of that part of the Town Centre; and
- d) the proposed use and associated works should not harm the historic interest and character of the Conservation Area and Listed Buildings.

TC3 - Protecting the Vitality and Viability of Carey Road Shops

Within the defined Local Centre, changes of any ground floor use within Class A of the Use Classes Order will be supported, provided that the proposed use and any associated physical alterations would maintain an active and publicly-accessible ground floor use that enlivens the streetscene and does not undermine the ability of the Local Centre to meet the everyday needs of its catchment population.

TC4 - Resisting Out of Town Class A Retail Floorspace

Any additional retail floorspace, including that for convenience goods (such as food), shall be situated within the Town Centre or the Local Centre in north Wareham. Proposals for new Class A floorspace of 200m² or over outside these boundaries shall be accompanied by a retail impact assessment, and will only be supported if it can be demonstrated that they would not have

a significant adverse impact on the vitality and viability of Wareham Town Centre and the Local Centre in North Wareham, and have followed the sequential test (prioritising town or local centre sites over edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered).



Figure 22 Pond's Hardware Store, St Johns Hill

- 4.3.8 Maintaining and enhancing the attractiveness of the historic Town Centre is clearly vital to its vitality and

viability. Taking care that paving materials, street lighting and other street furniture are in keeping with the character of the Conservation Area is important in securing the Town's future. In particular, enhancement of the footways which in some areas is still tarmac and concrete is needed to lift the appearance of the street scene and to make it safer for pedestrians. Throughout the Conservation Area yellow lines should be narrow and primrose in colour to reduce the impact on the street scene

TC5 - Maintaining and Enhancing the Public Realm

Within the Conservation Area care must be taken in the selection of paving materials, street lighting and other street furniture which is consistent and in keeping with the Town's historic character.

- 4.3.9 The scale and design of shop fronts and signs are important in the appearance of the street scene and should be in keeping with the character of the historic town. They should be of traditional design and materials, in scale with the building with signs hand painted. It is important to avoid designs which would appear visually dominant or incongruous in the context of the building and the street scene. Overly large fascias, internally lit box signs, and the instalment of external roller blinds are examples of unacceptable alterations.

TC6 - Maintaining and Enhancing the Street Scene

Within the Town Centre shop fronts must be designed to be in keeping with the Town's historic character, of traditional design and materials and in scale with the building. Signs should be hand painted, not bulky in appearance and normally only externally illuminated.

- 4.3.10 The weekly Street Market on The Quay provides a highly valued amenity enjoyed by both residents and visitors. It enhances the shopping offer and provides an important opportunity for social interaction. The Quay is also used for civic, community and cultural purposes and the ability to close it to motor vehicles for special events must be maintained. The statement TC7 below is advisory.

TC7 - Use of The Quay for the Street Market and Special Events

The Quay should be maintained as a public parking area from which motor vehicles can be excluded to allow for the Street Market and special events.



Figure 23 Saturday Street market on The Quay

4.4 Town Centre parking

4.4.1 The importance of convenient and reasonably priced (or free) Town Centre parking is now a well-established principle (Portas Review). The Town is served by a range of car parks of varying size and distance from the centre, managed by the local councils as short, medium and long-stay provision:

- Bonnets Lane East and West (46 spaces)
- Connegar Lane, Church Lane (27)
- Howards Lane (78)
- Rempstone Centre, Church Street (61)
- Streche Road (73)
- Wareham Quay (27)
- St John’s Hill (26)

4.4.2 In addition, there are about 60 on-street spaces managed by the Highways Authority, managed as short-stay spaces, and there is a small dedicated car park (12 spaces) at the rear of the Co-op foodstore on Mill Lane.

4.4.3 With much of the parking being in local government control, at a time when local councils are facing continued budget cuts, their future may be under review. Although a workshop event with local stakeholders suggested that the amount of dedicated car parking in the Town Centre is adequate, there were concerns raised about the parking pressure at the Rempstone Centre, especially on Saturday mornings and summer holidays. The availability of free on-street parking on the Town Centre’s principal streets, on a restricted basis, is considered to be of particular importance. The retail consultants concluded that, in the absence of firm data suggesting otherwise, there should be safeguarding policies protecting the Town Centre car parks. The statement TC8 below is advisory.



Figure 24 Streche Road Long Stay Car Park

TC8 - Improving the Use of Town Centre Car Parks

In order to make best use of the available stock of parking spaces, measures to improve the ease of use of the car parks should be considered, including better directional signage, flexible payment options and the installation of electric vehicle charging points.

TC9 - Protecting Town Centre Car Parks

The Town’s public car parks as shown on the Policies Map Sheet 2 shall be retained unless there are overriding planning benefits that would improve the vitality of the Town Centre, or the loss of parking is appropriately mitigated through suitable replacement provision elsewhere.

5 A Pedestrian and Cycle Friendly Town

5.1 The Local Transport Strategy

5.1.1 In 2004 Dorset County Council as the Highways Authority undertook a Transportation Study for Purbeck, which recommended various measures, collectively known as the Purbeck Transportation Strategy (PTS), to promote cycling and walking and encourage train and bus use. The Local Plan (Policies ATS and IAT) makes clear that new developments should have or provide for suitable walking and cycle links to allow people to access local services and facilities, and that detailed proposals for key transport infrastructure could be identified through neighbourhood plans, providing local people with more of a say on the best solutions for their area.

5.1.2 The consultation work undertaken identified that retaining and improving foot and cycle paths was a key priority for local residents, especially the ground level link across the railway line between northern Wareham and the shops and facilities in Wareham Town. This is the only pedestrian route between the two parts of the Town and is used by over 1,000 people daily including those with wheelchairs, buggies etc. The exploration of the potential to improve the operation of the crossing such as linking the operation of the barriers / gates to the signalling system would be welcomed. Fig 25 shows the main pedestrian and cycle routes important to connectivity within the Town.

PC1 - Main Pedestrian and Cycling routes

The main pedestrian and cycle routes within the NP area shown on Fig 25 including the surface level crossing across the railway line next to the Station shall be



Figure 25 Movement Attractors and main Pedestrian and Cyclist Routes

retained. New development should have good convenient routes to the Town Centre and main movement attractors.

A number of specific improvements to the network have been suggested through the consultations and following discussion with officers from Dorset County Council a series of minor improvements are proposed in Policy PC 2. Where improvements would be on non-highway land (such as Wareham Station or the proposed Health Hub site) the delivery will be dependent on the agreement of the relevant landowner.

PC2 - Pedestrian and Cycle Route Improvements

The following improvements are proposed to the foot and cycle network:

- **Widen footway for pedestrians and cyclists along Bere Road;**
- **Provide electric charging points at Wareham Railway Station for electric vehicles;**
- **Provide lockable storage for cycles at Wareham Railway Station;**
- **Create shared footway/cycleway along the bypass between North Causeway and Worgret roundabouts to improve route to school etc;**
- **Increase width of the footpath along West Street to improve access to proposed Health Hub at the former Middle School site in Worgret Road;**
- **Create new footpath on north side of Worgret Road between the new development at Westgate and the Health Hub and Primary School;**
- **Provide new access to the Primary School through proposed Health Hub site;**
- **Provide additional parking at the proposed Health Hub to serve parents picking up children at the Primary School.**

5.1.3 The reconnection of the Swanage Railway with the main line at Wareham has been a long aspiration of the Swanage Railway Company and the local community. A successful 60-day trial diesel Swanage to Wareham rail service took place in Summer 2017. Initial results show good levels of usage and a further trial is expected in 2019.

5.1.4 At present Swanage trains are required to pick up and drop off passengers at the mainline platforms. A siding is available on the east side of the pedestrian level crossing for stabling the train whilst the mainline service comes through. This leads to further interruption of the pedestrian crossing whilst trains are in the station and manoeuvring into and from the siding. Historically the service operated from dedicated bay platforms clear of the mainline of which that on the north side of the station is currently vacant. Bringing this bay into use would provide a better facility for passengers, allowing waiting trains to load and unload and not obstruct the mainline. It is therefore proposed that this land be safeguarded for future use by trains to and from Swanage subject to relocation of any protected species. The north side of the station is known to support a population of Sand Lizards and the potential impact of any development on these protected species will need to be fully considered as part of any planning application, and if appropriate suitable mitigation and enhancement secured.

PC3 - Swanage Railway

The reopening of the Swanage Railway to Wareham is supported and the currently vacant north side bay platform at Wareham Station shall be safeguarded for possible future use by trains to and from Swanage.

5.1.5 Parking at Wareham Station is limited and whilst some users of the Swanage service will change from mainline

trains at Wareham, some users will arrive by car to use the service. There is currently vacant railway land on the north side of the mainline east of the crossing which could provide additional parking should a more regular service be introduced. This land is therefore safeguarded for future station parking should the need be demonstrated.

PC4 - Parking at Wareham Station

In the event of the former sidings on the north side of the railway line east of the crossing being declared surplus to operational rail requirements the site should

be safeguarded for future parking space for rail users / community use.



Figure 26 Wareham Station Railway Crossing

6 Local Green Spaces & Community Facilities

6.1 The wide range of green spaces

6.1.1 All open space, sport and recreation areas are protected through the general policies in the Local Plan (G1). Some of the key spaces are identified, but neighbourhood plans are invited to consider which spaces are most valued and should be protected and enhanced. A survey of **local** green spaces has been undertaken and the results are summarised in Figure 29.



Figure 27 Valued allotments at Northmoor (site D)

Protected Open Spaces						
Open Space	Landscape Quality	Historic Significance	Recreation or Value	Wildlife Value	Ownership	Other
Houses Field	Medium	Low	High - including play area & skate park	Low	Wareham Town Council	A very well used and valued play area and informal recreation space. The area has been recently redeveloped and improved thanks to Wareham & District Development Trust.
Land in Northmoor Park between Northmoor Way and A352	High	Low	High	Medium	Dorset County Council	This area provides a green space between the existing housing estate and the busy main A351 road.
Various green spaces in Northmoor Park	Medium	Low	High	Medium	Purbeck District Council	Valued green amenity spaces some used for informal sitting and play.
Northmoor Park Allotments	High	Low	High	High	Morden Estates leased to Wareham Town Council	Highly valued, well used, secure community allotments.
Green space opposite Carey shops	Medium	Low	High	Medium	Astor Housing Association	A peaceful space in the housing estate.
Play Areas at Drax Avenue, Milstover Road & Westgate	Medium	Low	High	Low	Wareham Town Council (Westgate currently Bloor Homes)	Children's play areas.
The Sward	Medium	Low	Medium	Medium	Dorset County Council	Landscaped green site at the Bere Road entrance to the town.
Wareham Town Walls	High	High	High	High	Rempstone Estate leased to Purbeck District Council	Scheduled Ancient Monument. The ancient walls are a most significant feature of the town attracting visitors and locals. A marked interpretive historic walk leads around the walls.
Former Middle School Playing Fields	Medium	Low	High	Medium	Dorset County Council	Major community sports resource. Regularly used for training by local youth sports teams.
Purbeck School Playing Fields	Medium	Low	High	Medium	Dorset County Council	The playing fields are intensive used by The Purbeck School with some areas shared with the local community through agreements with Purbeck District Council.
Recreation Ground	High	Low	High	Low	Wareham Town Council	Used as a children's play area and site of Sports Pavilion and Cricket pitch.
Bestwall Allotments	Medium	Low	High	Medium	Wareham Town Council	Highly valued community allotments protected Under the Smallholding & Allotments Act 1908. Registered as a Community Asset.
Wareham Rugby Club Playing Fields	High	Low	High	Low	Wareham Town Council & Rugby Club	This is a significant community asset providing sporting and other community facilities.
War Memorial and land adjacent to St Martins Church	High	High	High	Medium	Wareham PCC	St Martins Church is the most complete example of an Anglo-Saxon Church in Dorset. It dates from 1030. Part of historic Walls Walk with peaceful path and space to the rear.
Castle Close Garden	High	High	Low	Low	Private	Scheduled Ancient Monument. 12th Century motte and bailey castle very visible in views from the south.

Figure 28 Summary of survey for selection of Local Green Spaces

GS1 - Protection of Local Green Spaces

Development other than minor works to preserve their recreational function and openness will be strongly resisted on the following protected Local Green Spaces within the Town:

- A. Hauses Field, Northmoor
- B. Land between A351 and Northmoor Way
- C. Various green spaces on Northmoor Park and Northport
- D. Northmoor Park Allotments
- E. Green space opposite Carey Shops
- F. Drax Avenue, Mistover Road & Westgate Play Areas
- G. The Sward opposite the Railway Station roundabout
- H. The Wareham Town Walls Scheduled Ancient Monument, whose setting will also be protected from harmful development
- I. The former Wareham Middle School Playing Fields
- J. Purbeck School and Primary School Playing Fields
- K. Recreation Ground
- L. Bestwall Allotments
- M. Rugby Club
- N. War Memorial and land adjacent to St Martin's Church
- O. Castle Close garden site of Norman Castle



Figure 29 Local Green Spaces

6.2 Health Hub

6.2.1 NHS Dorset Clinical Commissioning Group (CCG) has undertaken a Clinical Services Review (CSR) of healthcare provision in Dorset. The aim is to change our healthcare system to provide services that better meet the needs of local people and deliver better outcomes. This is to be partly achieved by joining-up and improving health and care services in the community for local people by creating community hubs. This involves teams including GPs, nurses, therapists, consultant doctors, social workers and community mental health nurses, working together across traditional organisational boundaries.

6.2.2 In Wareham currently, there is a GP Surgery and a Community Hospital providing in- and outpatient services. There is also an ambulance station operated by the South West Ambulance Service. The proposal agreed by the CCG in 2017 is for the provision of a non-bedded Community Hub at Wareham that would include the current GP Surgery. The Surgery is housed in a flat roofed 1960s building which is no longer fit for purpose.

6.2.3 Alternative sites for the provision of the Hub have been considered and the preferred location is that of the former Middle School buildings in Worgret Road. This site, which is significantly larger than the current hospital and surgery site and has better access and parking space, has sufficient capacity to accommodate extra care housing, key worker housing and care home capacity. The site has potential to improve road access to the adjoining primary school and to make good use of the existing recreation ground and playing fields to encourage healthy lifestyles. It also has potential to be an exemplar in sustainable design including renewable energy measures and should be of a high design quality.

6.2.4 The development of the site is likely to take place in phases as funding becomes available. To ensure a coordinated approach to the development of the site and a cohesive approach to the design of buildings a master plan and design code should be prepared to guide the development of the site.

GS2 - Proposed Health Hub (former Middle School Site)

Development of the area of the former Wareham Middle School buildings, playgrounds and parking areas as a new Health Hub for the Town and surrounding area will be supported, including

- **space for the relocated Wareham GP Surgery and Ambulance Station, with a view to providing improved primary health care facilities;**
- **sufficient parking space for staff and patients;**
- **vehicular access to the adjoining Primary School from Worgret Road;**
- **extra care housing, key worker housing and / or a care home facility;**
- **changing facilities to encourage use of the recreation ground and playing fields to east and west.**

A master plan and design code for the development of the site will be submitted to and approved by the Local Planning Authority in consultation with the Town Council prior to any development. An area(s) of Suitable Alternative Natural Greenspace (SANG) should be provided in accordance with the Dorset Heathlands Planning Framework for any housing development.

Buildings should be of high design quality and aim to achieve a high standard of sustainable design (BREAAM Very Good or Excellent).

7 A Locally Distinctive Place

7.1 A Strong Sense of Place

7.1.1 Wareham within the Town Walls has a very strong sense of place as a result of its history over some 2,000 years. It is clear from the consultation undertaken that this is strongly

valued by local residents and is a key factor in attracting visitors to the Town.

7.1.2 The Town's strong sense of place comes from:

- the unspoilt setting provided by the River Piddle and Frome water meadows creating a firm and attractive edge to Wareham Town from the south and north and providing a firm edge to North Wareham;



Figure 30 Wareham from the South (copyright Alamy)

- the high quality landscape north of North Wareham leading to Wareham Forest creating a very tranquil area close to people's homes;
- The defensive Town Walls themselves, reputed to be the best-preserved Saxon earthworks in Western Europe;
- The ancient loose grid street pattern within the Walls providing a clear hierarchy of four principal streets with narrower lanes within each of the four quarters;
- Tight frontages and sense of enclosure of buildings within the Walls creating streets of very high-quality townscape;
- The Quay, Church Green and St Johns Hill providing urban spaces of the highest quality and important

spaces for community activities such as the street market;

- Many historic buildings in a provincial Georgian style resulting from rebuilding after the fire of 1762 of brick with timber sash windows and fine door cases;
- Some cob cottages in a more vernacular style originally thatched with local reed;
- The radial pattern of roads and paths in northern Wareham, many following tree and hedge lined routes, focusing on the Railway Station and pedestrian level crossing on the route to the Town Centre.

7.1.3 The Housing White Paper published in February 2017 restates the importance of good design and states that neighbourhood plans should set out clear design expectations for new developments.



Figure 31 Wareham Street Elevations (Wareham Conservation Study, DCC, 1969)

7.1.4 The Wareham Conservation Area boundary is very tightly drawn around the Town Walls. However, it is clear from the Townscape Analysis (Matrix Partnership 2013 and Fig. 39) that the water meadows to north and south of the walled town make a major contribution to the Town's historic character. The Neighbourhood Plan recognises this special interest and recommends that in due course the

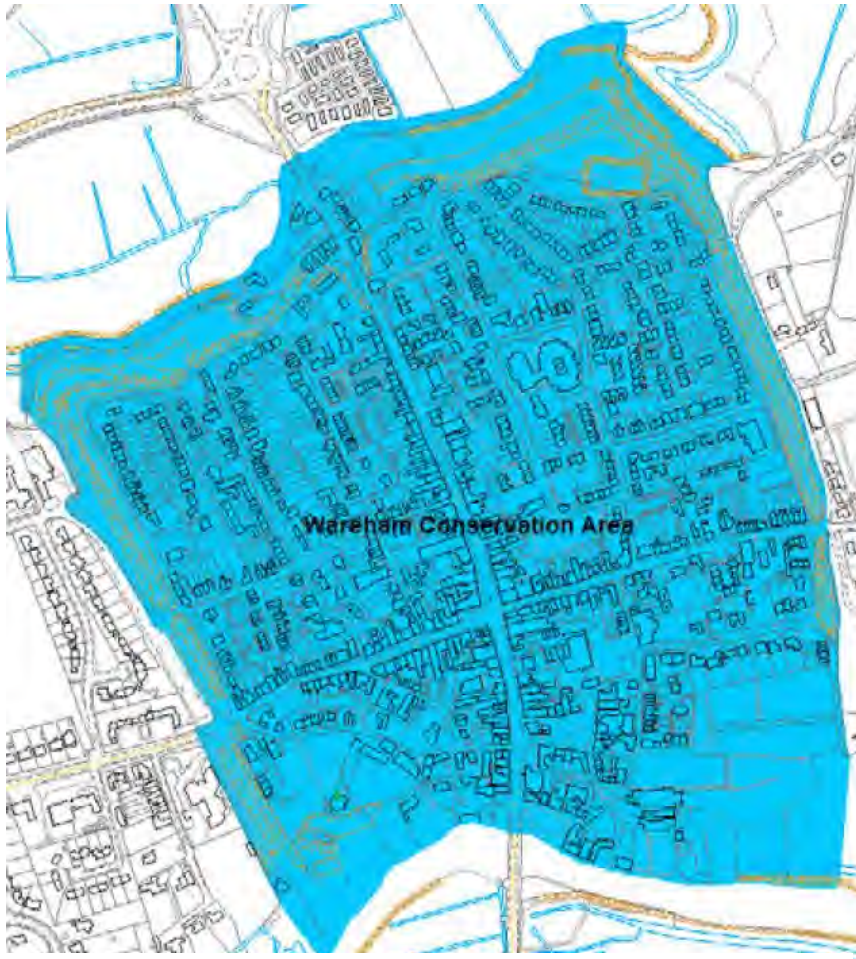


Figure 32 Wareham Conservation Area

Local Planning Authority considers extending the Conservation Area to include the setting of the Town.

7.1.5 A thorough analysis of the townscape character of Wareham Town and north Wareham has been undertaken by Matrix Partnership. This has provided important evidence for the preparation of the policies in this section.

7.1.6 Based on the analysis of townscape character, the following guidelines for new development within the Conservation Area should be followed:

- The grid street layout of the Town should be maintained and, where appropriate, continued, avoiding culs-de-sac;
- Buildings should be sited next to or close to the street;
- Buildings should be two, or in some instances, three storey in height, but with a ground floor level close to street level and low floor to ceiling heights to respect the smaller scale of older properties within the walls. Roofs should be steep pitched (47.5%);
- Brick walls or railings should define front garden areas. Paving should be natural stone;
- Parking should be to the rear of or behind the front of buildings to avoid dominating the street scene;
- Buildings should be in either simple Georgian style with sash windows with narrow glazing bars and deep reveals or cottage style with casement windows with narrow glazing bars;
- Doors should be functional not false;
- Building materials should be red/brown brick laid Flemish bond with narrow joints and plain clay tiles for the roof.

- 7.1.7 Meter boxes, flues, pipes (other than cast iron or similar down pipes), vents, etc. should not be visible from the street.
- 7.1.8 The following policies and guidelines have been developed to ensure that new development contributes to the local identity and sense of place and fits in with the local area.

LDP1 - Design of New Development

All new development must demonstrate good quality design. This means responding to and integrating with local surroundings and landscape context as well as the existing built environment. In Wareham good design means:

- achieving high quality design that respects the scale and character of existing and surrounding buildings (and in particular Listed Buildings) in terms of massing, roofscape, height, layout and elevational appearance taking into account their significance and setting;
- reflecting, where appropriate, the Town's Georgian heritage in new developments within the Conservation Area;
- respecting established building lines and arrangements of front gardens, walls, railings or hedges and creating a positive relationship with the public realm;
- ensuring proposals relate to established plot widths within streets where development is proposed, particularly where they establish a rhythm to the architecture in a street;
- using good quality materials that complement the existing palette of materials used within the Town

- ensuring that meter boxes, flues and vents are not visible from the public realm;
- achieving low carbon sustainable design;
- ensuring that landscaping and measures to enhance biodiversity are integrated into the design.

Good design should provide sufficient external amenity space, refuse and recycling storage and car and bicycle parking to ensure a high quality and well managed streetscape. Planning permission will not be supported for development of poor design that fails to take the opportunities available for improving local character and quality of the area or leads to a domination of the street scene with vehicle parking or garaging.



Figure 33 New Development in Mill Lane / Cow Lane

7.1.9 The area around the Railway Station including Northport and the area north of the Railway is important as a main arrival point into the Town, particularly on public transport, and is very visible from the north. This area is in need of enhancement. This may be achieved by encouraging the redevelopment of rundown sites and a programme of public realm works including soft landscaping.

LDP2 - Wareham Station Approaches Enhancement Area

The area around the Station and its approaches shall be enhanced and future development should be of high quality design to improve the appearance of this important gateway into the Town. Where enhancements may impact on operational railway land, it is recommended that Network Rail is consulted at an early stage.

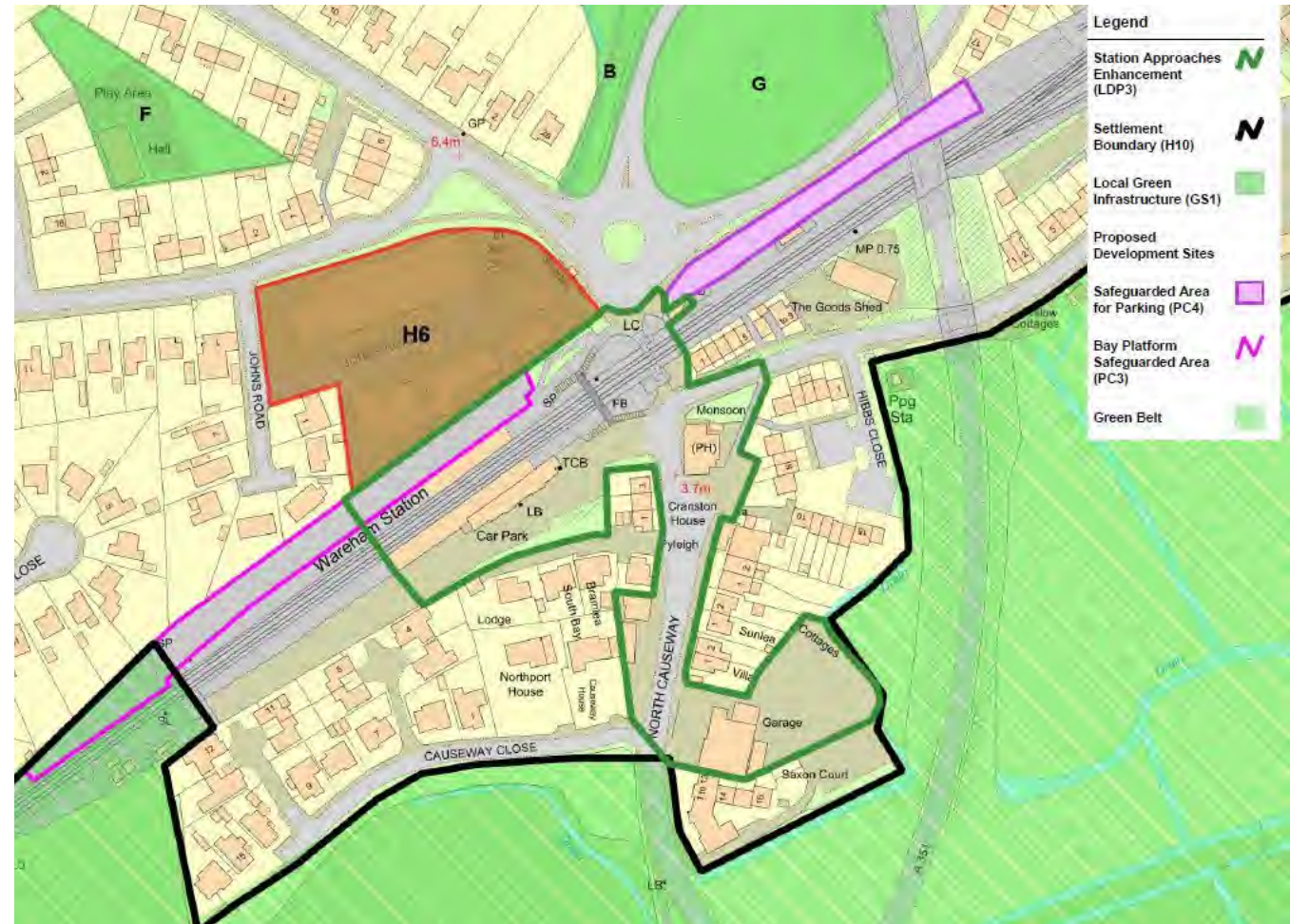


Figure 34 North Causeway



Figure 35 Tiled sign on Monsoon Restaurant

Figure 36 (map to right) Station Approaches Enhancement Area



7.1.10 The allocation of land in the Westminster Road area for a significant new development creates the opportunity to achieve a new character area reflecting those qualities which give Wareham a unique sense of place. These are summarised in para 7.1.2 above.

7.1.11 The following principles of good urban design should apply:

- **Respect site qualities / characteristics** including topography, slopes, Seven Barrows Ancient Monument and its setting, landscape character, surface water drainage, microclimate issues, habitats and wildlife. Consider how assets can be harnessed and constraints mitigated;
- **Select a street layout which maximizes permeability (choice or routes) on the site.** Develop an appropriate loose grid network of streets for the topography that maximises ease of access for the pedestrian and cyclist and connects to nearby developments;
- **Provide a clear hierarchy of streets and spaces.** Ensure principle streets are readily identifiable by their width, alignment and sense of enclosure to reinforce the legibility (ease of finding your way about) of the settlement;
- **Build active frontages.** Create a safe and vibrant public realm by providing buildings close to or on the back of the street with windows positioned to ensure informal surveillance of all public space;
- **Clearly define public space** with walls, hedges or railings;
- **Parking should be on plot or nearby** and not dominate the street scene;

- **Ensure legibility** by designing buildings at key locations to incorporate memorable forms or features;
- **Support biodiversity** through the design of buildings incorporating nesting and roosting spaces and open space and water courses supporting native habitats and using native species;
- **Develop a local design vocabulary.** Establish a palette of locally distinctive architectural features and building materials. Ensure quality workmanship. This may be achieved through a local design code;
- **Create energy efficient and sustainable buildings** through choice of building materials, building orientation, passive solar gain, high insulation levels, grey water recycling, etc.

LDP3 - Design of Westminster Road area (H4 and H5)

New development should be guided by an overall masterplan and design code agreed with the Local Planning Authority in consultation with the Town Council. The layout should be based on a loose grid street network dividing the site into blocks with perimeter buildings sited close to or on the back of the footway. Front and side gardens adjoining the public realm should be defined by walls, hedges or railings. Development should maximise the opportunity to achieve higher densities and should generally be two storeys in height. Parking should be designed to not dominate the street scene and be on plot or in close proximity to dwellings. Access to the site should be from Bere Road / Westminster Road.

Figure 37.

Illustrative masterplan showing one option of how a comprehensive development could be planned including a possible future development on site H4 following a review of the Plan. Due to multiple ownerships it is recognised that this could take place on a phased basis over some years depending when owners wish to bring their land forward. The plan shows a loose grid street network with buildings close to the street frontage. A surface water balancing pond is provided which could also provide a semi natural habitat. Play spaces are included within the site and potential sites for SANGs are identified adjoining the site. Westminster Road is planted as a treed avenue.



Townscape Analysis

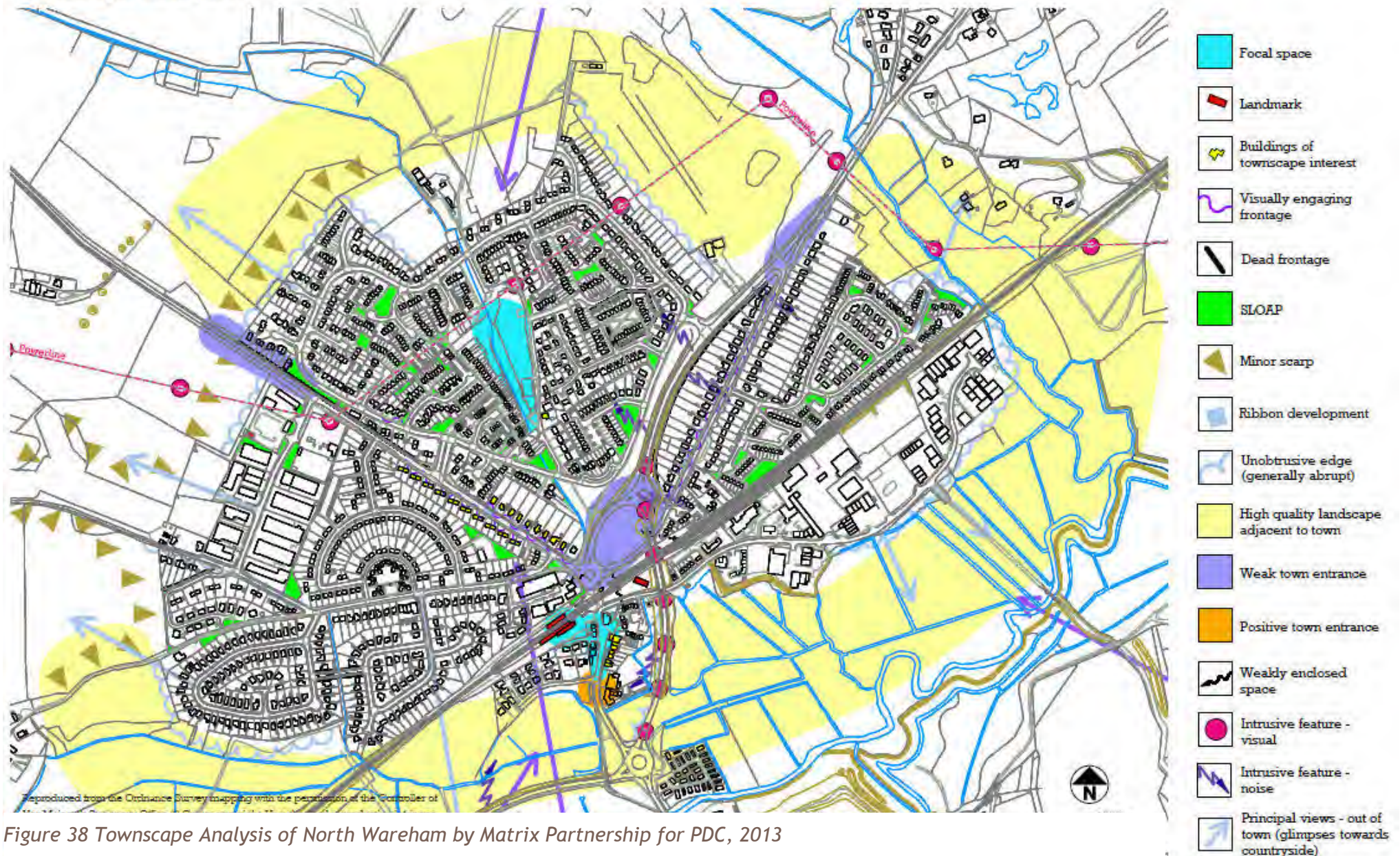


Figure 38 Townscape Analysis of North Wareham by Matrix Partnership for PDC, 2013

Townscape Analysis

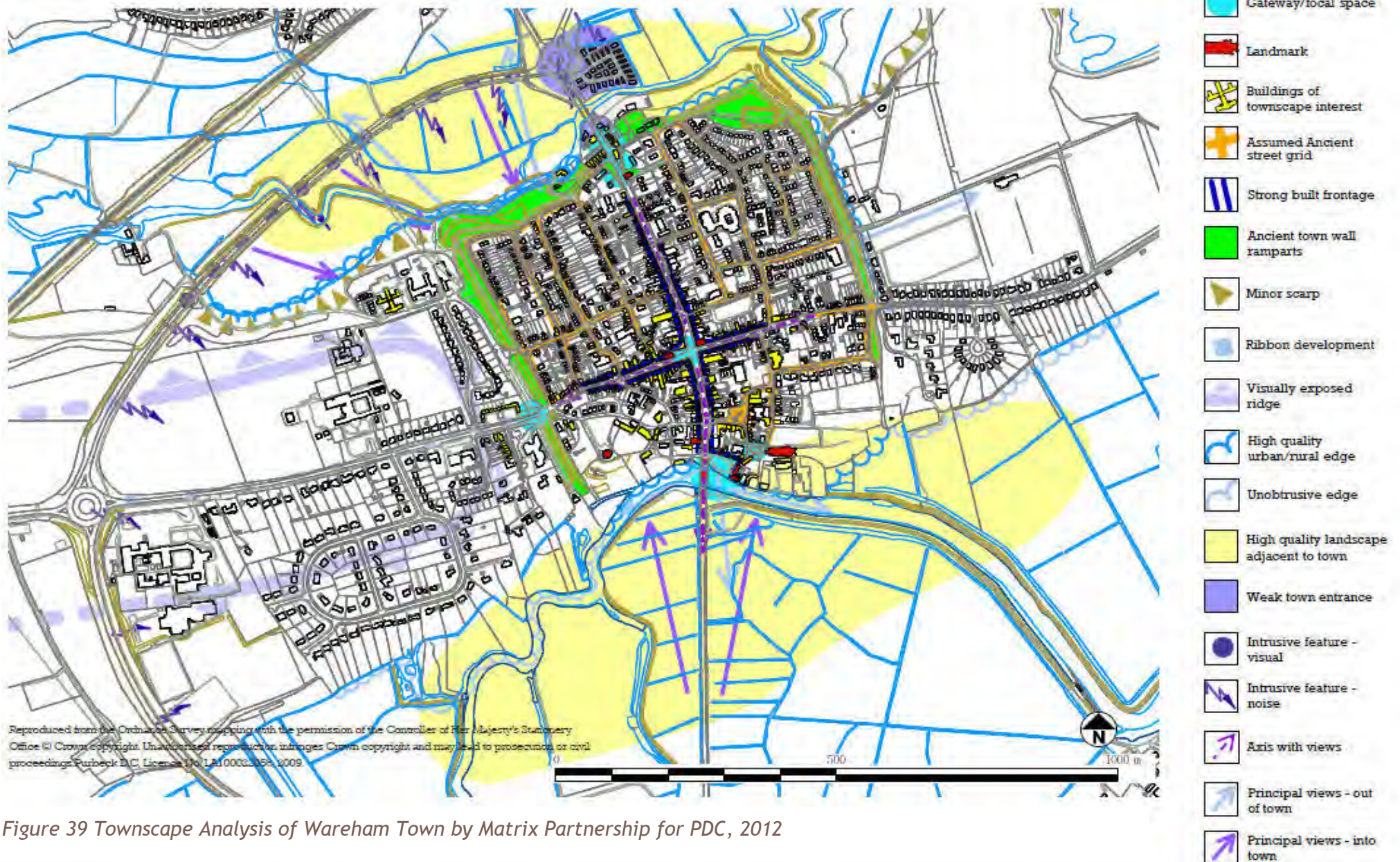


Figure 39 Townscape Analysis of Wareham Town by Matrix Partnership for PDC, 2012

8 Key Projects, Plan Monitoring and Review

8.1 Key project 1 - Wareham Railway Station Approaches Area

8.1.1 Wareham Town Council will take a lead role in partnership with landowners and other parties in bringing forward and coordinating an enhancement of the area around the Railway Station. This project at the gateway to the Town and wider Purbeck will be the recipient of some of the Community Infrastructure Levy moneys allocated from new development in the Plan Area.

8.2 Key Project 2 - Healthy Living Centre

8.2.1 In Partnership with Dorset Healthcare, Dorset County Council and the CCG the Town Council will assist in the delivery of this project and ensure the benefits of the recreation facilities on east and west sides are exploited

8.3 Key Project 3 - possible Community Land Trust

8.3.1 Wareham Town Council will consider the possibility of helping establish a Community Land Trust (CLT) for the Town which could take forward and manage the affordable housing proposed in the Plan. This would be likely to take place in partnership with a Registered Housing provider. A report on the possible establishment of a CLT will be considered by the Town Council during 2018.

8.4 Plan Monitoring and Review

8.4.1 Wareham Town Council will ensure the Neighbourhood Plan is monitored and reviewed.

8.4.2 To ensure that the Neighbourhood Plan is actively managed between its adoption and the end date of 2034, and to

take into account possible changes in national or local planning policies, the following review periods are built into the Plan:

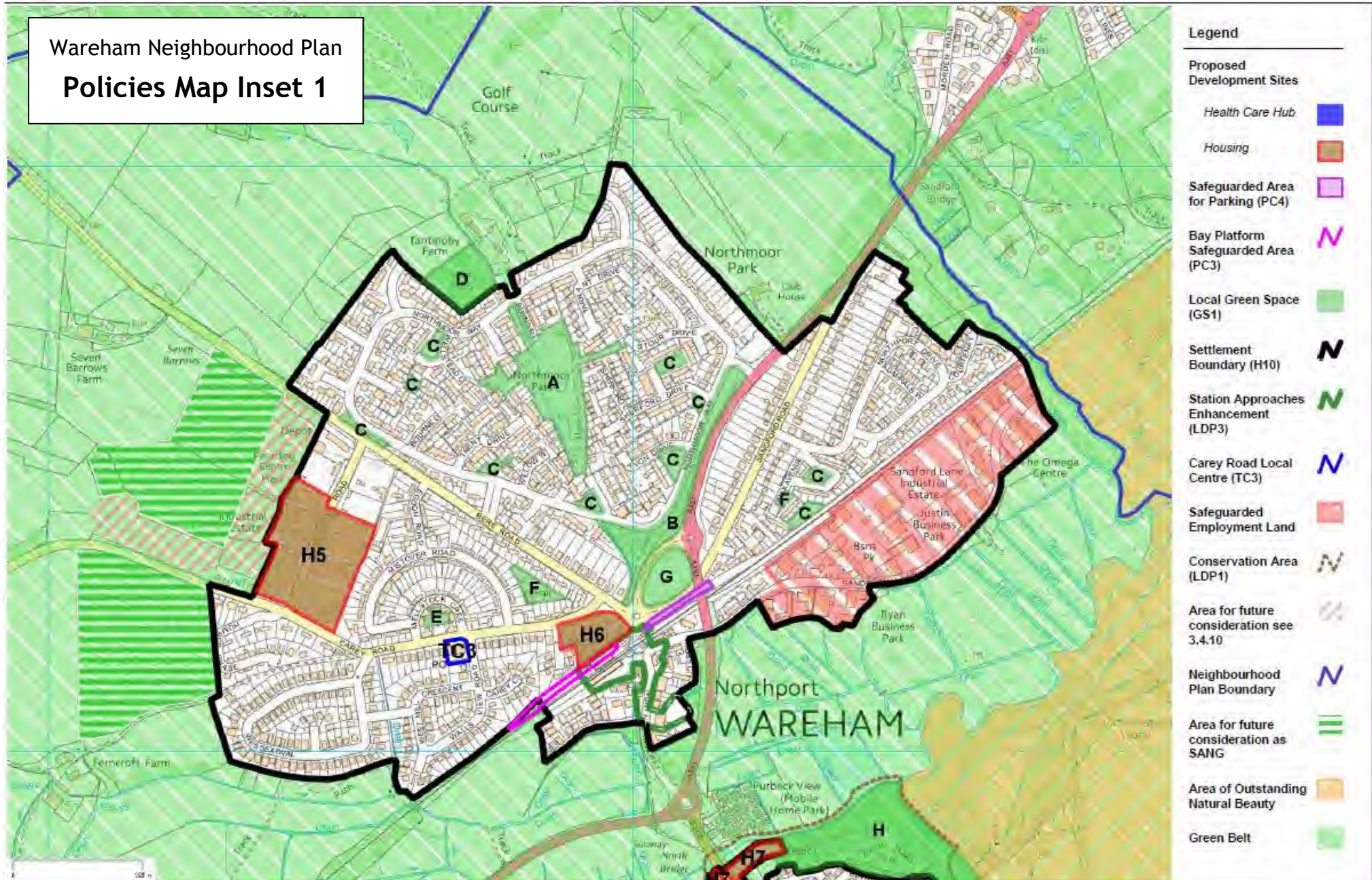
8.4.3 Once the revised Purbeck Local Plan has been adopted the Town Council intends to review the Neighbourhood Plan to consider amending the boundary of the Green Belt to allocate land to the west of Westminster Road between Bere Road and Carey Road for housing together with a SANG(s).

8.4.4 After the Neighbourhood Plan's implementation, at the meeting following the Annual Town Council Meeting, a detailed report will be presented which will monitor progress of the Plan in the previous year and detail the likely implementations and impact of the Plan for the forthcoming year. Where projects to be delivered by other agencies have slipped the Town Council will draw the attention of the agency to the slippage and seek a commitment to get the project back on track.

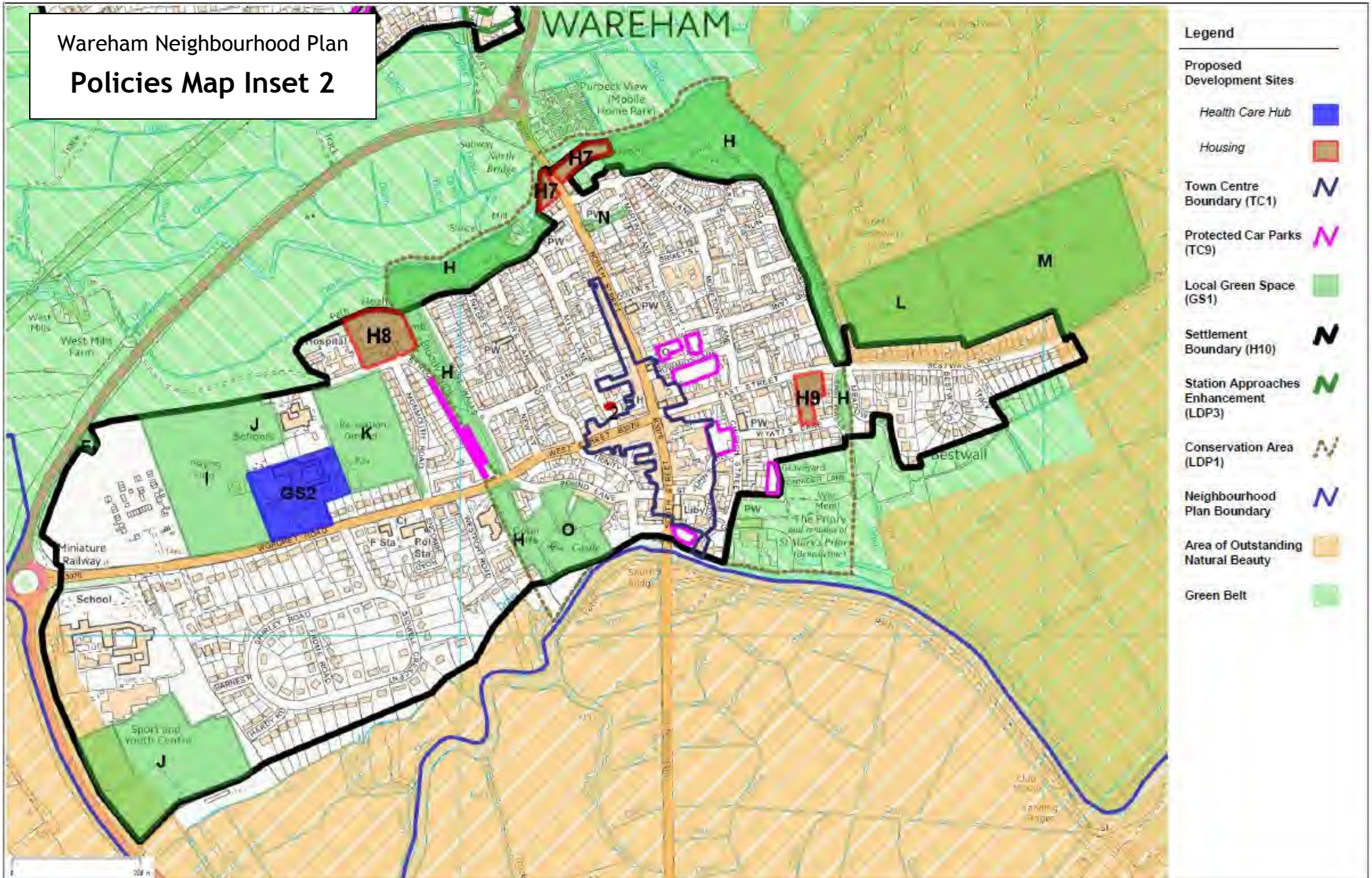
8.4.5 Every five years following adoption, i.e. in 2023 and again in 2028, there will be a thorough review of progress by the Town Council. The purpose of these reviews will be to guide the Town Council in its stewardship of the Plan, to monitor both development and infrastructure as outlined in the Plan, and to consider the need for proposing a review of, or amendment to, the Neighbourhood Plan to Dorset Council. An earlier review can be triggered by the Town Council if appropriate due to unforeseen circumstances.

8.4.6 No later than 2031 the Town Council will again recruit a new Steering Group including members of the community, to decide on the need for a subsequent Neighbourhood Plan, and if so desired, to overview the development of the subsequent Plan.

Wareham Neighbourhood Plan Policies Map Inset 1



Wareham Neighbourhood Plan
Policies Map Inset 2



9 Evidence Base

9.1 Key Documents

AECOM (2018), Wareham Neighbourhood Plan Strategic Environmental Assessment Report

AECOM (2018), Wareham Neighbourhood Plan Housing Needs Assessment

AECOM (2018), Wareham Neighbourhood Plan Masterplan of Westminster Road Area

AECOM (2018), Wareham Neighbourhood Plan Site Selection Report

AECOM (2018), Wareham Neighbourhood Plan Viability Assessment

Borough of Poole et al (2016), Dorset Heathlands Planning Framework 2015 - 2020

Borough of Poole et al (2017), Nitrogen Reduction in Poole Harbour Supplementary Planning Document

BRE (Building Research Establishment), Home Quality Mark <https://www.homequalitymark.com/what-is-the-hqm>

Cushman and Wakefield (2018) Wareham Town Centre Retail Report, Bristol

Davis, Terence (1984), Wareham: Gateway to Purbeck, Dorset Publishing Company, Sherborne, Dorset.

Dorset County Council (1969), Wareham Conservation Report.

Dorset County Council (2010), Dorset Data Book, Dorchester.

Dorset County Council (2011), Wareham Historic Urban Characterisation, Dorchester

Dorset Planning (2018) Local Green Space Assessment Wareham Neighbourhood Plan

Dorset Planning (July 2018) Employment Needs Assessment Wareham Neighbourhood Plan

Dorset Planning (2018) Walking and Cycling Routes Assessment Wareham Neighbourhood Plan

Hearn, G L (2014) Eastern Dorset Strategic Housing Market Assessment, London

Hearn, G L (2017) Purbeck OAN Update October 2017, London

Ladle, Lillian (1994), Wareham A Pictorial History, Phillimore, Chichester, Sussex

Matrix Partnership (2013), North Wareham Townscape Character Appraisal, Wareham, Purbeck District Council, Wareham

Matrix Partnership (2012), Wareham Townscape Character Appraisal, Wareham, Purbeck District Council, Wareham

ONS (Office for National Statistics) 2011 Census returns for Wareham Parish

Public Perspectives (2018), New Homes for Purbeck Consultation Report of consultation results: April 2018

Purbeck District Council (2012), Purbeck Local Plan (Part 1)

Purbeck District Council (2015), Strategic Land Availability Assessment (SHLAA), Wareham

Purbeck District Council (2018) Strategic Green Belt Review

Purbeck District Council (2018) New Homes for Purbeck - have your say (consultation leaflet and questionnaire)

Purbeck District Council (2018) Local Development Scheme

Purbeck District Council (October 2018) Pre Submission Local Plan

Wareham Community Plan Steering Group (2005) Wareham Community Plan

Comment

Agent	Ms Jo Witherden (1188327)
Email Address	[REDACTED]
Company / Organisation	Dorset Planning Consultant Limited
Address	8 Orchard Rise Milborne St Andrew Blandford Forum DT11 0LL
Consultee	Mrs Hilary Evans (1188328)
Email Address	[REDACTED]
Company / Organisation	Wareham the Neighbourhood Plan Steering Group
Address	c/o Wareham Town Council East Street Wareham BH20 4NS
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Wareham the Neighbourhood Plan Steering Group (Mrs Hilary Evans - 1188328)
Comment ID	PLPP12
Response Date	17/11/18 13:33
Consultation Point	Policy I4: Recreation, sport and open space (View)
Status	Processed
Submission Type	Web
Version	0.1
Files	Wareham NP LGS report

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?	I4
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 I4 protects existing open space, sport and recreation areas and identifies these on the policies map. This does not include a number of sites identified through the Neighbourhood Plan process which would fall within this category and are considered appropriate for Local Green Space designation. Although the Local Plan would not prohibit these additional areas from being designated the lack of consistency will give rise to confusion.

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 approach taken by Herefordshire County Council, where they have blanked out areas in their core strategy referring to where neighbourhood plan policies apply, would avoid overlap/confusion regarding such matters (see https://www.herefordshire.gov.uk/download/downloads/id/1799/core_strategy_policies_map.pdf).

Alternatively the omitted areas should be included within the Local Plan unless there is a clear reason why they do not warrant protection.

If you have any supporting documents please upload them here.

Wareham NP LGS report
Wareham NP LGS report

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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?

In order to fully explain the position on the Neighbourhood Plan and relevant issues

Local communities can identify green spaces for special protection (where new development is ruled out other than in very special circumstances). These are known as Local Green Spaces (NPPF para.s 76-78)

In order to qualify for the designation, it is important to demonstrate that the green space:

- is in **reasonably close proximity** to the community it serves
- **is demonstrably special to a local community** and holds a particular **local significance**, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife
- is **local in character** and is **not an extensive tract of land**
- **is not already consented for development** (no existing planning consents or allocations in the development plan)
- **is likely to endure** beyond the plan period (ie there is not likely to a reason why the green space would no longer be valued and could be developed)

How close is “in reasonably close proximity”?

There are no prescribed distances, however in general 800m is considered reasonable walking distance, so where a local green space is further from a settlement, special consideration should be given to the extent to which it is access and enjoyed. If public access is a key factor, then the site should normally be within easy walking distance of the community served.

What is “demonstrably special” and of “local significance”?

There is no specific guidance on this, but evidence of consultation showing strong support, the formation of ‘Friends of...’ type groups or other actions that make clear the space is of particular local interest should be cited. Where a Green Space is special because of a specific function it serves, and there may be a reasonable prospect of this function being relocated to another site, it would not be prudent to designate the site as a local green space (and suitable protection may already be given under general policies protecting community assets). Sites can be in private landownership and there does not need to be public access.

What is “an extensive tract of land”?

There is no prescribed upper size limit, so this is a matter of judgement in knowledge of the local context. In particular the reference to ‘local in character’ should be considered – if there is no notable difference in character between the proposed site and the surrounding fields, then the space may not readily qualify. Certainly some spaces in excess of 5ha have been considered to be too extensive by Neighbourhood Plan examiners.

What if there is already an existing level of protection?

Different types of designations are intended to achieve different purposes. If land is already protected by another designation (such as Green Belt status), consideration should be given to whether any additional local benefit would be gained by designation as Local Green Space.

The following Table illustrates how the various spaces meet the NPPF tests:

Local Green Space	Size (ha)	Distance (if > 400m from town)	Local Significance				Ownership	Existing statutory designations	Overview
			Landscape Value	Historic Significance	Recreation Value	Wildlife Value			
A. Hauses Field	2.1	n/a (within 400m)	Medium	Low	High	Low	Wareham Town Council	None	A very well used and valued play area (including skate park) and informal recreation space. The area has been recently redeveloped and improved thanks to Wareham & District Development Trust.
B. Land in Northmoor Park between A352 and Northmoor Way	1.4	n/a (within 400m)	High	Low	High	Medium	Dorset County Council	None	This area provides a green space between the existing housing estate and the busy main A351 road.
C. Various small green spaces in Northmoor Park	< 0.2	n/a (within 400m)	Medium	Low	High	Medium	Purbeck District Council	None	Valued green amenity spaces within housing estate generally used for informal sitting / play.
D. Northmoor Park Allotments	0.8	n/a (within 400m)	High	Low	High	High	Morden Estates leased to Wareham Town Council	Green Belt	Highly valued, well used, secure community allotments.
E. Green space opposite Carey shops	0.1	n/a (within 400m)	Medium	Low	High	Medium	Astor Housing Association	None	A peaceful space in the housing estate adjoining the local centre.
F. Play Areas at Drax Avenue, Mistover Road & Westgate	< 0.2	n/a (within 400m)	Medium	Low	High	Low	Wareham Town Council (Westgate currently Bloor Homes)	None	Children's play areas.
G. The Sward	0.7	n/a (within 400m)	Medium	Low	Medium	Medium	Dorset County Council	None	Landscaped green site at the Bere Road entrance to the town.
H. Wareham Town Walls	7.0	n/a (within 400m)	High	High	High	High	Rempstone Estate leased to Purbeck District Council	Scheduled Monument, Conservation Area, Green Belt (part) and Registered Commonland (part)	The ancient walls are a most significant feature of the town attracting visitors and locals to which the public have right of access. There is a marked interpretive historic walk leads around the walls. Although altogether these amount to approximately 7.0ha, their sinuous configuration does not make the space feel like an extensive tract of land.


Local Green Space	Size (ha)	Distance (if > 400m from town)	Local Significance				Ownership	Existing statutory designations	Overview
			Landscape Value	Historic Significance	Recreation Value	Wildlife Value			
I. Former Middle School Playing Fields	3.6	n/a (within 400m)	High	Low	High	Medium	Dorset County Council	None	Major community sports resource. Regularly used for training by local youth sports teams, and a prominent green space on high ground on the western edge of the town.
J. Purbeck School & St Mary's Primary School Playing Fields	4.0 + 0.7	n/a (within 400m)	Medium / High	Low	High	Medium	Dorset County Council	None	The playing fields are intensively used by The Purbeck School with some areas shared with the local community through agreements with Purbeck District Council. Landscape value of St Mary's Primary School Playing Fields is high due to being on high ground on the western edge of the town
K. Recreation Ground	2.3	n/a (within 400m)	High	Low	High	Low	Wareham Town Council	None	Used as a children's play area and site of Sports Pavilion and Cricket pitch.
L. Bestwall Allotments	2.5	n/a (within 400m)	Medium	Low	High	Medium	Wareham Town Council	Green Belt, AONB	Highly valued community allotments protected under the Smallholding & Allotments Act 1908. Registered as a Community Asset.
M. Wareham Rugby Club Playing Fields	6.7	n/a (within 400m)	High	Low	High	Low	Wareham Town Council & Rugby Club	Green Belt, AONB	This is a significant community asset providing sporting and other community facilities.
N. War Memorial and land adjacent to St Martins Church	0.1	n/a (within 400m)	High	High	High	Medium	Wareham PCC	Curtilage of Listed Building	St Martins Church is the most complete example of an Anglo-Saxon Church in Dorset. It dates from 1030. The grounds form part of historic Walls Walk with peaceful space to the rear.
O. Castle Close Garden	1.4	n/a (within 400m)	High	High	Low	Low	Private	Scheduled Monument	Former site of a 12th Century motte and bailey castle, very visible in views from the south.

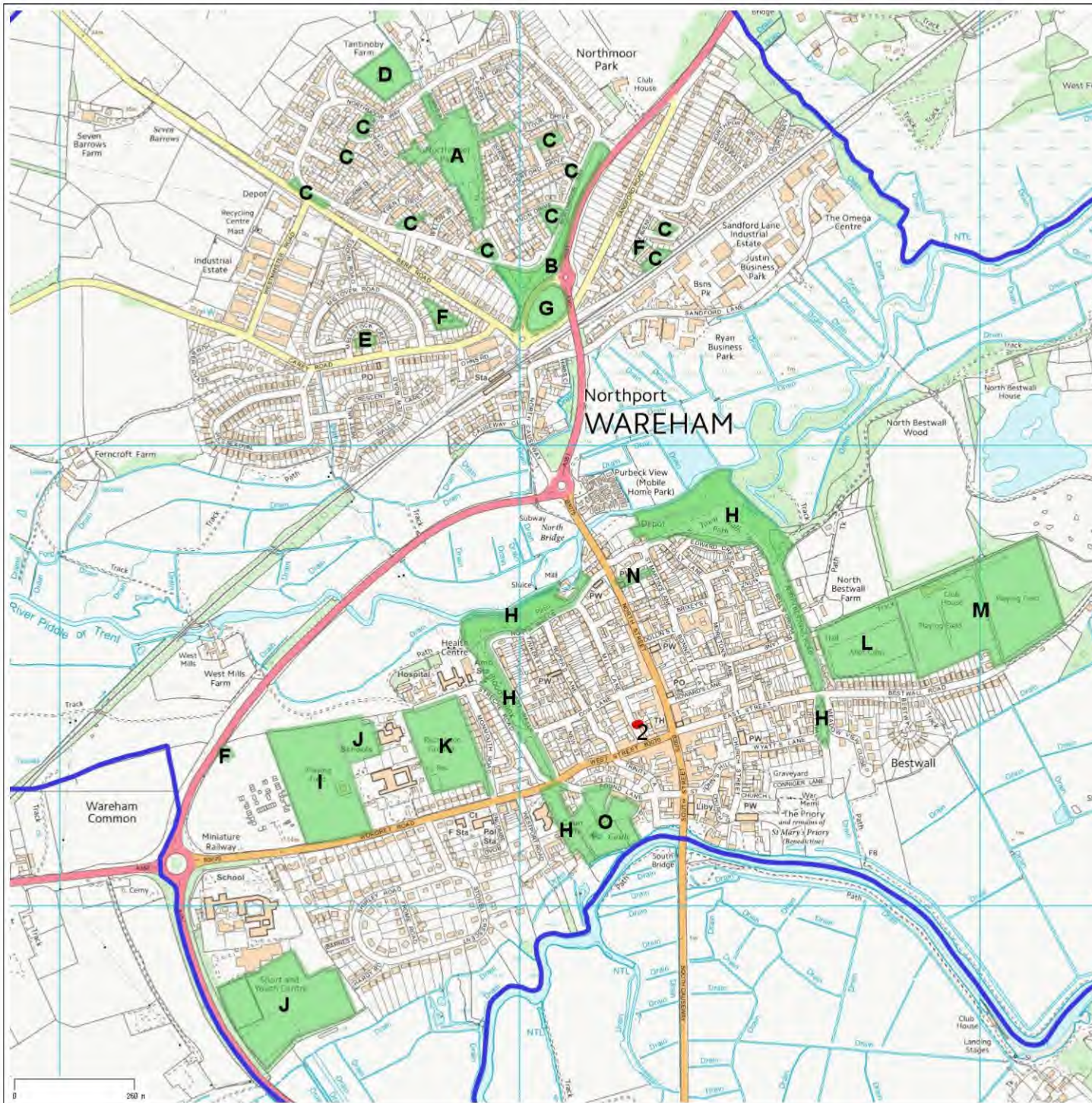


Wareham Town CP Local Green Spaces

Legend

Local Green Space (GS1) 

Parishes 



Date Created: 26-9-2018

Map Centre (Easting/Northing): 392079 / 87757 | Scale: 1:12500

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Comment

Consultee	Dr Anthony Warne (1190865)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dr Anthony Warne (1190865)
Comment ID	PLPP206
Response Date	01/12/18 16:32
Consultation Point	Chapter 1: Introduction (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? V1

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

Do you consider that the Local Plan is sound? No

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

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

Policy V1

The Purbeck Local Plan is unsound.

One of the problems with this plan is that it was conceived backwards. The plan for housing was developed before the infrastructure and implications were considered. This was highlighted at an open meeting at Purbeck School about the 2016 version of the plan and PDC agreed to go away and address the problem. This backwards process means that these issues could not be considered objectively. Some of the issues were considered in the Environmental and Infrastructure Capacity Study by external consultants but that only served to demonstrate the subjective nature of the process, for example it considered there were no problems with sewerage and there was no mention of the need for nitrate stripping etc., already part of a policy commitment by Purbeck DC, and very pertinent to increased housing. The absence of the Green Infrastructure Strategy and the Infrastructure Delivery Plan both mentioned in the text of the latest Purbeck Local Plan does not enable assessment of the full implications of the 470+ houses. This plan therefore is still only a housing plan.

Paragraph 8

In considering this plan a bibliography of the evidence sources used to compile it would have been useful as chasing up documents on a computer is extremely time-consuming. Locating the Evidence Base in the PDC website has not been 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)

The whole process needs to be repeated in the correct sequence

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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

Comment

Consultee	Dr Anthony Warne (1190865)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dr Anthony Warne (1190865)
Comment ID	PLPP207
Response Date	01/12/18 16:35
Consultation Point	Conserve and enhance Purbeck's natural habitat, biodiversity and geodiversity (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	Paragraph 80
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)

Paragraph 80 last sentence: -What evidence have PDC for biodiversity declines and how do you think the development would reverse these? The sentence suggests PDC have not listened to statements made about the high biodiversity of Wool parish for which there is plenty of evidence this due to many

very good biotopes being juxtaposed making optimal conditions for many species. Purbeck Gate illustrated the loss of biodiversity that can occur as a result of development. When open areas and grassland became waterlogged vast numbers of leather jackets emerged climbing house walls and fences, the situation would normally be very attractive to birds that often feed on such species when they "follow the plough" but the resource was ignored because of the proximity of houses and disturbance by people.

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)

No evidence for such a statement . It suggests all previous input about biodiversity has been ignored

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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?

This all needs proper consideration

Comment

Consultee	Dr Anthony Warne (1190865)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dr Anthony Warne (1190865)
Comment ID	PLPP208
Response Date	01/12/18 16:38
Consultation Point	Policy E8: Dorset heathlands (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? E8

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)

There is an existing policy for this but

Purbeck DC have recently allowed 5 residential caravans a few metres from the edge of Winfrith Heath This does not in any way comply with this policy, that exists now, so how much can we expect from it

in the future. Purbeck DC although not individually in control of other situations such as in Poole Harbour and Studland Bay is a member of groups that have so why has there been no action to control nitrates or protect the *Zostera* beds and their seahorses that have now apparently deserted the Studland Bay area. Policies are all very well but putting them into effect is what counts.

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)

Existing policies must be upheld

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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

Comment

Consultee	Dr Anthony Warne (1190865)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dr Anthony Warne (1190865)
Comment ID	PLPP209
Response Date	01/12/18 16:45
Consultation Point	Policy E10: Biodiversity and geodiversity (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	E10
Do you consider that the Local Plan is legally compliant?	No
Do you consider that the Local Plan is sound?	No
Do you consider that the Local Plan complies with the duty to co-operate?	No

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

Policy E10

The whole of Purbeck District is one of the most of biodiverse areas of Britain. The Nationally and Internationally important sites are dependent for their great importance on the matrix of countryside in which they sit forming a connected network. In such an area new development is extremely unlikely to have any beneficial role in reversing biodiversity declines. What evidence have PDC for making this statement (paragraph 80)? It might apply in the agricultural heart of East Anglia but in Purbeck development is only likely to accelerate declines in biodiversity. This is especially so in Wool where the development is proposed on organic farmland that from many wide-ranging studies has been shown to have at least 30% higher biodiversity and higher abundance of species than conventional farmland. The statement (in Para 80) is unsound and not supported by evidence.

The revised NPPF 2018 states that sustainable development has three objectives, the third of which is an environmental objective that includes protecting and enhancing our natural environment and minimising waste and pollution. Without much more specific policies the Purbeck Local Plan does not demonstrate how it supports sustainable development.

Many sites are designated for their International Importance (SPA, SAC, Ramsar etc) and others for their National Importance (SSSI) these sites are dependent on their being within a mosaic of countryside of exceptionally high biodiversity. Wool exemplifies this rich matrix where adjacent semi-natural areas complement and enhance each other for example woodland on rising ground above the watermeadows provides nesting sites for bumblebees that forage on the flowers on the watermeadows and nightjars nesting on the heath feed over the woodland and watermeadows this type of linkage exists over the whole of Wool parish and is an important factor supporting its exceptional biodiversity.

In the NPPF one proposal to protect and enhance biodiversity is by establishing ecological networks, corridors and steppingstones. In Wool, Bovington Camp and the adjacent conifer plantations form something of an east-west barrier between Wool Heath to the north and areas to the South of the BTA and the watermeadows. Extending Wool west and in effect linking it to the Winfrith site, creates another east-west elongated development blocking any connection between the watermeadows and woods to the north of Wool and the woods and fields on the chalk to the South. There appears little space to establish a functional corridor bridging this.

Dorset Wildlife Trust has promoted the idea of landscape conservation in Dorset. Wool provides a ready-made example of this and how it can function. The Purbeck Biodiversity Project recognised that Purbeck is one of the richest districts for wildlife in the country with over 30 habitats and 300 species of conservation concern but the Wild Purbeck NIA project would not include Wool where over 20 of the habitats can be found.

Assessing the biodiversity of an area is difficult but where there is evidence it should be used.

- 1 Numbers of species are vast so the present policies use only a few species originally selected on the basis of rarity and used for the designation of sites but these might not be ideal as biodiversity indicators.
- 2 Rarity is not enough - maintaining biodiversity depends on maintaining the full diversity of species because they are all interdependent, today's rare species can easily become tomorrow's rarities data from butterfly conservation shows that in Britain as a whole moths have declined 28% -but 40% in southern Britain though much less further north, many moths regarded as common 50 years ago are now rare.
- 3 Wherever possible a much wider range of species needs to be considered to understand how the interdependence works within mosaics of biotopes that have only been poorly considered compared with stand alone biotopes

Analysis of insect data for Wool shows that while the focus of planning policy (NPPF) is on notified sites of conservation importance SPA, SAC Ramsar SSSI and LNR our and locally SNCI this only protects about 50% of species and within this the proportion of rare and nationally notable species protected differs little from that in biotopes regarded as much less important such as road verges and field margins. Present policy therefore puts 50% of wildlife at risk.]

Comment

Consultee	Dr Anthony Warne (1190865)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dr Anthony Warne (1190865)
Comment ID	PLPP210
Response Date	01/12/18 16:46
Consultation Point	Policy IM1: Tools for delivery - the Purbeck Local Plan implementation strategy (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	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?	M1
Do you consider that the Local Plan is legally compliant?	No
Do you consider that the Local Plan is sound?	No
Do you consider that the Local Plan complies with the duty to co-operate?	No

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

Policy M1

The text of is full of things that will be done but some of these things need to be actioned before the plan as they concern existing problems that will only be exacerbated by more houses. The monitoring section at the end of the plan is not fit for purpose as it does not monitor the reality of what happens in the villages to which houses are being added but is simply an office paper exercise.

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Comment

Consultee	Dr Anthony Warne (1190865)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dr Anthony Warne (1190865)
Comment ID	PLPP225
Response Date	02/12/18 10:52
Consultation Point	Conserve and enhance Purbeck's natural habitat, biodiversity and geodiversity (View)
Status	Processed
Submission Type	Web
Version	0.1
Files	Wool Housing Increase2016 revised
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?	Paragraph 80
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
If you have any supporting documents please upload them here.	Wool Housing Increase2016 revised Wool Housing Increase2016 revised

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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

Reviewing the plan for Purbeck's Future.

Strategic Housing Land Availability Assessment (SHLAA) June 2016.

Wool

For some years I have been very concerned that the wildlife importance of the Parish of Wool has been overlooked. This started with my membership of the wildlife conservation group for the Bovington Training Area (BTA) where over the last 20 years a vast amount of information has been gathered on its wildlife. This expanded to cover Eight Acre Coppice Local Nature Reserve, a partnership between the Army and Dorset County Council, where again a considerable amount of data on its wildlife has been gathered. The water meadows beside the Frome are partly within the BTA and partly outside so surveys have extended to cover the organic grazing land south of the Frome. The first step has been the publication with Rachel Palmer of a chapter on *The Natural Environment* (pages 230 – 275) in *More Memories of Wool* by Alan Brown and some articles in the MOD Sanctuary annual conservation magazine.

Although the Bovington Training Area is not accessible to the public its wildlife spreads out from it and can be seen elsewhere in Wool, a good example is the nightjar one of the important birds that nest on the BTA but which feeds over the woods and water meadows of the wider area.

The rate of acquisition of data has always run ahead of its compilation so little has so far been passed to the Dorset Environmental Record Centre (DERC) though I have attempted to keep those involved in nature conservation informed that this data was available. Sites of Nature Conservation Importance (SNCI) and Notified Road Verges areas tend to be based on botanical information. I have based much of my assessment on invertebrate data and therefore my identified important areas do not always match these botanical evaluations and designated areas.

A problem occurs because the protection and conservation of sites is based on their position in the hierarchy of designations although they all interlink to support the high overall biodiversity; their sum is greater than their parts. The Habitats and Species Directive and Birds Directive refer to the requirements for species beyond just their breeding areas and although not applied the feeding areas for a breeding species should be protected so as in the case of the Nightjar above, the woodlands and water meadows ought to be given protection.

There are large areas of semi-natural vegetation around the designated sites especially within the BTA so the white areas on the following map may be arable land, grazing meadows, conifer plantations on heathland, partly damaged heath, ruderal communities or arable field margins. As may be seen from maps and aerial photographs Wool is more than a third semi-natural habitat a remarkable proportion, the rest is either buildings 18-20% and roads or farmland 26%. The proposal for 470 plus more houses would mean that built areas would increase to about 25% and farmland decrease to about 20%.

The impacts of this increase in housing will spread from the housing into the semi-natural habitats particularly through the need for recreational areas, the need for essential, expanded infrastructure and in the longer term the construction of a Wool bypass.

Status terms used in accounts of habitats and impacts

RDB1	Endangered	5 or less 10km sq in UK & in decline
RDB2	Vulnerable	Likely to become endangered
RDB3	Rare	15 or less 10km sq in UK
RDBI	Indeterminate	Rare but not known whether RDB1,2 or 3
RDBK	Insufficiently known	but known to be rare
Na	16-30	10km sq.in UK
Nb	30-100	10km sq in UK
N	16-100	10km sq. not sufficiently known for Na/Nb subdivision
Bocc4	Birds of Conservation Concern	4= latest version.
Red list = Birds of highest concern		
Amber List = Birds of concern		

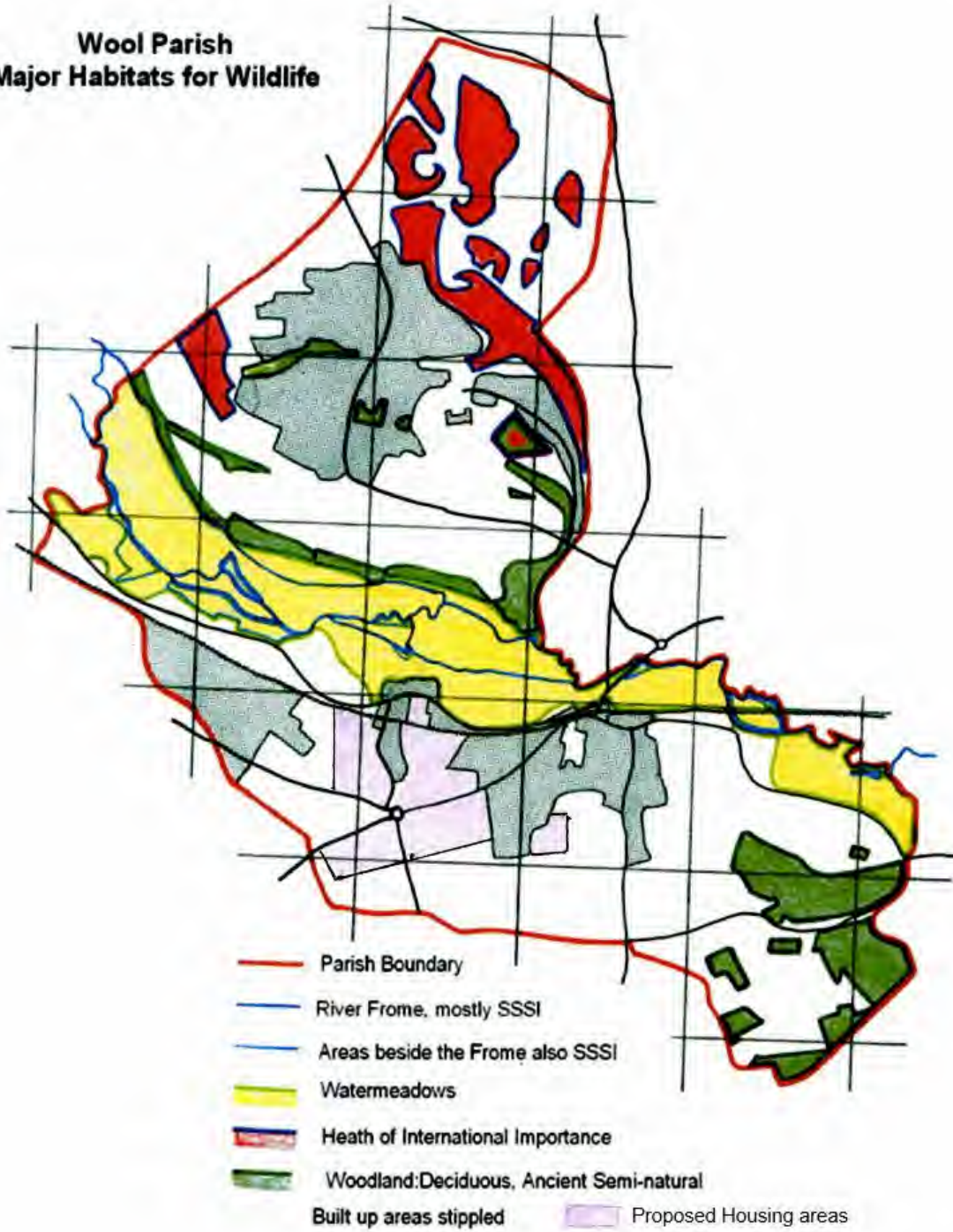
The Included Sites.

The arable fields that are the included sites are organic farmland that has been shown to have 30% greater biodiversity and abundance than conventional farmland. They may be used by skylarks (BoCC4 Red List) for nesting and by kestrels (BoCC4 Amber List) for hunting and by hares that are becoming less common. The hedges that surround them will be used as nesting sites by birds in particular Song Thrush and perhaps Mistle Thrush (both BoCC4 Red List). Unfortunately, however, the impact of houses on these fields is not confined to them but radiates out to have impacts on many other areas of Wool. As described in the introduction a large amount of Wool is covered by semi-natural habitats of importance for wildlife and therefore vulnerable to these radiating impacts.

Sewage and traffic create impacts whatever and wherever the development but they have particular impact in Wool. In the case of sewage down the Frome and as far as Poole Harbour and in the case of traffic a considerable increase travelling towards Poole and Bournemouth and to lesser extent towards Dorchester because of the bottleneck of the Wool railway crossing a bypass could need serious consideration in the near future.

The proposal would not only increase the number of people but would presumably have a proportional increase in dogs; a 60 – 75% increase might be expected. Dog walking would then produce another radiating area of impact on semi-natural habitats all around Wool even if a SANG is included in the project and its location in Ancient semi-natural woodland would be very damaging.

**Wool Parish
Major Habitats for Wildlife**



Habitats under Threat.

Heathland.

Details of the International and National designations and the vast number of Red Data Book and Nationally Uncommon plants and animals are not given here because most of the heathland in Wool is within the BTA and therefore inaccessible to the general public and will therefore not be harmed by increased recreation demand, however, because this reduces the area accessible it correspondingly increases the pressure on the wider area utilised.

The designated areas comprise about 6.5% of Wool but there are considerable intervening areas damaged by tanks to varying extent that are also important for wildlife such as around heathland ponds where there is a high population of Palmate Newts that are food for the protected Smooth Snake.

Heaths are the most important habitat for wildlife in Wool with about 12% of the 1100 insects recorded being Nationally Rare or Notable although inaccessible the fauna of these heaths does spread to other parts of Wool especially in the case of some of the birds to feed. A notable example is the nightjar that nests on the heath but may feed over the woodland and water meadows that provide much richer and more abundant food (moths) than on the heath. Similarly moths and other insects that develop on the heath fly into other adjacent areas where they may be seen.

The heaths outside Wool Parish especially Winfrith Heath (all part of the larger internationally important Dorset Heaths) will be used much more for dog walking and other recreation resulting from this housing increase and it may be difficult to persuade people to use a SANG as an alternative.

Water meadows.

Location / Species	Status	Harmful activity
River Frome	SSSI	Enrichment by sewage
Wool Watermeadows	Pt. SNCI	Disturbance by dogs & people
R.Frome & Watermeadows	Wildlife Corridor	Maintain links with other parts of the corridor.
Otter (Probable)	Schedule 5 WACA81	Disturbance by dogs & people
Wolverines	Schedule 5 WACA81	Disturbance by dogs & people
Lapwing	BoCC Red List	Disturbance by dogs & people
Cuckoo	BoCC Red List	Disturbance by dogs & people
Snipe	BoCC Amber List	Disturbance by dogs & people
Redshank	BoCC Amber List	Disturbance by dogs &

		people
Reed bunting	BoCC Amber List	Disturbance by dogs & people
Kingfisher	BoCC Amber List	Disturbance by dogs & people
Donacia bicolora	BAP 2007	Enrichment by sewage
27 invertebrates 7% of 750 recorded species	Nationally notable etc	As below
Biodiversity generally		Disturbance by dogs & people leading to agricultural change Enrichment by sewage Bypass impacts

The water meadows as a whole are an important area of Wool for wildlife although they are only partly covered by designations relating to their importance. They form about 17% of Wool Parish.

The River Frome itself and some of the watermeadows is a Site of Special Scientific Interest (SSSI) and some parts are a Site of Nature Conservation Importance (SNCI). The Frome is the most westerly chalk river in England it also includes a zone where marine, brackish and freshwater species meet. Treated sewage effluent is already discharged into the river and it is assessed by Natural England as being in Unfavourable condition because of pollution particularly nitrate enrichment. If there is a vast increase in housing the volume of the discharge will increase and nitrate and phosphate levels in particular will increase. This has implications for some of the rivers wildlife by decreasing oxygen levels possibly by affecting spawning areas for fish and invertebrates that have gills, use a plastron or physical gill or take oxygen from plant roots which require oxygen exchange with the water. The Frome discharges into Poole Harbour another SSSI (of international Importance) and an area where pollution and chemical enrichment is harmful and leads to blanketing algal mats and is also classified as being in Unfavourable condition and for which remedial action is identified as very difficult.

Curiously there is no mention of sewage and its effects on the Frome SSSI and Poole Harbour SSSI, SPA, Ramsar site in Natural England's letter of 12 March 2015, despite both these sites being graded as in Unfavourable Condition by Natural England because of nitrate and phosphate enrichment from various sources including treated sewage, perhaps this is an oversight. In documentation concerning nitrate levels agriculture is blamed for a large proportion but there are no actual figures given for sources and proportions. A 1000 house increase is going to elevate nitrate and phosphate levels by proportionally increasing the volume of normally treated sewage input unless nitrate and phosphate stripping can be incorporated into the necessary new treatment plant.

There is an area of the watermeadows that are part of the Frome SSSI that will need to be protected as they are adjacent to Wool sewage works that will certainly need expansion to

cope with 1000 additional homes, as it is at full capacity now. Expansion may be possible onto meadows to the West but pipelines in and out of the site may also affect heathland and watermeadows.

The River Frome and its associated ditches and water meadows are one of the most important areas remaining in Dorset for Water Voles that have declined drastically over the last 20 to 30 years due to predation by Mink. Water Voles are protected under Schedule 5 of the Wildlife and Countryside Act 1981. Water Voles use the river banks, ditches and water meadows and could be greatly discouraged by an increase in dogs being walked along the riverbank.

There is also evidence that Otters use the area, they are fully protected under Schedule 5 of the Wildlife and Countryside Act 1981. Pollution as well as disturbance might make the river inhospitable to both these mammals. The importance of a wildlife corridor is essential to Otters.

Wool water meadows are one of the best areas for cuckoos (BoCC4 Red list) in the Frome Valley. Cuckoos that have declined dramatically in recent years are dependent on the warblers that nest along the river to provide foster parents for their young. The sound of the cuckoo calling in spring is very precious to anyone interested in wildlife.

Many birds have declined nationally in recent years particularly waders. Lapwing (BoCC4 Red List), Snipe and Redshank (both BoCC4 Amber List) can occur on the water meadows in winter and some hang on in spring and may occasionally breed. Cettis warbler has become a recent breeding bird along water meadows while reed bunting (BoCC4 Amber List) has declined seriously.

Donacia bicolora is a metallic green leaf beetle that is dependent on bur reed (*Sparganium erectum*). It is estimated to have declined by 90% in recent years and was selected as a BAP (Biological Action Plan) species in 2007. The research turned up a few more sites for it in England so that its status now is Nationally Notable rather than Red Data Book (RDB), however, the research did identify the colony on the Frome at Wool as being one of the largest in Britain. It's aquatic larvae breathe by piercing air pocket tissues in the underwater roots of bur reed so it may be vulnerable to low dissolved oxygen in water, to pollutant chemicals in the water or silting of the roots by particles in the water all of which is possible if less than the highest quality treatment plant is built to extend the present Wool plant that is at present a full capacity.

Many of the invertebrates that occur on the water meadows are dependent on the habitat being maintained by grazing (currently by sheep) and particularly as organic grazing and if here there is an increase in dogs being walked, many inevitably off-lead, sheep grazing may not be possible and bullock grazing substituted which will have implications for both the fauna and flora.

If the long term a Wool bypass has to be built some options would be for it to run along the river valley or across it either of which scenario could well alter the hydrology and harm conditions for wild life.

Woodland.

Location	Status	Harmful activity
Ancient Deciduous Woodland (inc. Coniferised)	Planning should not result in loss. (NPPF) Ancient Woodland Register Dorset,	Disturbance to birds in nesting season. Enrichment from dog faeces Opening up
Biodiversity	As above	

Many of the woods in Wool parish are either ancient woodland or are ancient woodland that has been coniferised. These woods covering about 9% of Wool are a historic remnant of Wool's past as they supplied the timber for house building and the hurdles for sheep farming on the grasslands that formerly covered the area to the south of Wool and on the heaths to the north as well as a wide variety of other timber products. About 6% of the 750 insects recorded in Wool Woodlands are Nationally Rare or Notable. It is not possible to recreate ancient woodland and there is a planning presumption against damage to such sites including coniferised examples. Ancient woodland is a very precious wildlife resource.

Coombe Wood and North Wood that are proposed as a Suitable Accessible Natural Greenspace (SANG) are identified as Ancient Woodland in the Ancient Woodland Register for Dorset. Ancient woods should not be subject to damage or loss. Although parts of these woods are coniferised Ancient Woodland they appear very suitable for reversion to semi-natural ancient woodland by removal of the conifers. Although damaged by forestry operations it is an extremely rich site and part of the suite of sites that make the Wool area so rich in biodiversity. Kestrels and Buzzards nest in these woods. It is already well used for dog walking and there is enrichment due to dog owners not clearing up their dog's faeces. The long central ride has some flora suggesting enrichment in the past such as nitrogen promoting nettles and phosphates promoting thistles this would increase if the area became a SANG and there was a 60-70% increase in the dog population. Nettle and other nutrient demanding plants can colonise and squeeze out the typical flora and then be difficult to eradicate. The entrance to the wood is abused by fly tippers leaving garden refuse that has led to the establishment of some non-native garden plants as well as piles of soil, weeds and turves.

The wood is on a sand and gravel cap over chalk and this has probably contributed to its richness with both acidic and basic soil preferring plants. The acidity of some of the soils may have led to the historic retention this area as woodland as often ancient woods were on the poorer soils in a parish.

The suggestion that the wood has expansive views suggests opening up the wood or lack of knowledge of the wood as the main ride and most of the others are enclosed, opening up is not an option compatible with retaining its historic woodland character. Some people do not like to visit enclosed areas on their own but this is not a reason to damage the woods. These woods are not suitable for a SANG.

Experience with Blindman's Wood on the BTA has demonstrated that coniferised ancient woodland retains much of its pre-coniferisation wildlife and can be restored back to deciduous woodland with a characteristic fauna and flora quite quickly whereas new plantations can take hundreds of years to colonise. Opening up woodland can however change the microclimate that would harm lichens.

Other woods such as Cole Wood are also already used for recreation particularly dog walking. This may cause disturbance particularly during the bird nesting season and to the localised enrichment referred to above. It is quite possible that even if a SANG is provided if people need to go by car they could just as easily go to one of the other woods or to the Frome riverbank.

Road Verges

Location	Status	Harmful activity
Verge Burton Cross to New Buildings	Conservation Verge (DWT)	Mowing "Tidying"
Biodiversity		Mowing, "Tidying", Pollution by Car fumes & dust
Pollenators		Mowing "Tidying"
Adjacent hedges & trees	Birds of Conservation Concern Hedgerow Regulations.	Disturbance "Tidying"

Verges are a very undervalued wildlife resource in Dorset (and nationally) those in Wool having 5% of the nearly 200 insects recorded being Nationally Notable and although a very small proportion have a modified mowing regime to support uncommon plants the generality are subject to not only mowing regimes that are dictated by economic pressures rather than enhancement but are compacted by vehicles, dug up for service installation, polluted by cars and many other things adverse to wildlife.

At Burton Cross roundabout Corky-fruited Water Dropwort (*Oenanthe pimpinelloides*) occurs at the roundabout and is maybe the reason for the designated verge running south from the roundabout.

Mown verges close to the road of the roundabout at Burton Cross have been recorded as supporting only 55% of the insects of taller uncut vegetation further from the road. This may be due to a greater plant diversity but pollution and dust especially tyre rubber from cars may play a part. Mowing certainly reduces the suitability of vegetation for many species whose larvae develop in stems and seeds. Mowing removes flowers and buds and so decreases the resource available to pollinators.

There are considerable lengths of road verge that could be affected by increased housing. The urge to “tidy up” verges by mowing has a harmful effect on general biodiversity and pollinators in particular. Mitigating schemes might be devised to overcome this but would need long-term commitment and financing.

Adjacent to roads are hedges many with trees that are important to wildlife. Hedges are important for many birds for nesting and additionally support the insects on which the birds depend for feeding their young. Tidy hedges do not always suit birds as well as untidy edges and round housing there will be increased disturbance and predation by cats. The pre-enclosure hedges around Wool are particularly diverse. These can be protected under the Hedgerow Regulations.

Increased traffic will lead to more wildlife being killed on the roads; this is already causing depletion of some species such as hedgehogs and less obviously frogs and toads as they seek breeding ponds in the spring.

Gardens

Location	Status	Harmful activity
Pollinators		Housing in large gardens

The consultation document includes the possibility that a proportion of new housing might be made up by development in large gardens and some of this has already occurred in Wool in recent years. Wool already has, however, a higher density of housing than in some other areas of Purbeck.

Gardens are important for wildlife especially for insects that pollinate plants. There has been considerable concern about a decline in pollinators in the countryside. Many pollinators are

important for agricultural and fruit crops but because these may have a relatively brief flowering period and pollinators need a continuous supply of pollen and nectar plants to provide these in the times when crops are not available are essential. This is where gardens can be very important (potentially along with road verges). Many of the plants cultivated for their decorative appeal in gardens are important by providing pollen and nectar.

Conclusions.

There are two major aspects that need thorough consideration:

1. Under the Natural Environment and Rural Communities Act of 2006 a duty is placed on all public authorities in England and Wales to have regard, in the exercise of their functions, the purpose of conserving biodiversity. The National Planning Policy Framework makes it clear that pursuing sustainable development includes moving from a net loss of biodiversity to achieving net gains for nature. Not only the housing but the proposed SANG will cause losses

A 10 km ordnance survey square to the east of Wool is known to be the richest botanical area in Britain (Botanical Society of the British Isles). There is no equivalent survey for invertebrates but Wool has a greater richness of beetles than any 10 km² in Somerset (the nearest area for which data is available). Wool has a very high biodiversity that needs to be maintained and supported. **As it stands this proposal would result in a considerable loss of biodiversity.**

2. There are serious existing problems with nutrient levels particularly nitrogen in Poole Harbour and in the River Frome SSSIs. There are EU limits on levels of pollutants and there is a presumption that in preparing plans to meet development needs pollution should be minimal along with its adverse effects on the local and natural environment.

As there is already a clearly identified problem that needs solving before any increase is considered.

There should be an Environmental Impact Statement fully assessing this proposal on the grounds that there are changes to the degree of water pollution and changes to biodiversity.

With such a high biodiversity the proposal that Purbeck is made a National Park should be pursued. The current AONB failing to include the “Wessex” heaths is a historic error that should be corrected by this.

This proposal may or may not produce thriving communities but they will not (and cannot) be in balance with the natural environment.

More detail can be provided if required.

Dr.A.C.Warne,
Ecologist and Entomologist,
19 Dorchester Road,
Frampton.
Dorchester. Dorset
DT2 9ND

Appendix

Some Documents Consulted:

RSPB	Birds of Conservation Concern 4. (BoCC4)
Natural England	SSSI Citation for the River Frome. SSSI Citation for Poole Harbour Condition Monitoring for both the above
Purbeck D.C,	Reviewing the Plan for Purbeck’s Future Strategic Housing Land Availability Assessment (SHLAA) 2016
Dorset CC & others	Nitrogen Reduction in Poole Harbour Supplementary Planning Document Draft Oct-Nov 2015
Purbeck D.C.	Council Meeting 14-7-15 Draft Nitrogen Reduction in Poole Harbour Supplementary Planning Document for Consultation
UK Government	Planning Practice Guidance Natural Environment Biodiversity and Ecosystems
UK Government: Communities & Local Government	National Planning Policy Framework
Palmer R.M.& Warne A.C.	The Natural Environment In Brown A. More Memories of Wool
Mahon A. &	Endangered Wildlife in Dorset

Pearman D. eds	The County Red Data Book Dorset Environmental Records Centre.
Dorset Biodiversity Partnership	Dorset Biodiversity Strategy

Comment

Consultee	Mr Ralph Watts (1184929)
Email Address	[REDACTED]
Address	Unknown Unknown Unknown
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Ralph Watts (1184929)
Comment ID	PLPP535
Response Date	03/12/18 19:53
Consultation Point	Arrangements for commenting on the Presubmission Purbeck Local Plan timings and next steps (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	V1
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)

The Council have adopted a process to consult widely on alternative strategies to allocate the quantity of new housing which it is required by Central Government to plan for. It has engaged with communities both through outreach sessions in the main settlements in the District, through a telephone survey,

and through a questionnaire distributed to residents, business, and interested parties throughout the District. The Council has also engaged with the Town and Parish Councils in the District. The results of this engagement have been analysed in detail to determine the strategy which gained the largest degree of support. At the same time, the report of this analysis noted that "Residents that live near to the proposed developments are less likely to support the options that affect them." and that "each of the Parish Councils opposes the options in their areas". The approach taken has been democratic, and the result appears fair in terms of the distribution of new homes across the District. Achieving the balance required is always going to be difficult, and those people who live near the allocated sites will be most affected.

In addition to the above, the Council has taken great care through the Sustainability Assessment and the Green Belt Study to ensure that the option selected through the consultation is sustainable, making best use of existing infrastructure, and takes into account the effect on the environment and on the Green Belt, as set out in detail in the relevant supporting documentation.

Comment

Consultee	Mr Ralph Watts (1184929)
Email Address	████████████████████
Address	Unknown Unknown Unknown
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Ralph Watts (1184929)
Comment ID	PLPP537
Response Date	03/12/18 20:02
Consultation Point	Policies List (View)
Status	Processed
Submission Type	Web
Version	0.1

Are you responding on behalf of a group? No

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

Which policy / paragraph number / policies map does your comment relate to? H8

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

The Small Sites Policy brings benefits in terms of allowing smaller local builders the opportunity to participate in the development of new homes, in providing a component of the new homes provision on a smaller scale rather than through large developments of houses that all look the same, bringing more diversity into the character of our settlements, and also in enabling development to take place in smaller steps. The policy gained a reasonable amount of support as shown in the results of the New

Homes for Purbeck Options Consultation. It will be important that the size of small sites which might be allowed in the different settlements in the District is scaled to suit each settlement. In the Green Belt this policy is likely to have only very limited application due to constraints in the NPPF.

Comment

Consultee	Mr Ralph Watts (1184929)
Email Address	[REDACTED]
Address	Unknown Unknown Unknown
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Ralph Watts (1184929)
Comment ID	PLPP539
Response Date	03/12/18 20:09
Consultation Point	Policies List (View)
Status	Processed
Submission Type	Web
Version	0.1

Are you responding on behalf of a group? No

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

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

The addition of a Housing Mix policy is welcome. It is vital to ensure that new developments are made up of a mix of house sizes and styles, including provision for the elderly. The District has a high proportion of people in the over 60 age group, and over the next 20 to 30 years the provision of suitable housing will be important, including single storey homes and special purpose built homes for the elderly.

The addition of an allocation of self-build plots is also of value in providing opportunities for small local builders, and also greater diversity of style and construction in the homes that are built.

Comment

Consultee	Mr Ralph Watts (1184929)
Email Address	████████████████████
Address	Unknown Unknown Unknown
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Ralph Watts (1184929)
Comment ID	PLPP540
Response Date	03/12/18 20:15
Consultation Point	Policies List (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No

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

Which policy / paragraph number / policies map does your comment relate to?	H11
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)

The addition of policy H11 to add greater definition to the requirements for affordable homes is overdue. In particular, the inclusion of a relatively high proportion of affordable rented housing, and also social rented housing is important to ensure that the benefit of providing affordable housing is secured into the future, rather than being lost once the homes are subsequently sold on the open market.

Comment

Consultee	Mr Ralph Watts (1184929)
Email Address	██
Address	Unknown Unknown Unknown
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Ralph Watts (1184929)
Comment ID	PLPP547
Response Date	03/12/18 20:21
Consultation Point	Policies List (View)
Status	Processed
Submission Type	Web
Version	0.1

Are you responding on behalf of a group? No

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

Which policy / paragraph number / policies map does your comment relate to? H12

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)

There is a clear need for affordable housing within settlements across the District. It makes sense to ensure that Rural Exception Sites are located in and around existing settlements, making the best use of existing infrastructure. It is also important that the size of a Rural Exception Site should match the needs of the community near which it is located.

Comment

Consultee	Mr and Mrs Barrie Weeks (1190868)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr and Mrs Barrie Weeks (1190868)
Comment ID	PLPP217
Response Date	01/12/18 20:22
Consultation Point	Policies List (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	2
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	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?	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)

Whilst agreeing that it is necessary to build new homes we consider 470 very excessive for the area considering the total number of homes in East Burton and Wool combined are currently 1200.

Traffic at the level crossings at East Burton and Wool is already a major issue resulting in long delays and tailbacks. The prospect of more cars as a result of more homes will cause unimaginable extra delays, congestion, stress and pollution.

The lack of jobs in the area will mean new residents commuting to Dorchester or Poole for employment. All extra traffic Poole bound on the A351 will exacerbate the already notoriously high volume traffic on the road (especially during the tourist season) from Swanage through Wareham and Sandford to the Bakers Arms roundabout. Tourists as well as residents in the area already complain bitterly about the congestion and delays.

The Wellbridge Surgery is already very overstretched (it is barely coping with the current number of local residents) and there is no promise to provide extra doctors.

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)

An improved infrastructure needs to be in place to cope with the extra people and traffic. It is vital to have sufficient doctors available as well as sufficient places in the schools for the extra children.

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

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

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

Comment

Agent	Mr. Lachlan Robertson (1188064)
Email Address	[REDACTED]
Company / Organisation	Carter Jonas
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Company / Organisation	Welbeck Land
Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Welbeck Land (Mr. Andrew Hodgson - 1188067)
Comment ID	PLPP379
Response Date	03/12/18 14:53
Consultation Point	Chapter 1: Introduction (View)
Status	Processed
Submission Type	Web
Version	0.1
Files	181203 Collated Purbeck Local Plan Representations
Are you responding on behalf of a group?	No
If yes, how many people do you represent?	1
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	3

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)

see attached documents

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 documents

If you have any supporting documents please upload them here. [181203 Collated Purbeck Local Plan Representations](#)
[181203 Collated Purbeck Local Plan 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)

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

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

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

Yes, see 181203 Collated Purbeck Local Plan Representations

Site boundary 6.9 Ha - 17 Acres



REV	DATE	DESCRIPTION	DRAWN
E	03/12/18	Final	NZ

CLIENT
Welbeck Land LLP II




PROJECT TITLE
 Wareham
 Site north of Carey Road
 DRAWING TITLE
 Illustrative masterplan

DATE	DRAWN	CHECKED	AUTHORISED
03 Dec 2018	NZ	AB	AB
NUMBER	REV.	SCALE	
18.2003/SK.002	E	1:2000 @ A4	



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LEGEND

-  Site boundary 4.4 Ha - 10.87 Acres
-  Allotments area and associated parking - Access from Bere Road
-  Potential new footpath to and from SANG



REV	DATE	DESCRIPTION	DRAWN
A	03/12/18	Final	NZ

CLIENT
Welbeck Land LLP II

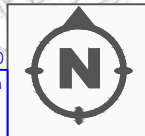
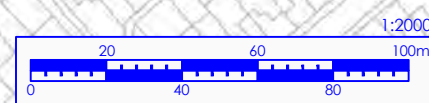
PROJECT TITLE
**Wareham
 Site north of Bere Road**

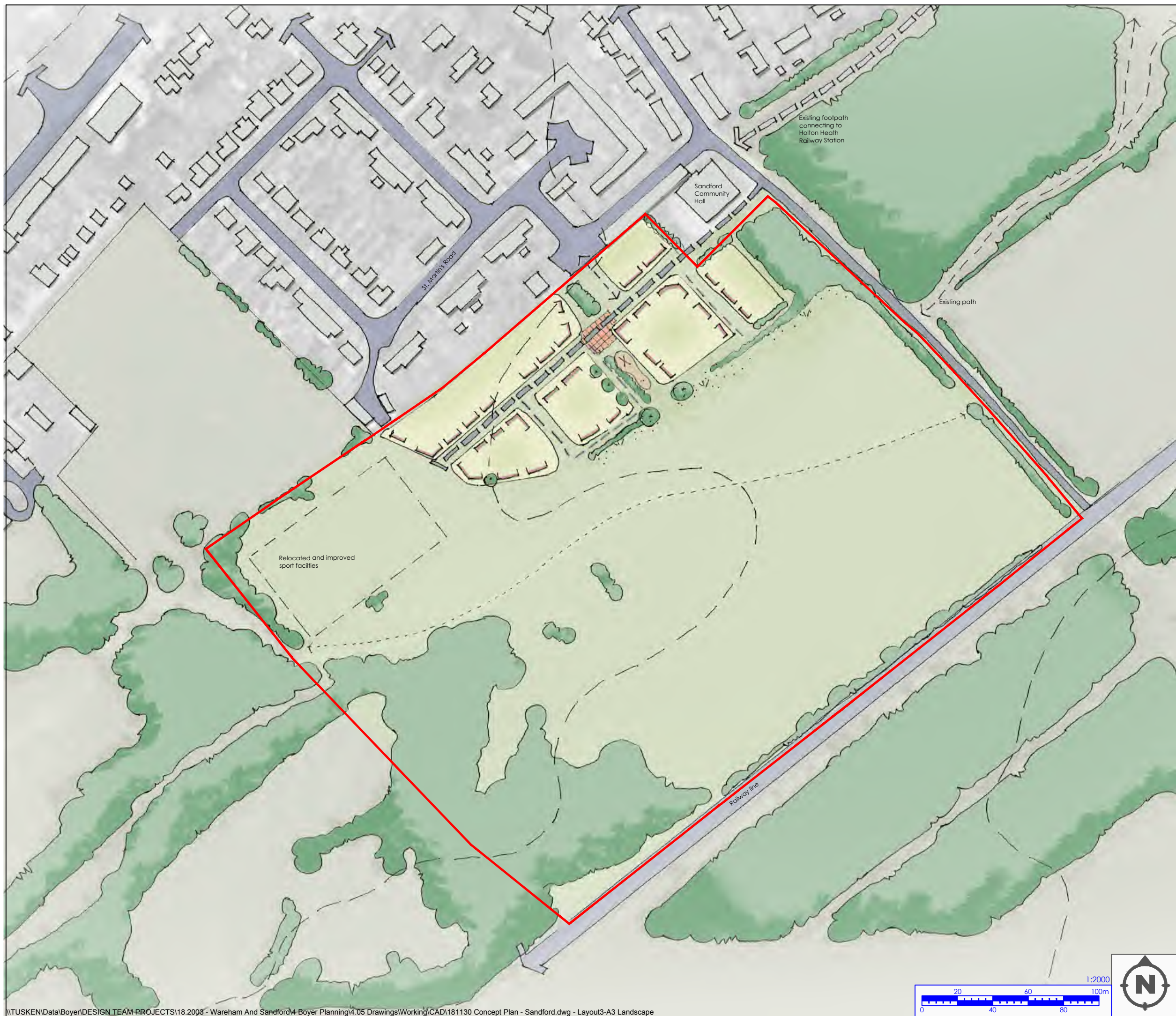
DRAWING TITLE
Illustrative Layout

DATE	DRAWN	CHECKED	AUTHORISED
03 Dec 2018	NZ	AB	AB
NUMBER	REV.	SCALE	
18.2003/SK002	A	1:2000 @ A3	



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LEGEND
 Site boundary 1.06 Ha - 2.61 Acres

REV	DATE	DESCRIPTION	DRAWN
-	03/12/18	Final	NZ

CLIENT
 Welbeck Land LLP II

PROJECT TITLE
 Sandford

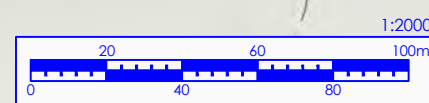
DRAWING TITLE
 Concept diagram
 Blocks and frontages

DATE	DRAWN	CHECKED	AUTHORISED
03 Dec 2018	NZ	LD	LD
NUMBER	REV.	SCALE	
18.2003/SK.003	-	1:2000 @ A3	

Boyer

bristol | cardiff | colchester | london | midlands | wokingham

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**THE PURBECK LOCAL PLAN PRESUBMISSION
CONSULTATION DECEMBER 2018**

REPRESENTATIONS

**ON BEHALF OF
WELBECK LAND**

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AUTHORISED:

SS	Version 1.2	181203 FINAL Purbeck Local Plan Representations

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1.0 INTRODUCTION AND BACKGROUND

Introduction

- 1.1 These representations to the Purbeck Local Plan Pre-submission (PLPP) publication consultation (under regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 as amended) are made on behalf of Welbeck Land ("Welbeck"). Welbeck is promoting the potential for the development of land at North Wareham and Sandford for residential and associated development acting on behalf of Charborough Estate. Part of the land at North Wareham lies to the north of Carey Road and is referred to in the PLP Pre-submission as a potential Green Belt release site.
- 1.2 The sites we are promoting are:
- North Wareham Site 1: Land to the North of Bere Road
 - North Wareham Site 2: Land to the North of Carey Road¹
 - Sandford Site: Land South of Sandford
- 1.3 Welbeck previously made representations to the consultation on the Purbeck District Council published document *New Homes for Purbeck* in March 2018 which included a considerable amount of technical material in support of the allocation of these sites. This information remains relevant to our representations on the PLPP. These are contained within an Addendum 1 to the current representations and we would ask for them to be included in the submission for Examination.
- 1.4 In addition, Welbeck has made representations to the current, parallel consultation on the Wareham Neighbourhood Plan. Due to the clear dependency of both Plans to each other, these representations are also relevant and therefore included as an Addendum 2 for submission to Examination purposes.

Purpose of these Representations

- 1.5 These representations begin in Section 2 by setting out our concerns in respect of the potential for the PLPP to be non-compliant with the legal requirements for the preparation of a Local Plan. Section 3 provides an overview of our concerns in respect to the general content of the Local Plan. Section 4 sets out our specific concerns on the soundness of the Plan by reference to specific paragraphs and policies, in chapter order. Section 4 also includes proposed alterations to the Plan where we are of the view that it is unclear or unsound. Where clarity could be improved we have suggested additional (i.e. minor) modification and where soundness is at issue we have outlined what we believe to be necessary modifications. Section 5 concludes.
- 1.6 Where our representations include reference to the supporting evidence base, for example where we have concerns about the Sustainability Appraisal or technical reports, these are included in the body of this document.

¹ a.k.a. Land to the South of Bere Road and also as Land to the West of Westminster Road Industrial Estate.

2.0 NATIONAL POLICY AND LEGAL COMPLIANCE

National Planning Policy Frameworks: 2012 or 2018

- 2.1 We are aware that following a critical response to the Purbeck Local Plan Partial Review Options, Purbeck District Council (PDC) paused on the process in December 2016. As part of the “pause and reset” required by PDC at their formal meeting in December 2016, PDC sought the agreement of the Secretary of State to start afresh (affirmed by the Government Minister’s letter to PDC of 25th January 2017) and used the independent services of the Planning Advisory Service (PAS) to report on the strength of PDC’s local plan process. In respect of the Evidence Base, PDC was complimented on its comprehensiveness and led PAS to advise that PDC converted the work into a new Local Plan Review.
- 2.2 The PAS quoted extensively from the Inspector’s report of October 2012 into the Purbeck Local Plan Part 1 (PLPP1) where it described the short term nature of the PLPP1 due to the accepted environmental constraints that predicated that Plan. In particular, the Inspector stated:
- “32. The Council will not be able to rely on these reasons for delay in three years time [i.e 2015]. This is a short term expedient approach and because the District will continue to be under pressure for additional housing (a need that is likely to increase) it is imperative that the early review is undertaken. If there was any evidence that this could not be achieved then LP1 would not be sound.”*
- 2.4 The Council’s intention to submit the Local Plan in “February / March 2019” as shown on page seven of the PLPP is noted. Given also, that there is no currently sound Development Plan for the area and that the underlying intention of the new Purbeck Local Plan is to provide for the nationally derived housing requirement under the Government’s Standard Methodology published in November 2017, we do not refer to the transitional arrangements of paragraph 214 of the NPPF 2018. A Plan derived from the most recent up-to-date national policy would provide a firmer strategic policy base for the future development of the area.²

Legal Compliance

- 2.5 Subject to one query which we set out below, Welbeck does not have any objections to the Plan in respect of its legal compliance requirements.
- 2.6 Our query is in regard to the Council’s obligations to prepare a Sustainability Appraisal of reasonable options, to prepare a report on the consultations received and to demonstrate that the Council have taken into account the representations made, under the relevant regulations.³ Welbeck has previously submitted representations which have raised important issues regarding the potential options for development in the area and the likely soundness of the Plan but no commentary has been published to indicate that our specific concerns have been taken into account. These matters are necessarily repeated in these current representations and we will seek evidence that they have been considered in detail during the remaining procedures of the Plan to avoid a legal compliance issue arising.

² Also, for the same reason that the PLPP1 is out-of-date we believe that there is some doubt that any Neighbourhood Plan which is under development now could be deemed to comply with its basic conditions as it has no clear strategic guidance. Nevertheless, if this analysis is incorrect, we have shown (Addendum 2) that the Wareham Neighbourhood Plan, currently underway as a parallel consultation with the Local Plan would not be compliant with the strategic policies of the PLPP1 in any case.

³ Regulation 18 (Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012

3.0 REPRESENTATIONS

General Comments

- 3.1 Purbeck District Council adopted the *Purbeck Local Plan Part 1 (PLPP1)* in 2012 with the clear understanding, expressed specifically by the Inspector during its Examination, that it could only ever be an interim document for dealing with the housing requirements of the District. Its adoption helped to set out policies for the protection of the unique assets of the area whilst setting out a timetable for providing policies which increases the amount of housing that needs to be delivered. The *Purbeck Local Plan Partial Review (Issues and Options Consultation)* published in 2015 sought to address this issue. However, Purbeck chose to replace the Plan in its entirety in the light of new emerging Government National Policy and further evidence gathering, including an additional housing-only consultation on *New Homes for Purbeck* in March 2018. This resulted in the Purbeck Local Plan Pre-submission document we now comment upon by these representations.
- 3.2 The delay in providing new policies which provide for the housing needs of the area has emphasised and exacerbated the problem of affordability of housing in the District. It is therefore in the interests of all parties, to facilitate the speedy conclusion of the Purbeck Local Plan.
- 3.3 In that context, Welbeck is generally supportive of the Purbeck Local Plan Pre-submission document (PLPP) insofar as it has the intention of providing the stable policy context for developers such as Welbeck Land to help provide the much needed housing in the District and in Wareham in particular.
- 3.4 However, Welbeck has specific and important concerns that the PLPP and its reliance on the Wareham Neighbourhood Plan (for which we have submitted separate representations) will not deliver the required housing at Wareham. The evidence supplied by Purbeck District Council does indicate that there is a case for removing some land from the Green Belt, that which has few environmental constraints, in the North Wareham area which would provide for the expansion of the town, commensurate with Wareham's size and importance to the District. This has not been addressed adequately through policies either within the Neighbourhood Plan or the Local Plan. Moreover, Welbeck is particularly concerned that the Purbeck Local Plan is attempting to contrive a position where this, with no adequate supporting evidence, would result in the loss of a viable and important employment land resource for Wareham and the District as a whole.
- 3.5 We have therefore set out in these representations why these issues may result in an unsound Purbeck Local Plan. However, we have also set out where corrections and proposed additional policies can be made at this stage prior to Examination.

4.0 SPECIFIC REPRESENTATIONS BY PARAGRAPH AND POLICY

Chapter 1: Introduction

Paragraph 3

- 4.1 In anticipation that the Plan will be adopted after the re-organisation of Local Government affecting Purbeck District, we would recommend an additional (i.e. minor) modification. Our recommendation is to include a statement which outlines what process will be followed and over which timescale it is intended to prepare a Review or replacement Local Plan that will cover this part of the new Council's administrative area. This would be in the interests of assuring the makers of Neighbourhood Plans and developers of the strategic allocations of the Plan that the Plan policies can be relied upon for long term planning.

Chapter 2: Vision and Objectives

Vision

- 4.2 The Vision is unsound because it inadequately describes the challenge posed by lack of housing delivery over many years. This includes affordability, as described in the evidence base, and as such the provision of new housing should be stated specifically as the principal aim of the Plan, to ensure conformity with national policy.
- 4.3 Whilst the views of local residents are clearly important, the evidence base does not contain the baseline information that supports a spatial strategy of spreading development across the District. It is reasonable and we support the Vision in locating the majority of housing at less environmentally constrained areas. But the evidence does not support the omission of Wareham as one of those locations. The evidence does support the position that North Wareham, which is physically though not functionally separate from the historic core of Wareham, is a sustainable location for development and less environmentally constrained than other locations. The Vision should therefore be clearer in that respect.
- 4.4 Welbeck supports the Vision in all other respects: and in particular highlight the importance placed by the Vision on building on the strengths in advanced engineering and manufacturing employment: with the caveat that this effort should prioritise locations within sustainable settlements or closely accessible to sustainable transport hubs.

Necessary Modification

- 4.5 In order for the Vision to be fully compliant with national policy – in particular paragraph 59 of the NPPF – it should be amended as follows (inserted words underlined):

The aim of the Purbeck Local Plan is to protect Purbeck's distinctive character whilst improving the quality of life for the local community. The natural and historic assets of the area will be protected, whilst continuing to manage effective recreational access and use.

The Local Plan will meet, in full, the housing and employment needs of the District.

Paragraph 40

- 4.6 It is not clear how the figure of 1,700 new homes residual has been calculated from the evidence base.⁴ As this is the starting point for any spatial strategy. An additional modification to include a simple table at this point would usefully clarify the calculations.

⁴ The evidence document, *Housing Background Paper*, does not contain an obvious analysis leading to this figure.

Paragraph 41

- 4.7 There is no material within the evidence base to justify the options presented in the *New Homes for Purbeck* consultation. The *Sustainability Appraisal (SA)* did not include the potential of Wareham as a strategic location for growth. There is a statement on page 21 of the SA report as follows:

“Different options with regards to settlements and spatial strategy were explored as part of the SA of the New Homes for Purbeck Consultation of January 2018.”

However, this iteration of the SA appears no longer to be available. The result of this omission has been to forestall any proper debate on the merits of this location in comparison with other identified sites for growth.

Policy V1

- 4.8 Welbeck objects to this policy, it is unsound on the grounds that the policy muddles *spatial strategy* with *allocations* and goes straight to the numbers, bypassing the usual analysis of the spatial advantages of particular locations. This renders the policy unjustified and potentially ineffective. In addition, the allocation of numbers to particular locations does not take proper account of the published evidence. In terms of environmental capacity, infrastructure capacity and in terms of measures which define sustainable locations this evidence shows that Wareham, and North Wareham in particular, is a strategic location on a par with, if not better than, Moreton Station, Wool, Lychett Matravers or Upton.

Necessary Modification

- 4.9 In order to correct Policy V1, the spatial strategy should provide a clear indication of which settlements are part of the strategy and there should be a clear strategic policy either within Policy V1 or preferably as a separate policy that provides the strategic allocations at Wareham.
- 4.10 It is not appropriate for a significant strategic policy to depend upon neighbourhood plans to allocate strategic sites essential to the delivery of the Local Plan. Wareham is too important a town within Purbeck (its second largest) for such decisions to be abrogated. This is compounded by the fact that the current Wareham Neighbourhood Plan in progress is incapable of making such allocations as relied upon by this policy. The Neighbourhood Plan itself states that it cannot in law release land from the Green Belt and in consequence cannot allocate the land at North of Carey Road to deal with the housing requirement of the town.

Policy V2

- 4.11 Whilst generally supporting the purpose of this policy, Welbeck is concerned that the identification of the land to be removed from the Green Belt as shown in the policies map does not go far enough to meet the needs of the Plan. The policy is therefore unsound because it is not effective in demonstrating that the necessary quantum of development can be delivered.
- 4.12 The latest *Green Belt Study October 2018* supporting this policy explicitly supports the release of Green Belt at Carey Road, and at Bere Road, following the earlier *Green Belt Review February 2018* assessments.
- 4.13 Purbeck District Council considered the Green Belt of North Wareham in their *Strategic Green Belt Review, January 2018*, and in their *Green Belt Background Paper, February 2018*. These reviews concluded that the strongest performing Green Belt land parcels were located to the south east of the Lytchett Minster; west of Upton; and along the eastern edges of the District. The land parcels in these areas were seen to perform well against the Green Belt criteria. As a result it was concluded that these areas should be avoided when considering any development in the area.
- 4.14 However, there is a recognised need to redraw Green Belt boundaries, where exceptional circumstances

required, or where land should be safeguarded for the future. In considering the North Wareham and Sandford areas of particular interest to Welbeck Land, the Review showed⁵ that land to the north west of North Wareham and to the south of the River Piddle flood plain were ranked the lowest in terms of Green Belt function and accordingly⁶ serve the least purpose.

- 4.15 The land providing the least contribution to the Green Belt included the site at Bere Road (reference SHLAA/0058) and Carey Road (referenced SHLAA/0059) sites at North Wareham.
- 4.16 Those sites have now been considered in more detail in the *Green Belt Study October 2018*. The sites are in close proximity, both sites are largely similar in character, both perform similarly in terms of the effect on Green Belt purposes. Both sites have been assessed as meeting the exceptional circumstances necessary for Green Belt release for housing. However despite the reasoned investigation and the recognised significant housing need in Wareham, SHLAA/0058 has not been proposed for release in the Local Plan.
- 4.17 In early 2018 the Council saw the North Wareham area as being the least constrained in terms of Green Belt function, and drew no difference between these two sites. Welbeck's landscape expert's site inspection shows that there are no real differences between them in terms of Green Belt functions, and that the potential boundary for Bere Road, along the golf course edge, has clear potential for permanence, an opportunity that is discussed in detail in the Council's report. Sensitive design is recognized as a requirement for Bere Road, and this is correct, bearing in mind the character of the residential area alongside. But this is neither a Green Belt issue in itself, nor does it present any difficulty to achieve.
- 4.18 Bere Road is best summed up in the Council's report as: 'the site is not considered as serving a significant function in preserving the character of Wareham'.

Necessary Modification

- 4.19 Regarding Policy V2, therefore, we suggest it should be modified to ensure its effectiveness. Welbeck considers that in order to protect and utilise the strategic value of Wareham as a location for housing growth, and to ensure that an appropriate range of sites are available for strategic allocations by the Local Plan for use during the plan period and beyond, the Bere Road site should also be removed from the Green Belt. This is in accordance with the conclusions of the *October 2018 Green Belt Review*.

Chapter 3: Environment

- 4.20 Welbeck has few specific comments to make on this section of the Plan but we would make the general observation that the variety and extent of protective designations limits the opportunities for growth within the District as a whole. Therefore this makes all the more valuable those locations, such as land adjacent to the west of North Wareham, which can accommodate growth without detriment or significant harm to the assets identified in this section.

Paragraph 85

- 4.21 This paragraph properly identifies the need for mitigation by the use of SANGs in appropriate circumstances. However this paragraph gives no strategic guidance as to how that it to be achieved in relation to the housing requirements of the Plan. Welbeck suggests an additional modification, that the text should be supplemented by a clear indication that the availability of a SANG directly associated with proposed allocations, cumulative impact of small sites and single windfall sites above the relevant scale of development threshold will be essential.

⁵ on map 41, page 110

⁶ on map 42, page 115

Policy E8

- 4.22 An additional modification would be helpful to the clarity of the Plan if the allocations and their SANGs are listed here, drawn from other site specific policies in the Plan.

Chapter 4: Housing**Policy H1**

- 4.23 Paragraph 23 of NPPF 2018 states:

“Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area”

- 4.24 Furthermore, paragraph 65 states (with our emphasis):

“Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations.”

- 4.25 It is therefore incumbent on the Purbeck District Council to determine the housing requirement within the body of the Purbeck Local Plan and not to defer the determination of the housing requirement to some future process.

Necessary Modification

- 4.26 In order for Policy H1 to be in conformity with national policy – in particular at paragraph 65 – the second paragraph of policy H1 should be deleted.

Policy H2

- 4.27 This is essentially the same policy as policy V1. There is no underlying spatial strategy that determines the distribution of housing given in policy H2, nor is it apparent from the published evidence why the number of dwellings promoted at each settlement location conforms to a spatial strategy. There is no explanation as to why it is necessary to include a windfall figure within the figure for Wareham alone and not for other settlements. Also, for reasons expressed in our comments on Policy V1, Welbeck considers that it is not appropriate or practically possible for the required strategic housing supply to be abrogated to the Neighbourhood Plans.

Policy H3

- 4.28 This policy applies a list of criteria with which allocated sites need to comply. The wording is unclear as to whether this list applies only to sites allocated in policies H4 – H8 or whether it is intended to apply to all sites that may be allocated in other, e.g. Neighbourhood, Plans. In particular, it seems clear that the criteria would not apply to sites that might otherwise have been allocated but which may be acceptable development either through windfall or through a *Part 2 Brownfield Land Register*⁷ provision.

⁷ Legislation allows for a local planning authority to identify suitable brownfield sites and allocate them for housing without the need for allocation within a Local Plan.

- 4.29 In addition, Welbeck objects to the lack of a policy for the allocation of land at North Wareham which are important strategic land allocations necessary for the effective delivery of this Local Plan.

Necessary Modification

- 4.30 To ensure the effective delivery of the vision and objectives of the Local Plan, and the Plan's over all soundness, we propose new policies in the last section of this housing chapter.

Policy H8

- 4.31 This policy seeks to provide for the potential of small sites in the remaining parts of the District. In general, we support the principle of such a provision but the maximum limit of 30 dwellings is unsound.
- 4.32 The figure of 30 is not justified by reference to the published evidence base. Moreover, the population of the settlement of Sandford is on a par with the scale of Wool, and in some ways superior in respect of its access to facilities, employment areas and transport links.

Necessary Modification

- 4.33 In order for Policy H8 to be considered fully justified and sound, referring to the evidence base, we would recommend that Sandford's potential to accommodate development at an appropriate scale is recognised. The 30 dwelling limit should be omitted from this policy and Sandford should be added to the settlements with specific allocations. We have proposed a new policy accordingly below.

Policy H11

- 4.34 Welbeck recognises the need to differentiate between greenfield and brownfield sites for the proportion of affordable housing, however where a large proportion of a limited proposed housing supply is obtained from brownfield land sources and small sites, there will be in consequence an overall constraint on the amount of affordable housing that can be delivered. This does have a real rather than theoretical effect and we have set out in our comments on the Wareham Neighbourhood Plan (Addendum 2) the extent to which the stated affordable housing requirement is not being met.

Proposed necessary modifications to the Purbeck Local Plan – Housing

- 4.35 In earlier responses to the emerging Purbeck Local Plan in March 2018, Welbeck provided the Council with two documents prepared by Boyer Architects: a *Development Vision for Sites at North Wareham* and a *Development Vision for Site at Sandford*. These documents describe how development in those locations can be taken forward. Since that time, the client's team have been working on bringing these sites and the associated SANG to a practical level of delivery. We would therefore propose that three new policies, set out below, are included within the plan to enable the delivery of these sites. The relevant Master Plans for each site are included within Addendum 3.
- 4.36 Proposed Policy H8A – North Wareham: Land North of Carey Road

Land as shown on the policies map will help to meet the District's housing needs by providing up to 60 new homes on Land to the North of Carey Road. Along with the requirements relating to all development on the sites allocated for new homes in this plan, housing development will be expected to:

- a. *Ensure that the site is accessible to all traffic from the Carey Road and from Westminster Road.*

- b. *Provide a suitable SANG commensurate with the scale of this allocation near or adjacent to the land.*

Provided that if an applicant considers there are site specific considerations that mean they are unable to provide any of the above, the Council expects applicants to submit a financial viability appraisal with their planning application. The applicant will be expected to fund the independent verification of the submitted viability assessment by a person appointed by the Council.

4.37 Proposed Policy H8B – North Wareham: Land North of Bere Road

Land as shown on the policies map will help to meet the District's housing needs by providing up to 95 new homes on Land to the north of Bere Road. Along with the requirements relating to all development on the sites allocated for new homes in this plan, housing development will be expected to:

- a. *Ensure that the site is accessible to all traffic from Bere Road.*
- b. *Provide a suitable SANG commensurate with the scale of this allocation near or adjacent to the land.*
- c. *Ensure no direct pedestrian access link to the public footpath leading to Wareham Forest.*
- d. *Provide a suitable alternative allotment facility within reasonable walking distance.*

Provided that if an applicant considers there are site specific considerations that mean they are unable to provide any of the above, the Council expects applicants to submit a financial viability appraisal with their planning application. The applicant will be expected to fund the independent verification of the submitted viability assessment by a person appointed by the Council.

4.38 Proposed Policy H8C – Sandford: Land to the South of Sandford

Land as shown on the policies map will help to meet the District's housing needs by providing up to 40 new homes on Land to the South of Sandford. Along with the requirements relating to all development on the sites allocated for new homes in this plan, housing development will be expected to:

- a. *Provide a suitable SANG, if required commensurate with the scale of this allocation, near or adjacent to the land.*
- b. *Provide a replacement public playing field facility.*

Provided that if an applicant considers there are site specific considerations that mean they are unable to provide any of the above, the Council expects applicants to submit a financial viability appraisal with their planning application. The applicant will be expected to fund the independent verification of the submitted viability assessment by a person appointed by the Council.

Chapter 5: Economy

Policy EE1

- 4.39 Policy EE1 is unsound. There is no justification within the published evidence to omit the Westminster Road Industrial Estate from the list of safeguarded employment sites.
- 4.40 Within the currently adopted development plan, *Policy E Employment* set out the basis for a safeguarding policy, the underlying reason for which remains supported by the published evidence for the new Local Plan⁸.

⁸ Workspace Strategy 2016

The only difference between the old and the new plan is that the list of safeguarded sites is almost identical except that the Westminster Road Industrial Estate is omitted.

4.41 The reason for this omission is published within the *Economy Background Paper* where paragraph 71 states:

“Westminster Road, Wareham: On the eastern edge of the town. The site is in single Council ownership (as identified in the SELAA 2016) and is a relatively large site benefitting from road access to the north and south with good accessibility to the local road network. The northern part of the site is partially occupied by the Local Waste Recycling Centre and Electricity Substation. The southern part of the site is comprised of mixed mid-20th century office and light industrial units. The latest SELAA indicates usage of the site is below full occupancy.”

4.42 Welbeck commissioned, and then provided to Purbeck District Council in May 2018, a report by Vail Williams on the future of the Westminster Road Industrial Estate⁹. This was a high-level overview of supply and demand of the employment land and property in the Wareham, Poole and Bournemouth areas. There was specific focus on the occupiers of Westminster Road, Wareham by the undertaking of an interview process to understand the views and opinions of the occupiers of the Estate to establish the viability of the use of this Estate now and in the future. This was supplemented by providing financial appraisals, using several valuation approaches, to show the viability of this employment land in the Wareham area.

4.43 This concluded that the WRIE is seen by occupiers as a key employment area and with owners who wish to occupy the units in the long term. It was established that it is not viable for the site to be purchased and redeveloped for residential use and that the delivery of the site would be difficult due to the fragmented and individual ownerships of the freehold interests.

4.44 Welbeck would therefore strongly contest the view that the site is incapable of providing full employment potential and can be lost to beneficial use. Contrary to the *Economy Background Paper*, the site is not in the ownership of the Council but is occupied by a variety of owner-occupiers and commercial tenants.

4.45 The justification for the deletion of the WRIE from the list of safeguarded sites is provided later in paragraph 72 of the *Economy Background Paper* as:

“Deletion of both the above sites from the overall safeguarded employment land supply in the Purbeck Local Plan pre-submission draft would not significantly impact upon total available employment land available for development in Wareham. Over the short to medium term the sites are likely to continue to provide opportunities for economic development but in the medium to longer term assessments indicate that scope for the introduction of a more flexible approach to future growth and investment, including alternative uses such as residential development, would facilitate the overall improvement in occupation and environmental quality of the sites as well as supporting wider needs for development.”

4.46 This is not supported by the evidence published. The loss of the WRIE would result in a loss of about 35% of the identified safeguarded sites in Wareham. There is no provision for new sites at Wareham. This is a significant loss of employment land at one of the three main towns in Purbeck District and one of the more sustainable locations in the District as evidenced by the town's size, access to facilities, transport links and proximity to the main employment hubs in the area. It is not clear what assessment supports the view that residential development of the site will improve the “occupation” of the site [assumed to mean occupation by employers] or why the environmental quality of the sites needs to be improved or is in any sense a priority over its current employment contribution to the town and the District.

⁹ Report on the long term future of the Westminster Road Industrial Estate dated 15th May 2018

- 4.47 Nevertheless, to ensure that we were not mistaken, Welbeck commissioned an update to the Vail Williams report. Both the original report and its update are included in Addendum 4. This indeed confirms that there remains a healthy employment use of the site and for the future. These reports are attached to these representations in Addendum 4.
- 4.48 Vail Williams state that in contrast to the opinions expressed within the Neighbourhood Plan (and repeated in the Local Plan) new owners are entering the WRIE and investing in its future. There is limited supply of development land close to WRIE and any significant increase in the availability of development land in the future is unlikely. Vail Williams disagrees with the view WRIE is now run-down and in their view is not at the end of its useful life. WRIE has transformed itself over the last 2-3 years as the owners continue to improve the quality of their buildings and the estate's aesthetics.
- 4.49 The sentiment of most of the new owners that were interviewed is that they are there for the long term and see the prospect of redevelopment of WRIE as a threat to their business rather than an opportunity.
- 4.50 The only conclusion that can be drawn is that neither the Neighbourhood Plan nor the Local Plan provides evidence which singles out the Westminster Road Industrial Estate from any other safeguarded employment site which justifies its loss to the employment capacity of the District, and Wareham in particular. We would suggest that the only reason for this proposal is a desire to find candidate land for residential use at any cost. More worryingly, we have detected in our investigations an atmosphere amongst tenants and owners within the WRIE that in the face of a campaign to discredit the value of the WRIE, then the apparent "inevitability" of its conversion to residential use will blight its prospects for long term investment in employment uses. There is a danger that this results in the self-fulfilling prophecy of decline in employment occupation which justifies re-use for housing.

Necessary Modification

- 4.51 This chapter of the Plan can be considered unsound as it does not fulfil, in the face of the evidence, the NPPF 2018 objective of building a strong economy, or the objective of the Plan to promote a prosperous and diverse local economy in the District and at Wareham in particular.
- 4.52 To ensure that Policy EE1 is fully justified, compliant with national policy and sound, we would respectively suggest that the Westminster Road Industrial Estate is returned to the list of safeguarded sites.

Policy EE2

- 4.53 Welbeck supports this policy and in particular the tests it contains for considering alternative uses. It is appropriate that if any safeguarded site is to be lost from employment use, that the proposal is tested for likelihood that it can be retained in employment use throughout the Plan period. If this and the other tests listed in sections a) to c) were applied to the Westminster Road Industrial Estate, we would respectfully suggest that planning permission for alternative uses would be refused.

Chapter 6: Infrastructure

- 4.54 Welbeck has no specific comments on this section, but in general we would re-iterate the point set out in paragraph 4.20-4.22 of these representations that there is a need for a specific policy on the provision of SANGs associated with strategic sites as well as the general need.

Chapter 7: Implementation, Delivery and Monitoring

Policy IM1

- 4.55 This policy is properly directed to keeping the Plan on track over the Plan period and we support its general

intent. However, we would advise that unless there are specific policies for allocating land for the strategic housing needs of Wareham as we have suggested, this policy does not have a mechanism for correcting the situation where non-delivery of housing at Wareham can be addressed. This may occur, for example, if the Wareham Neighbourhood Plan currently under consultation (or its intended successor which is the only means suggested for delivering the housing at Wareham through allocations) is either not made, delayed or otherwise rendered ineffective. Without such a mechanism, the delivery of much needed housing at Wareham has the potential to be seriously delayed.

5.0 CONCLUSIONS

- 5.1 Whilst Welbeck is generally supportive of the intention to speedily deliver the Purbeck Local Plan, we are concerned that in regard to its position on Green Belt, delivery of SANG, housing delivery and loss of previously safeguarded employment land that the Plan may be found to be unsound.
- 5.2 Corrections to the Plan can be made by amendments to its Vision, Housing Policies and Employment Policies which can be made in full accordance with its purpose and its evidence base.
- 5.3 Welbeck is promoting the sites referred to in this submission on behalf of the Charborough Estate, a historic landowner with close ties to the district and one that is in a unique position to provide a significant proportion of the housing development required for Wareham in the most logical locations as independently identified by Purbeck District Council as well as the SANGs land required to accompany the housing. Such comprehensive and integrative development is not achievable by any other party.

6.0 PARTICIPATION AT THE ORAL PART OF THE EXAMINATION

- 6.1 Welbeck would confirm that it wishes to take part in the oral part of the Local Plan Examination. This is to be able to inform the Inspector of the work undertaken to date on our sites, and to provide confidence in their delivery. Welbeck will also be able to answer specific questions relating to the sites, their constraints and the proposals for its development.

**THE PURBECK LOCAL PLAN REVIEW
NEW HOMES FOR PURBECK CONSULTATION
MARCH 2018**

NORTH WAREHAM AND SANDFORD

COMMENTARY AND REPRESENTATIONS

**ON BEHALF OF
WELBECK LAND**

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1.0 INTRODUCTION AND BACKGROUND

Introduction

1.1 These representations are made on behalf of Welbeck Land who have recently formed an agreement with the landowner, Charborough Estate, to engage in the Purbeck Local Plan-making process to promote the potential for the development of land at North Wareham and Sandford for residential and associated development. Part of the land owned by the Estate at North Wareham and Sandford is included within the *New Homes for Purbeck* consultation document as published by Purbeck District Council (PDC). Our representations address the general matters raised, provide further information in support of the proposed allocations and provide further information in support of possible additions to this allocations in pursuit of a sound Local Plan.

1.2 The sites we are promoting are:

- North Wareham Site 1: Land to the North of Bere Road
- North Wareham Site 2: Land to the South of Bere Road
- Sandford Site: Land South of Sandford

1.3 In addition, we draw attention to the wider “arc” of potential sites to the north-west of North Wareham for consideration.

1.4 The Council will be aware of past representations that have been made to the Local Plan through the landowner’s previous representatives, Pro-Vision, during the period of the earlier Local Plan process. These remain the views of the landowner and we would ask for them to be taken into account; insofar as they are relevant to the revised Local Plan process now underway.

1.5 Welbeck Land works in partnership with landowners and seeks to engage with local communities to bring forward residential land to meet housing need. It has formed a team, project managed by Carter Jonas, of specialists in Master Planning, Transport, Ecology, Historic Assets, Landscape, Infrastructure and Design to ensure that the best possible attention is paid to the provision of housing that both protects the environment and meets the needs of the area.

Background

1.6 Purbeck District Council (PDC) has had a pro-active approach to providing its community with up-to-date Local Plans in their various forms despite the obvious environmental constraints that are both an asset to the area and a challenge when providing for homes, tourism and local business needs. In the spirit of dealing with a

practical need for housing whilst recognising the significant constraints and issues facing the District, the current Purbeck Local Plan Part 1 was adopted under the clear understanding that there would be an early review starting in 2013 and new housing allocations in place by this point. Notwithstanding that there will always be a need to keep abreast of new approaches to environmental protection and new government policy on providing housing, there is an urgency in providing for the new housing to meet past, current and future requirements.

- 1.7 There are key milestones emerging this year, not least of which will be revisions to the National Planning Policy Framework, now published in consultation draft and due to be in place in the Summer of 2018. This includes the anticipated adoption of a national standard methodology for assessing the housing needs of individual Districts. We note that PDC's timetable allows for the pre-Submission consultation to take place in November 2018, thereby allowing PDC to put itself in a position where it can ensure that the Plan will be compliant with the new NPPF. Given the intended adoption date is September 2019, we are of the view that a sound Plan will only become so if it has put in place all of the necessary strategic allocations to cover the period from the original start of the Review in 2013 up to the end of the new Plan period in 2033.

Purpose of these Representations.

- 1.8 These representations begin in Section 2 by suggesting how the new Local Plan can be found "sound", setting out how we see national policy both current and emerging affecting the content of the Local Plan. Section 3 provides our response to selected consultation questions made by PDC and relevant to our client's interests. Section 4 discusses PDC's proposed approach to the allocation of land at North Wareham for housing. Section 5 discusses PDC's proposed allocation of land at Sandford for housing. Section 6 is a detailed response to consultation question 19 on the possible alternatives that PDC may wish to consider given that we believe that there is a risk that the approach suggested in the; *New Homes for Purbeck* consultation document would not result in a sound Local Plan.
- 1.9 Throughout these representations, we provide detailed technical guidance on each of the sites under consideration to provide a strong foundation for the new policies of the Local Plan that will be written during 2018. These technical investigations are on-going and Welbeck Land will be pleased to provide this information throughout the plan-making process to supplement PDC's own evidence base.

2.0 RELEVANT NATIONAL POLICY

Legislative Background to the Purbeck Local Plan Review

- 2.1 We are aware that following a critical response to the Purbeck Local Plan Partial Review Options, Purbeck District Council (PDC) paused on the process in December 2016. As part of the “pause and reset” required by PDC at their formal meeting in December 2016, PDC sought the agreement of the Secretary of State to start afresh (affirmed by the Government Minister’s letter to PDC of 25th January 2017) and used the independent services of the Planning Advisory Service (PAS) to report on the strength of PDC’s local plan process. In respect of the Evidence Base, PDC was complimented on its comprehensiveness and led PAS to advise that PDC converts the work into a new Local Plan Review.
- 2.2 From the perspective of the need for housing in Purbeck, this has had a negative impact as it has delayed the production of the Local Plan from the timetable originally envisaged. PDC’s Local Development Scheme (LDS) published in early 2017 envisaged the publication of the Draft Local Plan by February 2018 but a subsequent Local Development Scheme of January 2018 altered the programme such that the Draft would be published towards the end of 2018. In the meantime further evidence studies have been prepared and published which are relevant to the production of a revised Local Plan. It is in that context that a further consultation which is recorded in the LDS as a “*consultation to inform the DPD*” is now underway.
- 2.3 The current consultation refers only to the needs of housing and as such we assume, though it is unstated in the published consultation document, that this is only one part of a Regulation 18 Consultation under the relevant Planning Act.

National Policy Background to the Purbeck Local Plan Review

- 2.4 National planning policy is changing and we have the benefit at the time of writing of a draft National Planning Policy Framework 2018 out for consultation. However, the essential elements of that NPPF in regard to the process of preparing Local Plans remains, and is likely to remain, unchanged. It remains essential that for a Plan to be sound, it must be positively prepared to (at a minimum) meet Purbeck District’s objectively assessed housing needs. It must also be justified taking into account reasonable alternatives and it must be deliverable and consistent with national policy.
- 2.5 It is relevant to note that Neighbourhood Plans are tested differently and must meet the “basic conditions”; including the key conditions of having had regard to national policies, of contributing to sustainable development and of being in general conformity with given strategic policies.
- 2.6 It is also important to note that the NPPF currently states and will continue to state that the strategic plan should; “*as a minimum, plan for and allocate sufficient sites to deliver the strategic priorities of the area*”. This includes the necessary land to deliver significant housing.

- 2.7 The consultation draft of the NPPF 2018 includes a clearer requirement for Councils and developers to deliver significant quantities of housing. Councils are expected to use the “standard methodology” for determining the minimum requirement for a specific District and at the time of writing, further detail of this methodology is awaited. However, as a principle, we would welcome PDC publishing its local housing need assessment to affirm, or increase as appropriate, the quantities included within the Local Plan when it is published at the next stage in the process.
- 2.8 The consultation draft NPPF 2018 also makes it clear that there can be less affordable housing delivered from brownfield sites than from greenfield. It states that; *“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.”* This is an important national policy consideration in a context where local affordable housing needs are critical as in the case of Purbeck District.
- 2.9 The next section responds directly to the, *New Homes for Purbeck* consultation in the light of the above and in regard to the potential we have available to assist PDC in delivering its Local Plan.

3.0 RESPONSE TO PDC CONSULTATION QUESTIONS

General Comments

3.1 We provide here, our response to those questions which we believe are relevant our client's specific interests, i.e. Q2, Q3, Q4 (Sandford), Q5 (Westminster), Q6 (North Wareham), Q7 (delivery through NP) and Q19 (alternatives).

Q2: How important is it that new homes in Purbeck take account of PDCs stated principles?

3.2 PDC's stated principles as expressed both in the consultation leaflet and in the existing development plan for the area are all well known, nationally established, planning principles. As such, the planning of new homes should take account of all these principles at the highest level specified in the question; i.e. "Very Important". We are of the view that engaging positively with the landowner and developer of the most significant landholding available for residential use, with the least constraints and at the most sustainable settlement in the District, will deliver a sound Local Plan.

3.3 There are significant benefits to PDC engaging with a single landowner who is in partnership with an experienced developer and strong delivery team. Our response to each of the principles are as follows.

3.4 **Housing.** The consultation leaflet identifies meeting the housing needs of the area as a main principle; which we would support. The extent to which the required housing (including affordable housing) is capable of being delivered will be a significant issue for the Local Plan to tackle in much the same way as it was within the original Part 1 Purbeck Local Plan. The Inspector made it clear then that the Plan was an interim measure until such times as fuller investigations into the capacity of the area to deliver sufficient housing was conducted. We are of the view that there is capacity within the Wareham area and in the Sandford area to deliver a significant quantum of development to meet the past unmet need, currently identified needs and the needs into the future beyond the plan period.

3.5 **Employment.** Whilst the consultation leaflet is primarily aimed at discussing housing, we agree that determining the need based on an understanding of the employment needs of the District is very important. However, as we discuss below, we would counsel against unnecessarily constraining the amount of employment land as a means of lowering the demand for housing or otherwise losing existing important employment land resources that continue to serve a clear function in the economic health of an area.

3.6 **Local Heritage and History.** The abundance of nationally recognised assets in the District, particularly in the historic parts of Wareham, must be protected both due to their intrinsic value but also for their importance to the local tourist economy. We would judge this again to be a very important principle but one that can be maintained without impacting on the delivery of housing in this part of the District. This is set out in detail in later sections.

- 3.7 **Local Environment, Landscape and Flooding.** The water environment defines Wareham and has shaped its development since the history of the area has been recorded. The result is a pattern of development which is uniquely shaped and will continue to be so. The assessment of potential development land for housing is driven by the landscape and the water environment and therefore we have included a detailed assessment in respect of the relevant land in the sections below. We are confident that in this area, there is sufficient capacity for the full housing needs of the Plan and beyond without impacting on this principle.
- 3.8 More specifically, we have attached a *Landscape, Visual and Green Belt Assessment of Potential Development Parcels* (LV&GBA) undertaken by the landscape consultancy, SLR. Whilst we refer to this assessment in later sections relating to specific sites, in general, the document concludes that landscape matters are clearly an important consideration around Wareham. Nevertheless, there are also many opportunities for development in the North Wareham area. Whilst our landscape analysis supports PDC identified sites as set out in the consultation nevertheless we believe that there are further opportunities around the north western edge of the town that could provide flexibility for PDC and potentially create a coordinated scheme which could provide benefits of scale and SANGS without creating landscape or visual harm.
- 3.9 **Transport:** In summary we consider this to be a very important principle on the basis that the North Wareham area is well served by road transport links, public transport services and rail services. As such it is an obvious location for further sustainable development and full advantage of the existing transport facilities, with judicious improvements where necessary, should be taken. In addition, we have provided some additional information about individual sites in Sections 4 and 5 below.
- 3.10 More specifically, Wareham benefits from having high frequency rail services to a number of nearby settlements and key commuter towns in the county and across the south of England. Located on the Weymouth to London Line, South Western Railway operate two trains per hour to London Waterloo, which also stops at Bournemouth, Southampton and Portsmouth. The railway station is ideally located for existing residents and new residents from the proposed North Wareham site, to be able to access these services by foot/cycle or existing bus services.
- 3.11 Existing buses serving Wareham currently provide an hourly service seven days per week, with the main service being the number 40 service between Swanage and Poole, which also serves Wareham Railway Station and the existing residential area to the north via Bere Road and Northmoor Way.
- 3.12 Following our review of the existing timetable, there is scope to increase the frequency of the service, particularly between the two commuter peak periods as the service provides an important connection to larger retail towns of Swanage and Poole.
- 3.13 The X53 bus operates between Exeter and Poole roughly every two hours, Monday to Saturday, between 08:00 and 18:00. A further five services are run on Sunday along this route.

- 3.14 Employment areas are located along Westminster Road, and on Sandford Lane to the immediate east of the Railway Station. The Westminster Road Industrial Estate (WRIE) is situated approximately 550m from the centre of the North Wareham Site. The Town Centre also contains further employment opportunities in addition to retail, recreation and healthcare facilities (including Wareham Hospital).
- 3.15 Continuous pedestrian footways are provided throughout the majority of Wareham, with permeable footpath connections through existing green spaces within residential areas. The North Wareham site would be able to provide connections to existing pedestrian/cycle routes and where required, provide improvements to existing facilities.
- 3.16 Pedestrian access to the town centre is possible via existing pedestrian footways along Bere Road and Northmoor Way and footbridge over the railway line. The centre of Wareham is then accessed via Northport and the B3075, North Street.
- 3.17 An existing shared footway/cycleway runs along the A351, providing connections to Sandford. Cycling is generally accepted as a reasonable mode of travel for journeys up to 5km. All local facilities within Wareham lie within 5km of the centre of the site. Furthermore, the largely off-road cycle route along the A351 has no significant gradients, thus further increasing the attractiveness of cycling. It is concluded that cycling offers a realistic opportunity to undertake local journeys to key facilities in Sandford, along the A351 and in Wareham.
- 3.18 In view of the above, it is considered that the existing pedestrian/cycle and public transport facilities within the town are of a good standard and would be able to safely accommodate future development and provide suitable alternatives to travelling by car. Upgrades to footpaths/cyclepaths and enhancements to existing bus services would also help to reduce reliance on car journeys for existing and new residents, whilst also being in line with Local Policy aims to promote Smarter Travel Choices.
- 3.19 **Community Facilities and Affordable Housing:** We also believe that the provision of appropriate additional community facilities is a very important principle, but moreover that the Plan will want to ensure that the most efficient method for doing so is used. In that respect, the new housing should be provided on allocated sites of sufficient size to allow for economies of scale to be employed thus maximising the potential support that can be given to community facilities and to provide for a substantial amount as affordable housing. Equally, allocations of sites for residential development should avoid unnecessary costs and ensure that developments are viable to avoid either the loss of an opportunity to support community facilities well or reduce the potential for affordable housing.
- 3.20 **Ecology.** The principle that should be adopted is to retain any natural habitats of significant ecological interest identified at the sites wherever possible. We are of the view that this is achievable straightforwardly for the sites identified and as we have described below. For example, the existing Site of Nature Conservation Importance at Sandford can be retained and buffered in accordance with the designation currently afforded to it and if necessary enhanced if our investigations record that there are items recorded as being in poor

condition. The site and wider landholdings of the Estate provide the opportunity to achieve significant ecological enhancements as part of any development proposed.

- 3.21 Whilst further detailed ecological investigations will be conducted and presented in supporting information prior to the publication of the draft Local Plan, we are confident that we can say at this stage that the Wareham sites are the least constrained area adjacent to the settlements in this area.
- 3.22 **Master Planning.** We have commissioned Master-planners, Boyer, to prepare two documents: A *Development Vision For Site At Sandford* and a *Development Vision for Sites at North Wareham* to assist in PDC's understanding of the potential for residential development and supporting infrastructure in those areas. These are attached and are also described in greater detail within later sections of these representations. In general, our design principles would enhance the immediate areas at North Wareham and Sandford and are sensitive to the local landscape, heritage, ecology and design contexts. These also indicate where appropriate community facilities can be accessed and, where necessary, located on or near the potential development areas.
- 3.23 **Conclusion.** We would contend that all the principles mentioned in the consultation and expanded upon above are to be considered to be "Very Important". Moreover, the resources available to the Estate and their location means that that we are one of the few opportunities in the local area to apply those principles.

Q3: Do you agree or disagree with the proposed new small sites policy?

- 3.24 In principle we would agree with the general intention of the small sites policy, as it will enhance the range and type of housing available and allow for flexibility where the local community sees a particular need in their area. However, we would suggest that the policy is not restricted to an upper limit of housing given that other factors such as the size of the settlement and the particular constraints that apply to the identified sites will vary enormously from settlement to settlement.
- 3.25 We have expanded on this point in our response below to the Sandford allocation specifically.

Q4: Do you agree or disagree with the proposal to allocate a site for 30 homes at Sandford?

- 3.26 In principle we would agree with this proposal but we are of the view, following a detailed analysis of the area concerned, that there is an opportunity to provide a greater number of units without compromising the principles of the Plan. In particular, our analysis of the important environmental constraints suggests that more efficient use of the land would allow a greater number to come forward.

- 3.27 We would therefore suggest that a constraints led approach is taken to establish the number of units capable of being accommodated and we have provided in the sections below an initial analysis which would inform an appropriate planning policy for the Sandford allocation. The benefit of this approach would be to maximise the opportunities for affordable housing, recreational facilities and linkages to important transport facilities and minimise the environmental impact.
- 3.28 We would also suggest that an allocation policy based on this “constraints led” approach can be supported by reference to our *Landscape, Visual and Green Belt Assessment of Potential Development Parcels (LV&GBA)* document attached.
- 3.29 The development of the land at Sandford (referenced in the LV&GBA Plan L12 attached) is supported. There are few landscape or visual constraints that would prevent a development larger than 30 dwellings on the same or similar site to that proposed by the Council, and this is shown indicatively on the *Development Vision for Site at Sandford* and described in the commentary within Section 5 below

Q5: Do you agree or disagree with the proposal to have less employment land at the Westminster Road Industrial Estate?

- 3.30 We strongly disagree with this proposal which will result in the loss of the Westminster Road Industrial Estate (WRIE) and its replacement with an undeliverable housing allocation.
- 3.31 The WRIE is in active and vibrant use with a variety of commercial operations and is clearly well established as an important part of the industrial floorspace offer for the District and the local area. It is in an effective location on the edge of the settlement where transport links are of good quality. The premises themselves are well presented and of an integrated design which are of their time, but not intrusive. The buildings and their surrounds are well maintained and well used for the designed purpose. There is evidence, from the few sale boards at the time of writing and the active occupancy of businesses from the sites, that there is a healthy market for these premises.
- 3.32 The Council’s own evidence base as published to date states that there is a healthy level of occupancy for commercial premises across the District. In particular, WRIA is cited as the second largest of only three dedicated employment sites in Wareham and is a facility which helps; “*provide the District with a mix of industrial, storage, and office accommodation which act as facilitation grounds for small to medium sized, predominantly local based businesses.*” (PDC Evidence Base as of 28/02/18) Such sites are difficult to establish in modern times and would not be easily replaced. Given the employment needs of a District that will need to grow its employment base to maintain a healthy economy and provide the commensurate housing to suit, losing this resource would impact of the likelihood of making a “sound” Local Plan.
- 3.33 Notwithstanding the inadvisability of losing the WRIE employment resource, there is a further “soundness”

issue raised by the proposed allocation of the WRIE for housing. We would contend that it could not be delivered within the Plan period nor at a cost which would allow the other stated principles of the Plan to be achieved. The difficulty is one of land assembly and value. We have included a plan of the ownerships of the individual plots as known at January 2018 with this submission. Welbeck Land are very experienced in dealing with land assembly matters and in this case, concludes that it would be difficult to engage with every owner and construct a viable consortium and agreement to make the land available as a whole for residential development. In addition, the premises will have a significant value given that they are within a commercially viable area. It would not be advisable to “parcel” the site into individual residential sites as the remaining industrial uses would not be compatible with, nor would they result in, an attractive environment. Any redevelopment would also likely necessitate the need for SANGS which would require a considerable amount of third party land which would further make the scheme unviable.

- 3.34 We note that the WRIE is not included in PDC’s Part 1 Brownfield Land Register as of December 31st 2017 as a site which is suitable, achievable or available for housing.
- 3.35 We note that the recently published consultation document for the revised National Planning Policy Framework encourages the use of underused brownfield land for housing; *“provided this would not undermine key economic sectors”*. In the case of WRIE this is not vacant land and it is an important resource for employment purposes. We also note that the consultation draft NPPF includes a provision; *“where vacant buildings are being reused or redeveloped, any affordable housing contribution due should be reduced by a proportionate amount”* and where the reduction is; *“equivalent to the existing gross floorspace of the existing buildings”*. PDC may wish to consider the adverse impact that this would have on the delivery of affordable housing where a vacated WRIE, proposed for housing results in a lower provision of affordable housing.
- 3.36 Given the numerous reasons for concern stated above it is incumbent on PDC to seek robust evidence that all issues stated above can be adequately mitigated before progressing this proposal further. In the absence of such evidence the proposal should be discounted as undeliverable, unviable and unable to provide sufficient benefits to outweigh the negative impact notably job loss and ecology.
- 3.37 In conclusion, we would offer the view that such a proposed allocation is likely to lead to an unsound Plan and would not be considered to conform with the principle of sustainable development for a Neighbourhood Plan.

Q6: Do you agree or disagree with the proposal to release Green Belt?

- 3.38 We agree that it is necessary to release land from the Green Belt in accordance with the relevant principles contained in the National Planning Policy Framework: also kept within the currently proposed revisions to the NPPF. In particular, we would draw attention to the requirement for Councils to consider the longer term future of the Green Belt in the provision of safeguarded land with defensible boundaries to accommodate the long

term needs of the area beyond the Plan period.

- 3.39 In respect of one particular proposal contained in the consultation leaflet, we would strongly suggest that if PDC intends to rely upon an allocation in a forthcoming Neighbourhood Plan on the Westminster Road Industrial Estate (WRIE) for housing, that it recognises the risk that this may not be delivered. This can be dealt with by releasing further land from the Green Belt and allocating in the Local Plan further land within the North Wareham “arc” now or providing safeguarded land in that area for future use when required.
- 3.40 In respect of the *Green Belt Background Paper* and the *Strategic Green Belt Review* documents prepared by PDC, we would suggest that this supports the release of the Green Belt from the North Wareham and Sandford sites, as the same exceptional circumstances apply to all sites.
- 3.41 As part of this submission, we have attached a; “*Landscape, Visual and Green Belt Assessment of Potential Development Parcels Feb 2018*” study (LV&GBA) prepared by landscape specialists, SLR. We have noted and agree that PDC own Green Belt Review shows that that land to the north west of North Wareham and to the south of the River Piddle flood plain are ranked the lowest in terms of Green Belt function and accordingly serves the least purpose.

Q7: Do you have any comments about the proposal to provide 200 homes at Wareham through the Neighbourhood Plan?

- 3.42 Neighbourhood plans are the appropriate vehicles for the delivery of local policies. But where, as in this case, the Local Plan is identifying the only strategic allocation for Wareham and one of the largest for the District as a whole, then it is necessary for this to be allocated by that Local Plan. This is expressly contained within national planning policy. Wareham is the principal, sustainable settlement within this part of the District and the allocation for housing here is a matter directly relevant to and deliverable by the Local Plan as the relevant strategic document. There are no alternative locations of this significance for a Neighbourhood Plan to deliberate upon and therefore it is important that the site is allocated now and not left to a later or separate process. It is a key allocation that PDC should put forward to enable a “sound” Plan to be presented.
- 3.43 We would advise that the allocations for 200 dwellings on appropriate and deliverable site is firmly included within the Local Plan and not via the nascent Neighbourhood Plan.
- 3.44 In addition, we would strongly suggest that the provision of 200 homes is considered to be the minimum capable of being delivered at Wareham. Our various analyses, as set out in detail in later sections, shows that by adopting a constraints led approach to the land at North Wareham, there is capacity for a more substantial and sensitive delivery of housing to be allocated within the Plan, or through the use of safeguarded land, in the future. This is a matter that must be determined through the Local Plan process as it is not matter of providing local policies, but a matter of strategic concern to the Local Plan and the District as a whole.

Q19: Do you have any alternative suggestions?

- 3.45 The foundation of our response is that we would **support the proposed allocations** for housing at North Wareham and Sandford in principle as they can be justified through the evidence base supplied by PDC to date and as supplemented by our own analyses as set out elsewhere in this representation. However, these should be allocated in full within the Local Plan rather than through any future Neighbourhood Plan.
- 3.46 We do not support the allocation of the Westminster Road Industrial Estate for housing for the reasons set out above. In its place, there should be a return to the proposals originally set out in the earlier iteration of the Local Plan Review whereby further land at **North Wareham** is allocated for residential use. We have set out our proposals for further land at North Wareham in the attached Plan. The detailed justification for this allocation and how it can be achieved is set out in section 4 below.
- 3.47 At **Sandford**, we believe that by taking a “constraints led” approach to analysing the capacity available, that there is justification for the allocation in principle, but with the caveat that more than 30 units can be provided without harm to the local interests and to the benefit of the community. The detailed justification for this allocation on that basis is contained in section 5 below.
- 3.48 In addition, where there is a requirement for further developable land either arising from the new requirements for housing at a national planning policy level or for the longer term, we would advise that there is land available to provide an “**Arc of Communities**” across the north western edge of North Wareham each with their own individual characters. Again we have provided a detailed justification for doing so either in the form of additional allocations or in the provision of “safeguarded land” in section 6 below.

4.0 THE PROPOSED SITE “ALLOCATION” AT NORTH WAREHAM

General Comments

- 4.1 The *New Homes for Purbeck* consultation document refers to a potential site for housing on land between Carey Road and Bere Road (we refer to this site as Land to the West of Westminster Industrial Estate) solely in terms of its potential release from Green Belt and then consideration through the Neighbourhood Plan process. As set out elsewhere in these representations, we are of the opinion that this procedure would result in an unsound Plan and that a more effective approach would be to release Green Belt land and allocate the site specifically within the Local Plan.
- 4.2 Our master-planning firm, Boyer, have provided an illustrative plan of this site within the *Vision for Sites at North Wareham* document to show how the area may be developed for housing. The layout pays close attention to the appraisals and advice of our technical project team and therefore can be used as evidence to support an allocation directly into the Local Plan.
- 4.3 The consultation document identifies the adjoining Westminster Road Industrial Estate (WRIE) as requiring “regeneration”, but as set out elsewhere, the WRIE is in good condition both visually and economically. The allocation can work side by side with the existing land uses as does other residential areas to the south and east. There is no obvious justification as to why such “regeneration” is necessary.

Appraisal of the Proposed Land South of Bere Road and to the West of Westminster Industrial Estate.

Landscape Appraisal

- 4.4 As referred to previously, this site was analysed as part of our specific landscape appraisal document as attached. This site has been appraised in three parts under the reference of Parcels 3, 4 and 5 to reflect their individual landscape natures. From that analysis, we would conclude that only a part of the land immediately adjoining Carey Road (Parcel 3) is suitable for residential use to protect the landscape character of the valley. There is clear scope to allocate the two fields and lower slopes immediately to the west of Westminster Road Industrial Estate, which lies within Parcels 4 and 5. Please refer to the landscape appraisal document for the detail.

Transport and Highways

- 4.5 The site is located within close proximity to a range of services and facilities, including pedestrian/cycle routes, public transport services and employment, retail and recreation facilities.
- 4.6 Wareham Railway Station is served by a 30 minute frequency service operating between Weymouth and London Waterloo, with connections to nearby commuter destinations of Bournemouth, Southampton and

Portsmouth. Located approximately 800m from the centre of the site, with continuous footways from Winchester Road to the station, there is scope for a proportion of trips to/from the station to be made via sustainable modes. This is particularly likely given the limited parking at the station.

- 4.7 The number 40 bus service provides an important connection between Poole and Swanage via the centre of Wareham. Services operate hourly between 06:00 and 22:45 Monday to Saturday, with reduced services on Sundays. The nearest bus stops are situated along Northmoor Way, approximately 600m from the centre of the site, with no bus services operating along Carey Road. Continuous footways are provided between the site and these bus stops on Northmoor Way. Based upon the existing operating hours it is considered that there could be potential to enhance existing frequency of services, particularly between peak commuter periods.
- 4.8 With the promotion of development in North Wareham, a Residential Travel Plan would also be prepared to encourage and incentivise travel via sustainable modes. Accessibility to existing bus/rail services, along with good waiting facilities and distribution of promotional material, would help to increase the likelihood of a Travel Plan being successful. This would also be in line with Local Policy to promote Smarter Travel Choices.
- 4.9 The site is conveniently located to Westminster Road Industrial Estate, immediately adjacent to the site, and industrial units along Sandford Lane (1.3km), both of which are within acceptable walking distance of the site via safe, convenient footways/footpaths.
- 4.10 Land to the immediate north of Carey Road could be accessed either via Westminster Road, within the existing Industrial Estate or via Carey Road beyond the existing residential area. Carey Road has a width of approximately 3.4m currently, with no footways. The existing carriageway width would, therefore, need to be widened to facilitate vehicular access into the site. From the highway boundary searches completed, it appears that highway land may include strips along the side of the existing carriageway.
- 4.11 Access for all modes could be achieved via the existing Westminster Road cul-de-sac to the southeast of the site. Via this route, it would be possible to tie into the existing public highway, and connecting with existing pedestrian footways.
- 4.12 Whilst good quality footways/cycleways exist on the surrounding network, with development of the site, improvements would be required to help connect the site to the existing pedestrian/cycle network. There is also potential to provide enhancements to public transport services and waiting facilities, to help encourage and incentivise existing and new residents to travel via sustainable modes.
- 4.13 In addition to improving waiting facilities at existing stops, there is potential to improve the frequency of the number 40 service as previously stated. Providing increased frequency between peak commuter periods would help to increase patronage and subsequently reduce the number of car trips on the surrounding road network.
- 4.14 In order to facilitate development at this site it will be necessary to demonstrate to the Local Highway Authority

that any development proposals would not adversely affect the flow of traffic on the surrounding highway network. Subject to any allocation within the Local Plan it will, therefore, be necessary to undertake further assessments as part of any application submission.

Flood Risk, Utilities and Drainage Matters

- 4.15 We are in the process of preparing a detailed report on these matters that will be available for reference purposes for the purposes of providing evidence in support of the development of this site. To date we have established that there will be a need for flood risk attenuation on that part of the site that our landscape appraisal has identified as most suitable for residential development. This will be addressed in detail at a later stage.
- 4.16 In general, we are confident that there are a range of suitable services and connections to utilities available to the area as might be expected for land adjacent to an urban area.

Heritage Assessment

- 4.17 The site is situated in a dip, surrounded by high ridges to the north and south, with the Westminster Road Industrial Estate located to the southeast. The site is relatively well screened from heritage assets in the surrounding area by the local topography. A series of Scheduled Ancient Monuments (SAMs) are located approximately 100m north of the site's northernmost boundary.
- 4.18 These SAMs comprise a group of eight bowl barrows, which are 150m to the north of Seven Barrows Farm (NHLE 1015373 and 1015374). The barrows are oriented roughly SW-NE and occupy a ridge which overlooks Poole Harbour. The strategic position of the barrows is intentional, both as markers in the landscape, but also to provide commanding views of the surrounding area. The immediate surroundings of the barrows, comprising land under pasture, is also consistent with the historic setting of the barrows, and helps to keep a sense of separation from the modern settlement of North Wareham to the south. Both of these elements make important contributions to the significance of the barrows.
- 4.19 There are no views of the barrows from within the site due to the steep local topography. In addition, the surrounding vegetation provides additional screening. The site is present in views when looking south from the barrows, however it is not visible to the local topography noted above. In addition, the southernmost barrow can be seen from the top of a ridge to the south of the site, in a view that looks across the site, but again in which the site itself is not visible due to topography and substantive screening provided by mature vegetation. Therefore, the site is within the wider setting of the barrows, even though the site itself is not inter-visible with it.
- 4.20 Therefore, development within the site has the potential to adversely affect views of the barrows, as well as out from the barrows by intruding into the currently rural landscape which is a positive contributor to their

significance. However, any effects would be very modest due to the extent of the screening present. Any small effect could be easily mitigated by careful design and placement of building heights, augmented by selected screening and landscaping. On this basis it is clear that the site could be developed without resulting in any unacceptable harm to the significance of the SAMs.

- 4.21 Detailed archaeological assessments are underway for the site and have shown no evidence for the presence of buried remains which would preclude development within the site. Furthermore, archaeological investigations have taken place in land immediately to the west of the site as part of a quarry extension (Dorset Historic Environment Record reference EWX1849) which found no evidence of archaeological remains. As such the archaeological potential of the site could be dealt with via the normal planning process in due course as appropriate.
- 4.22 There are no nearby listed buildings or other designated heritage assets that would be adversely affected by development within the site.

Ecological Principles

- 4.23 It is acknowledged that, ecologically, the district is generally sensitive in nature given the array of designated sites, such as the Dorset Heathlands and Poole Harbour, in proximity to the site. There are a number of strategic level mitigation schemes that have been developed and embedded in policy to ensure no adverse effects on such European sites. Further, the overall land holdings of the Estate both immediately onsite and in the wider area offer unique opportunities that could help contribute towards any package of necessary mitigation, avoidance and enhancement measures required to address potential impacts on designated sites, protected species and other features of ecological interest from development at this site.

Master Plan Principles

- 4.24 The site's topography and landscape features combine to suggest that the residential development is best located towards the eastern side of the site. This would allow for a robust green buffer to be provided between the proposed development and surrounding buildings, including the Westminster Industrial Estate. The landscape assessment suggests a lower density towards the open space located to the west. A single point of access through the Westminster Industrial Estate seems to be appropriate.
- 4.25 An illustrative master plan is provided for discussion purposes only at this stage which suggests that the existing topography and the opportunity to provide generous open spaces can insert an attractive and sensitive development into the landscape.

Conclusion

- 4.26 We conclude that the site as identified for removal from the Green Belt is appropriate for development and has

many locational advantages. However, a “constraints led” approach suggests that in landscape terms, development is best restricted to the eastern half of the land identified. We are also firmly of the view that a formal allocation within the Local Plan is the more sound approach towards delivering this housing.

5.0 THE PROPOSED SITE ALLOCATION AT SANDFORD

General Comments

- 5.1 The *New Homes for Purbeck* consultation document refers to a potential site for housing that we identify as Land to the South of Sandford. We support this allocation and have undertaken an initial analysis of the site and its surroundings.
- 5.2 Our master-planning firm, Boyer, have provided an illustrative plan of this site within the *Vision for Site at Sandford* document to show how the area may be developed for housing. The layout pays close attention to the appraisals and advice of our technical project team and therefore can be used as evidence to support an allocation directly into the Local Plan.

Appraisal of the Proposed Allocated Site

Landscape

- 5.3 As referred to previously, this site was analysed as part of our specific landscape appraisal document (LV&GBA) as attached. This site has been appraised under the reference Parcel 8 which is a wider area for analysis purposes than the potential development site indicated in PDC's consultation document to reflect the strong physical features and boundaries that are characteristic of this area. Our landscape analysis supports the consultation document where PDC considers this area as suitable for residential development.

Transport and Highways

- 5.4 The Sandford site is located approximately 500m from the A351, Sandford Road, which provides access to the centre of Wareham to the south-west and the A35 approximately 4.0km north-east of the site. The site would be accessed via Keyworth Drive, which has a width of 5.0m for much of its length down to Sandford Community Hall, which is located adjacent to the site.
- 5.5 Several access options could be explored into the site for all modes, including potential to access the site via an existing field gate on Keyworth Drive. Subject to a speed limit of 30mph and with suitable carriageway width up to the Community Hall, an existing footway is also provided on the north-eastern side of Keyworth Drive, up to the A351. Footways are also provided through the existing residential area via St. Martins Road and St Helens Road. These pedestrian routes provide access to existing public transport services operating along the A351, designated cycle routes on Sandford Road and the various services/facilities within Sandford.
- 5.6 The number 40 bus service provides an important connection between Poole and Swanage via the centre of Wareham and A351 corridor. Services operate hourly between 06:00 and 22:45 Monday to Saturday, with

reduced services on Sundays. Bus stops are situated approximately 650m from the edge of the site, with a bus shelter provided on the north-eastern carriageway for eastbound services. Continuous footways are provided between the site and these bus stops. Based upon the existing operating hours it is considered that there could be potential to enhance existing frequency of services, particularly between peak commuter periods.

- 5.7 Holton Heath Railway Station is situated approximately 1.7km from the site via the existing Public Right of Way (PROW), east of Keysworth Drive. Wareham Railway Station is approximately 2.4km from the site via St Helens Road and the A351, Sandford Road. Wareham Station is served by a 30 minute frequency service, operating between Weymouth and London Waterloo, with connection to nearby commuter destinations of Bournemouth, Southampton and Portsmouth.
- 5.8 A large employment area is located at Walton Heath, which can be accessed via the existing PROW or the A351, Sandford Road. Other services/facilities within acceptable walking distance of the site includes Sandford St. Martins Primary School (900m), Sandford Pharmacy (400m), Sandford Surgery (350m) and Co-op convenience store (650m).
- 5.9 In terms of leisure opportunities, a formal recreation area is located behind Sandford Community Hall. This provides a local facility for existing residents and would provide an easily accessible site for residents of the proposed site.
- 5.10 It is, therefore, concluded that for most journey purposes, residents for the proposed development site would be able to access facilities on foot, within the recommended desirable, acceptable or preferred maximum journey distances.
- 5.11 Cycling is generally accepted as a reasonable mode of travel for journeys up to 5km. All local facilities within Wareham lie within 5km of the centre of the site. Furthermore, the largely off-road cycle route along the A351 has no significant gradients, thus further increasing the attractiveness of cycling. It is concluded that cycling offers a realistic opportunity to undertake local journeys to key facilities in Sandford, along the A351 and in Wareham.
- 5.12 The location of the proposed site, enables access to various services/facilities by sustainable modes, in addition to providing convenient access to the A351, Sandford Road and the A35 to the northeast.
- 5.13 Based upon the sites location, there could also be potential to provide access, either vehicular or solely as a pedestrian/cycle/emergency access route, to the north of the site, either through the existing Community Hall car park or directly onto St. Martins Road adjacent to the existing garages. With these potential access options, plus access via Keysworth Drive, it is considered that good connectivity to existing facilities within acceptable walking/cycle distance of the site is achievable.

- 5.14 In view of the foregoing, it is considered that safe and appropriate access, in accordance with Manual for Streets guidance, can be provided into the site for all modes.
- 5.15 Whilst footways exist along local residential streets, plus a cycleway along part of the A351, it is considered that further enhancements could be provided as part of development proposals. There is also potential to provide enhancements to public transport services, to help encourage and incentivise existing and new residents to travel via sustainable modes.
- 5.16 There is potential to improve the frequency of the number 40 service between peak commuter periods as previously noted. This would help to increase patronage and subsequently reduce the number of car trips on the surrounding road network.
- 5.17 Whilst existing cycle stands are located at Holton Heath Station, there is scope to provide additional cycle parking at the station as part of any future development. This would benefit new and existing residents.
- 5.18 In addition to any infrastructure improvements identified above the promotion of Smarter Travel Choices through the implementation of a Residential Travel Plan would be in line with existing Best Practice and would be coordinated with wider initiatives in the area.
- 5.19 Overall, it is concluded that the proposed development site provides significant opportunities for residents to access local facilities, bus routes and Holton Heath Railway Station on foot and by bicycle. The site would also be able to contribute towards improvements to existing sustainable travel modes in line with Local Policy.

Flood Risk, Utilities and Drainage Matters

- 5.20 We are in the process of preparing a detailed report on these matters that will be available for reference purposes for the purposes of providing evidence in support of the development of this site. To date we have established that there will be a need for minor flood risk attenuation on that part of the site that our landscape appraisal has identified as most suitable for residential development. This will be addressed in detail at a later stage.
- 5.21 In general, we are confident that there are a range of suitable services and connections to utilities available to the area as might be expected for land adjacent to an urban area.

Heritage Assessment

- 5.22 The key heritage constraint to development of the site is the presence of a grade II listed building, Camp Cottage (NHLE 1323418). This is situated 115m to the west of the site at the nearest point. The cottage dates to the early 18th century and is situated within its own grounds, surrounded by mature and high vegetation. This comprises its immediate setting. The immediate setting is surrounded by rural fields to the east, west and

south, and the Sandford Road to the north.

- 5.23 While it is close to the site, in practice the cottage is completely screened from the site by the presence of substantive vegetation and some ancillary buildings in the immediate setting of the cottage. The site occupies part of the wider rural setting of the cottage. The majority of the site is well screened from the cottage and development there would not be visible from it. However, development within the easternmost part of the site may affect the approach to the cottage and glimpsed views may be possible during winter. Therefore, there is a risk of a low level of effect to the cottage if the site is developed.
- 5.24 This level of effect could be easily mitigated by the use of landscaping and a set-back to provide screening, and care over the design of the development in this part of the site. These measures could be developed in liaison with the LPA Conservation Team during the normal course of the planning process. With the benefit of these steps, development within the site would not harm the significance of the cottage.
- 5.25 In addition, there is some potential for the presence of buried archaeological remains within the site. Detailed archaeological assessments are underway and have shown no evidence for the presence of buried remains which would preclude development within the site. As such the archaeological potential of the site could be dealt with via the normal planning process in due course as appropriate.

Ecological Principles

- 5.26 As before for the North Wareham site, the Estate and the wider area can offer unique opportunities to contribute towards any package of mitigation necessary to allow development in this area to be brought forward. In particular, the landholdings are much more extensive than the potential development area and can be closely managed for the long term future ecological protection of the local area and wider District.

Affordable Housing

- 5.27 Alongside new market housing, Welbeck Land is committed to delivering much needed affordable homes in North Wareham and Sandford, as well as new public open space and community facilities to support both existing and new residents.
- 5.28 Welbeck Land will work with Purbeck District Council to agree the right housing mix for both sites but our early intention is to deliver policy compliant on-site affordable housing.

Master Planning

- 5.29 The attached document, *Development Vision for Site at Sandford*, has been prepared by master planners, Boyer, who have taken their cue from the current draft local plan. It provides an indication of the potential development extent for this site, considers the sensitive landscape and ecological context around the site, and

includes a thorough assessment to determine a more accurate extent of the potential development.

- 5.30 In determining the efficient use of the available land, we have taken a “constraints led” approach which takes account of the important features of the site and the surrounding area. It identifies where development can take place without significant detriment to the landscape and the ecology of the area and suggests potential enhancements to the community infrastructure for the benefit of the area.
- 5.31 The design rationale is to retain trees and hedges where possible, integrate and connect to the existing neighbourhood, provide for housing densities in keeping with the neighbourhood, creatively use the water and green infrastructure assets of the area and relocate the sports pitches with improved facilities.
- 5.32 The master plan is illustrative at this stage and will continue to be worked upon in parallel with the emerging Local Plan process. Its design principles will take account of local opinion as it evolves. However, we have suggested that the site lends itself to the provision of four small development blocks with a central cross of green and movement corridors and integrating with the existing community hall. The existing sports pitch can be relocated to the west of the site, though further work will be undertaken to ensure that this is the best location.
- 5.33 On the basis of this “constraints led” approach we are of the view that the site can efficiently and justifiably accommodate a capacity of between 30 to 45 dwellings. We would therefore recommend that the Plan consider this level of allocation accordingly and make reference to a “constraints led” approach to determining the capacity of the area rather than by reference to a maximum number.

Conclusion

- 5.34 We conclude that the site as identified for removal from the Green Belt is appropriate for development and has many locational advantages. However, a “constraints led” approach suggests that there is a greater capacity than the Plan identifies.

6.0 THE WAREHAM “ARC OF COMMUNITIES” – A VISION FOR NORTH WAREHAM

General Comments

- 6.1 The Charborough Estate includes substantial land on the north western edge of North Wareham; part of which has been previously proposed by Purbeck District Council for potential allocation for residential use, a.k.a. Land off Fairway Drive. The landscape was analysed under the Parcels 6, land north of Bere Road and 7, land north of Northmoor Way. Other sites to the west of North Wareham have also been assessed from a landscape perspective
- 6.2 We are of the view that the west and north western edge of North Wareham offers a unique opportunity for Wareham to grow. It is the least constrained area of land suitable for expansion in the area for the long term.
- 6.3 In this section, we have provided supporting evidence which not only offers justification to re-introducing the development of the Land off Fairway Drive back into the Local Plan but also applies to the land along the western edge of North Wareham which we refer here as the “arc of communities”.

Appraisal of the land associated with the “Arc”

Landscape

- 6.4 As referred to previously, the Land to the South of Bere Road and West of Westminster Industrial Estate, the Land off Fairway Drive and other land to the west of North Wareham were analysed as part of our specific landscape appraisal document as attached. This “Arc” of land has been appraised under the references, Parcels 1 – 7. In general, the appraisal concluded that the whole area is indeed constrained by landform, woodland, heathland, Green Belt and ecological issues, many related to the North Wareham Heath. Purbeck District Council have rightly cited these constraints in their consultation document and the options they put forward. However, the document also concludes that there are individual pockets of land within those parcels where residential development could be located without harm to these issues.
- 6.5 We would refer to the detail of our landscape appraisal document, but in summary we would suggest that from a landscape perspective, there are many opportunities for development in the North Wareham Arc. While supporting PDC sites in the consultation it is believed that there are further opportunities around the north western edge of the town that could provide flexibility for PDC and potentially create a coordinated scheme which could provide benefits of scale and SANGS without creating landscape or visual harm.
- 6.6 There are opportunities to provide the required housing for the Wareham area within the plan period and beyond without prejudice to the important landscape character of the area. We would recommend that land is

safeguarded for the future on this basis and that sites are specifically allocated for at least 200 units from that resource.

Transport

- 6.7 The Land off Fairway Drive has been specifically appraised for Transport linkages, although the generality of this appraisal also applies to the other potential residential sites in the "Arc" area.
- 6.8 The site is located within close proximity to a range of services and facilities, including pedestrian/cycle routes, public transport services and employment, retail and recreation facilities.
- 6.9 Wareham Railway Station is served by a 30 minute frequency service operating between Weymouth and London Waterloo, with connections to nearby commuter destinations of Bournemouth, Southampton and Portsmouth. Located approximately 950m from the centre of the site, with continuous footways between the two, there is scope for a large proportion of trips to/from the station to be via sustainable modes. This is particularly likely given the limited parking at the station.
- 6.10 The number 40 bus service provides an important connection between Poole and Swanage via the centre of Wareham. Services operate hourly between 06:00 and 22:45 Monday to Saturday, with reduced services on Sundays. The nearest bus stops are situated along Northmoor Way, approximately 500m from the centre of the site. Continuous footways are provided between the site and these bus stops. Based upon the existing operating hours it is considered that there could be potential to enhance existing frequency of services, particularly between peak commuter periods.
- 6.11 With the promotion of development in North Wareham, a Residential Travel Plan would also be prepared to encourage and incentivise travel via sustainable modes. Accessibility to existing bus/rail services, along with good waiting facilities and distribution of promotional material, would help to increase the likelihood of a Travel Plan being successful. This would also be in line with Local Policy to promote Smarter Travel Choices.
- 6.12 The site is conveniently located to Westminster Road Industrial Estate (600m) and industrial units along Sandford Lane (1.3km), both of which are within acceptable walking distance of the site via safe, convenient footways/footpaths.
- 6.13 Access to other services/facilities within walking distance of the site include recreation facilities, local convenience stores (on Carey Road) and retail facilities within the centre of Wareham (accessible by foot, cycle and bus).
- 6.14 Cycling provides an opportunity to access all facilities within Wareham. The Town Centre can be accessed by bicycle from the site within approximately 5 minutes. Much of this route constitutes a designated cycle route with no crossings of main roads or severe gradients to negotiate.

- 6.15 The location of the proposed site, enables access from a number of locations for all modes. Based upon the extent of existing highway boundary, there is potential to provide vehicular access via both Fairway Drive and Seven Barrows Road, with connections to existing footways also possible via both routes. There is also scope to access the site via Bere Road, although the acceptability of an access at this location would be dependent upon available visibility and existing vehicle speeds in both directions.
- 6.16 Despite this, the potential accesses via Fairway Drive and Seven Barrows Road would be able to safely accommodate development traffic.
- 6.17 The ability for this site to provide multiple points of access enables traffic generated by the site to be dispersed amongst the various access points. Coupled with the proximity to pedestrian/cycle routes and public transport services, this would help to reduce the likely traffic impacts associated with the site on the surrounding road network.
- 6.18 In view of the foregoing, it is considered that safe and appropriate access, in accordance with Manual for Streets guidance and DMRB standards can be provided into the site for all modes of travel.
- 6.19 Based upon the sites location and existing pedestrian footways along Northmoor Way, it is considered that good connectivity to the various services/facilities within Wareham, which are within an acceptable walking/cycling distance of the site can be provided.
- 6.20 To ensure the internal access roads within any potential development is safe and conducive to walking and cycling, shared spaces should be provided, to encourage low vehicle speeds and promote safe movement around the site. Safe, attractive movement corridors throughout the development, linking with existing pedestrian routes, would also be provided.
- 6.21 Whilst Wareham benefits from good public transport services and a good pedestrian/cycle network, it is accepted that a proportion of journeys will still be made by car. With the potential for multiple points of access to/from the site (via Fairway Drive, Seven Barrows Road and potentially Bere Road), this would help not only to create permeable routes for pedestrians/cyclists but would also make the A351, A352, A35 and wider Strategic Trunk Road Network (STRN) easily accessible.
- 6.22 Whilst good quality footways/cycleways exist on the surrounding network, with development of the site, there is potential to provide enhancements to existing facilities. There is also potential to provide enhancements to public transport services and waiting facilities, to help encourage and incentivise existing and new residents to travel via sustainable modes.
- 6.23 In addition to improving waiting facilities at existing stops, there is potential to improve the frequency of the number 40 service as previously stated. Providing increased frequency between peak commuter periods would help to increase patronage and subsequently reduce the number of car trips on the surrounding road network.

- 6.24 Overall it is considered that the site provides significant opportunities for residents to access local facilities, bus routes and Wareham Railway Station by foot or cycle. It would also be able to contribute towards improvements to existing sustainable travel modes in line with Local Policy.
- 6.25 In order to facilitate development at this site, it will be necessary to demonstrate to the local Highway Authority, that any development proposals would not adversely affect the flow of traffic on the surrounding highway network. Subject to any allocation within the Local Plan it will, therefore, be necessary to undertake further assessments as part of any application submission.
- 6.26 The location of the proposed site enables access from a number of locations for all modes of travel. Based upon the extent of existing highway boundary, there is potential to provide vehicular access via both Fairway Drive and Seven Barrows Road, with connections to existing footways also possible via both routes. There is also scope to access the site via Bere Road, although the acceptability of an access at this location would be dependent upon available visibility and existing vehicle speeds in both directions.
- 6.27 Despite this, the potential accesses via Fairway Drive and Seven Barrows Road would be able to safely accommodate development traffic.
- 6.28 The ability for this site to provide multiple points of access enables traffic generated by the site to be dispersed amongst the various access points coupled within the proximity to pedestrian/cycle routes and public transport services. This would help to reduce the likely traffic impacts associated with the site on the surrounding road network.
- 6.29 In view of the foregoing, it is considered that safe and appropriate access, in accordance with the usual national standards can be provided into the site for all modes of travel.
- 6.30 Based upon the sites location and existing pedestrian footways along Northmoor Way, it is considered that good connectivity to the various services/facilities within Wareham, which are within an acceptable walking/cycling distance of the site can be provided.

Heritage Assessment

- 6.31 We refer here in particular to the site previously suggested for residential development in the previously emerging Local Plan, the Land off Fairway Drive, and then to the remaining sites within the "Arc" sites.
- 6.32 The key heritage constraint relevant to this site is the presence of a series of Scheduled Ancient Monuments (SAMs) to the north.
- 6.33 Most of the site does not provide views of the barrows, as the steep incline along the northern boundary prevents any inter-visibility. However, the north-western spur of the study site runs close to the position of the

barrows and provides good views of the north-eastern group of barrows (NHLE 1015373). As such this element of the site forms part of the setting of the barrows.

6.34 Development within the site therefore has the potential to adversely affect the significance of the barrows, if it were to occupy land within the north-western spur of the site and block views over Poole Harbour presently available. There may also be buried archaeological deposits close to the barrows that could be affected if the ground there was disturbed.

6.35 Development within the site would therefore need to adhere to the following parameters in order to be acceptable:

- The north-western spur of the site should be kept clear of built development, to preserve views out towards Poole Harbour.
- The building height of development within the remainder of the site should be carefully considered, to preserve the rural separation from North Wareham. Any planting schemes along the northern boundary of the site should also be carefully considered to preserve views south from the barrows and their rural setting.

6.36 Both of these parameters are easily accommodated within the site given the space available for development, as well as the level of housing under consideration. Therefore, the site could be developed for residential development, without resulting in unacceptable harm to the SAMs.

6.37 There are also opportunities to enhance the SAMs. At present the barrows are only publicly accessible via parking on a layby on Bere Road. If the north-western spur of the site were used as amenity land, this would provide opportunities for enhanced public engagement with the SAMs. Such a scheme could be considered and developed in liaison with Historic England and the Dorset Archaeology Service during the course of the planning process.

6.38 In addition, there is some potential for the presence of buried archaeological remains within the site. Detailed archaeological assessments are underway and have shown no evidence for the presence of buried remains which would preclude development within the site. As such the archaeological potential of the site could be dealt with via the normal planning process in due course as appropriate.

6.39 There are no nearby listed buildings or other designated heritage assets that would be adversely affected by development within the site.

6.40 In addition we have appraised the general "Arc of Communities" land in its entirety.

6.41 The "Arc" land includes both the above sites, together with land in between, forming an arc from Tantinoby

Farm to close to Ferncroft Farm. The “Arc” land occupies largely low-lying ground around the edge of Wareham. As is noted above, much of this land is within the setting of the group of bowl barrows near to Seven Barrows Farm, and as such would have the potential to affect the setting of the barrows and thereby harm their significance.

- 6.42 However, given the local topography, which includes a considerable differential between the surrounding ridges and the lower-lying ground which the “Arc” land occupies, the highest level of impact could be the presence of additional tops of roofs in the surrounding landscape. This effect could be mitigated by careful design and placement of building heights across the Arc Land, augmented by selected screening and landscaping. In addition, the land immediately to the south of the barrows should be kept clear of development to preserve views out from the barrows towards Poole Harbour.
- 6.43 On this basis it is clear that the “Arc” land could be developed without resulting in any unacceptable harm to the significance of the SAMs.
- 6.44 In addition to the SAMs, the “Arc” land is sufficiently far south that development in the southernmost field, close to Ferncroft Farm, could be visible from footpaths which run along the route of the scheduled town walls of Wareham. This footpath also runs along the boundary of the Wareham Conservation Area (CA). The historic landscape setting of Wareham comprised wetlands surrounded by a rural landscape. Against this the town walls of Wareham would have been an imposing presence. Much of this has been eroded in the 20th century by modern development, including at North Wareham, and to the east and west of Wareham itself. At present, the approach from the south, along the South Causeway, and also looking southwards from Wareham still preserves this rural character, as do some views north from the northern town walls, the A351 notwithstanding. Development along the southern part of the “Arc” land has the potential to be visible from this view, and if poorly designed, would be seen to further erode the rural character of this view.
- 6.45 To ensure that development within the “Arc” land is appropriate, the built form along the southernmost boundary of the Arc Land, close to Ferncroft Farm, should be carefully designed, with reference to key views agreed with the LPA conservation team. The land close to Ferncroft Farm rises topographically, so care is needed with regard to the height and placement of buildings. The use of set-backs and open spaces should also be considered to avoid exaggerating the effects of the development. Finally, landscaping and planting should be used to break up development and reinforce the rural character of the view.
- 6.46 Given the area of land available within the Arc Land, the above measures could easily be accommodated. Therefore, provided care is taken during the master-planning and planning process as described above, it is clear that residential development within the “Arc” land could be implemented without resulting in unacceptable harm to the Wareham CA, or the SAMs and listed buildings therein.
- 6.47 In addition, there is some potential for the presence of buried archaeological remains within the Arc Land. However, detailed archaeological assessments are currently underway and have shown no evidence for the

presence of buried remains which would preclude development within the Arc Land. As such any archaeological potential within the “Arc” land could be dealt with via the normal planning process in due course, as appropriate.

Ecological Principles

- 6.48 As before for the proposed allocated sites, the Estate and the wider area can offer unique opportunities to contribute towards any package of mitigation necessary to allow development in this area to be brought forward. In particular, the landholdings are much more extensive than the potential development area and can be closely managed for the long term future ecological protection of the local area and wider District.

Master Planning Principles

- 6.49 In respect of the Land North of Bere Road, the site lends itself to close integration with the adjacent housing and would appear as a natural extension to the urban form. The design rationale used helps to define a straightforward grouping of development blocks. This takes into account the potential access points, the movement strategy and the integration of existing landscape features into the scheme. The block form and size makes reference to the existing residential area to the east and addresses the enclosure and security of existing properties along the boundary. Building heights and the use of architecture will provide the variety of character between blocks and address the potential impact on the surrounding context.
- 6.50 Due to the extensive ownership of the Charborough Estate, there are a number of options for the re-location of the allotments within the immediate area. Welbeck Land would welcome constructive discussion with PDC and interested parties towards ensuring that this community facility is effectively re-provided.

Conclusion

- 6.51 We conclude that the Land North of Bere Road, which was previously identified by PBC as having clear potential for its removal from the Green Belt and allocation for residential development, continues to demonstrate many locational advantages and can be delivered effectively and well. It is a preferable alternative to the redevelopment of the Westminster Road Industrial Estate as well as having intrinsic merit in its own right.
- 6.52 Furthermore, there is other land within the “Arc” around this quadrant of North Wareham which would be suitable for the residential development needs of the District and should be considered for designation as safeguarded land.

7.0 SUMMARY

- 7.1 Welbeck Land on behalf of the Charborough Estate welcome the proposal to adjust the Green Belt in the Wareham and Sandford areas to allow potential residential development. The allocation of land at Sandford is welcomed, though it is recommended that a sound policy on its development capacity would be better based on a “constraints led” approach.
- 7.2 The adjustment to the Green Belt at the land to the west of Westminster Industrial Estate is also welcomed, but we are of the view that the Plan would not be sound if it relied on its allocation through the Neighbourhood Plan process. The site should be allocated within the Local Plan as it is part of the strategic resource for residential development to serve the Wareham area.
- 7.3 We are of the strong view that the loss of the Westminster Road Industrial Estate would neither result in a sound Plan nor form a deliverable source of residential land. This suggestion should be replaced by an allocation on land to the North of Bere Road as a reasonable and sustainable alternative. Welbeck Land is committed to the replacement and improvement of the Allotments at North Wareham.
- 7.4 Finally, Welbeck are of the opinion that there is an opportunity to create an arc of communities based on small, well integrated and well designed housing neighbourhoods, across the edge of North Wareham. This would offer general housing, affordable housing and support to community facilities for the area.
- 7.5 We look forward to further engagement in the Local Plan process as it unfolds in the future.

Report on the long term future of the Westminster Road Industrial Estate

Westminster Road, Wareham, Dorset

Report date: 15th May 2018

Prepared for:

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Welbeck Land Limited

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1 Scope of Instructions

- 1.1. Vail Williams have been appointed to undertake a high-level overview of supply and demand of the employment land and property in the Wareham, Poole and Bournemouth areas. There is specific focus on the occupiers of Westminster Road, Wareham by undertaking an interview process to understand the views and opinions of the occupiers of the Estate to establish the viability of the use of this Estate now and in the future.
- 1.2. The following report addresses the views of the occupiers on the Westminster Road, information on current land supply in the Purbeck and District, Bournemouth and Poole areas, providing financial appraisals by adopting several valuation approaches, ultimately arriving in our conclusions on the viability of employment land in the Wareham area.

2 Key Contact Details

- 2.1. The report has been undertaken by Philip Holmes, Partner, Solent region based in the Southampton and Portsmouth offices, Andrew Osborne Partner and LLP member based in the Gatwick region and Thomas Horton, Surveyor based in Vail Williams' Valuation team.

3 Setting the Scene

3.1. Location

Wareham is a semi-rural market town located in the Purbeck and District area to the south of Poole and Bournemouth. The population of the town in 2016 was 5,827 and 30.1% of the population is over 65 (source: Office for National Statistics) and benefits from a mainline railway station, busy town centre and three main industrial estates.

3.2. Industrial Estates

- 3.2.1. The first and largest industrial estate is Holton Heath located on the outskirts of the town on the A351. The second is Sandford Lane Industrial Estate in the town centre and the third is Westminster Road Industrial Estate.
- 3.2.2. The latter two industrial estates are small in comparison to industrial areas in the large conurbations of Bournemouth and Poole. However, for Wareham they are considered as key employment areas in the town centre.
- 3.2.3. The Purbeck and District area is not considered as an established location for industrial/warehousing use and in terms of new development of employment space there has been very few new developments for many years.

3.3. Westminster Road Industrial Estate

- 3.3.1. The subject site, Westminster Road is approximately 5.11 ha (12.65 acres) (source Nimbus Maps) totaling approximately 12,400 sq m (133,500 sq ft) (source: VOA) of employment space arranged as 13 buildings consisting of 18 units, plus the local authority recycling centre.

- 3.3.2. The buildings are mainly detached or semi-detached and appear to be built in the 1960's. They mainly have low eaves heights, two storey offices to the front, with generous parking or yard space.
- 3.3.3. In comparison to other estates in more recognised industrial locations, these buildings would be considered as inferior quality. However, in this specific location our report will show that because of a recent change in ownership of many of the units, the areas are being slowly regenerated.
- 3.3.4. Whilst we have not undertaken a detailed investigation into the employment population on the estate from our initial research, we are of the opinion there are approximately 180 people employed on the estate either on a full time or part time basis. However, to be accurate, this will require further investigation.

4 Local Supply

4.1. The Local Market

- 4.1.1. In terms of the wider area, as the market still recovers from the recessionary times there remains a lack of development of employment space. This is evidenced in our availability report produced by CoStar attached in Appendix 1.
- 4.1.2. In the attached Availability Report, we have listed the vacant units with areas ranging from 4,000 sq ft to 20,000 sq ft currently in the market from Wareham to the west, Wimborne to the north and Ringwood to the east.
- 4.1.3. The Wareham area is considered as an inferior industrial/employment location in comparison to the Bournemouth and Poole areas. The rents are considerably cheaper than the equivalent space in larger towns and our research suggests the affordability of space in Wareham has been a key attraction for the occupiers at Westminster Road.
- 4.1.4. This report shows a reasonable supply of units in the region. However, the majority are modern units at rents more than those being quoted and achieved in Wareham. In terms of Wareham, there is only one unit to let on Sandford Lane Industrial Estate.

4.2. Rental and Capital Values – Wareham

- 4.2.1. The most recent evidence of industrial transactions in Wareham have been the sales of the former Daler Rowney buildings on Westminster Road where freehold sales have completed at prices in the region of between £30 to £40 per sq ft. This equates to an estimated rental value in the order of £4.00 - £5.00 per sq ft
- 4.2.2. The listing in Appendix 1 is a general overview of availability, stock in these established industrial locations demand rents greater than those achieved in Wareham. In terms of rental parameters, quoting rents for stock range from approximately £6.00 per sq ft for basic stock up to £10 per sq ft for brand new buildings.
- 4.2.3. It can also be seen that there is a lack of supply of buildings to purchase, rather than lease. Occupiers who have accrued capital and have a pension fund tend to purchase their own building. In the current market, they struggle to identify opportunities to purchase.
- 4.2.4. Our research suggests that the occupiers were attracted to the industrial areas of Wareham where there is stock available for a lower price, available to purchase which their business allows them to be based in Wareham where access and communications are not as good as Bournemouth and Poole. This, however, is a "snapshot in time" as this only occurred when a major occupier decided to vacate the estate and it is likely this will not happen again.
- 4.2.5. Coincidentally, at the time of this report, Vail Williams are acting on behalf of Daler Rowney to dispose of units 16 and 17 Westminster Road. Vail Williams are appointed to sell the freehold

interest on behalf of Daler Rowney and the property was put under offer within a few days of it being released to the market.

5 Local Authority Allocations

Background

- 5.1. Purbeck District Council have adopted two Local Plans covering employment sites. The first is Purbeck Local Plan Part 1, adopted in 2012 with its employment evidence base having been undertaken in 2010. The second is the Swanage Local Plan, adopted in 2017.
- 5.2. Purbeck District Council are currently undertaking a review of their Local Plan Part 1. To date they have released an Issues and Options Document which sets out their broad aims for the district. This document has not been adopted. It should also be noted that Purbeck District Council have stalled work on the Local Plan review until new planning policy has been issued from Central Government.

Existing Employment Land Supply/Allocations

- 5.3. Purbeck did not allocate new employment sites for development in their Local Plan Part 1 due to the potential for redevelopment and intensifications on existing sites. In addition, with demand for 11.5 hectares of employment land it was anticipated that the current supply of employment land (35.15 hectares) would provide sufficient flexibility and choice of sites to cater for employment growth. Attached in Appendix 2 is a table showing the existing employment supply as detailed in the Purbeck Local Plan Part 1.
- 5.4. The majority of employment land supply is at Holton Heath Industrial Estate (35 hectares) and at Dorset Green Technology Park in Wool (72 hectares). The remainder are relatively small, infill sites in the general area including Westminster Road.

Potential Allocations in the Future

- 5.5. Purbeck District Council are currently considering several options for future employment allocations in the district through their review into the Purbeck Local Plan Part 1. In Appendix 2 we have provided details of proposed sites which have been identified through the Issues and Options process which have not been allocated and only demonstrate that the Purbeck District Council are currently considering if these sites have the potential to be allocated as employment sites, subject to public consultation.
- 5.6. Several of the sites that have been promoted through the Issues and Options statement are relatively small which are either the re-use of existing employment uses or farm land mainly in rural and semi-rural locations. The prospects of identifying developers to construct new industrial and warehouse buildings for letting to the open market is unlikely. Therefore, a more likely route would be the sale of these sites to owner occupiers.

6 Westminster Road – Overview

- 6.1. Westminster Road is situated to the north west of Wareham town centre. Via the A351 from Bournemouth and Poole, Wareham provides access into Corfe Castle, Swanage and the outlying villages.
- 6.2. Westminster Road is situated between Bere Road and Carey Road. This road is used mainly by local traffic and visitors to the estate. It is straight and mainly clear of obstructions, providing ease of access for HGVs and large trucks to turn and load without causing significant obstruction or traffic congestion. However, our research suggests that poor parking enforcement is a concern of some of the occupiers.
- 6.3. **Daler Rowney**
- 6.3.1. In 2014, Daler Rowney announced their intentions to vacate six buildings on the Westminster Road Estate and move their production operation to their HQ facility in Bracknell, Berkshire.
- 6.3.2. Daler Rowney have embarked on a phased process of relocation and their last building will become vacant when their lease expires in 2019. [REDACTED]
- 6.3.3. Apart from the leased unit, Daler Rowney owned the freehold interests of the buildings they occupied on the estate. Therefore, the typical scenario of a lease expiring did not happen; the buildings did not revert to the landlords or pension funds who owned parts or the whole estate, who are reluctant to sell.
- 6.3.4. At lease end, Daler Rowney would be obliged repair the building in accordance with their lease. Should it be required, the landlord may undertake further improvement works with the ultimate objective of having a refurbished building available to lease.

[REDACTED]

6.4. Purchasers

- 6.4.1. In this instance, apart from one unit, the freeholds were sold by Daler Rowney and in the case of Unit 1, the building was purchased from the receivers. The buildings needed improvements and had not been refurbished. This created a unique scenario where buildings in need of a refurbishment were launched to the market in the town at a relatively low cost.
- 6.4.2. This generated interest from local occupiers who seized the opportunity to purchase the buildings at a low cost and undertake works to make the building their own for the long term.
- 6.4.3. These owner-occupiers were either already based on the estate or recognised Westminster Road as a location to position their business from elsewhere in the area.

7 Westminster Road - Questionnaire

- 7.1. Vail Williams undertook a survey of most of the occupiers which resulted in a clearer understanding of their views and their future intentions.
- 7.2. Vail Williams interviewed the key contacts of the occupiers of Westminster Road who chose to participate, and a copy of the questionnaire is attached in Appendix 3. Three of the occupiers contacted either declined or did not respond to our requests for an interview.
- 7.3. Our research shows that the businesses on the estate have expanded their operation in Wareham and have made a significant investment in the improvement of their buildings on Westminster Road.
- 7.4. They identified Westminster Road as affordable space that is cheaper than its counterparts in more established areas in the Bournemouth and Poole area. The land surrounding the buildings offered the flexibility to extend and create external loading areas. The semi-detached or detached layout was an advantage over the typical terraced estates which mainly suffer from limited loading and car parking.
- 7.5. The configuration of the buildings has allowed these occupiers to expand their business, improve the quality of the buildings and invest in the configuration. Our research shows they have every intention of remaining there for the long term.
- 7.6. Below is a table of the occupiers of the estate.

Unit No Westminster Road	Occupier
1	Purbeck Ice Cream
2 & 3	Daler Rowney, lease exp 2019 and vacating
4 & 5	Polar Holdings
6	Evo Motion Design Ltd
7	National Tube Straightening Service
8 (Land West of Westminster Rd)	Splitz Studios (part)/Sita Waste (offices)
Electricity Substation	Electricity Substation
Wareham Recycling depot	Wareham Recycling depot
9	The Westminster Wire Factory Ltd
12	Chococo Ltd
13 (Land on west side of Westminster Road)	The Westminster Wire Factory Ltd
14	The Westminster Wire Factory Ltd
10	The Westminster Wire Factory Ltd
15	Olympia Triumph Manufacturing Company Ltd
16 & 17	Daler Rowney (under offer)
18	Eaton Stonemasons Ltd

- 7.7. For the purposes of this report, we have not interviewed the following
- Daler Rowney as they are vacating the estate and no longer have a long-term interest in the estate.
 - The occupier of the Purbeck and District refuse centre.
 - Occupiers on Carey Road
 - Unit 8 Westminster Road as this appears to be multi-let to a number of occupiers and we could not obtain the information.
 - The owners of the Electricity Substation
 - The owners of Woodbine Cottage and the attached land.
 - Those who did not respond or declined.

8 Responses from the Questionnaire

8.1. Methodology

- 8.1.1. After the brief was taken from the client, a questionnaire document was prepared and approved.
- 8.1.2. The questionnaire requested information on the tenure arrangements of the occupiers, how long they occupied the building(s) and then requested more in-depth information on their business, their staffing, their views on the employment base in the town and their future aspirations in terms of their growth and future investment in their property. A copy of the questionnaire can be found in Appendix 4.

8.2. Ownership

- 8.2.1. Of those interviewed, the table below provides the tenure of the respective occupiers:

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

8.3. **Questions and Responses**

8.4. **Question 1 – I have an aspiration to expand my business in the future**

- 8.4.1. All parties agreed. The occupiers interviewed on the Estate have growing businesses and need staff and buildings to satisfy this expansion. This also suggests the businesses have not grown to a point where further expansion will not be profitable or their business has matured to such a point that the owners do not see a need to expand any further.
- 8.4.2. One occupier, who has only recently moved onto the estate has moved from a 3,500 sq ft unit to 10,000 sq ft to take account of their future growth plans.

8.5. **Question 2 – Westminster Road suits my long-term property requirements**

- 8.5.1. All parties agreed. This reinforces the view of occupiers on the estate that own their freehold to take the opportunity to purchase their building for the long term.
- 8.5.2. Many occupiers on industrial estates typically lease their buildings and therefore there is a regular turnover of occupiers as they expand their business and move to larger premises elsewhere.
- 8.5.3. These occupiers have chosen to purchase a building on this estate as the physical layout of the building allows expansion and adaptation. It appears the growth plans of their business can be accommodated at Westminster Road.

8.6. **Question 3 - If I had to move (for whatever reason), there are viable alternative options for my business in the area?**

- 8.6.1. The responders disagreed with this statement. The reasons given was that the other estates in the area were “cramped and expensive” and there is limited choice.
- 8.6.2. The main piece of feedback was affordability. The values of the buildings and the prices paid are much lower than the equivalent property in larger, more established areas such as Bournemouth or Poole.
- 8.6.3. Whilst the new developments at Horton Heath could be considered as alternatives they are significantly more expensive than an equivalent property in Wareham.
- 8.6.4. The low base value of the estate reflects the view that Wareham is a less established industrial location and the inferior quality of the buildings that required investment from the new owners to refurbish and upgrade.
- 8.6.5. In addition to the feedback from the occupiers, in our experience, an occupier, when they own a building will be reluctant to relocate to a leasehold building.

8.7. **Question 4 - My business is Wareham based and I intend to keep my business in the town**

- 8.7.1. The occupiers agreed to this statement. One comment was that the occupiers have now established a strong network of casual labour that is drawn from the town in peak times as it is cheaper than the use of agency staff. This has taken several years to establish. Another occupier has invested heavily in the building to suit their needs and have no intention to move again.
- 8.7.2. In addition, in terms of the value of the buildings, the lower value of employment space in the area will impact the occupier’s ability to relocate to more expensive locations in the area.

8.8. **Question 5 - My business employs the following number of staff: (1-20; 20-40; 40-80; 80+)**

- 8.8.1. The occupiers (apart from Daler Rowney) are local businesses. The occupier’s staff levels mainly range from 1 to 20 with additional casual staff or those based in other locations in the region. However, one occupier has stated that their proposed relocation to Westminster Road will allow them to double their staff levels within the next 2 years.

8.9. **Question 6 - What percentage of my employees live in Wareham: (None; 10% - 20%; 30%-50%; 50%-75%; 75%- 100%)**

- 8.9.1. The responses range between 10% to 50%. This will depend on the type of work. However, additional comments from the occupiers stated that advertisements on local employment websites generated very few applications from Wareham residents.
- 8.9.2. Another occupier stated they advertised only in Wareham for two members of staff, but they only had one application from a local person, who was employed.
- 8.9.3. The remainder of the staff reside in outlying rural villages in the Purbeck area where there are limited local employment opportunities or commuting from the larger towns, mainly Bournemouth and Poole.

8.10. **Question 7 - My staff commute to work using public transport**

- 8.10.1. There are mixed opinions here, but the overall aspiration is that the train network is to be used by staff. There is an aspiration to increase the number of staff cycling to the unit through the growing cycle network.
- 8.10.2. Comments were made on the convenient train route to Wareham from Bournemouth and Poole and this is used by the employees on the estate.

8.11. **Question 8 – How far from Westminster Road are your staff based?**

- 8.11.1. The staff not living in Wareham are based up to 20 miles from the Estate but the average 4-10 miles. One business relocated from Swanage and have managed to retain their staff as the staff have chosen to relocate to allow them to have greater choice of affordable rented accommodation.

8.12. **Question 9: I am satisfied with the general presentation of the estate and do not see any need to improve (Agree; Neither agree or disagree; Disagree)**

- 8.12.1. The occupiers gave a positive response and recognised the recent relocation of Daler Rowney has allowed the estate to evolve and improve. The void space created has allowed new investment from the new occupiers and expanding occupiers already on the estate.
- 8.12.2. The occupiers have invested in the units to improve their own buildings and this is having a positive impact on the overall presentation of the estate. This view is that the improvement of the overall aesthetic and regeneration of the estate with new occupiers will increase employment for the local area and improve the local economy.

8.13. **Question 10 - If you disagree (with question 9), what would you like to see improved? (Access; Security; Road Surface; Landscaping)**

- 8.13.1. The occupiers did not identify anything specific and commented that there is still a need for general improvement. One occupier suggested the road surface could be improved and the estate landscaped however the main feedback was parking problems and improved traffic management. One occupier has a showroom with a public access and they suffer from congestion, mainly around the refuse centre.

8.14. **Question 11 – I am planning in investing in my property in Westminster Road in the next 5 years? (Agree; Neither agree or disagree; Disagree)**

- 8.14.1. The occupiers agreed with this statement and the planned investment will be in the purchase of new plant and machinery, improvements to their buildings such as new roofing and building extensions. One commented that this investment will then facilitate the ability to employ more staff.

- 8.15. **Question 12 - We believe there is demand in Wareham for the development of further employment space? (Agree; Neither agree or disagree; Disagree)**
- 8.15.1. Occupiers feedback was that they were able to purchase their building because it was less expensive than a similar property in more established industrial locations. Therefore, local demand in Wareham for new space at rents and prices that would make a new development viable will be low. There appears to be demand for employment space at the values paid at Westminster Road, but nothing more.
- 8.15.2. The other issue is the quality of the access and the view taken that the local road system cannot accommodate a significant increase in commuter traffic.

9 Report Appraisals

- 9.1. We attach in Appendix 4 our appraisal of a potential redevelopment of the site to residential use along with appraisals for the current use value of the site. These figures are based on certain assumptions of the existing assets, and the likely value of the estate as an income producing investment.
- 9.2. We have considered appraisals for both the current use of the site for commercial use and the development viability for residential housing.
- 9.3. We have used these scenarios to establish if in comparison with the appraisals undertaken of the existing space the redevelopment of the site is viable.
- 9.4. Assumptions have been made to arrive at these figures and hypothetical scenarios have been created. Therefore, these appraisals should be considered in the context of this report and not in isolation.
- 9.5. Please note that this section of the report should not be considered as a formal valuation. This is a desk top exercise to establish "high-level" appraisals and forms part of the overall comments in this report. Any changes in the development assumptions made will result in a different residual land figure and there are many variables and unknowns at this stage.
- 9.6. **Summary**
- 9.6.1. Our appraisals suggest the following:
- 9.6.2. **Current Use** - assuming a vacant estate - £6,400,000
- 9.6.3. **Appraisal of the Investment Asset** - assuming the estate is fully leased (rather than owner occupied) on identical lease terms – £6,400,000 to £7,900,000
- 9.6.4. **Residual Appraisal** - assuming a redevelopment site with consent for residential development we would anticipate parameters in the order of between £2,600,000 to £4,100,000
- 9.6.5. We can therefore conclude that the financial appraisals indicate, using two approaches, that the potential value of the current use of the estate is more than the estate if redeveloped for housing.
- 9.6.6. The reason for this is that these buildings remain fit-for purpose and are not at the end of their operational lives and redevelopment is not the only option. Whilst the prices paid for the buildings are at a low base, this reflects the quality of the buildings and the location. The works undertaken on the properties by the individual owners will only enhance the values of individual units on the estate.

10 Current Use Appraisal

- 10.1. In arriving at our opinion of current use value, we have undertaken the following methodology and utilised the tried and tested valuation techniques and appraisals.
- 10.2. Comparable and Investment Methods of Valuation techniques have been applied to establish high-level appraisals. The first approach assumed vacant buildings available in the open market and the second leased buildings to establish the value as an income producing investment.
- 10.3. To arrive at these figures, assumptions have been made and therefore these are hypothetical and is not an appraisal of the current status of the estate.
- 10.4. We have considered our historic knowledge of comparable transactions, premises currently available for sale and our experience of valuing comparable properties.
- 10.5. It should be noted that we have not inspected any property on the industrial estate for the purposes of this exercise and we are unable to comment on the condition, layout or detailed specification of the properties.
- 10.6. We have conducted an online enquiry via various portals, including the online EPC register and Co-Star to provide an estimate of the Gross Internal Areas of each unit.

10.7. Vacant Possession Valuation

- 10.7.1. To prepare our appraisal, we have adopted the Comparable Method of Valuation technique and have considered leasehold rents and freehold prices achieved of comparable properties within the vicinity.

10.8. Industrial Accommodation

- 10.8.1. We have considered, amongst others, the comparable transactions contained within Appendix 5. However, we believe that the following comparable evidence is of importance:

Description	Area (sq ft)	Sale Price (£)	Sale Price (£/psf)	Sale Date
Units 4 & 5, Westminster Road, Wareham	19,153	£665,000	£34.72	September, 2017
Unit 18, Westminster Road, Wareham	9,314	£435,000	£46.70	March, 2017

- 10.8.2. We understand that the sale of 18 Westminster Road was distressed and as such we believe that less weight should be attributed to it.
- 10.8.3. Therefore, based on the evidence available and on the basis the age, condition and specification of the buildings are broadly the same, for the purposes of the appraisal we have adopted £35.00 per sq ft as a freehold price to apply to our appraisal.

10.9. Residential Accommodation

- 10.9.1. We understand Woodbine Cottage, situated along Carey Road should form part of this appraisal. We have therefore utilised the Comparable Method of Valuation, assuming vacant possession to provide our opinion of the freehold price.

- 10.9.2. We have been unable to inspect the property and as such are unable to comment on the condition, layout or specification of the property. Therefore, we have conducted an online enquiry via various portals, including Rightmove, Zoopla, Google Street View and the online EPC register. We have concluded that the property is likely to be a 4 Bedroom Detached House that benefits from a garden and parking, being in the region of 1,400 sq ft.
- 10.9.3. In addition, we have assumed that the land to the east side of Woodbine Cottage is included within the demise of the property. One could argue that an individual might pay an additional sum for the land. However, due to scarcity of evidence, we are unable to comment on the former and as such have not attributed any extra value to the land.
- 10.9.4. We have had regard to, amongst others, the comparable transactions including the following:
- **33 Ropers Lane, Wareham, Dorset, BH20 4QT** – where a 157 sq m (1,690 sq ft) detached house sold in January 2018 for £450,000, equating to £2,863 psm (£266 psf). The property is not a new build, but presents in a good condition and benefits from a rear garden, a double garage, ample off-street car parking and being 0.4 miles from Wareham train station;
 - **Shore Drive, Wareham, Dorset, BH20 7BT** – where a 132 sq m (1,421 sq ft) 1986 four-bedroom detached house sold in December 2017 for £385,000, equating to £2,916 psm (£270 psf). The property is not a new build, but presents in a good condition although in need of modernisation and benefits from a garage, off street car parking, a garden and being 0.9 miles from Wareham train station;
 - **1 Gore Hill, Sandford, Wareham, Dorset, BH20 7AL** – where a 127 sq m (1,367 sq ft) 1970s four-bedroom detached house sold in January 2018 for £425,000, equating to £3,346 psm (£310 psf). The property is not a new build but presents in a good condition and benefits from a garage, garden and being 1 mile from Wareham train station. The property also benefits from an annex.

Considering the above, the evidence identified and with the above information, for the purposes of this appraisal we have adopted £405,000, which equates to a rate of £289.29 per sq ft.

10.10. Electricity Sub-Station

10.10.1. For the purposes of this report, we have assumed that the Electricity Sub-Station totaling 1.95 acres (7,879 sq m) is to be excluded from the aggregate site area and as such it has been omitted from our calculations.

10.11. Recycling Centre

10.11.1. We understand that the recycling centre totals 2.309 acres (100,580 sq ft).

10.11.2. In our experience and in line with the standard market approach, we have applied an open storage rate to land used by the recycling centre.

10.12. Appraisal of Estate with Vacant Possession

Based on certain assumptions our appraisals suggest a figure of £6,400,000 for the hypothetical scenario of a site available with vacant possession.

We have attached the appraisal in Appendix 6.

11 Investment Appraisal

11.1. For this appraisal, we have adopted a term and reversion valuation technique and used the comparable method of valuation to establish a reasonable rent, which is capitalized to calculate the freehold value.

11.2. Industrial Accommodation

11.2.1. For the purposes of this appraisal, we have made the following assumptions:

- 10-year term with a 5th year break option, reflecting a 5-year term certain;
- Covenant strengths are reflective of the age, specification and location of industrial estate;
- The properties are held on full repairing and insuring leases with schedule of conditions and are assumed to be put in full repair upon vacation of an outgoing tenant. We have, therefore, assumed that the units are being valued in full repair.

11.3. Leasehold Rent

11.3.1. For Market Rent, we have considered, amongst others, the comparable transactions contained within Appendix 6. However, we believe that the following comparable evidence is of importance:

Description	Area (sq ft)	Rent Per Annum (£)	Rent (£/psf)	Sale Date
Unit M2, Romany Works Business Park, Holton Heath	17,106	£95,000	£5.55	April, 2017
Units 2 & 3, Westminster Road, Wareham	19,214	£73,500	£3.83	July 2015
Unit 6, Westminster Road, Wareham	9,498	£39,900	£4.20	July 2015

11.3.2. There is not a wealth of direct comparable evidence within the immediate vicinity. Therefore, we have had regard to the above comparable evidence that is approximately 3 years old. However, we understand it to be the most recent evidence on the estate and to be reflective of the age and specification of the estate.

11.3.3. We have also included Unit M2 of Romany Works Business Park, which is the most recent transaction. It is useful to illustrate a ceiling rent per sq ft, as the property of a better specification and location, being close to the A35.

11.3.4. Considering the above, the evidence within Appendix 6 and with the current information to hand, we believe a reason rent could be £4.30 per sq ft.

11.4. Net Initial Yield

11.4.1. We have considered our historic knowledge of comparable transactions, premises currently available for sale to establish reasonable Net Initial Yield.

- 11.4.2. When determining the appropriate Net Initial Yield, one should have consideration of the risk to any potential investor and the covenant strength of any likely occupier.
- 11.4.3. The buildings on the estate are of a specification that would most likely suit an investor or developer who may either look to undertake a comprehensive refurbishment of the buildings or redevelop the larger area, as illustrated by the purpose of this report.
- 11.4.4. Therefore, a significant investment could be required by a potential investor and as such this should be reflected in the Net Initial Yield.
- 11.4.5. The industrial estates specification should be considered. It could be inferior compared to modern equivalents and would likely attract occupiers with covenant strengths that reflects the condition.
- 11.4.6. The figure stated above is merely an indication of an appropriate investment yield, based on the stated assumptions under para 11.2.1. For the purpose of this report we have taken considered the investment value of the whole estate assuming a yield range of 12% to 10%.
- 11.5. Residential Accommodation**
- 11.5.1. In line with common market practice the residential property (detailed in para. 10.7) is likely to be let on an Assured Shorthold Contract and due to the short nature of these contracts have assumed vacant possession for the purposes of this appraisal.
- 11.5.2. Considering the above and in line with figure 11.2.1 we have adopted a figure of £405,000 for the freehold interest.
- 11.6. Electricity Substation**
- 11.6.1. For the purposes of this report, we have assumed that the Electricity Sub-Station totaling 1.95 acres (7,879 sq m) is to be excluded from the aggregate site area and as such it has been omitted from our calculations.
- 11.7. Recycling Centre**
- 11.7.1. We believe that it is reasonable to apply a value of £0.75 per sq ft for the rent, equating to £75,435 pa.
- 11.8. Appraisal of Estate with Vacant Possession**
- 11.8.1. Having regard to the above and based on the evidence that is available as at the date of this report, we are, therefore, of the opinion that the Aggregate Value of the Freehold interest in the subject properties is in the order of £6,400,000 based on a 12% yield and £7,900,000 based on a 10% yield. Clearly a more optimistic yield than 10% would create a higher investment value and we consider our approach to be cautious.
- 11.8.2. Based on certain assumptions our appraisals suggest a range of £6,400,000 to £7,900,000 for the hypothetical scenario of a site available as an income producing investment.
- 11.8.3. The figure stated above is merely an indication of a possible investment value by applying certain valuation techniques, based on the stated assumptions under para. 11.2.1.
- 11.8.4. We have attached the above appraisal based on a yield of 12% in Appendix 7.

12 Residual Appraisal

- 12.1. We have undertaken a residual appraisal to assess the development viability of the site for residential housing.
- 12.2. We accept that there is currently a degree of uncertainty surrounding both costs and the market generally in the lead up to Brexit. Subsequently, these factors may impact upon sale prices and in accordance with accepted practice, we have assumed current comparables and costs in undertaking our viability assessment.
- 12.3. **Site Value and Associated Costs**
- 12.4. **Developers Profit**
- 12.4.1. For the proposals to be considered viable, a developer will require a profit or return. The level of profit is a function of the development risk associated with the construction and sales and the developer's required return on capital invested.
- 12.4.2. House builders typically seek a profit of circa 20% on Gross Development Value (GDV) or 25% Profit on Cost for market housing, although some require a higher return for a scheme to be acceptable and hence viable. For this report, we believe that a profit of 20% on cost is reasonable and is in line with our market expectations if the site was to be sold.
- 12.5. **Fees and Other Costs**
- 12.5.1. The proposed development will result in a residual site appraisal and usually the appraisal and/or viability methodology assumes the site will be sold with the benefit of planning consent to establish this residual value.
- 12.5.2. There would be costs associated with the sale comprising Stamp Duty Land Tax Commercial (SDLT Commercial), agents and solicitors. Agency and legal fees on a transaction of this size are likely to be in the order of 1.00% and 0.50% respectively.
- 12.6. **Gross Development Value**
- 12.6.1. We have assumed a development area of 10.707 acres (43,330 sq m), which was calculated using Nimbus Maps and is the aggregate total of the site, excluding the electricity sub-station. For the purposes of this report, we have assumed that the electricity sub-station is to be excluded from the calculations.
- 12.6.2. In line with general market practice, we have assumed a plot size of 250 sq m for 2 and 3-bedroom houses and 400 sq m for 4 bedroom houses. We have, therefore, calculated the aggregate housing provision to be 160 units. We believe that this assumption affords each house a garden of reasonable size and adequate parking provision. This is equivalent to 36.9 dwellings per hectare (dph), slightly higher than typical edge of town development densities at 35 dph, and is considered a sensible assumption. This is higher than historic density guidance at 30 dph and to refine this exercise an architect's master plan would be required.
- 12.6.3. We believe that the following housing mix could be appropriate:

Description	No. of Units
2 Bedroom House	41
3 Bedroom House	97
4 Bedroom House	22

- 12.6.4. In deciding the above, we have had reference to Purbeck's Local Plan (2012), which in 'Housing Mix', outlines in para. 8.3.4 a higher need for 2 and 3-bedroom properties.
- 12.6.5. It should be noted that the above is subject to the approval of Purbeck District Council and a developer, therefore it is likely to change.
- 12.6.6. We have had reference to the 'Technical Housing Standards – Nationally Described Space Standard (March 2015)' to determine the size of the accommodation for the proposed housing. Table 1 is illustrated below:

Table 1 - Minimum gross internal floor areas and storage (m²)

Number of bedrooms(b)	Number of bed spaces (persons)	1 storey dwellings	2 storey dwellings	3 storey dwellings	Built-in storage
1b	1p	39 (37) *			1.0
	2p	50	58		1.5
2b	3p	61	70		2.0
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	
4b	5p	90	97	103	3.0
	6p	99	106	112	
	7p	108	115	121	
	8p	117	124	130	
5b	6p	103	110	116	3.5
	7p	112	119	125	
	8p	121	128	134	
6b	7p	116	123	129	4.0
	8p	125	132	138	

(Source: Table 1 of the Technical Housing Standards – Nationally Described Space Standard (March 2015))

- 12.6.7. Based on the above, we have assumed the following Gross Internal Areas for Market and Affordable Housing:

Description	Elevation	Sq ft	Sq m
2 Bedroom Terraced House	2 Storey	850	79.00
3 Bedroom Semi-Detached House	2 Storey	1,100	102.00
4 Bedroom Detached House	2 Storey	1,335	124.00

- 12.6.8. For both the Market and Affordable Housing we have assumed that the buildings will be completed to a good standard with high quality fixtures and fittings. This will be necessary to achieve the sale prices set out below.

12.7. Gross Development Appraisal – Market Housing

- 12.7.1. To arrive at likely market sales prices, we have predominantly sought new build properties that are part of development schemes and are of a similar specification and design to the proposed housing. However, due to a lack of development projects within the vicinity of Wareham, we have extended our search radius to locate comparable new build properties.

- 12.7.2. We have used a search radius of 12 miles with the focal point being Wareham.
- 12.7.3. Within the given search area, there is a distinctive lack of development schemes that provide 2-bedroom houses. We have, therefore, utilised Rightmove's valuation service to locate existing 2-bedroom houses that are within Wareham. However, to consider the new build nature of the proposed houses, we have adjusted the freehold value of the properties by 10%. We believe that this is in line with standard market practice.
- 12.7.4. Based on the above areas that are illustrated in para. 10.6.3, we consider that the new units could have the following sale rates and gross values of:

Description	No. of Units	£/psf	Aggregate Value
2 Bedroom Terraced House	25	£341	£7,249,319
3 Bedroom Semi-Detached House	58	£295	£18,785,600
4 Bedroom Detached House	13	£330	£5,726,160
			£37,761,079

12.8. Gross Development Appraisal – Affordable Housing

- 12.8.1. In accordance with the Affordable Housing Supplementary Planning Document by Purbeck District Council (April, 2013), we have adopted an affordable housing provision of 40%. However, it should be noted that previous residential developments, such as Frenches Green by Wyatt Homes have provided affordable housing at 30%, following a ruling by the Planning Inspectorate.
- 12.8.2. The affordable housing provision of 40% would constitute 90% Affordable Housing Tenure (AHT) and 10% intermediate, as outlined by Purbeck District Council in the Affordable Housing Supplementary Planning Document by Purbeck District Council (April, 2013).
- 12.8.3. Based on Purbeck District Council's 'How to calculate the contribution for affordable housing as part of a planning application (2013)' and figures 12.6.3, we consider that the affordable housing provision could be as follows:

Description	No. of Units	Remainder
2 Bedroom Terraced House	16.40	0.40
3 Bedroom Semi-Detached House	38.80	0.80
4 Bedroom Detached House	8.80	0.80

- 12.8.4. The above table illustrates remainders of 0.40, 0.80 and 0.80 houses for the 2, 3 and 4 Bedroom Houses respectively. Based on Purbeck District Council's How to calculate the contribution for affordable housing as part of a planning application (2013), we understand that a financial affordable housing contribution will be required and could be in the region of £278,000.
- 12.8.5. We have assumed that the affordable housing could be purchased from the developer as a whole and at 55% of the freehold value. This equates to an aggregate total of £11,260,000 for affordable housing.

12.9. Development Costs

- 12.9.1. Figures 9.35, 9.36 and 9.37 provide a summary of the aggregate construction cost of £29,967,307.
- 12.9.2. Please note that a variance in the below development costs could adversely affect the appraisal.

12.10. Development Units

12.10.1. The below new build costs have been obtained from the construction rates provided by Building Cost Information Service (BCIS) of the RICS.

12.10.2. The BCIS's new build costs are based on figures provided in Q2 of 2018 and include a 'location factor' of 0.99, based upon the development being situated within Purbeck.

12.10.3. Please see the following median values for 2 storey new build houses, which are provided on a Gross Internal Basis:

Description	£/sq ft
Estate Housing Detached Housing	£127.00
Estate Housing Semi-Detached Housing	£106.00
Estate Housing Terraced Housing	£108.00

12.10.4. Preliminary costs have been included within the BCIS indices provide by the RICS.

12.11. Extra Construction Costs

12.11.1. We have set out a summary of the development costs that we believe are sensible assumptions and could be payable:

Description	No. of Units	Comment
Demolition Costs	£500,000	None
Land Remediation	£500,000	None
Landscaping, Roads and Externals	£3,716,236	Assumed at 20% of the House Construction Costs
Services	£1,858,118	Assumed at 10% of the House Construction Costs

12.11.2. The proposed residential development is situated on a predominately industrial site and as such there could be adverse ground conditions and potential contamination. As illustrated in the above table, we have made the explicit assumption that land remediation costs are in the region of £500,000.

12.11.3. We do not have the benefit of an Asbestos survey for the existing buildings. However, given the age and specification of the properties, the presence of asbestos is a possibility. We have made the explicit assumption to include the potential cost of removal within the allocated sum of £500,000 for Demolition Costs.

12.11.4. The above table illustrates a total Extra Construction Cost of £6,574,354.

12.12. Aggregate Fees

12.12.1. We have considered various professional related costs and a figure of 7.5% to 10% would normally be considered appropriate. We have made an allowance of 7.5% of the total construction cost at £1,980,998 for professional fees and a 5% for contingency at £1,257,777.

12.12.2. We believe that an interest rate of 6% is appropriate and the appraisal software assumes a cash flowed rate of 6% across all development costs, totaling £2,335,042.

12.12.3. We understand that there is a Community Infrastructure Levy (CIL) contribution associated with the planning permission and could be in the region of £950,000 based on £100 per sq m. We have made the explicit assumption to only calculate the CIL on market housing, which is typical.

12.12.4. Regarding Building Regulations and National House Building Council (NHBC) insurance, we have made respective allowances of £195,000 and £150,000. The latter has been assumed at £1,000 per dwelling, taking into consideration a quantum discount which we understand could be obtainable by a developer.

12.12.5. As highlighted above in the affordable housing section of this report, we have attributed £278,000 to a financial affordable housing contribution.

12.12.6. The above figures equate to a total fee of £3,553,998.

12.13. **Programme of Construction**

12.13.1. For appraisal purposes, we have assumed a site purchase once full planning consent has been granted.

Construction lead in post purchase/Discharge of Planning Conditions	3 months
Construction of Affordable Housing for 4 Bedroom Houses	12 months
Construction of Market Housing for 4 Bedroom Houses	12 months
Construction of Affordable Housing for 2 and 3 Bedroom Houses	18 months
Construction of Market Housing for 2 and 3 Bedroom Houses	24 months
Sales Period – Affordable Housing	1 month
Sales Period – Market Value Housing	32 months

12.13.2. It should be noted that we have assumed the sale of the affordable housing on practical completion.

12.13.3. The sales period assumed for the market value housing, represents the sale of 3 units per month. Considering the current market uncertainty, this is considered appropriate.

12.14. **Sales Fees and Other Costs**

12.14.1. We believe that there would be estate agent fees and legal costs to dispose of the proposed properties once completed. Respectively, we have assumed a blended rate of 1.00% and 0.35%, across both types of housing considering the size and scale of the development.

12.14.2. We have adopted £200,000 of promotion costs, which includes advertising and the cost of fitting out show houses.

12.14.3. **SANGS (Suitable Alternative Natural Green Space)**

12.14.4. We understand any residential development in the Wareham area will require land allocated to SANGS. This is a planning matter that has not been considered in this report. However, the cost of land purchase, the setting up and ongoing maintenance of the SANGS will be an additional cost that would have an impact of potentially significantly reducing the land value even further.

12.15. Appraisal Results

12.15.1. Please see Appendix 5, which displays the residual appraisal, which considers the above sales figure, aggregate development costs, developer's profit and timeframes, based on providing 40% affordable housing and the CIL contribution.

12.15.2. The appraisal generated a positive residual land value of £2,608,547.

12.15.3. If we were to take a more optimistic assessment of the residual land value, and assume there is no site remediation required, and the site roads, landscaping, externals and services cost 25% of the main House Construction Costs, the residual land figure increases to £4,057,000.

12.15.4. We therefore conclude that the land with planning consent for residential use in line with the above assumptions could have a residual land figure of between £2,600,000 and £4,100,000.

13 Conclusion

13.1. Vail Williams were asked to provide an overview of the viability of Westminster Road Industrial Estate by considering the following:

- Supply of alternative buildings in the wider area and local demand
- The current employment land supply emerging through the Local Plan
- Viability to consider the value of the site considering various scenarios
- The views of the occupiers on the estate

13.2. Whilst Westminster Road in comparison to sites in other locations is not a particularly high-quality estate, it is identified and recognised as a key employment area occupied by mainly owners who want to occupy the space in the long term.

13.3. Evidence from the occupier survey shows the enthusiasm to build and maintain their business on the estate and this has been demonstrated by the level of investment these occupiers are making to establish their business in Westminster Road.

13.4. We have established that it is not viable for the site to be purchased and redeveloped for residential use and the deliverability of the site would prove difficult due to the fragmented and individual ownerships of the freehold interests.

13.5. A unique scenario was created by Daler Rowney vacating several units on the estate thus creating a significant void in the local market.

13.6. Unlike the original expectation that this would have a detrimental impact on the town, conversely, new occupiers have purchased the properties and as a result, a regeneration of the estate has started.

13.7. The new occupiers have been able to purchase their building at an affordable price, allowing them to invest in the buildings. This has resulted in ongoing improvements and the overall aesthetics of the estate enhanced. For this reason, as they own their buildings and have invested to improve their buildings, it would be necessary to offer them substantial incentives and most likely expect to be paid a purchase price much higher than the value of the building to allow them to relocate to another building elsewhere on a 'like for like' basis, which will almost certainly be more expensive.

13.8. This is a now an improving and evolving estate that is providing employment for the occupiers of Wareham and the outlying area. The key attraction for the occupiers was affordability and the ability to purchase a building, not lease.

13.9. **Occupier's Questionnaire**

13.9.1. In terms of the occupier's future intentions, the evidence from the questionnaire suggests that because of being able to purchase a building at a low cost, they have every intention to remain in their building for the long term. This is not a stepping stone to relocate larger buildings.

13.9.2. In addition, the configuration and large plot areas at Westminster Road, in comparison to other estates, will allow occupiers to extend their buildings, further reducing their need to relocate.

13.9.3. Nevertheless, we believe demand in the town for future employment space is low. The occupiers who purchased buildings on Westminster Road capitalised on the ability to purchase, rather than lease, the buildings at a low cost.

13.9.4. Many commented in our questionnaire that this was a key reason for purchasing space on the Estate. To make any new development in Wareham viable the rent or the purchase price would have to be significantly higher than the values paid at Westminster Road

13.9.5. This evidence of lack of demand and the desire for occupiers to remain on the estate is supported by the fact that an occupier is expanding by purchasing 16 and 17 Westminster Road, a building that Vail Williams have been marketing on behalf of Daler Rowney. The marketing campaign, albeit brief, generated few enquiries for the building from occupiers outside the estate.

13.9.6. We can understand the concerns of the community about the future of the estate when Daler Rowney announced their relocation. However, the latent demand from owner occupiers in the area has filled that void and the estate is now being regenerated by the new owners.

13.9.7. This is a unique scenario which has been created by a series of current market factors. The available space on the estate created a supply of cheap, affordable stock in need of improvement, available for sale, rather than lease, in a general property market with strong owner occupier demand. In our view it is unlikely history will repeat itself and this situation will once again occur in Wareham.

13.9.8. The limited development opportunities in the area were considered by the occupiers as unaffordable and there is a general lack of supply of alternative buildings in the area.

13.9.9. The demand for these units has been driven by the existing and local occupiers seizing the opportunity to purchase these buildings. In our view it is not an indicator that there is any further demand for employment space in Wareham and further research would be needed to establish if this is the case.

13.10. **Financial Appraisals**

13.10.1. We have undertaken a theoretical approach to establish the values of the site by applying several valuation techniques and making a series of assumptions which we consider sensible.

13.10.2. In the first approach we calculated the current use value and we assumed the estate was available with vacant possession and could be purchased. Our calculations suggest a value in the order of £6.4m.

13.10.3. The second approach was a valuation of the investment by making several assumptions. The main assumption was that the buildings were all leased (rather than owned) by the occupiers.

13.10.4. The valuation also assumed a certain level of tenant covenant, or financial status, and on leases that would be expected on buildings of this location and nature. In this instance the investment approach suggests a value range of around £6.4m to £7.9m.

13.10.5. The third approach again is a development valuation to establish the residual land value, assuming residential planning consent was granted.

13.10.6. We have had to make several assumptions in terms of costs for demolition, decontamination, build costs and the likely housing densities. The residential land value for the site is in the order of £2.6m to £4.1m.

13.10.7. These three scenarios are all theoretical. In the first approach we have assumed an empty estate, in the second a fully leased estate and the third assumes a redevelopment for housing. These figures are not a formal valuation and must be considered 'high level' and used as a guide.

13.11. How Could the Land Be Developable?

13.11.1. To make these scenarios a reality, it will be necessary to convince the occupiers, who have mainly stated they are reluctant to move out of Wareham, to relocate. However, we have proven there are limited opportunities to purchase (rather than lease) a building at the same price elsewhere.

13.11.2. We assume as part of any planning application to redevelop this site for houses it will be necessary to prove lack of demand for this estate as an employment use. Through our marketing campaign which generated an enquiry for the building quickly, the evidence generated from the questionnaire about the occupier's demand to stay on the estate and the overall need to retain employment in the town, in our view it would be difficult to prove.

13.11.3. There would be the inevitable relocation and fit out costs required by the occupier along with the time and cost involved in negotiating with all the parties on the estate. This would increase the cost of the project and affect its viability.

13.11.4. If this was achieved, the scheme would have to remain viable and our initial high-level appraisal suggests land value for development is lower than the theoretical existing use or investment valuation.

13.11.5. We have proven the prospects of the site being a viable opportunity for redevelopment as unlikely. We have proven demand for buildings of this nature remains in the town but only at this price point. The buildings are mainly owned, not leased by occupiers who have clearly stated they have every intention to remain on the estate in the long term.

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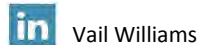
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Update Report

Westminster Road Industrial Estate, Wareham, Dorset

Report date: 28th November 2018

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1 Scope of Instructions

- 1.1. Vail Williams have been asked to provide a further report following their initial report issued in May 2018. The report provides:
 - an update on the current situation in terms of the occupiers and ownership status at Westminster Road Industrial Estate (WRIE) and;
 - a critique on the Employment Needs Assessment document July 2018 prepared by Dorset Planning for the Wareham Neighbourhood Plan.

2 Setting the Scene

- 2.1. In May 2018, Vail Williams produced a document entitled "Report on the Long-Term Future of The Westminster Road Industrial Estate" which provided advice on the longevity of the estate following the recent changes in the ownership structures of the buildings on WRIE after the relocation of Daler Rowney. It is understood that a redacted version of this document was supplied at the time to the Wareham Neighbourhood Plan Steering Group and Purbeck District Council.
- 2.2. In addition, the Vail Williams Solent Business Space team advised Daler Rowney on the disposal of 16/17 WRIE, which was sold to Purbeck Ice Cream in May 2018. At present, Vail Williams are not advising Daler Rowney on their remaining buildings on the estate.
- 2.3. **Summary of Vail Williams Report**
 - 2.3.1. Our report examined the ownership structure on the estate, advised on the local supply in the market, the anticipated rental values and analysed feedback from questionnaires sent to the occupiers of the estate during March to April 2018.
 - 2.3.2. The questionnaire and the findings of the report found that many occupiers now own their freehold interest. Some of the new owners have invested in updating and improving their buildings.
 - 2.3.3. Several occupiers confirmed they wished to remain on the estate and did not have plans to relocate due to their significant investment in the buildings. As the buildings were purchased at a low price, they took the opportunity to purchase a larger building to take account of their anticipated growth plans.
 - 2.3.4. Our report also commented on the current planning situation and commentary on the available employment sites in the Purbeck area.
 - 2.3.5. We undertook a "high-level" financial appraisal which examined the potential redevelopment of the site for residential use. Based on stated assumptions made (see the main report), the appraisal suggested that a future redevelopment of the site for residential purposes was most likely to be unviable.
 - 2.3.6. When Daler Rowney, announced their intentions to withdraw from the estate, releasing several buildings over a period of two years, the market conditions in the commercial property industry at the time could be considered as a "perfect storm", for the following reasons: -

- As we emerged from the global recession, take up of stock increased in the industrial market in the UK. This trend in the Purbeck region specifically was no exception.
 - The commercial developers who should have addressed the reducing stock levels by building new industrial buildings to increase stock levels and sustain market activity was delayed. This is due to the availability of deliverable commercial development sites, the prolonged timescales to secure planning consent and their remaining lack of confidence in the market.
 - The lack of new development did not address the reducing supply and whilst we are now seeing new industrial developments completing on the market, there remains an overall low level of existing stock available.
 - Out of the available space in the immediate area, the majority is for let only with only two large buildings current listed for sale. The low level of buildings for sale is because industrial estates are mainly owned by investment companies and financial institutions who very seldom sell individual buildings.
 - Our Business Team reports high demand for freehold industrial stock in the central Southern region. The take up of the freehold buildings at WRIE demonstrates there is demand from occupiers in the Purbeck region.
 - Many local occupiers can secure funding to purchase a building and will seize the opportunity to purchase when one becomes available. To secure a freehold interest, in many cases, they will compromise on location and quality of the building.
- 2.3.7. Because of these market conditions, the estate was purchased by several local businesses who have decided to secure this location as their long-term home.

3 Occupier Ownership

- 3.1. As a result of the recent transactions that have taken place on the estates, mainly as a consequence of the relocation of Daler Rowney, this the following ownership structure:-

Occupier	Unit Occupied	Tenure	Date of Purchase/Occupation
Purbeck Ice Cream	1	Freehold	May 2013
Daler Rowney	2 and 3	Leasehold	Unknown
Polar Holdings	4 and 5	Freehold	November 2017
Evo Design	6	Freehold	Q1 2018
National Tube Straightening Company	7	Freehold	October 2017
Cita Waste	8	Leasehold	Unknown
Westminster Wire Factory Limited	9 &10	Freehold	1999
Chococo	12	Leasehold	2010
Westminster Wire Factory Limited	13 &14	Freehold	1999

DWD Retail Display (occupier of the office space only)	14	Leasehold	2018
Olympia Triumph	15	Leasehold	January 2013
Purbeck Ice Cream	16 and 17	Freehold	May 2018
Eton Stonemasons	18	Freehold	March 2017

3.2. Freehold Ownership

3.2.1. According to our records 12 units are owned by the occupiers, following the recent purchase of Unit 14 by Westminster Wire from Jade Aden, the former occupiers. As a result, some of these occupiers are now undertaking works to the buildings to improve the aesthetics and secure their long-term future.

3.3. Leasehold Buildings

3.3.1. In terms of the tenanted buildings, upon expiry of the leases, the buildings may require a refurbishment before they are re-marketed.

3.3.2. The improvements in the overall appearance of the estate and the lack of available stock in the area may convince the landlords to respond to this strong market demand and undertake a refurbishment and re-release the building to the market by way of a new lease.

3.3.3. The landlords may consider a redevelopment of the building due to proven demand for new, modern, smaller units or they may look to assemble the buildings to form a larger site for redevelopment.

3.3.4. The recent sale of Unit 14 would suggest the landlord would prefer to sell the freehold interest and invest their capital elsewhere.

3.3.5. Daler Rowney remain as tenants of Units 2 and 3 until their lease expires in February 2022 but we understand they will be vacating the building during early 2019.

4 Employment Needs Assessment Critique

4.1. We have read the Employment Needs Assessment (ENA) dated July 2018 and we make the following comments firstly relating to the Executive Summary:-

4.2. Land Supply

4.2.1. In terms of the strategic assessments of employment land within the ENA, the suggestion is that the supply of employment land exceeds demand. This is surprising given the demand in the region for industrial stock which is the best performing commercial property sector in the market.

4.3. Unit Sizes

4.3.1. We agree with the view of the ENA that enquiries have shifted to smaller units. This is evidenced by the recent developments on Holton Heath where several new units have been made available for sale or to let, with sizes from 1500 sq ft.

4.3.2. In addition, we note planning consent has recently been granted for a 24-unit scheme with units ranging from 1,085 sq ft to 2,200 sq ft on the former Overhill Engineering site on the Wareham Road.

- 4.3.3. Some industrial buildings that are no longer viable are being redeveloped with new small unit industrial developments. Examples are Cobham Business Centre in Ferndown and Hilsea Industrial Estate in Portsmouth. Ordinarily, we would have expected to see this type of development at WRIE, if any of the buildings were considered as no longer viable.
- 4.4. **Employment Density**
- 4.4.1. The report states, “*that both Westminster Road Industrial Estate and Johns Road are seriously under-occupied in terms of employment density*”. The report suggests this as a negative point, however, we believe WRIE positions itself well in the market and should be considered as a positive.
- 4.4.2. In our view the estate responds to the demand from occupiers looking for low cost buildings with external storage areas and the availability of car parking.
- 4.4.3. When developers appraise a new industrial development site, to create viable and profitable financial model, the modern industrial estates are built to maximise the amount of lettable space. As land supply diminishes and land values increase, the viability of these estates becomes increasingly difficult to achieve.
- 4.4.4. The resultant typical industrial estate is a terrace of units with car parking and a loading door to the front. Due to the design and the high density of the estate, it is not possible to create secure yards as it compromises the ability for vehicles to turn and circulate within the common areas of the estate.
- 4.4.5. Our Business Space agency team regularly receive enquiries from occupiers looking for space with secure open storage yards and additional land for staff parking. Therefore, we believe that the design of the Westminster Road Industrial Estate benefits from having these two selling points.
- 4.4.6. The opportunity at WRIE is that it can accommodate occupiers who need external storage areas. Potential occupiers will gravitate to this estate rather than occupy a higher density estate where their external storage needs will create a nuisance for neighbouring occupiers.
- 4.5. **The View that it is a “Run Down” Estate**
- 4.5.1. We do not agree with the opinion that WRIE has “become run down and requiring modernization”. This may have been the case with the estate occupied by Daler Rowney at the time they decided to vacate the estate, but the new owner-occupiers of the buildings are breathing new life into the estate through improvement and refurbishment works. This has only been made possible by businesses purchasing and owning their buildings.
- 4.5.2. The Westminster Road Industrial Estate is a unique and valuable facility. We are witnessing its regeneration by occupiers now committed to remaining on the estate. This is a positive trend and good for economic activity in Wareham.
- 4.5.3. In different market conditions, the consequences of Daler Rowney vacating the estate could have been very different and we could have seen their former units falling into disrepair and decline.
- 4.6. **Part 2.2**
- 4.6.1. The NPPF seeks to support the economic growth through the planning system and “it makes it clear that planning policies should avoid long term protection of sites allocated for employment where there is no reasonable prospect of a site being used for that purpose”.
- 4.6.2. We believe there is “reasonable prospect” for employment. The estate is now occupied by the owners who are improving the estate by using their own capital. We believe the employment use of these buildings is a reasonable prospect in the long term.
- 4.7. **Part 2.4**

- 4.7.1. Once again paragraph 51 states that planning authorities “should normally approve applications to residential use... from commercial buildings where there is an identified need for additional housing... provided there is not a strong economic reason why such development would be inappropriate”.
- 4.7.2. In our opinion, there are economic reasons why WRIE should remain and not be redeveloped for another use. The owners have made a commitment to the estate and employ locally based staff or those commuting into Wareham, including Bournemouth, Poole, Dorchester and the outlying villages.
- 4.8. **Part 2.4 - Redevelopment**
- 4.8.1. Another *economic reason* is our opinion over the potential viability of residential redevelopment as detailed in our recent report dated May 2018. Although further investigation is required, the viability of residential development is questionable.
- 4.9. **Part 2.4 - Vacant Possession**
- 4.9.1. To facilitate the re-development of the whole estate, it would be necessary to purchase the individual freehold interests and potentially identify alternative buildings for these occupiers.
- 4.9.2. The landlords would need to secure vacant possession of leased buildings. Dependent on the tenant’s lease terms, under the provisions of the Landlord and Tenant Act, the landlord may have to compensate the tenant. If lease expiry is not imminent, to seek vacant possession, the landlord may need to compensate the tenant and potentially offer the tenant a capital sum.
- 4.9.3. We have established there is a lack of supply of similar stock in the market, so we do not know where the occupiers can relocate at comparable freehold or rental values.
- 4.9.4. It will then be necessary to consider the cost of demolition and any ground contamination caused by historical industrial processes on the site.
- 4.10. **Part 2.8**
- 4.10.1. Policy E allows for new employment provision of B Class uses and seeks to safeguard existing employment land, "*subject to certain criteria*". It is important to consider the criteria and whether the Estate satisfies this criteria, considering the current ownership structure and the overall improvements on the estate undertaken by the new owners.
- 4.11. **Holton Heath**
- 4.11.1. Holton Heath is a better strategic location for employment uses, should be safeguarded for employment and would be the obvious choice for new employment space. However, there is limited land supply on that estate which could be used for future development. Although we accept a few of the older buildings on the Estate could be redeveloped.
- 4.12. **Local Planning Evidence**
- 4.13. **Part 3.2**
- 4.13.1. We agree there is no further vacant development land available at Westminster Road although we note the Council Depot building is planned for demolition early next year.
- 4.13.2. We agree that 30% would mostly travel to Wareham from Bournemouth and Poole. This would be expected as this is one of the prime employment areas in the area.
- 4.13.3. In terms of the statistics, we would consider Sandford and Holton Heath as an outlying area of Wareham, which represents 7% of residents travelling between 2km and 5km from home.
- 4.13.4. When combining the two figures (36% and 7%) 43% are remaining and commuting within the town and immediate outlying areas. We believe this is a more accurate reflection of the distances travelled to work by Wareham residents.

4.14. **Part 6.1**

- 4.14.1. The Demand for Workspace graph shows an overall drop in demand from 2009. The ENA has not provided a reference or source of this data but in our opinion, the suggested trend is accurate, but we need to consider the reasoning behind these statistics.
- 4.14.2. However, this is not relevant in 2018 and our view of the future market activity. The reduction in demand was because of a global recession and is not because of changes in local occupier demand. This should not be a factor that would influence the provision of employment space in the Purbeck region.
- 4.14.3. Our Business Space team experienced a strong market from 2005 to 2006 with a considerable amount of industrial activity and new industrial development. In 2008-9 when the global recession took hold, occupier demand decreased before the market recovered in 2013/14 when there was rapid take up. This take up, coupled with lack of new development has resulted in lack of supply of new and existing stock.
- 4.14.4. This lack of supply, rather than occupier demand and market conditions have affected take up figures in 2015 and 2016.
- 4.14.5. In 2016 to 2017, developer confidence grew, and they speculatively commenced the construction of new industrial schemes in the region, which partially relieved the lack of stock in the market.
- 4.14.6. The 2016 figures are broadly on a par with the more stable market conditions dating back to early 2000's.
- 4.14.7. We agree that small unit schemes have increased over the last few years and our Business Space team report strong levels of enquiries for buildings within this size range.

4.15. **Part 7.3**

- 4.15.1. The feedback from the questionnaire detailed in 7.3 is broadly in line with our research which we undertook for our first report. Another reason why the occupiers relocated to Wareham was the availability of freehold interests, which is the main selling point.

4.16. **Part 7.5**

- 4.16.1. The businesses are “under-occupying” the buildings on WRIE. This is in line with our research which suggested the occupiers saw this as an opportunity to grow their business within their existing facility and accommodate their anticipated long-term growth.
- 4.16.2. This is a reasonable approach to future proofing their business and demonstrates the occupiers are informed of the market conditions. If they could not grow within their building, they would have to consider relocating which would be a difficult task considering the lack of employment space available in the market and the likely higher costs of a building elsewhere.

4.17. **Part 7.6**

- 4.17.1. We accept that the 2017 Survey showed a high local employment base because of Daler Rowney occupying the estate. However, the former Daler Rowney buildings have been replaced with local, growing businesses. We do not have any data on whether the Daler Rowney former employees have secured jobs elsewhere on WRIE or in the town.

5 Westminster Road Industrial Estate Detailed Appraisal

5.1. Part 8.1

5.1.1. Market conditions supported the purchase of the buildings by local businesses. These market forces have influenced the fortunes of the estate and had a positive result by giving WRIE a new lease of life. We note that units 2 & 3 will most likely become vacant in 2019 but we have no knowledge of the landlord's intentions. We do note, however, that the lease does not expire until 2022.

5.2. Part 8.6

5.2.1. As an update to the Employment Needs Assessment document, we can state that units 16 and 17 was released to the market in Q1 2018. In May 2018, the buildings were sold to Purbeck Ice Cream who are also the owner-occupiers of Unit 1.

5.2.2. Unit 14 was sold by Jade Aden to Westminster Wire Factory Ltd who have let the offices at the front of the building to DWD Retail Display.

5.2.3. Overall, the appearance of the estate has improved. New freehold owners of the estate, in particular Polar Holdings, Evomotion and National Tube Straightening Ltd, are in the process of improving the aesthetics of their buildings.

5.3. Part 8.8

5.3.1. The appearance of estates looking under-utilised is not necessarily the case and depends on the actual use of the building. The estate attracts occupiers who would struggle to occupy a conventional terraced development and in the absence of WRIE the occupier will either look elsewhere or not be able to grow their business locally and generate further employment.

5.3.2. The facilities on the estate have, and will, attract businesses who require external storage and/or more outside space.

5.3.3. A conventional industrial development is typically a terrace of units with parking and loading to the front. There are limited opportunities for the occupier to build secure external yards or to create additional parking.

5.3.4. In comparison to modern estates with units of a similar size, the layout and configuration of the buildings on Westminster Road is not typical. The units have external loading areas, parking on site and landscaping around the perimeter of the building where additional parking could be created. Although the construction and building materials used are not modern, for owner occupiers, there is market demand for this type and age of estate.

5.4. Part 8.9

5.4.1. It is accepted the loss of Daler Rowney has resulted in the loss of 40 positions, but the more important question is what has happened to them.

- Have they secured a new role outside the area?
- Have they joined one of the new businesses on the estate?
- Are they now out of the employment market?
- Have they secured a role with another employer in Wareham?

5.4.2. These are valid reasons and would not cast doubt on the future of WRIE.

5.5. **Part 8.10**

- 5.5.1. It has been suggested that Westminster Wire Factory Limited who own four buildings on Westminster Road would consider relocating to Holton Heath. The results of their questionnaire would suggest the contrary and we would question if that is the case.
- 5.5.2. Holton Heath has limited availability now and there is a limited prospect of purchasing a freehold building. We would suggest that this freehold occupier, or any other occupier of WRIE would not be able to secure a like-for-like building at the same price they paid for their building at WRIE.

5.6. **Part 8.11**

- 5.6.1. We understand that Polar Holdings relocated to Wareham to secure a cheaper building and their staff are based outside the area as they have another facility in Holton Heath. We also understand they are planning to increase their staff based at WRIE.

5.7. **Part 8.12**

- 5.7.1. It is accepted that the buildings are reflective of their age in terms of specification in comparison with modern industrial facilities. As an example, these buildings will not suit a typical warehouse occupier who requires an efficient high bay warehouse to maximise their storage requirements and turning and loading for arctic deliveries.
- 5.7.2. However, the occupiers that have been attracted to this estate are those who are in light manufacturing where they would consider the cost to heat a high bay warehouse as a disadvantage. They have capitalised on the older style by undertaking their own improvement works from their own resources which was possible due to the initial low purchase costs.

5.8. **Part 8.13**

- 5.8.1. We agree that servicing is difficult again mainly because of the older design. The buildings are either detached or semi-detached with the loading bay on the side elevation rather than on the front elevation, which is a standard design on modern buildings.
- 5.8.2. The unloading of large vehicles would have to be undertaken either on the road or outside the building from the side of the vehicle.
- 5.8.3. Our Business Space team market similar buildings and although some occupiers will discount the building, many occupiers will balance this disadvantage with the affordability of the building with this inconvenience against the cost and possibility of installing a more convenient front facing loading door.
- 5.8.4. In terms of lack of parking, when advising Daler Rowney on the disposal of Units 16 and 17, our Business Space team commented on the under-use of areas around the building which could be used for external and storage additional parking.

5.9. **Part 8.17**

- 5.9.1. The table under Part 8.17 requires updating and comment. The schedule states that 15 Westminster Road spent 39 months on the market from October 2009 to January 2013. This unit was eventually leased to Olympia Triumph who remain there as tenants.
- 5.9.2. The property was being marketed during the recession when there was very limited market activity and a marketing period of 39 months for a building of this nature was not unusual.
- 5.9.3. 18 Westminster Road was sold to Eton Stonemasons which completed in March 2017 which was on the market for approximately 10 months. Eton Stonemasons have since invested in improving the building and remain in occupation.

5.10. **Part 8.18**

- 5.10.1. The three bullet points raised by the Economic Development officer is correct and reasonable. We particularly agree with the concerns that the ownership structure and level of capital expenditure that the new owners of the estate have incurred.
- 5.10.2. In addition, the lack of industrial development pipeline in the wider region makes it difficult to identify land where it would be viable to cater for the displaced businesses. This reinforces the view that existing viable employment space, particularly in town centre locations must be safeguarded.
- 5.10.3. We agree job losses would occur because of any relocation as it is unlikely these businesses can be relocated elsewhere in Wareham.

5.11. **Part 8.19**

- 5.11.1. We agree with the feedback from Mr Sibbet of Sibbet Gregory but the term "patch and repair" is not correct. Most of these occupiers are undertaking a considerable amount of works to the property and are making significant investments to secure the long-term future of these buildings.

5.12. **Part 11 (h)**

- 5.12.1. A phased basis has been suggested in the conclusions to "*suit the timescales and future plans of the existing occupants*". Considering the ownership structure of the buildings and the future plans of the owners who have invested heavily in WRIE, their plans are to remain in their buildings for the long term.
- 5.12.2. We struggle to see how practically this will work as piecemeal changes of use will result in a substandard residential scheme, this will conflict with the new residents and the remaining occupiers of WRIE, the process will take a long time to complete and the same issues with relocating the occupiers elsewhere will remain.

6 Summary

- 6.1. We are concerned the views and opinions of the owners of the estate as expressed in the ENA document do not match our research and analysis of their views. The correct market conditions have secured the long-term future of WRIE by new owners identifying the opportunity of purchasing run-down buildings. This suits their needs by purchasing at a low cost and then investing to improve the buildings as they see their occupation being at WRIE in the long term.
- 6.2. Most of the buildings are now owned by the occupiers and the most recent leased property (Unit 14) was sold by the landlord to an existing occupier on the estate.
- 6.3. A building that may form a larger residential development may generate a higher value once planning consent is granted. Ordinarily, if the landlord believed there was any prospect of a redevelopment that would deliver a higher return, they would maintain ownership of the building and wait for the opportunity to arise. The sale of this building to an owner occupier may suggest the landlord's lack of confidence of the prospect of residential redevelopment on the estate.
- 6.4. The practical application of securing the freehold interests from the owners of the estate and finding a solution to relocate them elsewhere is going to be very difficult, expensive and time consuming.
- 6.5. Recent market activity has resulted in a significant lack of available alternative stock in the market. There is limited supply of development land close to WRIE and any significant increase in the availability of development land in the future is unlikely. In any event, new build properties and land values for these businesses would most likely be unaffordable for the occupiers of WRIE.

- 6.6. It is accepted the buildings can be considered as outdated. However, they are positioned well in the market to suit occupiers who would struggle to occupy a conventional terraced building as they require open storage areas and on-site parking.
- 6.7. In our opinion, the analysis in this update report and the original report from May 2018 is a better analysis of the future of WRIE.
- 6.8. We disagree with the view WRIE is now run-down and in our view is not at the end of its useful life. WRIE has transformed itself over the last 2-3 years as the owners continue to improve the quality of their buildings and the estate's aesthetics.
- 6.9. The sentiment of most of the new owners that were interviewed is that they are there for the long term and see the prospect of redevelopment of WRIE as a threat to their business rather than an opportunity.

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We advise on a wide range of development projects including the sale or acquisition of land and buildings. We create promotion, option, and development agreements, advise on scheme layout and provide viability appraisals to support planning applications, appeals and local plan enquiries.

Dilapidations

Combining our exceptional negotiation skills and understanding of your objective, we settle liabilities in your favour using our expertise and strategic advice across a broad range of property types.

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Representing your interests to bring commercial property disputes to the best possible conclusion.

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Improving efficiency to make sure your building provides the environment and services that will satisfy the business requirements of the occupiers whilst reducing costs and ensuring full compliance with regulations.

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Using our market knowledge and network of contacts to help you find investment or selling opportunities.

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Commercially astute and detailed strategic advice on all aspects of commercial property leases for both landlords and tenants.

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Providing accurate assessments across different sectors through highly experienced surveyors.

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Our job is to plan, budget, oversee and document all aspects of your project ensuring that each element is on schedule and meets all necessary regulations and standards. We will also help you select and manage the contractors and monitor their progress.

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Expert advice for negotiating the complexities of the town planning process.

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Providing advice that can lead to valuable cost savings in this often overlooked area.

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Ensuring your property portfolio delivers maximum value through tight credit control and management of supplier relationships.



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3 Ocean Way
Ocean Village
Southampton
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Our services:

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- Business Rates Consultancy
- Commercial Property Investment
- Lease Advisory
- LPA Receivership
- Marine and Leisure
- Occupier Advisory
- Property Acquisition and Disposal
- Property Asset Management
- Property Development Consultancy
- Property Planning Consultancy
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Regulated by RICS

Comment

Agent	Mr. Lachlan Robertson (1188064)
Email Address	[REDACTED]
Company / Organisation	Carter Jonas
Address	St James House The Square Bath BA2 3BH
Consultee	Mr. Andrew Hodgson (1188067)
Email Address	[REDACTED]
Company / Organisation	Welbeck Land
Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Welbeck Land (Mr. Andrew Hodgson - 1188067)
Comment ID	PLPP384
Response Date	03/12/18 14:57
Consultation Point	Chapter 2: Vision and objectives (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No
If yes, how many people do you represent?	1
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	Vision
Do you consider that the Local Plan is legally compliant?	Yes

Do you consider that the Local Plan is sound? 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)

see attached document

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see attached document

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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 previously attached file within the Introduction Section - 181203 Collated Purbeck Local Plan Representations

Comment

Agent	Mr. Lachlan Robertson (1188064)
Email Address	[REDACTED]
Company / Organisation	Carter Jonas
Address	St James House The Square Bath BA2 3BH
Consultee	Mr. Andrew Hodgson (1188067)
Email Address	[REDACTED]k
Company / Organisation	Welbeck Land
Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Welbeck Land (Mr. Andrew Hodgson - 1188067)
Comment ID	PLPP386
Response Date	03/12/18 14:59
Consultation Point	Policy V1: Spatial strategy for sustainable communities (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No
If yes, how many people do you represent?	1
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	40

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)

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Yes, See previously attached file within the Introduction Section - 181203 Collated Purbeck Local Plan Representations

Comment

Agent	Mr. Lachlan Robertson (1188064)
Email Address	[REDACTED]
Company / Organisation	Carter Jonas
Address	St James House The Square Bath BA2 3BH
Consultee	Mr. Andrew Hodgson (1188067)
Email Address	[REDACTED]
Company / Organisation	Welbeck Land
Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Welbeck Land (Mr. Andrew Hodgson - 1188067)
Comment ID	PLPP387
Response Date	03/12/18 15:01
Consultation Point	Spatial strategy for sustainable communities (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No
If yes, how many people do you represent?	1
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	41

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)

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Comment

Agent	Mr. Lachlan Robertson (1188064)
Email Address	[REDACTED]
Company / Organisation	Carter Jonas
Address	St James House The Square Bath BA2 3BH
Consultee	Mr. Andrew Hodgson (1188067)
Email Address	[REDACTED]
Company / Organisation	Welbeck Land
Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Welbeck Land (Mr. Andrew Hodgson - 1188067)
Comment ID	PLPP390
Response Date	03/12/18 15:02
Consultation Point	Spatial strategy for sustainable communities (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No
If yes, how many people do you represent?	1
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	Policy V1

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

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Yes, See previously attached file within the Introduction Section - 181203 Collated Purbeck Local Plan Representations

Comment

Agent	Mr. Lachlan Robertson (1188064)
Email Address	[REDACTED]
Company / Organisation	Carter Jonas
Address	St James House The Square Bath BA2 3BH
Consultee	Mr. Andrew Hodgson (1188067)
Email Address	[REDACTED]
Company / Organisation	Welbeck Land
Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Welbeck Land (Mr. Andrew Hodgson - 1188067)
Comment ID	PLPP391
Response Date	03/12/18 15:03
Consultation Point	Policy V2: Green belt (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No
If yes, how many people do you represent?	1
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	Policy V2
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)

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Yes, See previously attached file within the Introduction Section - 181203 Collated Purbeck Local Plan Representations

Comment

Agent	Mr. Lachlan Robertson (1188064)
Email Address	[REDACTED]
Company / Organisation	Carter Jonas
Address	St James House The Square Bath BA2 3BH
Consultee	Mr. Andrew Hodgson (1188067)
Email Address	[REDACTED]
Company / Organisation	Welbeck Land
Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Welbeck Land (Mr. Andrew Hodgson - 1188067)
Comment ID	PLPP392
Response Date	03/12/18 15:05
Consultation Point	Protected habitats (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No
If yes, how many people do you represent?	1
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	85
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)

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Yes, See previously attached file within the Introduction Section - 181203 Collated Purbeck Local Plan Representations

Comment

Agent	Mr. Lachlan Robertson (1188064)
Email Address	[REDACTED]
Company / Organisation	Carter Jonas
Address	St James House The Square Bath BA2 3BH
Consultee	Mr. Andrew Hodgson (1188067)
Email Address	[REDACTED]
Company / Organisation	Welbeck Land
Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Welbeck Land (Mr. Andrew Hodgson - 1188067)
Comment ID	PLPP394
Response Date	03/12/18 15:07
Consultation Point	Policy E8: Dorset heathlands (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No
If yes, how many people do you represent?	1
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	Policy E8
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)

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Yes, See previously attached file within the Introduction Section - 181203 Collated Purbeck Local Plan Representations

Comment

Agent	Mr. Lachlan Robertson (1188064)
Email Address	[REDACTED]
Company / Organisation	Carter Jonas
Address	St James House The Square Bath BA2 3BH
Consultee	Mr. Andrew Hodgson (1188067)
Email Address	[REDACTED]
Company / Organisation	Welbeck Land
Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Welbeck Land (Mr. Andrew Hodgson - 1188067)
Comment ID	PLPP397
Response Date	03/12/18 15:09
Consultation Point	Policy H1: Local housing requirement (View)
Status	Processed
Submission Type	Web
Version	0.1
Files	See previously attached file within this Section - 181203 Collated Purbeck Local Plan Representations
Are you responding on behalf of a group?	No
If yes, how many people do you represent?	1

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

Which policy / paragraph number / policies map does your comment relate to? Policy H1

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

Do you consider that the Local Plan is sound? No

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

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If you have any supporting documents please upload them here.

See previously attached file within this Section - 181203 Collated Purbeck Local Plan Representations
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Comment

Agent	Mr. Lachlan Robertson (1188064)
Email Address	[REDACTED]
Company / Organisation	Carter Jonas
Address	St James House The Square Bath BA2 3BH
Consultee	Mr. Andrew Hodgson (1188067)
Email Address	[REDACTED]
Company / Organisation	Welbeck Land
Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Welbeck Land (Mr. Andrew Hodgson - 1188067)
Comment ID	PLPP398
Response Date	03/12/18 15:11
Consultation Point	Policy H2: The housing land supply (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No
If yes, how many people do you represent?	1
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	Policy H2
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)

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Yes, See previously attached file - 181203 Collated Purbeck Local Plan Representations

Comment

Agent	Mr. Lachlan Robertson (1188064)
Email Address	[REDACTED]
Company / Organisation	Carter Jonas
Address	St James House The Square Bath BA2 3BH
Consultee	Mr. Andrew Hodgson (1188067)
Email Address	[REDACTED]
Company / Organisation	Welbeck Land
Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Welbeck Land (Mr. Andrew Hodgson - 1188067)
Comment ID	PLPP401
Response Date	03/12/18 15:12
Consultation Point	Policy H3: New housing development requirements (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No
If yes, how many people do you represent?	1
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	Policy H3

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

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Comment

Agent	Mr. Lachlan Robertson (1188064)
Email Address	[REDACTED]
Company / Organisation	Carter Jonas
Address	St James House The Square Bath BA2 3BH
Consultee	Mr. Andrew Hodgson (1188067)
Email Address	[REDACTED]
Company / Organisation	Welbeck Land
Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Welbeck Land (Mr. Andrew Hodgson - 1188067)
Comment ID	PLPP402
Response Date	03/12/18 15:14
Consultation Point	Policy H8: Small sites next to existing settlements (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No
If yes, how many people do you represent?	1
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	Policy H8

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

Do you consider that the Local Plan is sound? No

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

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Comment

Agent	Mr. Lachlan Robertson (1188064)
Email Address	[REDACTED]
Company / Organisation	Carter Jonas
Address	St James House The Square Bath BA2 3BH
Consultee	Mr. Andrew Hodgson (1188067)
Email Address	[REDACTED]
Company / Organisation	Welbeck Land
Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Welbeck Land (Mr. Andrew Hodgson - 1188067)
Comment ID	PLPP404
Response Date	03/12/18 15:17
Consultation Point	Policy H11: Affordable housing (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No
If yes, how many people do you represent?	1
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	Policy H11
Do you consider that the Local Plan is legally compliant?	Yes

Do you consider that the Local Plan is sound? No

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

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

See previously attached file - 181203 Collated Purbeck Local Plan Representations

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 previously attached file - 181203 Collated Purbeck Local Plan 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?

Yes, See previously attached file - 181203 Collated Purbeck Local Plan Representations

Comment

Agent	Mr. Lachlan Robertson (1188064)
Email Address	[REDACTED]
Company / Organisation	Carter Jonas
Address	St James House The Square Bath BA2 3BH
Consultee	Mr. Andrew Hodgson (1188067)
Email Address	[REDACTED]
Company / Organisation	Welbeck Land
Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Welbeck Land (Mr. Andrew Hodgson - 1188067)
Comment ID	PLPP406
Response Date	03/12/18 15:20
Consultation Point	Policy H1: Local housing requirement (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No
If yes, how many people do you represent?	1
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	112
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)

See proposed additional policies H8A, H8B and H8C (paras 4.36. to 4.38 as previously attached file - 181203 Collated Purbeck Local Plan Representations

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 proposed additional policies H8A, H8B and H8C (paras 4.36. to 4.38 as previously attached file - 181203 Collated Purbeck Local Plan Representations

Comment

Agent	Mr. Lachlan Robertson (1188064)
Email Address	[REDACTED]
Company / Organisation	Carter Jonas
Address	St James House The Square Bath BA2 3BH
Consultee	Mr. Andrew Hodgson (1188067)
Email Address	[REDACTED]
Company / Organisation	Welbeck Land
Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Welbeck Land (Mr. Andrew Hodgson - 1188067)
Comment ID	PLPP407
Response Date	03/12/18 15:22
Consultation Point	Promote a prosperous and diverse local economy (View)
Status	Processed
Submission Type	Web
Version	0.1
Files	See previously attached file - 181203 Collated Purbeck Local Plan Representations
Are you responding on behalf of a group?	No
If yes, how many people do you represent?	1

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

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

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)

See previously attached file - 181203 Collated Purbeck Local Plan Representations

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 previously attached file - 181203 Collated Purbeck Local Plan Representations

If you have any supporting documents please upload them here. [See previously attached file - 181203 Collated Purbeck Local Plan Representations](#)
See previously attached file - 181203 Collated Purbeck Local Plan 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?

See previously attached file - 181203 Collated Purbeck Local Plan Representations

Comment

Agent	Mr. Lachlan Robertson (1188064)
Email Address	[REDACTED]
Company / Organisation	Carter Jonas
Address	St James House The Square Bath BA2 3BH
Consultee	Mr. Andrew Hodgson (1188067)
Email Address	[REDACTED]
Company / Organisation	Welbeck Land
Address	[REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Welbeck Land (Mr. Andrew Hodgson - 1188067)
Comment ID	PLPP409
Response Date	03/12/18 15:24
Consultation Point	Policy IM1: Tools for delivery - the Purbeck Local Plan implementation strategy (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No
If yes, how many people do you represent?	1
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	Policy IM1

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)

See previously attached file - 181203 Collated Purbeck Local Plan Representations

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See previously attached file - 181203 Collated Purbeck Local Plan 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?

Yes, See previously attached file - 181203 Collated Purbeck Local Plan Representations

Comment

Consultee	Ruth Hall (1190241)
Email Address	████████████████████
Company / Organisation	Wessex Water
Address	Operations Centre Claverton Down Bath BS2 7WW
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Wessex Water (Ruth Hall - 1190241)
Comment ID	PLPP88
Response Date	29/11/18 12:13
Consultation Point	Policy V2: Green belt (View)
Status	Processed
Submission Type	Web
Version	0.2
Are you responding on behalf of a group?	Yes

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

Which policy / paragraph number / policies map does your comment relate to? Policy V2

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

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 V2: Green belt

Wessex Water is seeking to develop a regional office and storage/distribution facility to support its operational work. Land which previously formed part of the now disused Sandford Sewage Treatment Works is proposed for this use. The site is located to the south of the Omega Centre, Sandford Lane, Wareham, BH20 4DY. The site was evaluated for employment allocation during the Local Plan Review

Options stage but has not been allocated within the Draft Plan. Wessex Water ask that the Council reconsider the decision not to amend the greenbelt boundary and allocate the site. The land is brownfield land and its development represents a modest extension to an existing safeguarded employment site. The proposed facility is needed to enable the delivery and maintenance of infrastructure and is therefore essential to support the growth, productivity and environmental wellbeing of the district. We do not believe that the allocated employment sites provide a sufficiently sized site in a suitable location.

(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

Comment

Consultee	Ruth Hall (1190241)
Email Address	██
Company / Organisation	Wessex Water
Address	Operations Centre Claverton Down Bath BS2 7WW
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Wessex Water (Ruth Hall - 1190241)
Comment ID	PLPP89
Response Date	29/11/18 12:15
Consultation Point	Policy H2: The housing land supply (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	Yes

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

Which policy / paragraph number / policies map does your comment relate to? H2

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

Do you consider that the Local Plan is sound? Yes

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 H2: The housing land supply

The policy identifies that housing allocations at Swanage are as previously identified within the adopted Swanage Local Plan. Wessex Water are exploring options to relocate the existing seafront Swanage Sewage Treatment Works (STW) to an inland site. One of the possible locations which is being explored is at Prospect Farm Sludge Treatment Site (STS) (402120,079760). An expansion to the STS would

be required to enable it to operate as a STW. Wessex Water will be making representations for the safeguarding of adjacent land through the Waste Plan as appropriate. Future residential and employment land allocations should not be made in proximity to the STS to ensure that conversion of the site to a STW can take place in the future if this is required. A no development odour buffer zone will be required around the STW to protect residential amenity and to ensure that the treatment of sewage at the site is not restricted.

(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	Ruth Hall (1190241)
Email Address	██
Company / Organisation	Wessex Water
Address	Operations Centre Claverton Down Bath BS2 7WW
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Wessex Water (Ruth Hall - 1190241)
Comment ID	PLPP92
Response Date	29/11/18 12:21
Consultation Point	Policy H4: Moreton Station / Redbridge Pit (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	Yes

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

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

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

Do you consider that the Local Plan is sound? Yes

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 H4: Morton Station/Redbridge Pit

As identified in our consultation response to Policy V1: Spatial Strategy, coordination on development phasing between Wessex Water, Purbeck District Council and developers will be required to plan and

deliver water and sewerage infrastructure to serve new allocations. This is particularly the case for larger allocations such as that at Morton Station/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? No

Comment

Consultee	Ruth Hall (1190241)
Email Address	██
Company / Organisation	Wessex Water
Address	Operations Centre Claverton Down Bath BS2 7WW
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Wessex Water (Ruth Hall - 1190241)
Comment ID	PLPP93
Response Date	29/11/18 12:23
Consultation Point	Policy H5: Wool (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	Yes

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

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

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

Do you consider that the Local Plan is sound? Yes

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: Wool

As identified in our consultation response to Policy V1: Spatial Strategy, coordination on development phasing between Wessex Water, Purbeck District Council and developers will be required to plan and deliver water and sewerage infrastructure to serve new allocations. This is particularly the case for larger allocations such as that in Wool. The council has identified four suitable sites; Land to the west

of Chalk Pit Lane and Oakdene Road, Land to the north east of Burton Cross Roundabout, Land to the north west of Burton Cross Roundabout and Land to the north of the railway line.

Wessex Water have undertaken preliminary sewer network modelling to inform foul drainage options. We suggest the inclusion of the following policy to ensure that foul drainage is delivered in a timely and coordinated manner, to reduce disruption and costs;

The developers of Land to the west of Chalk Pit Lane and Oakdene Road, Land to the north east of Burton Cross Roundabout, Land to the north west of Burton Cross Roundabout and Land to the north of the railway line will be required to work cooperatively with each other and with Wessex Water to deliver a suitable foul sewer connection to the Wool Sewage Treatment Works.

(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	Ruth Hall (1190241)
Email Address	████████████████████
Company / Organisation	Wessex Water
Address	Operations Centre Claverton Down Bath BS2 7WW
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Wessex Water (Ruth Hall - 1190241)
Comment ID	PLPP95
Response Date	29/11/18 12:24
Consultation Point	Policy H6: Lytchett Matravers (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	Yes

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

Which policy / paragraph number / policies map does your comment relate to?	H6
Do you consider that the Local Plan is legally compliant?	Yes
Do you consider that the Local Plan is sound?	Yes

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

Policy H6: Lytchett Matravers

As identified in our consultation response to Policy V1: Spatial Strategy, coordination on development phasing between Wessex Water, Purbeck District Council and developers will be required to plan and deliver water and sewerage infrastructure to serve new allocations. This is particularly the case for larger allocations such as that at Lytchett Matravers.

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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	Ruth Hall (1190241)
Email Address	[REDACTED]
Company / Organisation	Wessex Water
Address	Operations Centre Claverton Down Bath BS2 7WW
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Wessex Water (Ruth Hall - 1190241)
Comment ID	PLPP97
Response Date	29/11/18 12:26
Consultation Point	Policy H7: Upton (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	Yes

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

Which policy / paragraph number / policies map does your comment relate to?	H7
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Do you consider that the Local Plan is legally compliant?	Yes
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Do you consider that the Local Plan is sound?	Yes
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Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

Policy H7: Upton

As identified in our consultation response to Policy V1: Spatial Strategy, coordination on development phasing between Wessex Water, Purbeck District Council and developers will be required to plan and deliver water and sewerage infrastructure to serve new allocations.

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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	Ruth Hall (1190241)
Email Address	[REDACTED]
Company / Organisation	Wessex Water
Address	Operations Centre Claverton Down Bath BS2 7WW
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Wessex Water (Ruth Hall - 1190241)
Comment ID	PLPP99
Response Date	29/11/18 12:28
Consultation Point	Policy E11: Development next to sewage treatment works and pumping stations (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	Yes

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? E11

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

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 E11: Development next to sewage treatment works and pumping stations

The policy identifies that development proposed adjacent to Sewage Treatment Works (STW) and Sewage Pumping Stations (SPS) will only be permitted if the applicant can demonstrate that the proposed development is not likely to be adversely affected by unpleasant odour, noise or vibration.

Insects are also an identified statutory nuisance. Section 101 of the Clean Neighbourhoods Protection Act 2005 added to the description of statutory nuisances listed in section 79(1) of the Environmental Protection Act 1990:

'(fa) any insects emanating from relevant industrial, trade or business premises and being prejudicial to health or a nuisance'.

We believe policy E11 should be expanded to identify the need to protect future residents from fly nuisance where new development is proposed adjacent to STWs. The majority of fly complaints Wessex Water receive are from STWs which use trickling filter beds (also known as percolating filters). Further to the recent development of our Fly Management Plan, we recommend that a no development buffer of 250m is maintained around STWs which use filter beds as part of the treatment process. Of the STWs for which odour consultation zones are identified on the proposals map the following use filter beds; Blackheath, Corfe Castle, East Stoke, Studland and Wareham.

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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	Ruth Hall (1190241)
Email Address	[REDACTED]
Company / Organisation	Wessex Water
Address	Operations Centre Claverton Down Bath BS2 7WW
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Wessex Water (Ruth Hall - 1190241)
Comment ID	PLPP100
Response Date	29/11/18 12:29
Consultation Point	Policy EE1: Employment land supply (View)
Status	Processed
Submission Type	Web
Version	0.2
Are you responding on behalf of a group?	Yes

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

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

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

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: Employment land supply

Within the plan period Wessex Water wish to develop a new regional office and storage/distribution facility to support its operational work. The proposed facility is needed to enable the delivery and maintenance of infrastructure and is therefore essential to support the growth, productivity and environmental wellbeing of the district. We do not believe that the allocated employment sites provide

a sufficiently sized site in a suitable location. We strongly recommend that the Council reconsider the need for an extension to the existing allocated employment site at Sandford Lane, Wareham.

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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

Comment

Consultee	Ruth Hall (1190241)
Email Address	████████████████████
Company / Organisation	Wessex Water
Address	Operations Centre Claverton Down Bath BS2 7WW
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Wessex Water (Ruth Hall - 1190241)
Comment ID	PLPP101
Response Date	29/11/18 12:29
Consultation Point	Policy V1: Spatial strategy for sustainable communities (View)
Status	Processed
Submission Type	Web
Version	0.2
Are you responding on behalf of a group?	Yes

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

Which policy / paragraph number / policies map does your comment relate to? Policy V1

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

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 V1: Spatial strategy

Coordination on development phasing between Wessex Water, Purbeck District Council and developers will be required to plan and deliver water and sewerage infrastructure to serve new allocations.

The Spatial Strategy identifies that employment development will be directed towards the strategic employment sites and other identified employment sites. Within the plan period Wessex Water wish to develop a new regional office and storage/distribution facility to support its operational work. The proposed facility is needed to enable the delivery and maintenance of infrastructure and is therefore essential to support the growth, productivity and environmental wellbeing of the district. We do not believe that the allocated employment sites provide a sufficiently sized site in a suitable location.

(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

Comment

Agent	(1191050)
Email Address	██████████
Company / Organisation	Ken Parke Planning Consultants
Address	Anniversary House 23 Abbott Road Bournemouth BH9 1EU
Consultee	Westcoast (Purbeck) Ltd (1191219)
Email Address	██████████
Company / Organisation	Ken Parke Planning Consultants
Address	Anniversary House 23 Abbott Road Bournemouth BH9 1EU
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Ken Parke Planning Consultants (Westcoast (Purbeck) Ltd - 1191219)
Comment ID	PLPP438
Response Date	03/12/18 16:35
Consultation Point	Chapter 4: Housing (View)
Status	Processed
Submission Type	Web
Version	0.1
Files	Purbeck Local Plan Pre-Submission Consultation Response and AB1 - Westcoast(Purbeck)Ltd - KPPC.pdf
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	1

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

Which policy / paragraph number / policies map does your comment relate to? Chapter 4 Housing

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)

Please see attached statement and AB1

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)

Please see attached statement and AB1

If you have any supporting documents please upload them here. Purbeck Local Plan Pre-Submission Consultation Response and AB1 - Westcoast(Purbeck)Ltd - KPPC.pdf

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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?

Please see attached statement and AB1

2416



KenParke
PLANNING CONSULTANTS

Anniversary House
23 Abbott Road
Bournemouth BH9 1EU



www.kenparkeplanning.com

The Head of Planning Services
Purbeck District Council
Westport House
Worgret Road
Wareham
Dorset BH20 4PP

3rd December 2018

Our ref: AB/3056 - N

Dear Sir

**Re: Purbeck Local Plan Review – Pre-Submission Draft Consultation –
Binnegar Hall, Worgret Road, East Stoke**

The following letter has been prepared in response to the Council's current consultation in respect of the Purbeck Local Plan Pre-Submission Draft which seeks the opinion of the public, landowners, stakeholders and developers on the intended strategy for the delivery and management of development across Purbeck District from 2018-2034.

This letter is prepared on behalf of Westcoast (Purbeck) Ltd in response to the consultation and in promotion of their land at 'Binnegar Hall, Worgret Road, East Stoke' – 'the site' – as an available and deliverable site, which is not subject to any significant constraint, and can be allocated for housing development within the plan period.

We have made substantial submissions to the Council in respect of this site at each stage of the local plan preparation process. The Council will have these responses on record, however the letter dated 21st March 2018 provided in response to the previous 'New Homes for Purbeck' Consultation is appended at **AB1** for completeness.

The following paragraphs respond to the Purbeck Local Plan Pre-Submission Draft strategy and make comment on the strategic allocations, providing justification for why our Client's site should be allocated for housing development.

Having regard for the fundamental determination to be made through the examination of the Local Plan, we also comment on the degree to which the plan which has been prepared is sound; in accordance with Paragraph 35 of the NPPF.

Housing Needs – Chapter 4

Since the Council commenced with the preparation of the new Purbeck Local Plan, the Government has brought in to force the NPPF 2018. The revised NPPF now forms the overarching national policy framework, alongside Planning Practice Guidance (PPG). The Local Plan must be broadly in accordance with the direction of the NPPF in order to be found sound and capable of adoption. With the coming in to force of the NPPF the standard methodology for the calculation of housing needs now applies to all strategic plan making processes where Councils project that their plan will be submitted for examination post January 2019. Plans submitted before this date will still be able to make use of the most up-to-date Strategic Housing Market Assessment (SHMA) data, in recognition of the fact that they have been in the midst of preparation and to avoid abortive work. Where Councils however propose to submit their plans post January 2019, any calculation of housing need should be based upon the standard methodology.

The Council has confirmed that it intends to formally submit its plan for examination between February and March 2019. Housing delivery within the plan period should thus be based on the standard methodology and any previous SHMA is of no relevance.

Housing Requirements – Policy H1

With reference to Chapter 4 of the Pre-Submission Document; Paragraphs 108 to 112, it is clear that the Council is still basing its proposed delivery of housing upon the SHMA 2018 as the underlying evidence base. The Council however suggests that it has incorporated an uplift upon the SHMA figure, in accordance with the standard methodology, of 42% to take in to consideration the need for affordable housing.

This does not follow the direction of National Planning Policy which indicates that the standard methodology should form the basis for determination of housing need. Paragraph 002 of the Planning Practice Guidance (PPG) relating to 'Housing Needs' confirms that authorities are expected to follow the standard method in assessing local housing need. Paragraph 003 of the PPG confirms however that if Councils consider that circumstances warrant an alternative approach then they can expect this to be scrutinised more closely at examination. There is an expectation that the standard method will be used, and any other method should only be used in exceptional circumstances.

It appears that the Council has sought to incorporate the standard methodology in to its SHMA 2018 updated in calculating its housing need, however this has based on a starting year of 2017 – as was the case at the time the Government released draft projections with the announcement of the standard methodology back in 2017 – as opposed to using the correct base year of 2018; being the current year and beginning of the Local Plan period. Planning Practice Guidance (PPG) states at Paragraph 004 of the ‘Housing Need’ section that calculations of national growth should be based on 10 consecutive years with the current year being the first year – in this case 2018.

Policy H1 directs that the Council will seek to deliver, over the 16-year proposed plan period, 2,688 homes or 168 per annum. This is the figure advocated for by the SHMA 2018 and does not appear to have correctly applied the standard methodology.

Standard Methodology

Section 5 of the NPPF provides the Government’s approach to the delivery of a sufficient supply of housing.

Paragraph 60 of the Framework establishes that strategic policies should be informed by a local housing need assessment which uses the standard method as set out in national planning guidance.

The standard methodology establishes that housing need is based upon the expected annual average housing growth (Step 1), with an adjustment factor which is based upon the ratio of house prices to earnings (Step 2), which is then subject to a cap based on the status of the existing development plan and average household growth to provide a meaningful and achievable minimum figure (Step 3).

Step 1

In Purbeck District, the projected growth in households for the next 10 years; taking account of the current year as the starting point, is 1284; which provides an average housing growth figure of **128.4 per annum**. This figure is based upon the data from the Office for National Statistics (ONS) baseline projections from 2014; as National Planning Policy directs.

Step 2

The Affordability Ratio (AR) for Purbeck is **11.05**, based on Table 5c of the ONS report - Ratio of house price to workplace-based earnings (lower quartile and median), 1997 to 2017.

Putting this figure in to the standard formula provides us with an Adjustment Figure (AF) of 1.440625

Step 3

Putting Step 1 and Step 2 provides with an overall housing need figure of **185 dwelling per annum**. This is the overarching capped figure for need.

It is necessary however to consider whether the Council has recently reviewed its local plan or housing needs, or whether these are out of date. In the case of Purbeck, the Local Plan and its housing needs position are both out of date. As a result therefore, the overall housing need for the District is to be capped based on a figure of:

- 40% above whichever is the higher of:
 - The annual housing growth figure worked out in Step 1; or,
 - The average annual housing requirement figure set out in the most recently adopted strategic policies.

In respect of Purbeck, the last adopted housing requirement figure was 120 dwellings per annum, which is lesser than the average growth figure of 128.4 per annum and thus it is the latter higher figure which should be used.

The minimum housing need for Purbeck is thus 40% above 128.4 dpa, which provides us with a figure of **180 dwellings per annum**. This is lesser than the capped figure and thus this is the figure to be adopted.

The Council should therefore be planning for 180 dwellings per annum and not the 168 dwellings per annum it is currently planning for. The result is a shortfall of **192 dwellings**.

In the context of the very modest housing needs of the District, this is a significant shortfall which should be planned for by the Council as part of its delivery strategy.

Housing Delivery – Policies H2, H8

Policy H2 provides the Council's delivery strategy for the 2,688 homes which are being planned for. It is noted that within the context of this supply figure the Council has only sought to allocate 1,455 dwellings; excluding the figure of 300 for Wareham which are being planned for as part of the Neighbourhood Plan and is also stated to include windfall development within this settlement. The Draft Neighbourhood Plan proposes allocations for 200 dwellings with 100 assumed to be deliverable through windfall. This therefore brings the total proposed allocations number up to 1,655.

With a proposed allocations figure of 1,655 this leaves a shortfall of 1,033 dwellings, compared to the Council's projection of need based on its SHMA 2018 and **1,225 dwellings** when compared with the actual needs for the District as calculated by the standard methodology.

The Council has made an allowance for, including the 100 windfall at Wareham, 1,033 dwellings to be delivered through a small sites policy and general windfall within existing settlements.

There is very little if any justification which has been provided for this level of windfall delivery.

The Council's recent completions statistics do not provide appropriate justification for this approach; taking the past 5 years:

2012-2013 – 79 dwellings completed
2013-2014 – 72 dwellings completed
2014-2015 – 67 dwellings completed
2015-2016 – 232 dwellings completed
2016-2017 – 89 dwellings completed

These figures include both windfall and completions in respect of allocated sites. In order to deliver the 1,033 homes projected, spread across the plan period the Council will need to deliver 64 dwellings per annum solely through windfall. On the basis of the limited rate of completions, there is simply no justification for this approach.

The NPPF directs at Paragraph 68 that small and medium sites make an important contribution to meeting the housing requirements of an area and that to promote the development of a good mix of sites LPAs should (a) identify through the development plan land to accommodate at least 10% of their housing requirement on sites no larger than one hectare. Whilst the Council has sought to adopt a small sites policy, it has not identified where these small sites are and whether there are sufficient sites to deliver the amount of housing which the Council is projecting. The NPPF expects specifically that these sites are identified as opposed to a policy approach simply being provided which would facilitate this. This provides no certainty for residents, landowners, stakeholders or developers and certainly does not justify that this quantum of housing can be delivered.

Paragraph 70 of the NPPF states that where an allowance is made for windfall sites as part of the supply there should be compelling evidence that they will provide a reliable source of supply. The allowance should be realistic having regard for the SHLAA, historic windfall delivery rates and expected future

trends. As has been demonstrated above, the Council would need to deliver significantly increased rates of windfall supply in order to deliver the level of housing which it is advocating for – with over a third of its annual supply comprising windfall development.

Having regard for the fact that we believe the Council has sought to deliver insufficient housing in respect of its needs in any event, there is a significant need to put in place further formal allocations in order rather than seeking to rely on a windfall figure which is simply not backed up by any objective evidence.

The Council should therefore seek to allocation additional small to medium sites which are capable of meeting housing needs.

Should the Council not consider that further allocations are necessary we do not consider that, in accordance with Paragraph 35 of the NPPF, the plan is positively prepared, justified or effective. The plan does not provide appropriate justification or certainty for housing the housing needs of the District will be met in placing too great a reliance on windfall development without the appropriate evidence of available sites to back this up and having regard for past rates of delivery and moreover the plan does not seek to meet the assessed housing needs of the District in full being based on an out of date assessment which does not correctly apply the standard methodology. We do not, as a result consider that it should be found sound in its current form.

The Council should seek to review and amend the Pre-submission Draft Plan prior to its submission for examination.

Housing Trajectory

The Council's proposed trajectory indicates that it intends to undersupply for the initial 5 years of the plan period, oversupply for the next 5 years and latterly undersupply at the back end of the plan period. The precise delivery figures proposed are not clear however. The data is presented in the format of a chart with 50-unit increments which does not make clear at all what is expected to be delivered when.

The Council could better seek to meet its housing needs in the initial years of the plan period through the allocation of more small to medium sites which are capable of coming forwards sooner than the strategic sites. There is significant reliance put on the fact that significant numbers of units will be delivered on the strategic sites from 2021-2022 until 2026-27 and that a series of the allocated sites will build out at the same time. It is well established that housebuilders are unlikely to build out more than 30-50 dwellings per annum even on the large sites so as not to flood the market. The fact that the majority of the development

has been focussed to two principal locations; being Moreton and Wool, will likely see the delivery rate be substantially slower than predicted, levelling out across the plan period as a whole, rather than addressing the slow start to supply from the earlier years whilst these sites are gearing up.

It is vital therefore that formal allocations are made for small to medium sites to address this matter. Having regard for the fact that the Council's housing supply numbers should increase in any event, it is suggested that the Council should look to allocate additional sites which have to date been excluded.

The promoted site; Binnegar Hall, is a previously developed site which is subject to no significant constraint and is located outside of both the Green Belt and Dorset Area of Outstanding Natural Beauty (AONB) and outside of the protected 400m designation of the Dorset Heathlands Special Protection Area (SPA).

The site is subject of an existing planning consent for housing development which is currently being built out and the Council are in receipt of a more substantial application for the development of the rest of the site for 49 dwellings with associated open space and SANG provision. There is no issue with the principle of the development and thus there is no reason why the Council should not seek to support this site as a formal allocation within the Local Plan.

Housing Mix – Policy H9

The Council's housing mix policy is seeking to deliver mixed and balanced communities and provide the type and format off homes which it is suggested are required in accordance with its recent SHMA documents.

The Council as a result propose, at Policy H9 to place an obligation on all developments which deliver 20 or more homes to deliver; from the market housing provision:

- 5% as self-build plots; and,
- 10% as single storey homes.

This requirement places a significant and unreasonable expectation on all developers where sites would deliver this quantum of development without any regard for the site-specific circumstances, what is appropriate to local character and constraints and scheme viability. The Council state that if applications do not comply with this it will be necessary to demonstrate exceptional circumstances by way of a viability assessment confirming why this is the case; having regard for the viability evidence which has informed the Local Plan.

The Council has sought to justify this on the basis of the findings of the SHMA 2018. The SHMA demonstrated that there is a clear need for a mix of 2, 3 and 4 bedroom homes to meet market housing needs; being weighted more heavily towards three bedroom properties. In comparison for affordable units the mix also comprises some 1 bedroom homes and is weighted heavier towards two bedroom properties with a need for a much lesser number of 4 bedroom homes.

The Council also note from the SHMA evidence that there is a greater number, on average, of older residents within the Eastern Dorset Market Area; 27% when compared with the national average of 21%. Purbeck itself has closer to 30% of residents in the over 65 category. The Council as a result recognise a need for more housing for older persons.

Whilst there is clearly a need for more housing for older people it is not appropriate to mandate that single storey properties be provided on all sites of greater than 20 homes to deliver this aim; this has no regard for the location of the development in particular which is pertinent to whether this will (1) be attractive to this sector of the market and (2) whether it is the most appropriate location for such development having regard for the regular needs of this element of the population. Older persons housing should be directed more towards the principal settlements where there is close access to services and facilities, in particular shops, doctors, pharmacies and other day to day facilities which this section of the population rely more heavily on.

Whilst it is the case that specialist accommodation, delivered by the experienced market leaders in this sector, provides for a large element of the needs for this demographic of the population, it is recognised that more traditional housing in a non-communal environment also has its place in the market. It is the case however that it should be developed intentionally as part of specific schemes rather than as an afterthought because it is mandated as part of applications by an overly restrictive housing mix policy.

The desire to provide housing for the older generation and lifetime homes is laudable, however there is a significant need for market housing for the wider populace, focussing on two, three and four bedroom homes, and a need to make efficient use of the land which stands to a degree opposite this. Many sites will clearly not be suitable for the delivery of single storey units, because they would be out of character or simply because that is not what would make best use of the site. The implications of single storey homes often being they require a considerably greater footprint compared to two storey dwellings and do not make best and most appropriate use of the land available.

To mandate the provision of self-build plots on schemes of this size where effectively, for a 20 units scheme, the Council would be seeking 1 self-build

plot, is completely unworkable. Developers will not be willing to deliver this, and this would lead to piecemeal development within such sites at the risk of comprehensiveness. The provision of single self-build plots on sites which have otherwise been carefully considered to take account of their specific constraints and ensure appropriate amenity for neighbouring uses and proposed residents is not good planning. Effectively these plots would be constrained to a pre-determined outcome in any event and at which point is it simply the case that providing such plots would materially impact upon viability for the developer and deliver no real benefit to the person seeking to buy the self-build plot when what they can construct will not be materially different to what would have been built on the site in any event. It simply does not make any sense.

There is a place for self-build housing and it is on sites where the intention is to deliver solely this format of development; in the form of a site where landscaping and access are managed, and a design code is put in place for the development as a whole which provides a degree of flexibility but also a defined set of constraints. This represents positive and proactive planning. Singular or groups of two or three self-build plots will not provide positive planning outcomes.

It is not considered appropriate for the Council to seek to impose an overly restrictive housing mix policy which mandates certain formats of accommodation. The Council can appropriately suggest where the need for housing lies within the District, but to obligate this does not have represent good planning or the need to consider individual sites based on their own opportunities and constraints. Developers are instead likely to look to deliver 19 units on sites to avoid all of these constraints which defeats precisely the purpose of this policy. If the Council wants to seek the delivery of this format of development, it should direct this solely to its site allocations where greater control can be had over the outcomes and meaningful numbers of these dwellings can be delivered.

The Council should strongly consider rewording this policy to place the obligation solely on allocated sites or remove this all together.

Building Regulations – Policy H10

Further to the Council's housing mix policy, it is also seeking to direct that Applicants on all sites which comprise major development, as defined by the Framework, provide at least 10% of new homes to meet the optional requirement of the Building Regulations in respect of accessibility – Category M4(2).

The Council expects this to be delivered on all sites unless site specific considerations mean this cannot be provided and in this case the Council

expects a viability appraisal to be submitted to justify why the development cannot deliver this.

There are other significant considerations beyond viability which would indicate that this requirement cannot be applied; for example, flood risk and the desire to make development surface or fluvial flood resilient. The Council has had no regard for this in the construction of this policy and no stipulation is provided to remove the requirement in such circumstances.

In the case of an exceptional weather event even those areas which are not subject to any defined surface water or fluvial flood risk may be subject of an element of water ingress due to site specific circumstances such as ground levels. There are clear times when the provision of level access thresholds would not be acceptable, not because of the expense of constructing the buildings, but because it is not in the best interests of future residents and places the developer at additional risk and liability. This is something which should be determined by the Applicant, having regard for site specific circumstances and not something mandated by Local Policy.

With this provided as an option within the building regulations where developers are providing a format of accommodation where this would be desirable or beneficial it is completely superfluous to deal with this at the planning application stage and will only seek to constrain development which is completely acceptable in all respects.

Affordable Housing – Policy H11

The recently adopted National Planning Policy Framework (NPPF) imposes a new threshold for affordable housing. As the most up to date planning policy this supersedes the Ministerial Statement from 2014 which brought in to place a 10-unit threshold with a gross floorspace limitation. The new threshold is based upon the statutory definition of Major Development; being proposals for 10 or more units or a site area of greater than 0.5ha.

The NPPF makes clear at Paragraph 63 that no affordable housing contributions should thus be required for residential developments that are not major developments; unless in designated rural areas where the LPA has adopted a lower threshold where contributions cannot be sought from developments of 5 units or fewer.

Policy H11 seeks to impose a 2 units threshold on sites where development which is not major is proposed. This is completely contrary to the NPPF and in no manner meets the tests of soundness in being consistent with National Policy.

There is absolutely no justification for this approach in any manner. The policy should be substantially reworded in this respect.

The Council is capable of adopting the lower threshold for affordable housing in designated rural areas where it will be capable of seeking contributions on sites of 6 or more units or where the site is over 0.5ha in area; as a result. The suggestion of a lower threshold however is completely unreasonable and unjustified.

Second Homes - Policy H14

The Council is seeking to follow the direction of Local Authorities such as Cornwall Council which have adopted a policy restricting the provision of second homes. The practicality however of implementing such a policy is however questionable.

The Council, through Policy H14, is seeking to impose planning conditions which will restrict the occupation of properties to only a person's sole or main residence in respect of applications for:

- The erection of new residential properties in the AONB;
- Change of use of existing buildings to residential;
- Replacement homes; and,
- The policy also applies on small sites in accordance with Policy H* and on rural exception sites.

The policy will result in some significantly odd outcomes, for example, where an existing property is occupied as a second home by the owner, they are unable to replace that building with a new dwellinghouse if they will continue to occupy it. In gaining planning permission it would have a restriction placed upon it which would prevent them from being able to live in it.

In planning terms, they would be replacing one home, which they live in as a second home, with another which they would continue to occupy as a second home; with no material change in the use in any manner and where there would be no change in the availability of local housing stock at all. This makes absolutely no sense in planning terms at all and would not pass the test of reasonableness or necessity.

The purpose of the policy in effect is to ensure that new housing delivered is provided to meet local needs and persons from outside of the area are not buying up the housing stock which does not reduce overall needs and will potentially make affordability worse. The way to tackle this matter is not however through the imposition of an unreasonable and unenforceable condition, but rather to build more housing. The Council would be better served

seeking to deliver additional housing development to take account of any issue in respect of second homes to ensure sufficient stock to meet the needs of local persons.

It is unclear why there needs to be a restriction in respect of rural exception sites as the criteria for the acceptability of such development is that there is an established local need which would be met. Persons will not be on the housing register if they already have a home which they would also retain; they may move to a new home which better addresses their needs criteria in terms of property size, or location, but they will then give up their other property. It is unclear why the policy includes this stipulation as a result; this makes little sense.

Chapter 6 – Infrastructure – Policy I1

Policy I1 of the Pre-submission Plan provides the Council's suggested approach to developer contributions.

The approach advocated appears highly irregular and confused with the Council seeking to on the one hand collect CIL contributions, but at the same time to seek contributions towards:

- Local transport;
- Health;
- Open space;
- Extension of GP facilities; and,
- Education.

By way of specific contribution to be secured by way of s106 agreement.

It is recognised that, in accordance with Paragraph 122 of the Community Infrastructure Levy (CIL) Regulations (2010) and the NPPF, the Council may seek site specific contributions in respect of development where it is necessary to make the development acceptable in planning terms, directly related to the development and, fairly and reasonably related in scale and kind to the development. Such contributions should however be seeking to collect additional s106 contributions for matters which are included directly within CIL in respect of pooled infrastructure such as GP surgeries, education contributions, open space contributions and highways improvements which are not directly related to the site.

The Council appear to be seeking to 'double-dip' on contributions for these elements which is completely unjustified.

The policy should be reworded to state that site specific contributions may be sought where they meet the relevant tests of Paragraph 122 of the Community Infrastructure Levy (CIL) Regulations (2010) and the NPPF, however in all other circumstances will be secured by CIL. There is simply no justification for any other approach if the Council intends to continue to gather CIL.

Overall Soundness of the Local Plan Approach

Determining the soundness of a Local Development Plan is one of the principal roles for the examining Inspector at an EiP. 'Soundness' as a concept is defined within the NPPF by a series of tests, if these tests are met then the plan will be capable of being found sound; dependant on whether it meets the other tests of legal compliance and compliance with other relevant requirements such as the duty to co-operate, both of these aspects however fall within the realms of consideration of whether a plan is sound.

Paragraph 35 of the NPPF 2018 sets out the approach to the examination of Local Plans and whether they meet the legal and procedural requirements as enshrined within the legislation. The tests of soundness are clear, namely that a plan must be:

- Positively prepared;
- Justified;
- Effective; and,
- Consistent with National Policy.

Positively Prepared

To be positively prepared, a plan must be based on a strategy which as a minimum seeks to meet strategic level needs and be consistent with achieving sustainable development.

The fundamental point therefore is that strategic needs, such as for housing, must be met. Where a plan does not demonstrate that assessed needs will be met it will not be sound and will not achieve the aim of ensuring sustainable development.

The Council's proposed housing supply and distribution of development raises significant concerns in this respect; with the Council seeking to deliver a level of development below its needs as calculated by the standard methodology and placing a significant and unjustified reliance on the delivery of windfall

development when instead certainty should be provided through the allocation of smaller and medium sites which confirm how and where the needs of the District will be met.

The Council should be seeking to allocate additional sites in order to make up for the shortfall in delivery identified and should, in accordance with the direction of the NPPF seek to allocate at least 10% of its supply on smaller and medium sites in order to ensure delivery in the initial years of the plan period. The Council has proposed a small sites policy which it considers can deliver such development however it would be more appropriate, particularly in Green Belt locations, for the Council to seek to formally allocate these sites to provide certainty for all parties.

The plan is not as a result positively prepared at this time and is in need of review and amendment prior to its submission for examination.

Justified

To be justified the plan should be the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence.

It is essential to understand that housing delivery is best achieved through development at a range of scales; small, medium and large strategic scale. Placing reliance on only large strategic sites which are likely to have infrastructure requirements or other barriers to their delivery giving rise to significant delays in meeting objectively assessed needs for housing, is likely to guarantee that the needs in the earlier years of a plan period will not be appropriately met. Some development will inevitably come forwards through the vehicle of windfall, however the Council has made what it considers to be an appropriate allowance for windfall in its housing trajectory and is still deficient on its housing numbers.

Whilst Paragraph 72 of the NPPF 2018 acknowledges that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages or towns, Paragraph 68 of the NPPF confirms that small and medium sites can make an important contribution to meeting the housing requirements of an area and are often built-out relatively quickly. The new NPPF advocates Councils allocating at least 10% of their housing requirement on smaller sites of no larger than 1ha.

Clearly the Council has the opportunity here to allocate some sites capable of delivering less development which would still be of a significant scale having regard for the Council's housing supply. Leaving significant numbers of housing

to speculative windfall provision is not reasonable or justified and does not represent good plan making.

Effective

For a plan to be effective it must be deliverable over the plan period, with appropriate consideration having been given to joint working and the duty to co-operate.

Whilst the plan has given consideration to the duty to co-operate with neighbouring authorities and this has been found not to be an option. It is not considered, for the reasons above that the local plan is effective in its current form. There are significant questions over the Council's housing trajectory in respect of the ability for the amount of development which is required to be delivered at the right time in the plan period, it is anticipated that the Council's strategic allocations will come forwards later than has been projected and will not deliver the quantum of development in the timescales which have been indicated. The Council has also provided insufficient justification for its approach to windfall development which will not ensure that the housing needs of the District are appropriately met.

It is not in this regard considered that the plan meets the tests of effectiveness in its current format, it is in need of alteration.

Consistent with National Policy

To be consistent in this respect the plan should enable the delivery of sustainable development in accordance with the policies of the Framework.

There are several overarching conflicts with the policies of the Local Plan Pre-submission Draft, as proposed, and the direction of National Policy.

The Council has not had appropriate regard for the NPPF in determining its approach to affordable housing which is not in any manner justified, it has also not had appropriate regard for the Framework in respect of its approach to securing developer contributions.

To meet the tests of soundness these policies will need to be significantly reworked.

Legal Compliance of the Plan – Sustainability Appraisal (SA)

The Council has provided the necessary evidence by way of a Sustainability Appraisal, with reference to a supporting documents library, to demonstrate that the legal requirements as set out within the Environmental Assessment of Plans

and Programmes (Strategic Environmental Assessment) Regulations (2004) have been met in preparing its Local Plan.

The fact that the Council may have undertaken the necessary assessment to demonstrate legal compliance with the SEA Regulations does not however in turn indicate that the plan strategy itself is sound. On the contrary however, failing to meet the necessary tests of legal compliance are sufficient to render a plan not sound and incapable of adoption.

The Council has sought to demonstrate that its proposed strategy is capable of meeting the tests of the SEA Regulations; however, this does not demonstrate this is the only or most appropriate strategy. In undertaking the Sustainability Appraisal (SA) the Council has had regard for opportunities for improvements to economic, social and environmental conditions as it is required to do, however it has not been conclusively demonstrated that these represent the most appropriate option. In this regard therefore whilst the legal tests of the SEA Regulations have been met this does not mean that the strategy is sound.

As discussed, it is not considered that the approach taken by the Council to the delivery of housing within the District results in the achievement of sustainable development at this time as it does not meet District's assessed housing needs in full and opportunities to spur delivery in the earlier years of the plan period instead of providing a shortfall have not been explored where reliance on windfall development could be reduced and more certainty provided.

Conclusion

Whilst there is no objection to the overarching strategy of the Purbeck Local Plan Pre-Submission Draft, there are clear and substantial failings which need to be addressed in respect of elements of the housing delivery strategy and also the wording and approach of specific policies in order to render the plan sound and capable of submission for examination.

The promoted site; Binnegar Hall, is a previously developed site which is subject to no significant constraint and is located outside of both the Green Belt and Dorset Area of Outstanding Natural Beauty (AONB) and outside of the protected 400m designation of the Dorset Heathlands Special Protection Area (SPA).

The site is subject of an existing planning consent for housing development which is currently being built out and the Council are in receipt of a more substantial application for the development of the rest of the site for 49 dwellings

with associated open space and SANG provision. There is no issue with the principle of the development and thus there is no reason why the Council should not seek to support this site as a formal allocation within the Local Plan.

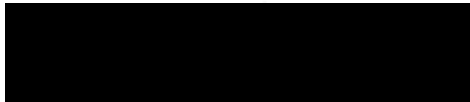
Detailed discussion of the constraints and opportunities of the site have been discussed in the application documents submitted to the Council and previous representations made to it as part of the Local Plan preparation process. We have engaged with the Council at each stage of the plan preparation, including responding to the previous stage of consultation in March 2018; as appended at **AB1**.

The site can be delivered within the early years of the plan period and will contribute significantly to supply within the early years, directly addressing the shortfall.

Should the Council wish to discuss out Client's site further, it should not hesitate to get in contact with us directly.

We ask to remain updated on the progress of the Local Plan as it proceeds and wish to take part in the Examination Hearings.

Yours sincerely



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Enc.

**AB1 - Letter of Representation - New Homes for Purbeck Consutlation –
Binnegar Hall - KPPC**

AB1

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BY EMAIL

21st March 2018

Our ref: AB/3056

Dear Sir

Re: New Homes for Purbeck – Local Plan Review Consultation

The following letter is prepared in response to the Council's recent 'New Homes for Purbeck' consultation document which seeks the opinion of the public, landowners, stakeholders and developers on the intended strategy for the delivery of housing across Purbeck District from 2016-2033.

This letter also seeks to further promote 'Land at Binnegar Hall, Worgret Road' (SHLAA Ref. 6/11/1337) – 'the site' – as an available and deliverable site, which is not subject to any significant constraint, and can be allocated for housing development within the plan period.

Since the release of the Council's consultation document, the Government has released its Draft NPPF March 2018 and several other documents for consultation, including details on the Government's proposed housing needs assessment methodology. These draft documents will impact upon the delivery of housing within Purbeck District during the plan period and have broad implications for the site selection process and for the delivery of the Local Plan review as a whole

The Draft NPPF 2018 takes a particularly robust position on the release of land within the Green Belt for housing development. Paragraph 135 of the document states that LPAs must demonstrate exceptional circumstances to justify altering Green Belt Boundaries and should ensure that the amended boundary is of a degree of permanence such that it will persist beyond the end of the plan period. The salient point here is that it is not acceptable to make repeated piecemeal changes to the Green Belt boundary and thus that sufficient land should be released at the plan review stage to meet objectively assessed housing needs in the long term.

Further detail is provided by Paragraph 136 of the Draft NPPF on how Councils must go about justifying that exceptional circumstances exist to remove land from the Green Belt. The expectation is that the LPA should have examined all other reasonable options for meeting its identified needs for development taking account of Paragraph 135 and whether the strategy:

- Makes as much use as possible of suitable brownfield sites and underutilised land;
- Optimises the density of development, including whether policies promote a significant uplift in minimum density standards in suitably sustainable locations; and,
- Has been informed by discussions with neighbouring LPAs about whether they could accommodate some of the identified need for development, as demonstrated through a statement of common ground.

It is further reiterated at Paragraph 138 that when defining Green Belt Boundaries, the LPA must be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period.

Fundamentally Councils should be allocating land outside of the Green Belt in preference to altering its defined boundaries, where land which fulfils the definition of sustainable development exists and is available and deliverable within the plan period.

Whilst it is the intention of the Council to look to submit its Local Plan Review for examination prior to the adoption of the Draft NPPF 2018 later this year, the Council must be mindful of the fact that it will come in to force at an early point within the proposed plan period; 2016-2033, and the Council's future strategy for the delivery of housing will need to be developed in accordance with the new Framework and its requirements and thus it is important that steps are put in place at this stage to embody and react to the policy change.

The Council must expressly justify the release of land from the Green Belt at this stage in favour of the delivery of other available sites which are not located within the designation and meet the definition of sustainable development. It should be recognised that the District is highly rural in its nature with modest sized settlements and a significant dependence upon private vehicles as a result. It is not reasonable therefore to consider the need to travel alone as a determinative factor in assessing the sustainability of a site, particularly when the development would represent the best use of underutilised and previously developed land. This is reflected at Paragraph 34 of the NPPF and further within the PPG where the section on 'supporting sustainable rural communities' states that *different sustainable transport policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas*; according with Paragraph 29 of the NPPF.

The Binnegar Hall site is a previously developed land parcel suitably located between the two sustainable settlements of Wool; 3.6km to the west, and Wareham; 2.7km to the east. Both settlements are within comfortable cycling distance. Leaving from the western end of the site there is an established pedestrian footway along the southern edge of the A352 to the hamlet of Stokeford, from where one can pick up local footpath routes westwards to Wool. In terms of access eastwards towards Wareham, the land immediately adjoining the site is known as Ford Heath and is common land; allowing open public access. A new footpath can be provided from the site edge to join with the existing footway and provide significant connectivity improvements from where one can pick up existing footways to Wareham.

The site is clearly capable of providing a meaningful level of additional housing development in order to support the vitality and function of these settlements in accordance with Paragraph 55 of the NPPF. The site is not isolated; consent has already been established for a number of dwellings on the site and the site itself sits within a ribbon of development which runs along the northern edge of Worgret Road. The High Court recently ruled on paragraph 55 of the NPPF within *Braintree*ⁱ; where Lang J ruled clearly on the correct interpretation of the test set out within Paragraph 55 of the NPPF. The fact that the Binnegar Hall site is not isolated alongside public transport and local facility improvements which can be delivered as part of the scheme; providing wider social, economic and environmental benefits, justifies the allocation of this site. The decision in *Braintree* also helpfully provides clarification that the Policy Approach set out in Paragraphs 29 and 34 of the NPPF; in favour of locating development where travel is minimised and the use of public transport is maximised, has to be sufficiently flexible to take account of the differences between urban and rural areas.

With the site not subject to any significant environmental or landscape constraints the only reason why the site is not being delivered is that it lies outside of a defined settlement boundary. There is no reason why the Council should not seek to bring it forwards for development as part of the strategic planning process; being located outside of the settlement is not a barrier to allocation in this regard; particularly considering the Council's proposals to allocate a substantial parcel of land outside of the small village settlement of Moreton – some significant distance from any local service centre settlement within Purbeck District and far removed from Moreton settlement.

The fact that Binnegar Hall is previously developed further supports the fact that this site should be brought forward in preference to other greenfield or undeveloped land within more sensitive areas of the District. The current consented use of the site for housing does not make best use of the available land which has sufficient capacity for a more comprehensive development of approximately 75-90 units in total. The promoted site is available and deliverable and should be considered for inclusion within the Local Plan as a preferred site for housing.

The New Homes for Purbeck Consultation Document

The Council has adopted the position that it needs to allocate sufficient land to deliver only 1700 additional homes within the plan period 2016-2033. This is on the basis that it considers that it has already planned to deliver 1200 homes as part of its current strategy, which will also come forwards during the plan period; taking to total to 2900 homes; approximately 161 dwellings per annum over the plan period.

The 1200 homes which the Council suggests will come forwards as an aside to the new allocations comprises;

- 90 homes completed between April 2016 and March 2017;
- 370 homes that have planning permission but have not yet been built;
- 500 homes which could be built under current policies, including on previously developed land;
- 150 homes allocated at Swanage; and,
- 50 homes allocated at Lytchett Matravers within the adopted plan.

The Council is putting a significant reliance of the delivery of 500 homes within the plan period by way of windfall development. At the time of the examination of the 2012 Local Plan the Council did not make any allowance for windfall development in its delivery projections, however the Strategic Housing Land Availability Assessment (SHLAA) January 2018 indicates that since 2006 approximately 77% (1142 dwellings) of the District's supply has been delivered by way of windfall development. The fact that this has been the case to date however is not sufficient indicator that this will continue. The Council did not have any Local Plan in place prior to the current document; adopted in 2012. For the first 6 years of the plan period therefore there was less control on development with applications defaulting to being determined in accordance with National Planning Policy in the absence of any up to date plan. Delivery in the initial 4 years up to 2010 was significant and comprised almost wholesale windfall development whereas, thereafter, delivery fell off considerably from 2010-2015. To anticipate windfall delivery on anything like the same rate would therefore be misguided. The Council should provide appropriate justification for how the 500 homes it is suggesting can be delivered; having particular regard for the low rate of delivery in recent years, with the exception of 2015-16; when the strategic allocation west of Wareham came forwards.

There is no evidence at this time therefore to suggest that this figure is likely to be achievable.

The New Homes for Purbeck consultation document proposes three potential options for the delivery of the 1700 additional homes the Council suggests it needs to plan for across the plan period;

- Option A represents a hybrid approach of Green Belt release at Lytchett Matravers and Upton and development of less constrained land at Wool settlement, 250 homes on unidentified smaller sites across the District and a significant new community development south of Moreton; on the furthest fringe of Purbeck

District. The new community proposed at Moreton is a significant distance from the nearest local service centre of Wool and instead will need to rely on the more limited services and facilities within Crossways; which sits within West Dorset District. The expectation that 250 homes will be delivered by way of a collection of smaller sites for up to 30 dwellings does not appear to have been appropriately evidenced and there is no confirmation of where these sites will be and whether they are actually available or deliverable. Given that several of the sites proposed for allocation at Wool and Lytchett Matravers would deliver less than 30 units each and are considered of sufficient scale to allocate, it is inconsistent and somewhat unreasonable for the Council to place a significant degree of uncertainty on the delivery of 250 homes – just under 10% of the indicated housing need. This does not provide an adequate degree of certainty that the Council's housing needs can be met which fails the tests of Paragraph 47 of the NPPF (2012) and thus this approach would not meet the tests of 'soundness' set out at Paragraph 182 of the NPPF in that the plan would be neither positively prepared nor effective.

- Option B seeks to direct the housing supply in the main to the settlement of Wool and the new community south of Moreton, with the remaining 250 homes to be again delivered on yet unidentified sites. Taking this approach would put significant strain on the settlement of Wool in terms of its existing infrastructure; moreover, given the number of sites and sheer amount of development it is unlikely that new homes will be delivered at a sufficient rate to meet the Council's housing needs, with developers not wishing to flood the local market and in turn harm sales prices and profitability. Again, the absence of any certainty on where the other 250 homes required will be delivered is not reasonable and will not pass the tests of soundness.
- Option C seeks to direct even more development to Wool – not less than 800 homes and 600 homes within the new community south of Moreton. Delivering the housing in this manner will further exacerbate the strain imposed on Wool and further hamper actual housing completions to the extent that the Council is unlikely to be meeting its projected housing delivery figures. It is not rational to expect that developers will seek to bring forwards several of these sites in tandem and flood the market with new homes; the reality is that only a limited number of units will be delivered per annum. With only two areas of allocation to meet the suggested target of 173 dwellings per annum will be difficult and lead to significant uncertainty.

With all three options there are serious concerns over the ability for Wool settlement to (1) accommodate this level of growth given the need for significant infrastructure improvements and for the delivery of a new school, and (2) due to significant flood risk considerations; both for fluvial and surface water flows, at Wool which have not been appropriately investigated. Several of the sites are subject to high surface water flooding risk in isolation which would need to be managed. It is important however that the Council takes a holistic view to the potential for the cumulative development of all of the identified greenfield sites contiguous to the settlement to put a significant pressure upon and increase the risk of flooding across the settlement in general with a significant increase in the level of built form and hard surfacing and diminishing of the land's capacity for natural infiltration.

The Council does not at this stage appear to have given due consideration for the requirement to deliver Sustainable Alternative Natural Greenspace (SANG) as part of any of the sites at Wool and the land at Moreton, in order to mitigate the impacts of additional residential development upon the protected heathland. The provision of SANG is particularly land hungry and it is unclear how and where this would be delivered.

There is fundamentally a lack of service provision within Wool and particularly at Moreton to support this quantum of development without placing significant additional pressure upon existing infrastructure in surrounding settlements. The Council has not addressed the infrastructure improvements which need to be delivered to accompany this quantum of housing.

The Council's current approach in Options A & B of leaving 250 homes unallocated to be delivered on suitable smaller sites of up to 30 units across the District is not reasonable. The Council has already accounted within its suggested available housing supply of 1200 homes, for the delivery of 500 dwellings in accordance with the policies in the existing Local Plan. In combination with the additional 250 homes to be delivered on yet unallocated sites there is an expectation that 750 homes will be delivered via windfall development within the proposed plan period.

In reality there are not sufficient sites which sit within or on the edge of existing settlements which can be readily brought forwards for development of approximately 30 homes in accordance with suggested small sites policy. Many of the settlements within Purbeck District are constrained by either the Green Belt or protected designations of the Dorset Heathlands, or are located within the protected landscape of the AONB where exceptional circumstances would need to be demonstrated to justify the development. It is not reasonable to expect significant development to come forwards in this manner without a directed planning policy approach.

It would be far more appropriate for the Council to seek to provide more certainty for the general public, landowners, stakeholders and developers, by actually allocating sufficient sites to meet the Council's needs. If additional land comes forwards during the plan period and the Council exceeds its housing needs target, then this is not an issue. Housing need is not a maximum figure, but rather a minimum. The purpose is to ensure that the objectively assessed needs of the District are met by delivering at least the required amount of housing. The Council should not be a barrier to the development of sustainable sites.

It is vitally important that any plan put forwards for examination passes the tests of soundness as defined by Paragraph 182 of the NPPF;

- In order to be rendered sound the strategy must first and foremost be '**positively prepared**'; defined as *providing a strategy which seeks to meet the objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do*

so and consistent with achieving sustainable development. There is no certainty that the current strategy will meet objectively assessed needs.

- The plan must be '**justified**' and *the most appropriate strategy when considered against the reasonable alternative, based on proportionate evidence.* It is not considered that any of the proposed solutions have been given sufficient consideration, particularly regarding possible build out timescales to ensure that the annual housing need can be appropriately met.
- The plan must be '**effective**' in that it must *be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.* The fact that insufficient consideration has been given to potential constraints and issues with lack of infrastructure and potential build out rates arising from significant allocations at one settlement provides no confidence that the proposals will be effective.
- Finally, the plan must be '**consistent with National Policy**' in *enabling the delivery of sustainable development in accordance with the policies of the Framework.* As discussed it is considered that the Council has not sought to allocate sufficient land in the right places in order to ensure that sustainable sites will be delivered in accordance with the Framework and that the objectively assessed needs of the District can be met.

In summary it is considered that the Council should reconsider its approach to the distribution of development across the District in a more balanced and sustainable manner that will ensure that its housing needs will be delivered at the appropriate rate within the plan period. It is also unrealistic to leave such a degree of uncertainty in respect of the Council's smaller sites policy which will be hampered by the environmental and landscape constraints within the District. In order to be effective, the Council should instead seek to allocate sites now and provide certainty and ensure the approach can be found sound. The recent rates of delivery within the District are indicative of the fact that the current Local Plan policies do not allow for sustainable development to come forwards in this manner, particularly on sites of up to 30 units as is suggested. There is no justification for this policy rationale.

Housing Delivery to Date

The Council has recently published what it considers to be an up to date Five Year Housing Land Supply Report; covering the period April 2017 to March 2022, but also setting out its figures for completions to date and its performance in respect of the overall housing needs for the plan period.

The report confirms the Council's position that it can demonstrate in excess of a 5-year supply of deliverable sites based on its performance to date within the plan period. Unfortunately, the forecasts set out within the document are not correct.

The Council has stuck rigidly to the belief that it needed to deliver only 120 dwellings per annum over the course of the plan period since its adoption in 2012. Unfortunately, the Council has not properly taken in to account the EiP Inspector's Report which, whilst recommending adoption of the Purbeck Local Plan 2012 at that time, made clear that the Council's housing figures were inadequate and needed to be reviewed

immediately. The Inspector stated that a partial review would need to be undertaken, commencing in 2013 and to be in place by 2017, based on the Strategic Housing Market Assessment 2012 which projected a requirement for not less than 170 dwellings per annum to be delivered across the plan period.

The EiP Inspector stated clearly that the Purbeck Local Plan Part 1 (2012) was to be found sound as there was no other established policy framework in place due to failings with previous plan documents. Whilst allowing the plan to be made, the Inspector did not consider that it was sound in respect of its approach to housing. He was clear in his report that *policies regarding housing supply would be immediately out of date* and that the Council was only being allowed to proceed on the basis that it agreed to undertake an immediate review commencing in 2013 with the new plan to be adopted by 2017. Failing this its plan would be out of date and it would not be able to rely on its out of date delivery strategy.

The EiP Inspector was very clear that this figure whilst appropriate for the short term; i.e. the first 5 years of the plan period, it was not appropriate for the medium or long terms and that the Council should instead amend its housing needs figure to 170 dwellings per annum (dpa). The EiP Inspector required specifically that the need to fundamentally review the housing position and adopt a figure of 170 dpa be written in to the Local Plan Part 1.

The Council has not reflected the fact that a more up to date assessment of its housing need was undertaken during the course of the adopted Local Plan preparation and examination and thus should have formed the starting point for its housing needs since 2012, as directed by the Inspector. The Council has not updated its housing need projections as it was required to do and, as a result, the housing requirement figure for the next 5 years is completely inaccurate.

In reality therefore, the Council has underdelivered on its housing needs to date within the current local plan period;

(1)

Housing Need 2006-2012	– 720 dwellings (120 per annum)
Housing Need 2012-2017	– 850 dwellings (170 per annum)
Total Need to Date	– 1570 dwellings

Recorded Completions 2006-2017	– 1476 dwellings
Performance Relative to Need	– <u>94 dwellings shortfall</u>

Assuming the Sedgefield method of addressing housing shortfall is employed.

5-year requirement 2017-2022	– 987 dwellings (170 per annum plus shortfall and 5% buffer)
Annual Requirement 2017-2022	- 197.4 dwellings

(2)

Even if we assume that the housing need figure should remain at 120 dwellings per annum until the 2017 deadline set by the inspector for undertaking and adoption of the Local Plan review;

Housing Need 2006-2012	– 720 dwellings (120 per annum)
Housing Need 2012-2017	– 600 dwellings (120 per annum)
Total Need to Date	– 1320 dwellings
Recorded Completions 2006-2017	– 1476 dwellings
Performance Relative to Need	– <u>156 dwellings surplus</u>
Remaining Need to 2027	– 1622 dwellings (170 per annum minus oversupply and adding 5% buffer)
5-year requirement 2017-2022	– 811 dwellings
Annual Requirement 2017-2022	- 162.2 dwellings

Taking either projection in to account the Council cannot demonstrate a 5-year supply based on the 618 dwellings which it has projected are available and deliverable. This would amount to **3.1 years** of supply in the worst-case scenario (1) and **3.8 years** of supply in the best-case scenario (2).

The result is that the Council does not have sufficient land to meet its needs in the short terms and should be planning for additional development to ensure that its needs can be adequately met.

This absence of a deliverable 5 year housing land supply puts in jeopardy the figures set out within the New Homes for Purbeck consultation document – particularly that the Council has allowed for 500 dwellings by way of windfall provision; that would comply with current local plan policy, in addition to 250 dwellings which the Council considers a can be brought forwards within the plan period as part of a small sites policy for less than 30 dwellings. There is simply no justification for these figures and no evidence to demonstrate that this is in any manner achievable. A position which is backed up by the Council's recent competition statistics for 2016-2017 which stands at just 89 units. It is also relevant to note that this does not tally with the 90 homes stated by the New Homes for Purbeck Consultation Document.

The Council commissioned as part of its plan review, the preparation of a formal assessment of its objectively assessed needs for the period 2013-2033. The document prepared by GL Hearn states that the annualised housing need for the District during this period amounts to **173 dwellings per annum**. Updating the projections on this basis puts the Council in an equally bleak position of **3.2 years of supply** at present based on the Sedgfield method of addressing any shortfall within the next 5-year period. It is worth noting that even employing the Liverpool method would leave the Council without a deliverable 5-year supply.

Considering the above, the Council should therefore be planning for the delivery of not less than 3460 homes from 2013-2033. The Council's completion figures between 2013 and 2017 amount to 460 dwellings. The result therefore is that the Council should

be planning to deliver not less than **3000 additional homes** as part of the Local Plan review.

Conclusion

The New Homes for Purbeck Consultation Document seeks to allocate land for an additional 1700 homes; supplemental to 1200 which it considers can and will be delivered without any additional allocations. Even if all of the projected housing comes forwards as suggested, the Council will still be short of meeting its housing needs by in order of 100 dwellings and this does not account for an appropriate buffer of sites for non-delivery.

There are significant concerns over the ability of the sites selected to deliver the quantum of development which has been proposed, taking account of specific issues such as flood risk and a lack of supporting infrastructure at Wool and also the need to provide SANG as part of any development in order to render the development acceptable in accordance with the Dorset Heathlands Planning Framework SPD. It is questioned whether there is sufficient land proposed for allocation to deliver the proposed housing numbers.

The Council has also not at present provided any tangible evidence to demonstrate that its windfall housing projections of 750 dwellings across the plan period; including 250 on sites of up to 30 units, can be delivered. Based on the rate of undersupply in all but one of the past seven years it is not considered reasonable to leave this level of windfall allocation; amounting to approximately 25% of the overall housing need, in such a state of uncertainty. The Council should instead seek to allocate sufficient sites to meet its objectively assessed needs as a minimum. It is important to provide certainty that the housing need can be met in order for the Local Plan to pass the tests of soundness at examination.

The Council should therefore look to allocate additional unconstrained sites which can be delivered in a sustainable manner. The fact that sites lie outside of a defined settlement is not an issue at plan making stage; particularly when the Council's three preferred approaches all include a substantial site non-related to the nearest settlement and significantly removed from the nearest local service centre within Purbeck District.

The Binnegar Hall site is available now and can be delivered within the next 5 years in order to assist the Council in meeting its housing supply shortfall discussed. The Council must take a pragmatic approach to the allocation of sites to ensure that it is not left in a position without an up to date and adopted plan which will inevitably lead to planning by appeal.

The Council must be proactive in bringing its Local Plan Review forwards, given that the current plan is rendered out of date in accordance with the EiP Inspector's findings at the 2012 examination in public; however, it is important that the plan is not rushed to examination on the back of a flawed strategy or evidence which will prejudice its chances of achieving soundness. We would urge the Council to think again on its

strategy and seek to allocate sufficient land to meet its needs and provide certainty over delivery.

Should the Council wish to discuss out Client's site further, it should not hesitate to get in contact with us directly.

We ask to remain updated on the progress of the Local Plan as it proceeds and notified of any further consultation periods.

Yours sincerely



Adam Bennett BA (Hons)
Town Planning Consultant

ⁱ Braintree District Council v SoSCLG, Greyread Limited and Granville Developments Ltd [2017] EWHC 2743 (Admin)



This questionnaire is only for use by organisations. If you wish to respond to the consultation as a local resident or local business, please use the questionnaire that has been delivered to your address along with the special edition of About Purbeck. If you have not received a questionnaire then please contact Public Perspectives on FREEPHONE 0800 533 5386 or purbeck@publicperspectives.co.uk.

Consultation about new homes for Purbeck - Questionnaire

Before you fill in this questionnaire, please make sure you have read the special edition of About Purbeck sent with the questionnaire. This includes background information, maps and details about the proposed numbers and potential locations for new homes, as well as proposed new housing policies about second homes, developments on small sites and affordable housing.

The special edition of About Purbeck is also available on-line at:
www.dorsetforyou.gov.uk/Purbeck-local-plan-review

If you would like further information or help to complete the questionnaire, please contact Public Perspectives on FREEPHONE 0800 533 5386 or purbeck@publicperspectives.co.uk.

Please complete the following details before answering the questions:

Name of organisation:

Name of individual completing the questionnaire:

Date of completion:

Section 1: New second homes policy

The Council is proposing to stop new homes in some parts of the district from being used as second homes.

Please read the information about this proposed new policy on page 4 of About Purbeck and then answer the following question.

Q1 Do you agree or disagree with the Council's proposed policy to stop new homes in some parts of the district from being used as second homes?

Please select one answer only.

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know

Do you have any comments about the proposed second homes policy?

Section 2: Principles behind new homes

The Council has considered several principles in determining the number of homes required and identifying potential sites.

Depending on the outcomes of this consultation, these principles will be included in the revised local plan. They will help determine the number and location of new homes, and developers will have to take note of them when making planning applications.

Please read the information about these principles on page 5 of About Purbeck and then answer the following question.

Q2 How important is it that new homes in Purbeck take account of the following principles?

Please select one response for each principle.

	Very important	Important	Neither important nor unimportant	Not important	Not important at all	Don't know
Respect the character and distinctiveness of Purbeck's towns, villages and countryside	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Conserve and enhance Purbeck's landscape, historic environment and cultural heritage	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Conserve and enhance Purbeck's natural habitat	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Provide affordable homes	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Ensure high quality design, in keeping with the local area	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Provide appropriate community infrastructure e.g. shops, schools, doctors' surgeries, recreation and sport, including play areas	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Provide appropriate transport infrastructure e.g. roads, buses and trains	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Promote a prosperous local economy	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Ensure adequate parking	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Promote homes that make best use of renewable energy	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Are there any other principles you would like considered?

Section 3: Small sites

New small sites policy

All options include focusing the majority of development in two or more areas. Some options also include some development spread across the district. This means that there would be much smaller sites in addition to the larger site proposals. The Council is considering introducing a policy which would enable small housing sites to be developed outside existing town and village boundaries, where certain conditions are met.

Please read the information about this proposed new policy on pages 5 and 6 of About Purbeck and then answer the following question.

Q3 Do you agree or disagree with the proposed new small sites policy?

Please select one answer only.

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know

Do you have any comments about the proposed new small sites policy?

Potential small site allocation - Sandford

In addition to the proposed new small sites policy, the Council is considering allocating a site for 30 homes at Sandford on land that is currently within the Green Belt.

Please view the map and read the information about this proposal on page 6 of About Purbeck and then answer the following question.

Q4 Do you agree or disagree with the proposal to allocate a site for 30 homes at Sandford?

Please select one answer only.

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know

Do you have any comments about the proposal to allocate 30 homes at Sandford?

Section 4: Neighbourhood Plans

The Bere Regis Neighbourhood Plan Steering Group is planning to consult in the near future on its draft neighbourhood plan. The plan is seeking to deliver 105 new homes in addition to normal planning applications. The Steering Group will be consulting local people about the location of these homes.

The Wareham Neighbourhood Plan Steering Group is exploring options to deliver 200 new homes in addition to normal planning applications. Local residents will be consulted about the Wareham Neighbourhood Plan in the near future. To facilitate the emerging proposals, Purbeck District Council would need to change its current policy that safeguards the Westminster Road and Johns Road industrial estates for employment uses and release Green Belt to the west of the Westminster Road Industrial Estate (south of Bere Road and north of Carey Road).

Please view the map and read the information about this proposal on pages 6 and 7 of About Purbeck and then answer the following questions.

Q5 Do you agree or disagree with the proposal to have less employment land to help allow new homes at Westminster Road and Johns Road Industrial Estates?

Please select one answer only.

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know

Q6 Do you agree or disagree with the proposal to release Green Belt to build homes to the west of the Westminster Road Industrial Estate (south of Bere Road and north of Carey Road)?

Please select one answer only.

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know

Q7 Do you have any comments about the proposals to provide 105 homes at Bere Regis and/or 200 homes at Wareham through the neighbourhood plans?

Q9 Overall, to what extent do you agree or disagree with Option A?

Please select one answer only.

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Don't know

Q10 Do you have any comments about Option A?

Option B: 650 homes at Wool, 500 homes at Redbridge Pit/Moreton Station, 250 homes on smaller sites

This option would focus the majority of development on two main sites but would also include the use of smaller sites across the district.

Please see pages 10 and 11 of About Purbeck for more detail about this option and then answer the following questions.

Q11 Do you agree or disagree with the following proposals outlined in the option?

Please select one response for each proposal.

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
650 homes at Wool	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
500 homes at Redbridge Pit/Moreton Station	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
250 homes on smaller sites across the district	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Q12 Overall, to what extent do you agree or disagree with Option B?

Please select one answer only.

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know

Q13 Do you have any comments about Option B?

Option C: 800 homes at Wool, 600 homes at Redbridge Pit/Moreton Station

This option focuses development on two main locations.

Please see pages 12 and 13 of About Purbeck for more detail about this option and then answer the following questions.

Q14 Do you agree or disagree with the following proposals outlined in the option?

Please select one response for each proposal.

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
800 homes at Wool	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
600 homes at Redbridge Pit/Moreton Station	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Q15 Overall, to what extent do you agree or disagree with Option C?

Please select one answer only.

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know

Q16 Do you have any comments about Option C?

Q17 Considering all three options, which is your preferred option?

Please select one answer only.

- Option A - 470 homes at Wool, 440 homes at Redbridge Pit/Moreton Station, 90 homes at Upton, 150 homes at Lytchett Matravers and 250 homes on smaller sites
- Option B - 650 homes at Wool, 500 homes at Redbridge Pit/Moreton Station, 250 homes on smaller sites
- Option C - 800 homes at Wool, 600 homes at Redbridge Pit/Moreton Station
- I like all the options
- I do not like any of the options
- Don't know

Q18 Do you have any other comments about the options above?

Q19 Do you have any alternative suggestions about how best to meet the housing need by delivering the required number of new homes by 2033?

Possible locations for new homes at Wool

The three options presented above all involve development at Wool, but with different numbers of homes in each case. The precise location of any new homes within this area will depend on a number of factors, including the overall number of homes to be provided, areas of flood risk, and provision of open spaces and community facilities to support the homes.

Please see page 14 of About Purbeck for a map and more detail about the potential locations and then answer the following question.

Q20 If new homes are built at Wool, which of the possible locations do you prefer?

Please select all suitable answers. Please note that several locations may be required depending on the number of homes built at Wool.

- Location 1
- Location 2
- Location 3
- Location 4
- Location 5
- I do not like any of the locations
- Don't know

Q21 Do you have any comments about the possible locations at Wool?

Section 6: Affordable homes

It is the Council's current policy that on sites of over 10 new homes, 40 or 50 per cent of them are affordable. The current affordable housing policy does not stipulate what type of rent levels (affordable rented or social rented) should be offered. The Council is considering introducing a policy which encourages 10% of the affordable homes provided on eligible development sites to be social rented.

Please read the information about this proposed new policy on page 15 of About Purbeck and then answer the following question.

Q22 Do you agree or disagree with the proposal to stipulate that 10% of affordable homes are social rented?

Please select one answer only.

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know

Do you have any comments about the proposed new affordable housing policy?

Q23 Please use the space below to make any further comments about the proposals:

Thank you for taking part in the consultation.

Please e-mail your completed questionnaire to: purbeck@publicperspectives.co.uk by Monday 12th March 2018.

Alternatively you can print and post the questionnaire, free of charge, to:

Freepost RSGJ-HSTC-CGTT
New Homes for Purbeck Consultation
Public Perspectives Ltd
20 Camp View Road
St. Albans
AL1 5LL

Comment

Agent	(1191050)
Email Address	████████████████████
Company / Organisation	Ken Parke Planning Consultants
Address	Anniversary House 23 Abbott Road Bournemouth BH9 1EU
Consultee	Westcoast (Purbeck) Ltd (1191219)
Email Address	████████████████████
Company / Organisation	Ken Parke Planning Consultants
Address	Anniversary House 23 Abbott Road Bournemouth BH9 1EU
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Ken Parke Planning Consultants (Westcoast (Purbeck) Ltd - 1191219)
Comment ID	PLPP738
Response Date	03/12/18 16:35
Consultation Point	Policy H14: Second homes (View)
Status	Processed
Submission Type	Web
Version	0.2
Files	Purbeck Local Plan Pre-Submission Consultation Response and AB1 - Westcoast(Purbeck)Ltd - KPPC.pdf
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	1

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

Which policy / paragraph number / policies map does your comment relate to? Chapter 4 Housing

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Please see attached statement and AB1

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Email Address	████████████████████
Company / Organisation	Ken Parke Planning Consultants
Address	Anniversary House 23 Abbott Road Bournemouth BH9 1EU
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Ken Parke Planning Consultants (Westcoast (Purbeck) Ltd - 1191219)
Comment ID	PLPP739
Response Date	03/12/18 16:35
Consultation Point	Policy I1: Developer contributions to deliver Purbeck's infrastructure (View)
Status	Processed
Submission Type	Web
Version	0.2
Files	Purbeck Local Plan Pre-Submission Consultation Response and AB1 - Westcoast(Purbeck)Ltd - KPPC.pdf
Are you responding on behalf of a group?	Yes
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Email Address	██████████
Company / Organisation	Ken Parke Planning Consultants
Address	Anniversary House 23 Abbott Road Bournemouth BH9 1EU
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Ken Parke Planning Consultants (Westcoast (Purbeck) Ltd - 1191219)
Comment ID	PLPP740
Response Date	03/12/18 16:35
Consultation Point	Policy H1: Local housing requirement (View)
Status	Processed
Submission Type	Web
Version	0.2
Files	Purbeck Local Plan Pre-Submission Consultation Response and AB1 - Westcoast(Purbeck)Ltd - KPPC.pdf
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	1

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Email Address	[REDACTED]
Company / Organisation	Ken Parke Planning Consultants
Address	Anniversary House 23 Abbott Road Bournemouth BH9 1EU
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Ken Parke Planning Consultants (Westcoast (Purbeck) Ltd - 1191219)
Comment ID	PLPP741
Response Date	03/12/18 16:35
Consultation Point	Policy H2: The housing land supply (View)
Status	Processed
Submission Type	Web
Version	0.3
Files	Purbeck Local Plan Pre-Submission Consultation Response and AB1 - Westcoast(Purbeck)Ltd - KPPC.pdf
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	1

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

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Email Address	██████████
Company / Organisation	Ken Parke Planning Consultants
Address	Anniversary House 23 Abbott Road Bournemouth BH9 1EU
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Ken Parke Planning Consultants (Westcoast (Purbeck) Ltd - 1191219)
Comment ID	PLPP742
Response Date	03/12/18 16:35
Consultation Point	Policy H8: Small sites next to existing settlements (View)
Status	Processed
Submission Type	Web
Version	0.4
Files	Purbeck Local Plan Pre-Submission Consultation Response and AB1 - Westcoast(Purbeck)Ltd - KPPC.pdf
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	1

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

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Email Address	[REDACTED]
Company / Organisation	Ken Parke Planning Consultants
Address	Anniversary House 23 Abbott Road Bournemouth BH9 1EU
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Ken Parke Planning Consultants (Westcoast (Purbeck) Ltd - 1191219)
Comment ID	PLPP743
Response Date	03/12/18 16:35
Consultation Point	Policy H9: Housing mix (View)
Status	Processed
Submission Type	Web
Version	0.1
Files	Purbeck Local Plan Pre-Submission Consultation Response and AB1 - Westcoast(Purbeck)Ltd - KPPC.pdf
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	1

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Email Address	██████████
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Address	Anniversary House 23 Abbott Road Bournemouth BH9 1EU
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Ken Parke Planning Consultants (Westcoast (Purbeck) Ltd - 1191219)
Comment ID	PLPP744
Response Date	03/12/18 16:35
Consultation Point	Policy H11: Affordable housing (View)
Status	Processed
Submission Type	Web
Version	0.2
Files	Purbeck Local Plan Pre-Submission Consultation Response and AB1 - Westcoast(Purbeck)Ltd - KPPC.pdf
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	1

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Company / Organisation	Ken Parke Planning Consultants
Address	Anniversary House 23 Abbott Road Bournemouth BH9 1EU
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Ken Parke Planning Consultants (Westcoast (Purbeck) Ltd - 1191219)
Comment ID	PLPP779
Response Date	03/12/18 16:35
Consultation Point	Policy H10: Part M of the Building Regulations (View)
Status	Processed
Submission Type	Web
Version	0.1
Files	Purbeck Local Plan Pre-Submission Consultation Response and AB1 - Westcoast(Purbeck)Ltd - KPPC.pdf
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	1

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

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Address	Anniversary House 23 Abbott Road Bournemouth BH9 1EU
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Ken Parke Planning Consultants (Westcoast (Purbeck) Ltd - 1191219)
Comment ID	PLPP443
Response Date	03/12/18 16:36
Consultation Point	Chapter 6: Infrastructure (View)
Status	Processed
Submission Type	Web
Version	0.1
Files	Purbeck Local Plan Pre-Submission Consultation Response and AB1 - Westcoast(Purbeck)Ltd - KPPC.pdf (1)
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	1

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

Which policy / paragraph number / policies map does your comment relate to? Chapter 6 Infrastructure

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2476



KenParke
PLANNING CONSULTANTS

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www.kenparkeplanning.com

The Head of Planning Services
Purbeck District Council
Westport House
Worgret Road
Wareham
Dorset BH20 4PP

3rd December 2018

Our ref: AB/3056 - N

Dear Sir

**Re: Purbeck Local Plan Review – Pre-Submission Draft Consultation –
Binnegar Hall, Worgret Road, East Stoke**

The following letter has been prepared in response to the Council's current consultation in respect of the Purbeck Local Plan Pre-Submission Draft which seeks the opinion of the public, landowners, stakeholders and developers on the intended strategy for the delivery and management of development across Purbeck District from 2018-2034.

This letter is prepared on behalf of Westcoast (Purbeck) Ltd in response to the consultation and in promotion of their land at 'Binnegar Hall, Worgret Road, East Stoke' – 'the site' – as an available and deliverable site, which is not subject to any significant constraint, and can be allocated for housing development within the plan period.

We have made substantial submissions to the Council in respect of this site at each stage of the local plan preparation process. The Council will have these responses on record, however the letter dated 21st March 2018 provided in response to the previous 'New Homes for Purbeck' Consultation is appended at **AB1** for completeness.

The following paragraphs respond to the Purbeck Local Plan Pre-Submission Draft strategy and make comment on the strategic allocations, providing justification for why our Client's site should be allocated for housing development.

Having regard for the fundamental determination to be made through the examination of the Local Plan, we also comment on the degree to which the plan which has been prepared is sound; in accordance with Paragraph 35 of the NPPF.

Housing Needs – Chapter 4

Since the Council commenced with the preparation of the new Purbeck Local Plan, the Government has brought in to force the NPPF 2018. The revised NPPF now forms the overarching national policy framework, alongside Planning Practice Guidance (PPG). The Local Plan must be broadly in accordance with the direction of the NPPF in order to be found sound and capable of adoption. With the coming in to force of the NPPF the standard methodology for the calculation of housing needs now applies to all strategic plan making processes where Councils project that their plan will be submitted for examination post January 2019. Plans submitted before this date will still be able to make use of the most up-to-date Strategic Housing Market Assessment (SHMA) data, in recognition of the fact that they have been in the midst of preparation and to avoid abortive work. Where Councils however propose to submit their plans post January 2019, any calculation of housing need should be based upon the standard methodology.

The Council has confirmed that it intends to formally submit its plan for examination between February and March 2019. Housing delivery within the plan period should thus be based on the standard methodology and any previous SHMA is of no relevance.

Housing Requirements – Policy H1

With reference to Chapter 4 of the Pre-Submission Document; Paragraphs 108 to 112, it is clear that the Council is still basing its proposed delivery of housing upon the SHMA 2018 as the underlying evidence base. The Council however suggests that it has incorporated an uplift upon the SHMA figure, in accordance with the standard methodology, of 42% to take in to consideration the need for affordable housing.

This does not follow the direction of National Planning Policy which indicates that the standard methodology should form the basis for determination of housing need. Paragraph 002 of the Planning Practice Guidance (PPG) relating to 'Housing Needs' confirms that authorities are expected to follow the standard method in assessing local housing need. Paragraph 003 of the PPG confirms however that if Councils consider that circumstances warrant an alternative approach then they can expect this to be scrutinised more closely at examination. There is an expectation that the standard method will be used, and any other method should only be used in exceptional circumstances.

It appears that the Council has sought to incorporate the standard methodology in to its SHMA 2018 updated in calculating its housing need, however this has based on a starting year of 2017 – as was the case at the time the Government released draft projections with the announcement of the standard methodology back in 2017 – as opposed to using the correct base year of 2018; being the current year and beginning of the Local Plan period. Planning Practice Guidance (PPG) states at Paragraph 004 of the ‘Housing Need’ section that calculations of national growth should be based on 10 consecutive years with the current year being the first year – in this case 2018.

Policy H1 directs that the Council will seek to deliver, over the 16-year proposed plan period, 2,688 homes or 168 per annum. This is the figure advocated for by the SHMA 2018 and does not appear to have correctly applied the standard methodology.

Standard Methodology

Section 5 of the NPPF provides the Government’s approach to the delivery of a sufficient supply of housing.

Paragraph 60 of the Framework establishes that strategic policies should be informed by a local housing need assessment which uses the standard method as set out in national planning guidance.

The standard methodology establishes that housing need is based upon the expected annual average housing growth (Step 1), with an adjustment factor which is based upon the ratio of house prices to earnings (Step 2), which is then subject to a cap based on the status of the existing development plan and average household growth to provide a meaningful and achievable minimum figure (Step 3).

Step 1

In Purbeck District, the projected growth in households for the next 10 years; taking account of the current year as the starting point, is 1284; which provides an average housing growth figure of **128.4 per annum**. This figure is based upon the data from the Office for National Statistics (ONS) baseline projections from 2014; as National Planning Policy directs.

Step 2

The Affordability Ratio (AR) for Purbeck is **11.05**, based on Table 5c of the ONS report - Ratio of house price to workplace-based earnings (lower quartile and median), 1997 to 2017.

Putting this figure in to the standard formula provides us with an Adjustment Figure (AF) of 1.440625

Step 3

Putting Step 1 and Step 2 provides with an overall housing need figure of **185 dwelling per annum**. This is the overarching capped figure for need.

It is necessary however to consider whether the Council has recently reviewed its local plan or housing needs, or whether these are out of date. In the case of Purbeck, the Local Plan and its housing needs position are both out of date. As a result therefore, the overall housing need for the District is to be capped based on a figure of:

- 40% above whichever is the higher of:
 - The annual housing growth figure worked out in Step 1; or,
 - The average annual housing requirement figure set out in the most recently adopted strategic policies.

In respect of Purbeck, the last adopted housing requirement figure was 120 dwellings per annum, which is lesser than the average growth figure of 128.4 per annum and thus it is the latter higher figure which should be used.

The minimum housing need for Purbeck is thus 40% above 128.4 dpa, which provides us with a figure of **180 dwellings per annum**. This is lesser than the capped figure and thus this is the figure to be adopted.

The Council should therefore be planning for 180 dwellings per annum and not the 168 dwellings per annum it is currently planning for. The result is a shortfall of **192 dwellings**.

In the context of the very modest housing needs of the District, this is a significant shortfall which should be planned for by the Council as part of its delivery strategy.

Housing Delivery – Policies H2, H8

Policy H2 provides the Council's delivery strategy for the 2,688 homes which are being planned for. It is noted that within the context of this supply figure the Council has only sought to allocate 1,455 dwellings; excluding the figure of 300 for Wareham which are being planned for as part of the Neighbourhood Plan and is also stated to include windfall development within this settlement. The Draft Neighbourhood Plan proposes allocations for 200 dwellings with 100 assumed to be deliverable through windfall. This therefore brings the total proposed allocations number up to 1,655.

With a proposed allocations figure of 1,655 this leaves a shortfall of 1,033 dwellings, compared to the Council's projection of need based on its SHMA 2018 and **1,225 dwellings** when compared with the actual needs for the District as calculated by the standard methodology.

The Council has made an allowance for, including the 100 windfall at Wareham, 1,033 dwellings to be delivered through a small sites policy and general windfall within existing settlements.

There is very little if any justification which has been provided for this level of windfall delivery.

The Council's recent completions statistics do not provide appropriate justification for this approach; taking the past 5 years:

2012-2013 – 79 dwellings completed
2013-2014 – 72 dwellings completed
2014-2015 – 67 dwellings completed
2015-2016 – 232 dwellings completed
2016-2017 – 89 dwellings completed

These figures include both windfall and completions in respect of allocated sites. In order to deliver the 1,033 homes projected, spread across the plan period the Council will need to deliver 64 dwellings per annum solely through windfall. On the basis of the limited rate of completions, there is simply no justification for this approach.

The NPPF directs at Paragraph 68 that small and medium sites make an important contribution to meeting the housing requirements of an area and that to promote the development of a good mix of sites LPAs should (a) identify through the development plan land to accommodate at least 10% of their housing requirement on sites no larger than one hectare. Whilst the Council has sought to adopt a small sites policy, it has not identified where these small sites are and whether there are sufficient sites to deliver the amount of housing which the Council is projecting. The NPPF expects specifically that these sites are identified as opposed to a policy approach simply being provided which would facilitate this. This provides no certainty for residents, landowners, stakeholders or developers and certainly does not justify that this quantum of housing can be delivered.

Paragraph 70 of the NPPF states that where an allowance is made for windfall sites as part of the supply there should be compelling evidence that they will provide a reliable source of supply. The allowance should be realistic having regard for the SHLAA, historic windfall delivery rates and expected future

trends. As has been demonstrated above, the Council would need to deliver significantly increased rates of windfall supply in order to deliver the level of housing which it is advocating for – with over a third of its annual supply comprising windfall development.

Having regard for the fact that we believe the Council has sought to deliver insufficient housing in respect of its needs in any event, there is a significant need to put in place further formal allocations in order rather than seeking to rely on a windfall figure which is simply not backed up by any objective evidence.

The Council should therefore seek to allocation additional small to medium sites which are capable of meeting housing needs.

Should the Council not consider that further allocations are necessary we do not consider that, in accordance with Paragraph 35 of the NPPF, the plan is positively prepared, justified or effective. The plan does not provide appropriate justification or certainty for housing the housing needs of the District will be met in placing too great a reliance on windfall development without the appropriate evidence of available sites to back this up and having regard for past rates of delivery and moreover the plan does not seek to meet the assessed housing needs of the District in full being based on an out of date assessment which does not correctly apply the standard methodology. We do not, as a result consider that it should be found sound in its current form.

The Council should seek to review and amend the Pre-submission Draft Plan prior to its submission for examination.

Housing Trajectory

The Council's proposed trajectory indicates that it intends to undersupply for the initial 5 years of the plan period, oversupply for the next 5 years and latterly undersupply at the back end of the plan period. The precise delivery figures proposed are not clear however. The data is presented in the format of a chart with 50-unit increments which does not make clear at all what is expected to be delivered when.

The Council could better seek to meet its housing needs in the initial years of the plan period through the allocation of more small to medium sites which are capable of coming forwards sooner than the strategic sites. There is significant reliance put on the fact that significant numbers of units will be delivered on the strategic sites from 2021-2022 until 2026-27 and that a series of the allocated sites will build out at the same time. It is well established that housebuilders are unlikely to build out more than 30-50 dwellings per annum even on the large sites so as not to flood the market. The fact that the majority of the development

has been focussed to two principal locations; being Moreton and Wool, will likely see the delivery rate be substantially slower than predicted, levelling out across the plan period as a whole, rather than addressing the slow start to supply from the earlier years whilst these sites are gearing up.

It is vital therefore that formal allocations are made for small to medium sites to address this matter. Having regard for the fact that the Council's housing supply numbers should increase in any event, it is suggested that the Council should look to allocate additional sites which have to date been excluded.

The promoted site; Binnegar Hall, is a previously developed site which is subject to no significant constraint and is located outside of both the Green Belt and Dorset Area of Outstanding Natural Beauty (AONB) and outside of the protected 400m designation of the Dorset Heathlands Special Protection Area (SPA).

The site is subject of an existing planning consent for housing development which is currently being built out and the Council are in receipt of a more substantial application for the development of the rest of the site for 49 dwellings with associated open space and SANG provision. There is no issue with the principle of the development and thus there is no reason why the Council should not seek to support this site as a formal allocation within the Local Plan.

Housing Mix – Policy H9

The Council's housing mix policy is seeking to deliver mixed and balanced communities and provide the type and format off homes which it is suggested are required in accordance with its recent SHMA documents.

The Council as a result propose, at Policy H9 to place an obligation on all developments which deliver 20 or more homes to deliver; from the market housing provision:

- 5% as self-build plots; and,
- 10% as single storey homes.

This requirement places a significant and unreasonable expectation on all developers where sites would deliver this quantum of development without any regard for the site-specific circumstances, what is appropriate to local character and constraints and scheme viability. The Council state that if applications do not comply with this it will be necessary to demonstrate exceptional circumstances by way of a viability assessment confirming why this is the case; having regard for the viability evidence which has informed the Local Plan.

The Council has sought to justify this on the basis of the findings of the SHMA 2018. The SHMA demonstrated that there is a clear need for a mix of 2, 3 and 4 bedroom homes to meet market housing needs; being weighted more heavily towards three bedroom properties. In comparison for affordable units the mix also comprises some 1 bedroom homes and is weighted heavier towards two bedroom properties with a need for a much lesser number of 4 bedroom homes.

The Council also note from the SHMA evidence that there is a greater number, on average, of older residents within the Eastern Dorset Market Area; 27% when compared with the national average of 21%. Purbeck itself has closer to 30% of residents in the over 65 category. The Council as a result recognise a need for more housing for older persons.

Whilst there is clearly a need for more housing for older people it is not appropriate to mandate that single storey properties be provided on all sites of greater than 20 homes to deliver this aim; this has no regard for the location of the development in particular which is pertinent to whether this will (1) be attractive to this sector of the market and (2) whether it is the most appropriate location for such development having regard for the regular needs of this element of the population. Older persons housing should be directed more towards the principal settlements where there is close access to services and facilities, in particular shops, doctors, pharmacies and other day to day facilities which this section of the population rely more heavily on.

Whilst it is the case that specialist accommodation, delivered by the experienced market leaders in this sector, provides for a large element of the needs for this demographic of the population, it is recognised that more traditional housing in a non-communal environment also has its place in the market. It is the case however that it should be developed intentionally as part of specific schemes rather than as an afterthought because it is mandated as part of applications by an overly restrictive housing mix policy.

The desire to provide housing for the older generation and lifetime homes is laudable, however there is a significant need for market housing for the wider populace, focussing on two, three and four bedroom homes, and a need to make efficient use of the land which stands to a degree opposite this. Many sites will clearly not be suitable for the delivery of single storey units, because they would be out of character or simply because that is not what would make best use of the site. The implications of single storey homes often being they require a considerably greater footprint compared to two storey dwellings and do not make best and most appropriate use of the land available.

To mandate the provision of self-build plots on schemes of this size where effectively, for a 20 units scheme, the Council would be seeking 1 self-build

plot, is completely unworkable. Developers will not be willing to deliver this, and this would lead to piecemeal development within such sites at the risk of comprehensiveness. The provision of single self-build plots on sites which have otherwise been carefully considered to take account of their specific constraints and ensure appropriate amenity for neighbouring uses and proposed residents is not good planning. Effectively these plots would be constrained to a pre-determined outcome in any event and at which point is it simply the case that providing such plots would materially impact upon viability for the developer and deliver no real benefit to the person seeking to buy the self-build plot when what they can construct will not be materially different to what would have been built on the site in any event. It simply does not make any sense.

There is a place for self-build housing and it is on sites where the intention is to deliver solely this format of development; in the form of a site where landscaping and access are managed, and a design code is put in place for the development as a whole which provides a degree of flexibility but also a defined set of constraints. This represents positive and proactive planning. Singular or groups of two or three self-build plots will not provide positive planning outcomes.

It is not considered appropriate for the Council to seek to impose an overly restrictive housing mix policy which mandates certain formats of accommodation. The Council can appropriately suggest where the need for housing lies within the District, but to obligate this does not have represent good planning or the need to consider individual sites based on their own opportunities and constraints. Developers are instead likely to look to deliver 19 units on sites to avoid all of these constraints which defeats precisely the purpose of this policy. If the Council wants to seek the delivery of this format of development, it should direct this solely to its site allocations where greater control can be had over the outcomes and meaningful numbers of these dwellings can be delivered.

The Council should strongly consider rewording this policy to place the obligation solely on allocated sites or remove this all together.

Building Regulations – Policy H10

Further to the Council's housing mix policy, it is also seeking to direct that Applicants on all sites which comprise major development, as defined by the Framework, provide at least 10% of new homes to meet the optional requirement of the Building Regulations in respect of accessibility – Category M4(2).

The Council expects this to be delivered on all sites unless site specific considerations mean this cannot be provided and in this case the Council

expects a viability appraisal to be submitted to justify why the development cannot deliver this.

There are other significant considerations beyond viability which would indicate that this requirement cannot be applied; for example, flood risk and the desire to make development surface or fluvial flood resilient. The Council has had no regard for this in the construction of this policy and no stipulation is provided to remove the requirement in such circumstances.

In the case of an exceptional weather event even those areas which are not subject to any defined surface water or fluvial flood risk may be subject of an element of water ingress due to site specific circumstances such as ground levels. There are clear times when the provision of level access thresholds would not be acceptable, not because of the expense of constructing the buildings, but because it is not in the best interests of future residents and places the developer at additional risk and liability. This is something which should be determined by the Applicant, having regard for site specific circumstances and not something mandated by Local Policy.

With this provided as an option within the building regulations where developers are providing a format of accommodation where this would be desirable or beneficial it is completely superfluous to deal with this at the planning application stage and will only seek to constrain development which is completely acceptable in all respects.

Affordable Housing – Policy H11

The recently adopted National Planning Policy Framework (NPPF) imposes a new threshold for affordable housing. As the most up to date planning policy this supersedes the Ministerial Statement from 2014 which brought in to place a 10-unit threshold with a gross floorspace limitation. The new threshold is based upon the statutory definition of Major Development; being proposals for 10 or more units or a site area of greater than 0.5ha.

The NPPF makes clear at Paragraph 63 that no affordable housing contributions should thus be required for residential developments that are not major developments; unless in designated rural areas where the LPA has adopted a lower threshold where contributions cannot be sought from developments of 5 units or fewer.

Policy H11 seeks to impose a 2 units threshold on sites where development which is not major is proposed. This is completely contrary to the NPPF and in no manner meets the tests of soundness in being consistent with National Policy.

There is absolutely no justification for this approach in any manner. The policy should be substantially reworded in this respect.

The Council is capable of adopting the lower threshold for affordable housing in designated rural areas where it will be capable of seeking contributions on sites of 6 or more units or where the site is over 0.5ha in area; as a result. The suggestion of a lower threshold however is completely unreasonable and unjustified.

Second Homes - Policy H14

The Council is seeking to follow the direction of Local Authorities such as Cornwall Council which have adopted a policy restricting the provision of second homes. The practicality however of implementing such a policy is however questionable.

The Council, through Policy H14, is seeking to impose planning conditions which will restrict the occupation of properties to only a person's sole or main residence in respect of applications for:

- The erection of new residential properties in the AONB;
- Change of use of existing buildings to residential;
- Replacement homes; and,
- The policy also applies on small sites in accordance with Policy H* and on rural exception sites.

The policy will result in some significantly odd outcomes, for example, where an existing property is occupied as a second home by the owner, they are unable to replace that building with a new dwellinghouse if they will continue to occupy it. In gaining planning permission it would have a restriction placed upon it which would prevent them from being able to live in it.

In planning terms, they would be replacing one home, which they live in as a second home, with another which they would continue to occupy as a second home; with no material change in the use in any manner and where there would be no change in the availability of local housing stock at all. This makes absolutely no sense in planning terms at all and would not pass the test of reasonableness or necessity.

The purpose of the policy in effect is to ensure that new housing delivered is provided to meet local needs and persons from outside of the area are not buying up the housing stock which does not reduce overall needs and will potentially make affordability worse. The way to tackle this matter is not however through the imposition of an unreasonable and unenforceable condition, but rather to build more housing. The Council would be better served

seeking to deliver additional housing development to take account of any issue in respect of second homes to ensure sufficient stock to meet the needs of local persons.

It is unclear why there needs to be a restriction in respect of rural exception sites as the criteria for the acceptability of such development is that there is an established local need which would be met. Persons will not be on the housing register if they already have a home which they would also retain; they may move to a new home which better addresses their needs criteria in terms of property size, or location, but they will then give up their other property. It is unclear why the policy includes this stipulation as a result; this makes little sense.

Chapter 6 – Infrastructure – Policy I1

Policy I1 of the Pre-submission Plan provides the Council's suggested approach to developer contributions.

The approach advocated appears highly irregular and confused with the Council seeking to on the one hand collect CIL contributions, but at the same time to seek contributions towards:

- Local transport;
- Health;
- Open space;
- Extension of GP facilities; and,
- Education.

By way of specific contribution to be secured by way of s106 agreement.

It is recognised that, in accordance with Paragraph 122 of the Community Infrastructure Levy (CIL) Regulations (2010) and the NPPF, the Council may seek site specific contributions in respect of development where it is necessary to make the development acceptable in planning terms, directly related to the development and, fairly and reasonably related in scale and kind to the development. Such contributions should however be seeking to collect additional s106 contributions for matters which are included directly within CIL in respect of pooled infrastructure such as GP surgeries, education contributions, open space contributions and highways improvements which are not directly related to the site.

The Council appear to be seeking to 'double-dip' on contributions for these elements which is completely unjustified.

The policy should be reworded to state that site specific contributions may be sought where they meet the relevant tests of Paragraph 122 of the Community Infrastructure Levy (CIL) Regulations (2010) and the NPPF, however in all other circumstances will be secured by CIL. There is simply no justification for any other approach if the Council intends to continue to gather CIL.

Overall Soundness of the Local Plan Approach

Determining the soundness of a Local Development Plan is one of the principal roles for the examining Inspector at an EiP. 'Soundness' as a concept is defined within the NPPF by a series of tests, if these tests are met then the plan will be capable of being found sound; dependant on whether it meets the other tests of legal compliance and compliance with other relevant requirements such as the duty to co-operate, both of these aspects however fall within the realms of consideration of whether a plan is sound.

Paragraph 35 of the NPPF 2018 sets out the approach to the examination of Local Plans and whether they meet the legal and procedural requirements as enshrined within the legislation. The tests of soundness are clear, namely that a plan must be:

- Positively prepared;
- Justified;
- Effective; and,
- Consistent with National Policy.

Positively Prepared

To be positively prepared, a plan must be based on a strategy which as a minimum seeks to meet strategic level needs and be consistent with achieving sustainable development.

The fundamental point therefore is that strategic needs, such as for housing, must be met. Where a plan does not demonstrate that assessed needs will be met it will not be sound and will not achieve the aim of ensuring sustainable development.

The Council's proposed housing supply and distribution of development raises significant concerns in this respect; with the Council seeking to deliver a level of development below its needs as calculated by the standard methodology and placing a significant and unjustified reliance on the delivery of windfall

development when instead certainty should be provided through the allocation of smaller and medium sites which confirm how and where the needs of the District will be met.

The Council should be seeking to allocate additional sites in order to make up for the shortfall in delivery identified and should, in accordance with the direction of the NPPF seek to allocate at least 10% of its supply on smaller and medium sites in order to ensure delivery in the initial years of the plan period. The Council has proposed a small sites policy which it considers can deliver such development however it would be more appropriate, particularly in Green Belt locations, for the Council to seek to formally allocate these sites to provide certainty for all parties.

The plan is not as a result positively prepared at this time and is in need of review and amendment prior to its submission for examination.

Justified

To be justified the plan should be the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence.

It is essential to understand that housing delivery is best achieved through development at a range of scales; small, medium and large strategic scale. Placing reliance on only large strategic sites which are likely to have infrastructure requirements or other barriers to their delivery giving rise to significant delays in meeting objectively assessed needs for housing, is likely to guarantee that the needs in the earlier years of a plan period will not be appropriately met. Some development will inevitably come forwards through the vehicle of windfall, however the Council has made what it considers to be an appropriate allowance for windfall in its housing trajectory and is still deficient on its housing numbers.

Whilst Paragraph 72 of the NPPF 2018 acknowledges that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages or towns, Paragraph 68 of the NPPF confirms that small and medium sites can make an important contribution to meeting the housing requirements of an area and are often built-out relatively quickly. The new NPPF advocates Councils allocating at least 10% of their housing requirement on smaller sites of no larger than 1ha.

Clearly the Council has the opportunity here to allocate some sites capable of delivering less development which would still be of a significant scale having regard for the Council's housing supply. Leaving significant numbers of housing

to speculative windfall provision is not reasonable or justified and does not represent good plan making.

Effective

For a plan to be effective it must be deliverable over the plan period, with appropriate consideration having been given to joint working and the duty to co-operate.

Whilst the plan has given consideration to the duty to co-operate with neighbouring authorities and this has been found not to be an option. It is not considered, for the reasons above that the local plan is effective in its current form. There are significant questions over the Council's housing trajectory in respect of the ability for the amount of development which is required to be delivered at the right time in the plan period, it is anticipated that the Council's strategic allocations will come forwards later than has been projected and will not deliver the quantum of development in the timescales which have been indicated. The Council has also provided insufficient justification for its approach to windfall development which will not ensure that the housing needs of the District are appropriately met.

It is not in this regard considered that the plan meets the tests of effectiveness in its current format, it is in need of alteration.

Consistent with National Policy

To be consistent in this respect the plan should enable the delivery of sustainable development in accordance with the policies of the Framework.

There are several overarching conflicts with the policies of the Local Plan Pre-submission Draft, as proposed, and the direction of National Policy.

The Council has not had appropriate regard for the NPPF in determining its approach to affordable housing which is not in any manner justified, it has also not had appropriate regard for the Framework in respect of its approach to securing developer contributions.

To meet the tests of soundness these policies will need to be significantly reworked.

Legal Compliance of the Plan – Sustainability Appraisal (SA)

The Council has provided the necessary evidence by way of a Sustainability Appraisal, with reference to a supporting documents library, to demonstrate that the legal requirements as set out within the Environmental Assessment of Plans

and Programmes (Strategic Environmental Assessment) Regulations (2004) have been met in preparing its Local Plan.

The fact that the Council may have undertaken the necessary assessment to demonstrate legal compliance with the SEA Regulations does not however in turn indicate that the plan strategy itself is sound. On the contrary however, failing to meet the necessary tests of legal compliance are sufficient to render a plan not sound and incapable of adoption.

The Council has sought to demonstrate that its proposed strategy is capable of meeting the tests of the SEA Regulations; however, this does not demonstrate this is the only or most appropriate strategy. In undertaking the Sustainability Appraisal (SA) the Council has had regard for opportunities for improvements to economic, social and environmental conditions as it is required to do, however it has not been conclusively demonstrated that these represent the most appropriate option. In this regard therefore whilst the legal tests of the SEA Regulations have been met this does not mean that the strategy is sound.

As discussed, it is not considered that the approach taken by the Council to the delivery of housing within the District results in the achievement of sustainable development at this time as it does not meet District's assessed housing needs in full and opportunities to spur delivery in the earlier years of the plan period instead of providing a shortfall have not been explored where reliance on windfall development could be reduced and more certainty provided.

Conclusion

Whilst there is no objection to the overarching strategy of the Purbeck Local Plan Pre-Submission Draft, there are clear and substantial failings which need to be addressed in respect of elements of the housing delivery strategy and also the wording and approach of specific policies in order to render the plan sound and capable of submission for examination.

The promoted site; Binnegar Hall, is a previously developed site which is subject to no significant constraint and is located outside of both the Green Belt and Dorset Area of Outstanding Natural Beauty (AONB) and outside of the protected 400m designation of the Dorset Heathlands Special Protection Area (SPA).

The site is subject of an existing planning consent for housing development which is currently being built out and the Council are in receipt of a more substantial application for the development of the rest of the site for 49 dwellings

with associated open space and SANG provision. There is no issue with the principle of the development and thus there is no reason why the Council should not seek to support this site as a formal allocation within the Local Plan.

Detailed discussion of the constraints and opportunities of the site have been discussed in the application documents submitted to the Council and previous representations made to it as part of the Local Plan preparation process. We have engaged with the Council at each stage of the plan preparation, including responding to the previous stage of consultation in March 2018; as appended at **AB1**.

The site can be delivered within the early years of the plan period and will contribute significantly to supply within the early years, directly addressing the shortfall.

Should the Council wish to discuss out Client's site further, it should not hesitate to get in contact with us directly.

We ask to remain updated on the progress of the Local Plan as it proceeds and wish to take part in the Examination Hearings.

Yours sincerely

Adam Bennett BA (Hons)
Town Planning Consultant

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Enc.

**AB1 - Letter of Representation - New Homes for Purbeck Consutlation –
Binnegar Hall - KPPC**

The Head of Planning Services
Purbeck District Council
Westport House
Worgret Road
Wareham
Dorset BH20 4PP

BY EMAIL

21st March 2018

Our ref: AB/3056

Dear Sir

Re: New Homes for Purbeck – Local Plan Review Consultation

The following letter is prepared in response to the Council's recent 'New Homes for Purbeck' consultation document which seeks the opinion of the public, landowners, stakeholders and developers on the intended strategy for the delivery of housing across Purbeck District from 2016-2033.

This letter also seeks to further promote 'Land at Binnegar Hall, Worgret Road' (SHLAA Ref. 6/11/1337) – 'the site' – as an available and deliverable site, which is not subject to any significant constraint, and can be allocated for housing development within the plan period.

Since the release of the Council's consultation document, the Government has released its Draft NPPF March 2018 and several other documents for consultation, including details on the Government's proposed housing needs assessment methodology. These draft documents will impact upon the delivery of housing within Purbeck District during the plan period and have broad implications for the site selection process and for the delivery of the Local Plan review as a whole

The Draft NPPF 2018 takes a particularly robust position on the release of land within the Green Belt for housing development. Paragraph 135 of the document states that LPAs must demonstrate exceptional circumstances to justify altering Green Belt Boundaries and should ensure that the amended boundary is of a degree of permanence such that it will persist beyond the end of the plan period. The salient point here is that it is not acceptable to make repeated piecemeal changes to the Green Belt boundary and thus that sufficient land should be released at the plan review stage to meet objectively assessed housing needs in the long term.

Further detail is provided by Paragraph 136 of the Draft NPPF on how Councils must go about justifying that exceptional circumstances exist to remove land from the Green Belt. The expectation is that the LPA should have examined all other reasonable options for meeting its identified needs for development taking account of Paragraph 135 and whether the strategy:

- Makes as much use as possible of suitable brownfield sites and underutilised land;
- Optimises the density of development, including whether policies promote a significant uplift in minimum density standards in suitably sustainable locations; and,
- Has been informed by discussions with neighbouring LPAs about whether they could accommodate some of the identified need for development, as demonstrated through a statement of common ground.

It is further reiterated at Paragraph 138 that when defining Green Belt Boundaries, the LPA must be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period.

Fundamentally Councils should be allocating land outside of the Green Belt in preference to altering its defined boundaries, where land which fulfils the definition of sustainable development exists and is available and deliverable within the plan period.

Whilst it is the intention of the Council to look to submit its Local Plan Review for examination prior to the adoption of the Draft NPPF 2018 later this year, the Council must be mindful of the fact that it will come in to force at an early point within the proposed plan period; 2016-2033, and the Council's future strategy for the delivery of housing will need to be developed in accordance with the new Framework and its requirements and thus it is important that steps are put in place at this stage to embody and react to the policy change.

The Council must expressly justify the release of land from the Green Belt at this stage in favour of the delivery of other available sites which are not located within the designation and meet the definition of sustainable development. It should be recognised that the District is highly rural in its nature with modest sized settlements and a significant dependence upon private vehicles as a result. It is not reasonable therefore to consider the need to travel alone as a determinative factor in assessing the sustainability of a site, particularly when the development would represent the best use of underutilised and previously developed land. This is reflected at Paragraph 34 of the NPPF and further within the PPG where the section on 'supporting sustainable rural communities' states that *different sustainable transport policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas*; according with Paragraph 29 of the NPPF.

The Binnegar Hall site is a previously developed land parcel suitably located between the two sustainable settlements of Wool; 3.6km to the west, and Wareham; 2.7km to the east. Both settlements are within comfortable cycling distance. Leaving from the western end of the site there is an established pedestrian footway along the southern edge of the A352 to the hamlet of Stokeford, from where one can pick up local footpath routes westwards to Wool. In terms of access eastwards towards Wareham, the land immediately adjoining the site is known as Ford Heath and is common land; allowing open public access. A new footpath can be provided from the site edge to join with the existing footway and provide significant connectivity improvements from where one can pick up existing footways to Wareham.

The site is clearly capable of providing a meaningful level of additional housing development in order to support the vitality and function of these settlements in accordance with Paragraph 55 of the NPPF. The site is not isolated; consent has already been established for a number of dwellings on the site and the site itself sits within a ribbon of development which runs along the northern edge of Worgret Road. The High Court recently ruled on paragraph 55 of the NPPF within *Braintree*ⁱ; where Lang J ruled clearly on the correct interpretation of the test set out within Paragraph 55 of the NPPF. The fact that the Binnegar Hall site is not isolated alongside public transport and local facility improvements which can be delivered as part of the scheme; providing wider social, economic and environmental benefits, justifies the allocation of this site. The decision in *Braintree* also helpfully provides clarification that the Policy Approach set out in Paragraphs 29 and 34 of the NPPF; in favour of locating development where travel is minimised and the use of public transport is maximised, has to be sufficiently flexible to take account of the differences between urban and rural areas.

With the site not subject to any significant environmental or landscape constraints the only reason why the site is not being delivered is that it lies outside of a defined settlement boundary. There is no reason why the Council should not seek to bring it forwards for development as part of the strategic planning process; being located outside of the settlement is not a barrier to allocation in this regard; particularly considering the Council's proposals to allocate a substantial parcel of land outside of the small village settlement of Moreton – some significant distance from any local service centre settlement within Purbeck District and far removed from Moreton settlement.

The fact that Binnegar Hall is previously developed further supports the fact that this site should be brought forward in preference to other greenfield or undeveloped land within more sensitive areas of the District. The current consented use of the site for housing does not make best use of the available land which has sufficient capacity for a more comprehensive development of approximately 75-90 units in total. The promoted site is available and deliverable and should be considered for inclusion within the Local Plan as a preferred site for housing.

The New Homes for Purbeck Consultation Document

The Council has adopted the position that it needs to allocate sufficient land to deliver only 1700 additional homes within the plan period 2016-2033. This is on the basis that it considers that it has already planned to deliver 1200 homes as part of its current strategy, which will also come forwards during the plan period; taking to total to 2900 homes; approximately 161 dwellings per annum over the plan period.

The 1200 homes which the Council suggests will come forwards as an aside to the new allocations comprises;

- 90 homes completed between April 2016 and March 2017;
- 370 homes that have planning permission but have not yet been built;
- 500 homes which could be built under current policies, including on previously developed land;
- 150 homes allocated at Swanage; and,
- 50 homes allocated at Lytchett Matravers within the adopted plan.

The Council is putting a significant reliance of the delivery of 500 homes within the plan period by way of windfall development. At the time of the examination of the 2012 Local Plan the Council did not make any allowance for windfall development in its delivery projections, however the Strategic Housing Land Availability Assessment (SHLAA) January 2018 indicates that since 2006 approximately 77% (1142 dwellings) of the District's supply has been delivered by way of windfall development. The fact that this has been the case to date however is not sufficient indicator that this will continue. The Council did not have any Local Plan in place prior to the current document; adopted in 2012. For the first 6 years of the plan period therefore there was less control on development with applications defaulting to being determined in accordance with National Planning Policy in the absence of any up to date plan. Delivery in the initial 4 years up to 2010 was significant and comprised almost wholesale windfall development whereas, thereafter, delivery fell off considerably from 2010-2015. To anticipate windfall delivery on anything like the same rate would therefore be misguided. The Council should provide appropriate justification for how the 500 homes it is suggesting can be delivered; having particular regard for the low rate of delivery in recent years, with the exception of 2015-16; when the strategic allocation west of Wareham came forwards.

There is no evidence at this time therefore to suggest that this figure is likely to be achievable.

The New Homes for Purbeck consultation document proposes three potential options for the delivery of the 1700 additional homes the Council suggests it needs to plan for across the plan period;

- Option A represents a hybrid approach of Green Belt release at Lytchett Matravers and Upton and development of less constrained land at Wool settlement, 250 homes on unidentified smaller sites across the District and a significant new community development south of Moreton; on the furthest fringe of Purbeck

District. The new community proposed at Moreton is a significant distance from the nearest local service centre of Wool and instead will need to rely on the more limited services and facilities within Crossways; which sits within West Dorset District. The expectation that 250 homes will be delivered by way of a collection of smaller sites for up to 30 dwellings does not appear to have been appropriately evidenced and there is no confirmation of where these sites will be and whether they are actually available or deliverable. Given that several of the sites proposed for allocation at Wool and Lytchett Matravers would deliver less than 30 units each and are considered of sufficient scale to allocate, it is inconsistent and somewhat unreasonable for the Council to place a significant degree of uncertainty on the delivery of 250 homes – just under 10% of the indicated housing need. This does not provide an adequate degree of certainty that the Council's housing needs can be met which fails the tests of Paragraph 47 of the NPPF (2012) and thus this approach would not meet the tests of 'soundness' set out at Paragraph 182 of the NPPF in that the plan would be neither positively prepared nor effective.

- Option B seeks to direct the housing supply in the main to the settlement of Wool and the new community south of Moreton, with the remaining 250 homes to be again delivered on yet unidentified sites. Taking this approach would put significant strain on the settlement of Wool in terms of its existing infrastructure; moreover, given the number of sites and sheer amount of development it is unlikely that new homes will be delivered at a sufficient rate to meet the Council's housing needs, with developers not wishing to flood the local market and in turn harm sales prices and profitability. Again, the absence of any certainty on where the other 250 homes required will be delivered is not reasonable and will not pass the tests of soundness.
- Option C seeks to direct even more development to Wool – not less than 800 homes and 600 homes within the new community south of Moreton. Delivering the housing in this manner will further exacerbate the strain imposed on Wool and further hamper actual housing completions to the extent that the Council is unlikely to be meeting its projected housing delivery figures. It is not rational to expect that developers will seek to bring forwards several of these sites in tandem and flood the market with new homes; the reality is that only a limited number of units will be delivered per annum. With only two areas of allocation to meet the suggested target of 173 dwellings per annum will be difficult and lead to significant uncertainty.

With all three options there are serious concerns over the ability for Wool settlement to (1) accommodate this level of growth given the need for significant infrastructure improvements and for the delivery of a new school, and (2) due to significant flood risk considerations; both for fluvial and surface water flows, at Wool which have not been appropriately investigated. Several of the sites are subject to high surface water flooding risk in isolation which would need to be managed. It is important however that the Council takes a holistic view to the potential for the cumulative development of all of the identified greenfield sites contiguous to the settlement to put a significant pressure upon and increase the risk of flooding across the settlement in general with a significant increase in the level of built form and hard surfacing and diminishing of the land's capacity for natural infiltration.

The Council does not at this stage appear to have given due consideration for the requirement to deliver Sustainable Alternative Natural Greenspace (SANG) as part of any of the sites at Wool and the land at Moreton, in order to mitigate the impacts of additional residential development upon the protected heathland. The provision of SANG is particularly land hungry and it is unclear how and where this would be delivered.

There is fundamentally a lack of service provision within Wool and particularly at Moreton to support this quantum of development without placing significant additional pressure upon existing infrastructure in surrounding settlements. The Council has not addressed the infrastructure improvements which need to be delivered to accompany this quantum of housing.

The Council's current approach in Options A & B of leaving 250 homes unallocated to be delivered on suitable smaller sites of up to 30 units across the District is not reasonable. The Council has already accounted within its suggested available housing supply of 1200 homes, for the delivery of 500 dwellings in accordance with the policies in the existing Local Plan. In combination with the additional 250 homes to be delivered on yet unallocated sites there is an expectation that 750 homes will be delivered via windfall development within the proposed plan period.

In reality there are not sufficient sites which sit within or on the edge of existing settlements which can be readily brought forwards for development of approximately 30 homes in accordance with suggested small sites policy. Many of the settlements within Purbeck District are constrained by either the Green Belt or protected designations of the Dorset Heathlands, or are located within the protected landscape of the AONB where exceptional circumstances would need to be demonstrated to justify the development. It is not reasonable to expect significant development to come forwards in this manner without a directed planning policy approach.

It would be far more appropriate for the Council to seek to provide more certainty for the general public, landowners, stakeholders and developers, by actually allocating sufficient sites to meet the Council's needs. If additional land comes forwards during the plan period and the Council exceeds its housing needs target, then this is not an issue. Housing need is not a maximum figure, but rather a minimum. The purpose is to ensure that the objectively assessed needs of the District are met by delivering at least the required amount of housing. The Council should not be a barrier to the development of sustainable sites.

It is vitally important that any plan put forwards for examination passes the tests of soundness as defined by Paragraph 182 of the NPPF;

- In order to be rendered sound the strategy must first and foremost be '**positively prepared**'; defined as *providing a strategy which seeks to meet the objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do*

so and consistent with achieving sustainable development. There is no certainty that the current strategy will meet objectively assessed needs.

- The plan must be '**justified**' and *the most appropriate strategy when considered against the reasonable alternative, based on proportionate evidence.* It is not considered that any of the proposed solutions have been given sufficient consideration, particularly regarding possible build out timescales to ensure that the annual housing need can be appropriately met.
- The plan must be '**effective**' in that it must *be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.* The fact that insufficient consideration has been given to potential constraints and issues with lack of infrastructure and potential build out rates arising from significant allocations at one settlement provides no confidence that the proposals will be effective.
- Finally, the plan must be '**consistent with National Policy**' in *enabling the delivery of sustainable development in accordance with the policies of the Framework.* As discussed it is considered that the Council has not sought to allocate sufficient land in the right places in order to ensure that sustainable sites will be delivered in accordance with the Framework and that the objectively assessed needs of the District can be met.

In summary it is considered that the Council should reconsider its approach to the distribution of development across the District in a more balanced and sustainable manner that will ensure that its housing needs will be delivered at the appropriate rate within the plan period. It is also unrealistic to leave such a degree of uncertainty in respect of the Council's smaller sites policy which will be hampered by the environmental and landscape constraints within the District. In order to be effective, the Council should instead seek to allocate sites now and provide certainty and ensure the approach can be found sound. The recent rates of delivery within the District are indicative of the fact that the current Local Plan policies do not allow for sustainable development to come forwards in this manner, particularly on sites of up to 30 units as is suggested. There is no justification for this policy rationale.

Housing Delivery to Date

The Council has recently published what it considers to be an up to date Five Year Housing Land Supply Report; covering the period April 2017 to March 2022, but also setting out its figures for completions to date and its performance in respect of the overall housing needs for the plan period.

The report confirms the Council's position that it can demonstrate in excess of a 5-year supply of deliverable sites based on its performance to date within the plan period. Unfortunately, the forecasts set out within the document are not correct.

The Council has stuck rigidly to the belief that it needed to deliver only 120 dwellings per annum over the course of the plan period since its adoption in 2012. Unfortunately, the Council has not properly taken in to account the EiP Inspector's Report which, whilst recommending adoption of the Purbeck Local Plan 2012 at that time, made clear that the Council's housing figures were inadequate and needed to be reviewed

immediately. The Inspector stated that a partial review would need to be undertaken, commencing in 2013 and to be in place by 2017, based on the Strategic Housing Market Assessment 2012 which projected a requirement for not less than 170 dwellings per annum to be delivered across the plan period.

The EiP Inspector stated clearly that the Purbeck Local Plan Part 1 (2012) was to be found sound as there was no other established policy framework in place due to failings with previous plan documents. Whilst allowing the plan to be made, the Inspector did not consider that it was sound in respect of its approach to housing. He was clear in his report that *policies regarding housing supply would be immediately out of date* and that the Council was only being allowed to proceed on the basis that it agreed to undertake an immediate review commencing in 2013 with the new plan to be adopted by 2017. Failing this its plan would be out of date and it would not be able to rely on its out of date delivery strategy.

The EiP Inspector was very clear that this figure whilst appropriate for the short term; i.e. the first 5 years of the plan period, it was not appropriate for the medium or long terms and that the Council should instead amend its housing needs figure to 170 dwellings per annum (dpa). The EiP Inspector required specifically that the need to fundamentally review the housing position and adopt a figure of 170 dpa be written in to the Local Plan Part 1.

The Council has not reflected the fact that a more up to date assessment of its housing need was undertaken during the course of the adopted Local Plan preparation and examination and thus should have formed the starting point for its housing needs since 2012, as directed by the Inspector. The Council has not updated its housing need projections as it was required to do and, as a result, the housing requirement figure for the next 5 years is completely inaccurate.

In reality therefore, the Council has underdelivered on its housing needs to date within the current local plan period;

(1)

Housing Need 2006-2012	– 720 dwellings (120 per annum)
Housing Need 2012-2017	– 850 dwellings (170 per annum)
Total Need to Date	– 1570 dwellings

Recorded Completions 2006-2017	– 1476 dwellings
Performance Relative to Need	– <u>94 dwellings shortfall</u>

Assuming the Sedgefield method of addressing housing shortfall is employed.

5-year requirement 2017-2022	– 987 dwellings (170 per annum plus shortfall and 5% buffer)
Annual Requirement 2017-2022	- 197.4 dwellings

(2)

Even if we assume that the housing need figure should remain at 120 dwellings per annum until the 2017 deadline set by the inspector for undertaking and adoption of the Local Plan review;

Housing Need 2006-2012	– 720 dwellings (120 per annum)
Housing Need 2012-2017	– 600 dwellings (120 per annum)
Total Need to Date	– 1320 dwellings
Recorded Completions 2006-2017	– 1476 dwellings
Performance Relative to Need	– <u>156 dwellings surplus</u>
Remaining Need to 2027	– 1622 dwellings (170 per annum minus oversupply and adding 5% buffer)
5-year requirement 2017-2022	– 811 dwellings
Annual Requirement 2017-2022	- 162.2 dwellings

Taking either projection in to account the Council cannot demonstrate a 5-year supply based on the 618 dwellings which it has projected are available and deliverable. This would amount to **3.1 years** of supply in the worst-case scenario (1) and **3.8 years** of supply in the best-case scenario (2).

The result is that the Council does not have sufficient land to meet its needs in the short terms and should be planning for additional development to ensure that its needs can be adequately met.

This absence of a deliverable 5 year housing land supply puts in jeopardy the figures set out within the New Homes for Purbeck consultation document – particularly that the Council has allowed for 500 dwellings by way of windfall provision; that would comply with current local plan policy, in addition to 250 dwellings which the Council considers a can be brought forwards within the plan period as part of a small sites policy for less than 30 dwellings. There is simply no justification for these figures and no evidence to demonstrate that this is in any manner achievable. A position which is backed up by the Council's recent competition statistics for 2016-2017 which stands at just 89 units. It is also relevant to note that this does not tally with the 90 homes stated by the New Homes for Purbeck Consultation Document.

The Council commissioned as part of its plan review, the preparation of a formal assessment of its objectively assessed needs for the period 2013-2033. The document prepared by GL Hearn states that the annualised housing need for the District during this period amounts to **173 dwellings per annum**. Updating the projections on this basis puts the Council in an equally bleak position of **3.2 years of supply** at present based on the Sedgfield method of addressing any shortfall within the next 5-year period. It is worth noting that even employing the Liverpool method would leave the Council without a deliverable 5-year supply.

Considering the above, the Council should therefore be planning for the delivery of not less than 3460 homes from 2013-2033. The Council's completion figures between 2013 and 2017 amount to 460 dwellings. The result therefore is that the Council should

be planning to deliver not less than **3000 additional homes** as part of the Local Plan review.

Conclusion

The New Homes for Purbeck Consultation Document seeks to allocate land for an additional 1700 homes; supplemental to 1200 which it considers can and will be delivered without any additional allocations. Even if all of the projected housing comes forwards as suggested, the Council will still be short of meeting its housing needs by in order of 100 dwellings and this does not account for an appropriate buffer of sites for non-delivery.

There are significant concerns over the ability of the sites selected to deliver the quantum of development which has been proposed, taking account of specific issues such as flood risk and a lack of supporting infrastructure at Wool and also the need to provide SANG as part of any development in order to render the development acceptable in accordance with the Dorset Heathlands Planning Framework SPD. It is questioned whether there is sufficient land proposed for allocation to deliver the proposed housing numbers.

The Council has also not at present provided any tangible evidence to demonstrate that its windfall housing projections of 750 dwellings across the plan period; including 250 on sites of up to 30 units, can be delivered. Based on the rate of undersupply in all but one of the past seven years it is not considered reasonable to leave this level of windfall allocation; amounting to approximately 25% of the overall housing need, in such a state of uncertainty. The Council should instead seek to allocate sufficient sites to meet its objectively assessed needs as a minimum. It is important to provide certainty that the housing need can be met in order for the Local Plan to pass the tests of soundness at examination.

The Council should therefore look to allocate additional unconstrained sites which can be delivered in a sustainable manner. The fact that sites lie outside of a defined settlement is not an issue at plan making stage; particularly when the Council's three preferred approaches all include a substantial site non-related to the nearest settlement and significantly removed from the nearest local service centre within Purbeck District.

The Binnegar Hall site is available now and can be delivered within the next 5 years in order to assist the Council in meeting its housing supply shortfall discussed. The Council must take a pragmatic approach to the allocation of sites to ensure that it is not left in a position without an up to date and adopted plan which will inevitably lead to planning by appeal.

The Council must be proactive in bringing its Local Plan Review forwards, given that the current plan is rendered out of date in accordance with the EiP Inspector's findings at the 2012 examination in public; however, it is important that the plan is not rushed to examination on the back of a flawed strategy or evidence which will prejudice its chances of achieving soundness. We would urge the Council to think again on its

strategy and seek to allocate sufficient land to meet its needs and provide certainty over delivery.

Should the Council wish to discuss out Client's site further, it should not hesitate to get in contact with us directly.

We ask to remain updated on the progress of the Local Plan as it proceeds and notified of any further consultation periods.

Yours sincerely

Adam Bennett BA (Hons)
Town Planning Consultant

ⁱ Braintree District Council v SoSCLG, Greyread Limited and Granville Developments Ltd [2017] EWHC 2743 (Admin)



This questionnaire is only for use by organisations. If you wish to respond to the consultation as a local resident or local business, please use the questionnaire that has been delivered to your address along with the special edition of About Purbeck. If you have not received a questionnaire then please contact Public Perspectives on FREEPHONE 0800 533 5386 or purbeck@publicperspectives.co.uk.

Consultation about new homes for Purbeck - Questionnaire

Before you fill in this questionnaire, please make sure you have read the special edition of About Purbeck sent with the questionnaire. This includes background information, maps and details about the proposed numbers and potential locations for new homes, as well as proposed new housing policies about second homes, developments on small sites and affordable housing.

The special edition of About Purbeck is also available on-line at:
www.dorsetforyou.gov.uk/Purbeck-local-plan-review

If you would like further information or help to complete the questionnaire, please contact Public Perspectives on FREEPHONE 0800 533 5386 or purbeck@publicperspectives.co.uk.

Please complete the following details before answering the questions:

Name of organisation:

Name of individual completing the questionnaire:

Date of completion:

Section 1: New second homes policy

The Council is proposing to stop new homes in some parts of the district from being used as second homes.

Please read the information about this proposed new policy on page 4 of About Purbeck and then answer the following question.

Q1 Do you agree or disagree with the Council's proposed policy to stop new homes in some parts of the district from being used as second homes?

Please select one answer only.

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know

Do you have any comments about the proposed second homes policy?

Section 2: Principles behind new homes

The Council has considered several principles in determining the number of homes required and identifying potential sites.

Depending on the outcomes of this consultation, these principles will be included in the revised local plan. They will help determine the number and location of new homes, and developers will have to take note of them when making planning applications.

Please read the information about these principles on page 5 of About Purbeck and then answer the following question.

Q2 How important is it that new homes in Purbeck take account of the following principles?

Please select one response for each principle.

	Very important	Important	Neither important nor unimportant	Not important	Not important at all	Don't know
Respect the character and distinctiveness of Purbeck's towns, villages and countryside	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Conserve and enhance Purbeck's landscape, historic environment and cultural heritage	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Conserve and enhance Purbeck's natural habitat	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Provide affordable homes	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Ensure high quality design, in keeping with the local area	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Provide appropriate community infrastructure e.g. shops, schools, doctors' surgeries, recreation and sport, including play areas	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Provide appropriate transport infrastructure e.g. roads, buses and trains	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Promote a prosperous local economy	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Ensure adequate parking	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Promote homes that make best use of renewable energy	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Are there any other principles you would like considered?

Section 3: Small sites

New small sites policy

All options include focusing the majority of development in two or more areas. Some options also include some development spread across the district. This means that there would be much smaller sites in addition to the larger site proposals. The Council is considering introducing a policy which would enable small housing sites to be developed outside existing town and village boundaries, where certain conditions are met.

Please read the information about this proposed new policy on pages 5 and 6 of About Purbeck and then answer the following question.

Q3 Do you agree or disagree with the proposed new small sites policy?

Please select one answer only.

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know

Do you have any comments about the proposed new small sites policy?

Potential small site allocation - Sandford

In addition to the proposed new small sites policy, the Council is considering allocating a site for 30 homes at Sandford on land that is currently within the Green Belt.

Please view the map and read the information about this proposal on page 6 of About Purbeck and then answer the following question.

Q4 Do you agree or disagree with the proposal to allocate a site for 30 homes at Sandford?

Please select one answer only.

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know

Do you have any comments about the proposal to allocate 30 homes at Sandford?

Section 4: Neighbourhood Plans

The Bere Regis Neighbourhood Plan Steering Group is planning to consult in the near future on its draft neighbourhood plan. The plan is seeking to deliver 105 new homes in addition to normal planning applications. The Steering Group will be consulting local people about the location of these homes.

The Wareham Neighbourhood Plan Steering Group is exploring options to deliver 200 new homes in addition to normal planning applications. Local residents will be consulted about the Wareham Neighbourhood Plan in the near future. To facilitate the emerging proposals, Purbeck District Council would need to change its current policy that safeguards the Westminster Road and Johns Road industrial estates for employment uses and release Green Belt to the west of the Westminster Road Industrial Estate (south of Bere Road and north of Carey Road).

Please view the map and read the information about this proposal on pages 6 and 7 of About Purbeck and then answer the following questions.

Q5 Do you agree or disagree with the proposal to have less employment land to help allow new homes at Westminster Road and Johns Road Industrial Estates?

Please select one answer only.

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know

Q6 Do you agree or disagree with the proposal to release Green Belt to build homes to the west of the Westminster Road Industrial Estate (south of Bere Road and north of Carey Road)?

Please select one answer only.

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know

Q7 Do you have any comments about the proposals to provide 105 homes at Bere Regis and/or 200 homes at Wareham through the neighbourhood plans?

Q9 Overall, to what extent do you agree or disagree with Option A?

Please select one answer only.

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know

Q10 Do you have any comments about Option A?

Option B: 650 homes at Wool, 500 homes at Redbridge Pit/Moreton Station, 250 homes on smaller sites

This option would focus the majority of development on two main sites but would also include the use of smaller sites across the district.

Please see pages 10 and 11 of About Purbeck for more detail about this option and then answer the following questions.

Q11 Do you agree or disagree with the following proposals outlined in the option?

Please select one response for each proposal.

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
650 homes at Wool	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
500 homes at Redbridge Pit/Moreton Station	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
250 homes on smaller sites across the district	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Q12 Overall, to what extent do you agree or disagree with Option B?

Please select one answer only.

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know

Q13 Do you have any comments about Option B?

Option C: 800 homes at Wool, 600 homes at Redbridge Pit/Moreton Station

This option focuses development on two main locations.

Please see pages 12 and 13 of About Purbeck for more detail about this option and then answer the following questions.

Q14 Do you agree or disagree with the following proposals outlined in the option?

Please select one response for each proposal.

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don't know
800 homes at Wool	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
600 homes at Redbridge Pit/Moreton Station	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Q15 Overall, to what extent do you agree or disagree with Option C?

Please select one answer only.

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know

Q16 Do you have any comments about Option C?

Q17 Considering all three options, which is your preferred option?

Please select one answer only.

- Option A - 470 homes at Wool, 440 homes at Redbridge Pit/Moreton Station, 90 homes at Upton, 150 homes at Lytchett Matravers and 250 homes on smaller sites
- Option B - 650 homes at Wool, 500 homes at Redbridge Pit/Moreton Station, 250 homes on smaller sites
- Option C - 800 homes at Wool, 600 homes at Redbridge Pit/Moreton Station
- I like all the options
- I do not like any of the options
- Don't know

Q18 Do you have any other comments about the options above?

Q19 Do you have any alternative suggestions about how best to meet the housing need by delivering the required number of new homes by 2033?

Possible locations for new homes at Wool

The three options presented above all involve development at Wool, but with different numbers of homes in each case. The precise location of any new homes within this area will depend on a number of factors, including the overall number of homes to be provided, areas of flood risk, and provision of open spaces and community facilities to support the homes.

Please see page 14 of **About Purbeck** for a map and more detail about the potential locations and then answer the following question.

Q20 If new homes are built at Wool, which of the possible locations do you prefer?

Please select all suitable answers. Please note that several locations may be required depending on the number of homes built at Wool.

- Location 1
- Location 2
- Location 3
- Location 4
- Location 5
- I do not like any of the locations
- Don't know

Q21 Do you have any comments about the possible locations at Wool?

Section 6: Affordable homes

It is the Council's current policy that on sites of over 10 new homes, 40 or 50 per cent of them are affordable. The current affordable housing policy does not stipulate what type of rent levels (affordable rented or social rented) should be offered. The Council is considering introducing a policy which encourages 10% of the affordable homes provided on eligible development sites to be social rented.

Please read the information about this proposed new policy on page 15 of About Purbeck and then answer the following question.

Q22 Do you agree or disagree with the proposal to stipulate that 10% of affordable homes are social rented?

Please select one answer only.

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- Don't know

Do you have any comments about the proposed new affordable housing policy?

Q23 Please use the space below to make any further comments about the proposals:

Thank you for taking part in the consultation.

Please e-mail your completed questionnaire to: purbeck@publicperspectives.co.uk by Monday 12th March 2018.

Alternatively you can print and post the questionnaire, free of charge, to:

Freepost RSGJ-HSTC-CGTT
New Homes for Purbeck Consultation
Public Perspectives Ltd
20 Camp View Road
St. Albans
AL1 5LL

Comment

Consultee	Mr Terry Sneller (1191006)
Email Address	████████████████████
Company / Organisation	West Dorset District Council
Address	South Walks House South Walks Road Dorchester DT1 1UZ
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	West Dorset District Council (Mr Terry Sneller - 1191006)
Comment ID	PLPP294
Response Date	03/12/18 10:29
Consultation Point	Policy H12: Rural exceptions sites (View)
Status	Processed
Submission Type	Web
Version	0.1

Are you responding on behalf of a group? No

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

Which policy / paragraph number / policies map does your comment relate to? H12

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

Do you consider that the Local Plan is sound? 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)

Affordable Housing delivery

The housing objectives of the proposed Local Plan are focused on meeting the needs including affordable housing needs of local residents.

One route to delivering affordable housing within rural areas is through affordable housing led rural exception developments. With a permissive small sites policy allowing open market led housing developments at villages within the rural area, there is a risk that the delivery of rural exception developments is significantly undermined compromising delivery of *“affordable housing that meets the needs of 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	Mr Terry Sneller (1191006)
Email Address	████████████████████
Company / Organisation	West Dorset District Council
Address	South Walks House South Walks Road Dorchester DT1 1UZ
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	West Dorset District Council (Mr Terry Sneller - 1191006)
Comment ID	PLPP295
Response Date	03/12/18 10:31
Consultation Point	Policy H4: Moreton Station / Redbridge Pit (View)
Status	Processed
Submission Type	Web
Version	0.2
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	H4
Do you consider that the Local Plan is legally compliant?	Yes
Do you consider that the Local Plan is sound?	Yes
Do you consider that the Local Plan complies with the duty to co-operate?	Yes

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

Policy H4: Moreton Station / Redbridge Pit allocation

West Dorset notes the proposed allocation of the site for 490 new homes at Moreton Station / Redbridge Pit and agrees that Crossways village (to which the site is adjoined) represents a suitable location for development. It is however noted that the capacity of this site has increased from the 440 homes suggested in the previous consultation with no increases on any other allocations. An explanation of this increase and further consideration of the implications for infrastructure provision would be welcomed.

The development of the site will impact on the existing population of Crossways and the facilities that exist within the village. The increased population will help to support these facilities and strengthen the West Dorset, Weymouth & Portland joint Local Plan Review preferred option of identifying of Crossways as a Local Centre. The identification of the village as a local centre would lead to it becoming a focus for the provision of new facilities.

The proposed policy for the Moreton Station / Redbridge Pit allocation indicates that there will be a need to expand provision at Frome Valley First School. The need for the expansion of this school has also been identified in the West Dorset, Weymouth & Portland joint Local Plan Review preferred options document which identifies land adjacent to the school for this purpose. The cumulative impact of growth within West Dorset and as a result of this proposal will however need to be fully evaluated and planned for.

Similarly, the expansion of GP provision at Crossways is something that has been identified within the West Dorset, Weymouth & Portland joint Local Plan Review preferred options document. The policy should however be amended to allow for a flexible approach to delivering this additional provision. Provision could be made through an extension to the existing building or through the development of a new surgery building. Purbeck District Council should also be mindful of the need to consider health needs beyond primary care, for instance community and mental health needs. This need should be established through discussions with the Dorset Healthcare University Foundation Trust and Poole and Bournemouth Hospitals.

West Dorset supports the requirement for further improvements to the footway and cycle links between the site, the railway station and to Crossways village itself. Enhanced linkages to Dorset Innovation Park are also welcomed. There however also a need for improved parking facilities and access arrangements at Moreton Station to facilitate greater use of the railway as an alternative to car based travel. In addition, contributions should be taken from the development to help fund the delivery of the road link to the West Stafford bypass to enable the closure of the Woodsford no. 38 Level Crossing and avoidance of the low railway bridge on Highgate Lane.

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

Comment

Consultee	Mr Terry Sneller (1191006)
Email Address	████████████████████
Company / Organisation	West Dorset District Council
Address	South Walks House South Walks Road Dorchester DT1 1UZ
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	West Dorset District Council (Mr Terry Sneller - 1191006)
Comment ID	PLPP296
Response Date	03/12/18 10:31
Consultation Point	Policy H1: Local housing requirement (View)
Status	Processed
Submission Type	Web
Version	0.2

Are you responding on behalf of a group? No

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

Which policy / paragraph number / policies map does your comment relate to? H1

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

Do you consider that the Local Plan is sound? 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)

Overall Housing Target

The Pre-submission Purbeck Local Plan assumes that the Local Housing Need figure for the Purbeck area is 168 dwellings per annum or 2,688 new dwellings over the 16 year plan period. It is assumed that this figure is based on the MHCLG 2014 household growth projections and the ONS 2016 affordability ratios, as quoted in the Statement of Common Ground. However, as set out in the planning practice guidance, when new affordability ratios or new household growth projections are published, the assessment of Local Housing Need should be revised to take into account the latest available information. New affordability ratios were published for the 2017 year which, when applied to the 2014 Household projections would give a slight uplift in the Local Housing Need figure to give a requirement of 170 new dwellings per annum or 2720 new homes over the plan period.

In addition, there is uncertainty whether the unmet need from neighbouring areas (such as that arising from the Bournemouth, Christchurch, Poole conurbation) has been fully considered through the preparation of the Purbeck Local Plan. Although it is acknowledged in the Statement of Common Ground that this need has not yet been quantified, it is something that may need clarification in supporting documentation especially once the new Bournemouth, Christchurch, Poole Council is formed on 1st April 2019. It is acknowledged that the Purbeck plan area is subject to a number of significant constraints and that small scale greenbelt release is included within the proposals.

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Comment

Consultee	Mr Terry Sneller (1191006)
Email Address	████████████████████
Company / Organisation	West Dorset District Council
Address	South Walks House South Walks Road Dorchester DT1 1UZ
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	West Dorset District Council (Mr Terry Sneller - 1191006)
Comment ID	PLPP297
Response Date	03/12/18 10:31
Consultation Point	Policy H2: The housing land supply (View)
Status	Processed
Submission Type	Web
Version	0.2
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	H2
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)

Meeting the housing requirement

Meeting the identified need is a requirement of national policy with paragraph 65 of the NPPF stating that: *“Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period”*.

From the information available, there may be a need for greater clarification on the deliverability of housing from some of the identified sources to give greater certainty that the plan’s housing requirement will be met.

Neighbourhood plans

There is a significant risk in relying on housing delivery from neighbourhood plans that have not reached the examination or referendum stage.

National policy (NPPF paragraph 18) specifically makes the distinction between local policies and strategic policies with only local policies being acceptable within neighbourhood plans. Paragraph 20 of the NPPF states that *“Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for:*

- 1 *housing (including affordable housing), employment, retail, leisure and other commercial development;”*

If an allowance is to be made for a contribution towards the strategic housing needs from a neighbourhood plan, there should be a degree of certainty over its delivery.

Green belt, AONB and the relationship with Policy H8 Small Sites

The overall strategy of dispersing growth across the plan area has led to the inclusion of sites within the green belt and a small sites policy (Policy H8). The Council understand and support the case for the small scale release of green belt land particularly as suitable land within West Dorset, in close proximity to Purbeck is needed to help meet the housing requirements arising from the West Dorset area. There is however concern that the inclusion of the small sites policy (Policy H8) has the potential to lead to unsustainable patterns of development.

The small sites policy appears to be contrary to the strategic review of green belt required by national policy when planning for development within the green belt. National policy states that *“Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period.”* (NPPF paragraph 136). Permitting development of up to 30 dwellings adjacent to existing settlements on an ad-hoc basis would not meet this strategic requirement.

Similar to the concern over the application of the small sites policy in the green belt, the application of the policy within the AONB also raises concerns. Within the AONB, national policy again requires exceptional circumstances to be demonstrated where major development is proposed. It is accepted that the definition of exceptional circumstances in this case is a matter for the decision maker, the presence of the AONB does appear to restrict the availability of suitable sites.

From the information available, it is unclear whether the small sites policy would deliver sufficient homes within the green belt or within the AONB and therefore whether the allowance for small sites will meet the estimate included in the overall supply. This does however highlight the need for the higher proportion of homes in the Moreton / Crossways area; an approach which West Dorset support.

Windfall allowance

The inclusion of a windfall allowance within the supply is supported and in accordance with National Policy. Windfall sites are, by definition, not specifically identifiable however in many areas they make a significant contribution to the supply of housing in the short, medium and longer term. It is however important that any windfall allowance is estimated using compelling evidence as required by national policy. From the information available it is unclear as to whether the past records of completions, on which the allowance is based, includes sites that would also fall within the ‘small sites’ policy and therefore whether there is any double counting taking place.

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Comment

Consultee	Mr Terry Sneller (1191006)
Email Address	████████████████████
Company / Organisation	West Dorset District Council
Address	South Walks House South Walks Road Dorchester DT1 1UZ
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	West Dorset District Council (Mr Terry Sneller - 1191006)
Comment ID	PLPP298
Response Date	03/12/18 10:32
Consultation Point	Policy H8: Small sites next to existing settlements (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	H8
Do you consider that the Local Plan is legally compliant?	Yes
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)

Sustainable patterns of growth and the relationship with Policy H8 Small Sites

There is concern over the application of the small sites policy which may lead to unsustainable patterns of development. There appears to be no restriction within Policy H8 on the number of small sites (of

up to 30 dwellings) which could be developed at any particular settlement. This permissive approach to smaller sites may result in an incremental negative impact on settlements putting additional strain on existing infrastructure without the certainty that adequate provision for additional infrastructure will be made to support growth.

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

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

Comment

Consultee	Mr Terry Sneller (1191006)
Email Address	[REDACTED]
Company / Organisation	West Dorset District Council
Address	South Walks House South Walks Road Dorchester DT1 1UZ
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	West Dorset District Council (Mr Terry Sneller - 1191006)
Comment ID	PLPP662
Response Date	03/12/18 10:31
Consultation Point	Policy EE3:Vibrant town and local centres (View)
Status	Processed
Submission Type	Web
Version	0.4
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	EE3
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)

The wording of Policy EE3: Vibrant Town and Local Centres does however cause some concern. The policy suggests that provision of additional retail needs should be made on the housing allocation site. Although it is accepted that there is a need for additional retail provision to serve the new development at Moreton Station / Redbridge Pit, provision on the development site may not be the most appropriate location. Provision of additional retail space should be made in a more sustainable location, closer to the centre of the population of the expanded Crossways village rather than within the boundary of the Moreton Station / Redbridge Pit allocation. The detail of the most appropriate location for facilities associated with a local centre should be something considered as part of the joint masterplan for the Crossways / Moreton area.

The West Dorset, Weymouth & Portland Local Plan review proposes to designate the village of Crossways as a Local Centre within the retail hierarchy to encourage the provision of additional retail space at the village.

Comment

Consultee	Miss Emily Blake (1190735)
Email Address	[REDACTED]
Company / Organisation	West Lulworth Parish Council
Address	The Bungalow Chydyok Road Dorchester DT2 8DL
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	West Lulworth Parish Council (Miss Emily Blake - 1190735)
Comment ID	PLPP330
Response Date	03/12/18 13:20
Consultation Point	Foreword (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	284
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	Forward
Do you consider that the Local Plan is legally compliant?	No
Do you consider that the Local Plan is sound?	No
Do you consider that the Local Plan complies with the duty to co-operate?	No

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)

Consultation

The council has failed to consult effectively with Parish and Town Councils ruling out many communities in Purbeck. The concentration on those councils that have the resources to produce a neighbourhood plan rules out many of the smaller parishes and skews the response towards the larger councils.

This consultation is further skewed by the insistence of an online response excluding all except the most computer literate. Many of these are also those who are unable to travel to PDC to see the plan or collect the forms needed to respond.

Therefore the council has failed to consult effectively with the community.

Geography

The focus of developing housing in the west of the district does not make sense. Many villages in the west are the most remote in the area, they do not have the infrastructure to cope with new homes. Many do not have easy access to an A road and certainly there is insufficient public transport for residents to access employment, shops, or medical facilities.

Policy

The changes to planning policies will have a devastating effect on many Purbeck villages. Allowing development in and around conservation areas, ignoring settlement boundaries, allowing multiple small sites around villages, ignoring the views of local communities and parish and town councils, and allowing uncontrolled development in the AONB will change Purbeck in the long term.

Summary

This plan is not robust, effective and deliverable.

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)

Changes

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

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

To express my views

Comment

Consultee	Miss Emily Blake (1190735)
Email Address	[REDACTED]
Company / Organisation	West Lulworth Parish Council
Address	The Bungalow Chydyok Road Dorchester DT2 8DL
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	West Lulworth Parish Council (Miss Emily Blake - 1190735)
Comment ID	PLPP331
Response Date	03/12/18 13:20
Consultation Point	Policy V1: Spatial strategy for sustainable communities (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	284
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	Policy V1
Do you consider that the Local Plan is legally compliant?	No
Do you consider that the Local Plan is sound?	No
Do you consider that the Local Plan complies with the duty to co-operate?	No

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

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

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

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

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

to express my views

Comment

Consultee	Miss Emily Blake (1190735)
Email Address	[REDACTED]
Company / Organisation	West Lulworth Parish Council
Address	The Bungalow Chydyok Road Dorchester DT2 8DL
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	West Lulworth Parish Council (Miss Emily Blake - 1190735)
Comment ID	PLPP332
Response Date	03/12/18 13:21
Consultation Point	Arrangements for commenting on the Presubmission Purbeck Local Plan timings and next steps (View)
Status	Processed
Submission Type	Web
Version	0.2
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	284
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	Arrangements for commenting
Do you consider that the Local Plan is legally compliant?	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 flow chart does not indicate that there are 55 documents inputting the Pre-submission many without consultation with the local community, or parish or town councils. A lot of the documentation has only been released in the last month.

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)

Include a list of the documents indicating those that have been consulted upon. To meet with NPPF 16 c) Plans should: be shaped by early, proportionate and effective engagement between plan-makers and communities. All elements of the plan and its supporting documentation should be subject to consultation with Parish and Town councils as representatives of the local communities.

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

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

To express my view

Comment

Consultee	Miss Emily Blake (1190735)
Email Address	██
Company / Organisation	West Lulworth Parish Council
Address	The Bungalow Chydyok Road Dorchester DT2 8DL
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	West Lulworth Parish Council (Miss Emily Blake - 1190735)
Comment ID	PLPP333
Response Date	03/12/18 13:22
Consultation Point	Chapter 3: Environment (View)
Status	Processed
Submission Type	Web
Version	0.2
Files	WL Parish Plan H:\P&CS\Planning Policy\1-local-plans\local-plan-review\6-submission\documents\draft-documents\responses-document\correct-responses-extracted-from-objective-17-01-2019\WL Parish Plan.pdf
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	284
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	Para 50 a
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 No 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)

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

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

Parish plans should be referenced.

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

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

to express our views

Comment

Consultee	Miss Emily Blake (1190735)
Email Address	[REDACTED]
Company / Organisation	West Lulworth Parish Council
Address	The Bungalow Chydyok Road Dorchester DT2 8DL
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	West Lulworth Parish Council (Miss Emily Blake - 1190735)
Comment ID	PLPP334
Response Date	03/12/18 13:22
Consultation Point	Policy E2: Historic environment (View)
Status	Processed
Submission Type	Web
Version	0.2
Files	Village Trail (2)
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	284
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 f
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)

E2 f. measures to avoid or minimise harm to the heritage asset's significance must be supported and not damaged by excessive intrusive developments. The small sites policy suggest allowing developments in and around conservation areas.

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 parish view is that this will undermine the integrity of the village. Included is the west lulworth village trail to indicate how the village is and should remain.

If you have any supporting documents please upload [Village Trail \(2\)](#) them here.

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

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

To express our views

UPLONG (11 TO 30)

Much of the social life of the village is centred in Church Road, with the shop (11), the British Legion Club (12) (one of the first in the country), the Village Hall (13), and Holy Trinity Church (14). Visit the church to see the stained glass windows, Oberramergau carvings, and the Village Exhibition.

Enter West Road behind the Church and walk to the War Memorial (15). Here is Churchfield House (16), the Red Lion of George 111's visit. Note the Victorian post-box (17) set in the wall of the bus-shelter and the row of 17th century cottages opposite.

Join the main road taking care at this narrow part. In the old churchyard (18) is another war memorial, erected by the Schuster family in memory of the Bible class. Here was the old Norman church. The Castle Inn (19) was originally named The Jolly Sailor.

Cross the road when you see the 17th century Elizabeth Cottage (20) with Ann Boleyn terracotta plaques on the end wall. Turn right into The Triangle past the Old Carpenter/wheelwrights (21) and Rickyard Cottages into Farm Lane.

The Old Farmhouse (22) was the centre of West Lulworth Farm which was in existence until the early 1970s.



Beyond the War Memorial is the old garage, now Handel Cottage (26). This was the first bakery which became a filling station in 1927. The Shirley Hotel (27) was originally Randall's general store. Opposite is Gatton House (28) built in 1901 as a private residence.

Before the junction with Church Road, note the cross on St. Mary's Chapel (29). This was the original Roman Catholic Chapel and school. Over the road Chapel Cottage's garage (30) is built on the site of the Congregational "little iron church".

The fields here are grazed by the dairy herd of Hambury Farm (10), which is mentioned in Domesday Book.

Now return to the car park past the Cromwell House (9), one of the first guesthouses in the village.

DOWNLONG (1 TO 8)

Leave the car park by the Heritage Centre (1) and walk down past the Cove Hotel (2), an old coaching inn.

WEST LULWORTH VILLAGE TRAIL

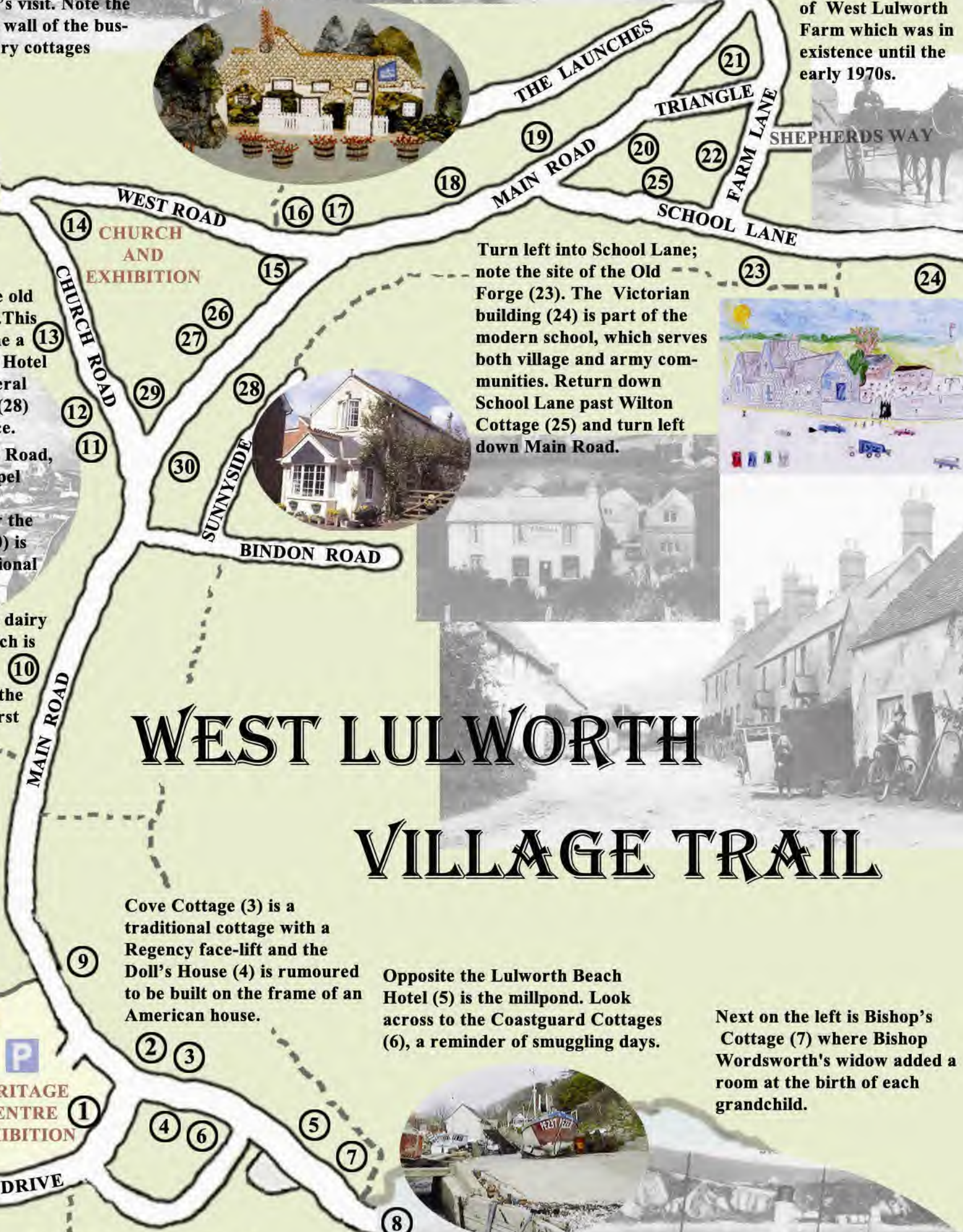
Cove Cottage (3) is a traditional cottage with a Regency face-lift and the Doll's House (4) is rumoured to be built on the frame of an American house.

Opposite the Lulworth Beach Hotel (5) is the millpond. Look across to the Coastguard Cottages (6), a reminder of smuggling days.

Next on the left is Bishop's Cottage (7) where Bishop Wordsworth's widow added a room at the birth of each grandchild.

Lulworth Cove (8) is a small fishing cove where once day-trippers arrived by steamer. Only the Miller family fish here now and visitors come by coach and car.

Retrace your steps past the car park along main road turning left into Church road to visit UPLONG the village.



Comment

Consultee	Miss Emily Blake (1190735)
Email Address	[REDACTED]
Company / Organisation	West Lulworth Parish Council
Address	The Bungalow Chydyok Road Dorchester DT2 8DL
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	West Lulworth Parish Council (Miss Emily Blake - 1190735)
Comment ID	PLPP335
Response Date	03/12/18 13:23
Consultation Point	Policy H1: Local housing requirement (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	284
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	H1
Do you consider that the Local Plan is legally compliant?	No
Do you consider that the Local Plan is sound?	No
Do you consider that the Local Plan complies with the duty to co-operate?	No

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

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

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

Add to Policy H1: The council will also work with Parish and Town Councils to determine housing need in their area.

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

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

to express our views

Comment

Consultee	Miss Emily Blake (1190735)
Email Address	██
Company / Organisation	West Lulworth Parish Council
Address	The Bungalow Chydyok Road Dorchester DT2 8DL
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	West Lulworth Parish Council (Miss Emily Blake - 1190735)
Comment ID	PLPP336
Response Date	03/12/18 13:23
Consultation Point	Ensuring a sufficient supply of homes (View)
Status	Processed
Submission Type	Web
Version	0.3
Files	Settlement Hierarchy 3 (1)
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	284
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	Para 113
Do you consider that the Local Plan is legally compliant?	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)

Para 113 Distribution of housing is one of the most significant issues that the Purbeck Local Plan must address through the appropriate allocation of land and establishing robust policy to guide development. The allocation of small sites across the district is not balanced with the largest percentage falling on West Lulworth at 24% of the Purbeck allocation. (see Settlement Hierarchy 3 Attached)

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

Para 113 Last sentence to read:

Limited developments that are sympathetic to their surroundings will also be supported elsewhere across the District, but limited to two sites per settlement and cumulatively 10% in proportion, for the duration of the plan for all except towns and key service villages.

If you have any supporting documents please upload [Settlement Hierarchy 3 \(1\)](#) them here.

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

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

to express our views

Small Sites Allocation Towns:	Settlement hierarchy	Sites	Homes	%
	Swanage	3	56	13%
	Upton			
	Wareham			
Key Service Villages:				
	Bere Regis,	4	86	19%
	Bovington			
	Corfe Castle,			
	Lytchett Matravers,			
	Sandford,			
	Moreton Station			
	Wool	1	22	5%
Local Service Villages:				
	Langton Matravers,			
	Stoborough	2	33	7%
	West Lulworth	8	107	24%
	Winfrith Newburgh	7	98	22%
Villages with a Settlement Boundary:				
	Briantspuddle,			
	Chaldon Herring,	2	13	3%
	Church Knowle,			
	East Burton,			
	East Lulworth,	1	4	1%
	Harmans Cross,			
	Kimmeridge,			
	Kingston,			

Lytchett Minster,

Studland

Ridge

Worth Matravers	1	4	1%
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Villages without a Settlement Boundary:

Affpuddle

Bloxworth

Coombe Keynes,

East Knighton,

East Stoke,	1	23	5%
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Holton Heath,

Morden

Moreton	1	1	0.22%
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Organford

Worgret

Total	31	447	
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Comment

Consultee	Miss Emily Blake (1190735)
Email Address	[REDACTED]
Company / Organisation	West Lulworth Parish Council
Address	The Bungalow Chydyok Road Dorchester DT2 8DL
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	West Lulworth Parish Council (Miss Emily Blake - 1190735)
Comment ID	PLPP337
Response Date	03/12/18 13:24
Consultation Point	Ensuring a sufficient supply of homes (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	284
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	Para 115
Do you consider that the Local Plan is legally compliant?	No
Do you consider that the Local Plan is sound?	No
Do you consider that the Local Plan complies with the duty to co-operate?	No

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

The consultation for the SHLAA did not identify the small sites later published in the SHLAA (Oct18) Parish Councils were not consulted on the identified sites. The local plan suggests that the small sites should be spread across the district whereas 24% of the identified sites are in one village, West Lulworth. A further 22% are in Winfrith.

SHLAA Comments The evidence base (namely the SHLAA) is not sufficiently robust to deliver the housing numbers set out in Policy H2. The Strategic Housing Land Availability Assessment (SHLAA) 2018 underpins the approach to delivering the required housing across the district in the plan period. By indicating those sites which are 'suitable' and those which are 'unsuitable' for consideration the SHLAA identifies and assesses the potential for development at specific sites. West Lulworth small sites The conclusion to the site (SHLAA/0065) - land to the east of Farm Lane and Shepherds Way, is that it is "unsuitable because of potential adverse impact on the Dorset Area of Outstanding Natural Beauty (AONB) and because not clear how adverse effects on European sites could be avoided or mitigated".

An assessment of the eight additional small sites within or adjacent to West Lulworth should also be drawn that they are unsuitable for the same reasons. Further the Allotment Gardens, Bindon Road, West Lulworth, suggests building on allotments contrary to NPPF Policy 91c : Planning policies and decisions should aim to achieve healthy, inclusive and safe places which enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling. Some of these sites are unsuitable for development because of the adverse impact on the surrounding village character; on the setting of the AONB; and because the necessary infrastructure improvements to allow them to be developed would have an adverse impact on the special character of the village. An example of this is that private roads which would be necessary to service some of these developments are not capable of being upgraded, and any such upgrades would harm the character of the village. The proposed capacity of these sites cannot be met without changing the character of the Village. In conclusion that the sites put forward and assessed in the SHLAA within West Lulworth should not have passed the first test and should also have been discounted due to their development having an adverse impact on the special character of the village within the AONB. Therefore (using the SHLAA methodology) they should have been classified as unsuitable for development in the SHLAA. Therefore it can be concluded that the SHLAA cannot be relied upon as an accurate assessment of the development capacity within West Lulworth to contribute to the housing growth across the district, required within the plan period. For this reason the Plan is not 'sound'. This could have been avoided had PDC consulted with West Lulworth parish council on the SHLAA prior to publication.

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

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

To express my views

Comment

Consultee	Miss Emily Blake (1190735)
Email Address	[REDACTED]
Company / Organisation	West Lulworth Parish Council
Address	The Bungalow Chydyok Road Dorchester DT2 8DL
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	West Lulworth Parish Council (Miss Emily Blake - 1190735)
Comment ID	PLPP338
Response Date	03/12/18 13:25
Consultation Point	Policy H8: Small sites next to existing settlements (View)
Status	Processed
Submission Type	Web
Version	0.2
Files	Lul sites .jpg
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	284
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	H8
Do you consider that the Local Plan is legally compliant?	No
Do you consider that the Local Plan is sound?	No
Do you consider that the Local Plan complies with the duty to co-operate?	No

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

This policy allows multiple small sites to be identified of a disproportionate size to the existing settlement and focused in the west of the district . This could lead to doughnutting of villages ie old village in a ring of new homes

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

Policy H8: Small sites next to existing settlements (Amendments underlined) These provide an opportunity to spread developments across the District where larger developments would be unacceptable. Applications for small sites will be permitted where adjacent to existing homes in the closest town or village (as defined in the settlement hierarchy in the glossary of this plan), and not appear isolated in the countryside, provided the following apply: a) the scale of proposed development is proportionate to the size and character of the existing settlement, up to a maximum of 30 homes; up to a maximum of two sites per settlement over the period of the plan; and not exceeding 10% of the existing settlement. b) individually and cumulatively, the size, appearance and layout of proposed homes must not harm the character and value of any landscape or settlements potentially affected by the proposals; and c) the development would contribute to the provision of a mix of different types and sizes of homes to reflect the Council's expectations in Policy H9 or, where expressed in a neighbourhood plan, those of the relevant local community. d) the development would be identified in consultation with the appropriate Parish or Town Council. Where proposals would be within the green belt, only limited infilling, on sites positioned in-between existing buildings, within and around the edges of towns and villages will be permitted. Existing towns and villages are listed under 'settlement hierarchy' in the glossary of the Purbeck Local Plan.

If you have any supporting documents please upload [Lul sites .jpg](#) them here.

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Comment

Consultee	Miss Emily Blake (1190735)
Email Address	[REDACTED]
Company / Organisation	West Lulworth Parish Council
Address	The Bungalow Chydyok Road Dorchester DT2 8DL
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	West Lulworth Parish Council (Miss Emily Blake - 1190735)
Comment ID	PLPP339
Response Date	03/12/18 13:26
Consultation Point	Small sites development (View)
Status	Processed
Submission Type	Web
Version	0.2
Files	Traffic DYL App
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	284
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	Para 145
Do you consider that the Local Plan is legally compliant?	No
Do you consider that the Local Plan is sound?	No
Do you consider that the Local Plan complies with the duty to co-operate?	No

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

The small sites allocation allocate 107 homes to West Lulworth, a remote village with poor infrastructure, no services and no facilities. The nearest A road is 5 miles away and the roads around the village are often blocked by visitor traffic. There is very limited public transport which means residents need cars to travel. Extra homes will lead to more cars and more jams on the narrow roads.

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)

Restrict the number of developments per settlement.

If you have any supporting documents please upload [Traffic DYL App](#) them here.

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to express our views

Background to the request for double yellow lines on West Rd, West Lulworth.



Lulworth brought to a standstill by cars parking on both sides of West Road on Sunday 27th August 2017.

31 residents attended the parish council on 4th September 2017 to request that the double yellow lines on West Rd be extended to between Church Rd and Dagers Gate to prohibit parking on both sides and to keep the road open.

Press Reports.

Double yellow lines to be extended in West Lulworth after 'chaos' last summer

Echo 12th. April 18

Definitely dangerous: Residents speak out over gridlock misery on West Road in West Lulworth

Echo 1st. September 17

Durdle Door light show: Man dies after ambulance route blocked

BBC News 2nd October 15



Jam on West Rd Lulworth for approx 2hrs with consequent gridlock through the village on 27th Aug 2017.





Heading into Lulworth by Durdle Door.



Heading out of Lulworth towards Winfrith.



Objections have been registered by Advantage Point and Beandon. A solution could be to end the double lines outside of Hillhampton where the broken white line starts.

Two other objections have been received, one from the village shop concerned about the reduction in footfall, and the other from the village hall concerned about event parking. In response to these the parish council have confirmed that there should be no change in parking restrictions on Church Rd.

If there are objections, these are reported to the appropriate Committee who make a recommendation to Cabinet. This may be to proceed as advertised, make modifications to or abandon the proposal altogether.

(DCC TRO Procedure)

Summary

Lulworth is now getting up to one million visitors per year. There is sufficient car parking but the problem arises when inconsiderate parking blocks the access road. The parish therefore support the TRO to extend the double yellow lines on West Rd to between the Church Rd junction and Daggers Gate.

West Lulworth Parish Council Nov 18

Comment

Consultee	Miss Emily Blake (1190735)
Email Address	[REDACTED]
Company / Organisation	West Lulworth Parish Council
Address	The Bungalow Chydyok Road Dorchester DT2 8DL
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	West Lulworth Parish Council (Miss Emily Blake - 1190735)
Comment ID	PLPP340
Response Date	03/12/18 13:26
Consultation Point	Rural and entry level exception sites (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	284
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	H12
Do you consider that the Local Plan is legally compliant?	Yes
Do you consider that the Local Plan is sound?	No
Do you consider that the Local Plan complies with the duty to co-operate?	No

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

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

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

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

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

to express our views

Comment

Consultee	Miss Emily Blake (1190735)
Email Address	[REDACTED]
Company / Organisation	West Lulworth Parish Council
Address	The Bungalow Chydyok Road Dorchester DT2 8DL
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	West Lulworth Parish Council (Miss Emily Blake - 1190735)
Comment ID	PLPP341
Response Date	03/12/18 13:27
Consultation Point	Affordable housing need (View)
Status	Processed
Submission Type	Web
Version	0.2
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	284
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	Para 162
Do you consider that the Local Plan is legally compliant?	No
Do you consider that the Local Plan is sound?	No
Do you consider that the Local Plan complies with the duty to co-operate?	No

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

Affordable Housing The real housing crisis is for genuinely affordable housing for rent and to buy. Item 164 [plan pre submission] indicates that 'almost 90% of the identified housing requirement' is for affordable housing. Unfortunately, that item goes on to say that the maximum proportion of affordable housing that's achievable is only 40%. This means that a huge number of people will not be served by this plan, and a significant amount of development in our district will be inaccessible to local people and therefore pointless so who is it being built for. The government definition of affordable housing is 80% of market value but there are many references throughout the plan document, housing background paper, second homes evidence paper and an LEP report 2017 that the government's definition of what's affordable is not affordable to the demographic expected to access it. The council knows [and have admitted] that the 'affordable' housing provision throughout Purbeck is for the most part unaffordable to the relevant demographic.

We're told that the average income in Purbeck stands at £22,500.00 pa. Even with a deposit, an individual would require a mortgage of approx. 12 times their income for a two bed AFFORDABLE dwelling. As mortgage providers generally only offer 3.5 times a household income, the demographic most in need will gain nothing from the plan. The affordable rental market isn't much better. Depending on the landlord, a prospective renter is required to have 6 weeks deposit and undergo a number of credit checks, which cost the individual money and have to provide references. At 80% of market value, significant numbers of people find the alleged 'affordable' rental market is sufficiently out of reach as to make it impossible for them to consider moving to their own home. The LEP published a document in 2017 [5.22, Dorset-Future Housing Provision] which stated that 'In terms of absolute affordability, the standard measure is the income required for an 80% mortgage to a maximum of 3.5 times annual wage. By this measure none of the median priced new build dwellings are affordable even in the least expensive parts of Dorset'. With a median income of £30,727 pa ALL new build housing in Purbeck is unaffordable! In order to afford an 'affordable' flat there would need to be an income of approx. £59,886pa.

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

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

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

Comment

Consultee	Miss Emily Blake (1190735)
Email Address	██
Company / Organisation	West Lulworth Parish Council
Address	The Bungalow Chydyok Road Dorchester DT2 8DL
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	West Lulworth Parish Council (Miss Emily Blake - 1190735)
Comment ID	PLPP342
Response Date	03/12/18 13:28
Consultation Point	Policy H14: Second homes (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	284
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)

2nd Homes Policy The second homes policy was a welcomed addition to the plan and was included after PDC received complaints in the 2015 and 16 consultations that the plan did not address the problems associated by high numbers of second homes and holiday lets. However, whilst the policy appears to address the issue of second homes, it does not go far enough to protect us against the impact of holiday lets on our communities. Indeed, the council is contradicting itself by consistently telling us that we 'need newhomes' but equally is not willing to ensure that new homes are not taken out of the local availability because they become empty due to being used as holiday lets. However, in 3.10 [second homes policy evidence paper] the council states that 'the Council will further explore its options in ensuring that all homes, both market and affordable are restricted to permanent residents'. This statement is more akin to the initial second homes evidence paper 2017 which promoted a full residency policy but unfortunately the council have ignored this advice and settled for this half hearted attempt.

It should be noted that in general, the public do not differentiate between second homes and holiday lets. They see a property that is not in full residency and understand the impact of that in their community. The council have stated that holiday lets offer some economic benefit to our local area, however, despite asking officers to produce evidence which supports that claim, none has been forthcoming to date. In fact, the anecdotal evidence from residents supports a full residency policy and the benefits of this far outweighs the councils claim of any economic benefit. In contradiction to item 5, [bullet point 3, second home evidence paper], small businesses currently qualify to receive full small business rate relief meaning that they don't contribute in any way to our local taxes and services and therefore don't contribute to the police, ambulance and fire brigade etc even though they have full use of the facilities. All holiday lets are someone's second home but run as a business by individuals, who live outside of our area and predominantly out of county. This means that the majority of money earned, leaves our area to be spent elsewhere or even, in some cases, abroad. There is a small amount of money paid out for cleaners but generally repair, heating, gardening services appear to be coming in from other areas and most often from large towns. There is no proof that holiday lets provide more than a marginal benefit to any community. I have heard it said that they are of equal benefit to other holiday makers. This is not true. We see that holiday lets have deliveries of food from major supermarkets and are, therefore, not dependant on local pubs and restaurants as is the case with holiday makers staying in hotels and B&Bs. PDC have stated that other businesses claim that having holiday lets benefits their business all year round. We have asked to see the evidence which supports that claim. In reality, how can a property occupied between 20 – 35 weeks per year be more economically beneficial than somebody in permanent residency who may be away on holiday approx. 4 weeks per year? Holiday lets and second homes do NOT contribute in any way to the sustainability of smaller communities as they damage social fabric and community cohesion of our settlements, including their contribution to a changing population profile. They are not here to contribute to the upkeep of the churches and graveyards, help with other jobs like cutting grass, war memorial maintenance, running the village hall, taking part in fetes, community events, support the school, shop or pub. The owners are not here to support the parish council or more importantly stand for election! Their absence means that an ever dwindling number of people are responsible for a lot of work and this is set to increase with forthcoming devolution plans! It is ridiculous for the council to exclude holiday lets from this policy as per item 3.9 in the evidence background paper. 2nd homes and holiday lets 'behave' in the same way. Both are empty for significant and unpredictable periods during the year, both have absent owners, both cause the cost of housing to inflate because of potential earning possibilities and both have an impact on social cohesion. Not addressing the effect of holiday lets by making a full residency policy Purbeck wide, contributes to making our villages even more unsustainable than they already are and, of course, contributes further to an affordability issue because of potential earning capacity regardless of whether they're within or out of the AONB.

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

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

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

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

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

Comment

Consultee	Mr Bernard White (1186981)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Bernard White (1186981)
Comment ID	PLPP75
Response Date	28/11/18 20:45
Consultation Point	Policy V1: Spatial strategy for sustainable communities (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No

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

Which policy / paragraph number / policies map does your comment relate to? V1 point 2

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

Do you consider that the Local Plan is sound? No

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

The policy states

- 1 Purbeck's ageing population will be catered for by the provision of two 65 bed care homes - one at Wool and one at Moreton.

There must be serious doubt that the local population would be unable to afford the charges for such care homes having regard to amounts charged for other such homes in the area, e.g. Sandford and the average wages of local residents of £18,500.

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 provision care homes should be eliminated from the plan in favour of social housing for those who need it.

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

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

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

Comment

Consultee	Mr Bernard White (1186981)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Bernard White (1186981)
Comment ID	PLPP76
Response Date	28/11/18 20:46
Consultation Point	Policy V1: Spatial strategy for sustainable communities (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No

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

Which policy / paragraph number / policies map does your comment relate to? V1 point 2

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

Do you consider that the Local Plan is sound? No

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

The policy states

- 1 Purbeck's ageing population will be catered for by the provision of two 65 bed care homes - one at Wool and one at Moreton.

It is very doubtful whether local residents, particularly those on the average wage of circa £18,500, would be able to afford the current charges of such care homes - see, for example, Sandford.

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 provision for care homes should be withdrawn from the plan in favour of homes for local 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

Consultee	Mr Bernard White (1186981)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Bernard White (1186981)
Comment ID	PLPP77
Response Date	28/11/18 20:48
Consultation Point	Policy E12: Design (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? E12,g

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

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)

In light of the recommendations of the Intergovernmental Panel on Climate Change (IPCC) (8 October 2018) that the increase in global temperature above pre-industrial levels must be limited to 1.5 degrees C and that net greenhouse emissions must be reduced to zero by 2050, the Plan should require all developments to be powered by renewable energy, which will always be 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)

The Plan should require all developments to be powered by renewable energy, which will always be possible.

(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 enable me to present the recommendations of the IPCC.

Comment

Consultee	Mr Bernard White (1186981)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Bernard White (1186981)
Comment ID	PLPP78
Response Date	28/11/18 20:50
Consultation Point	Policy H8: Small sites next to existing settlements (View)
Status	Processed
Submission Type	Web
Version	0.2
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	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)

Given the number of homes proposed for the Small Sites policy, it is unacceptable that the likely location of these sites is not shown in the Plan. It is not reasonably possible to comment of the Plan

overall without an understanding of the location of these sites which could distort one's view of the proposals for the specified locations.

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 specify where the Small Sites are likely to be.

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

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

Comment

Consultee	Mr Bernard White (1186981)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Bernard White (1186981)
Comment ID	PLPP79
Response Date	28/11/18 20:51
Consultation Point	Policy H3: New housing development requirements (View)
Status	Processed
Submission Type	Web
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:	
Which policy / paragraph number / policies map does your comment relate to?	H3(b)
Do you consider that the Local Plan is legally compliant?	Yes
Do you consider that the Local Plan is sound?	No
Do you consider that the Local Plan complies with the duty to co-operate?	Yes

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

The policy requires delivery of affordable homes, a mix of different types of homes and accessible homes as required by Policies H9, H10 and H11.

In its consultation, January 2018, the Council lead with

“The Council is planning to meet the housing needs of current and future generations, so we are consulting on plans for future homes in Purbeck.”

and continued:

“Why do we need new homes?

- 1 To help deal with the local gap between average income and average house prices by providing affordable homes for local people;
- 2 To help young people who want to stay in the area;
- 3 To provide homes for people who look after us as we get older;
- 4 To help people facing homelessness or who live in overcrowded homes;
- 5 To support our local economy”

The proposed Plan singularly fails even to address these objectives, let alone achieve them, on the basis of which residents responded to the consultation.

In addition, in paragraph 164 of the Plan, the Council state that about 90% of the assessed housing need would be met by the numbers of people needing affordable housing. Even this is not achieved by the Plan because it is stated not to be affordable.

Purbeck simply does not need the market value homes for which the Plan provides. Moreover, the proposed housing mix in the Plan does not accord with the policy in the Government White Paper of February 2017 (Fixing Our Broken Housing Market) encapsulated in the Prime Minister's overview

"Today the average house costs almost eight times average earnings – an all-time record. As a result it is difficult to get on the housing ladder, and the proportion of people living in the private rented sector has doubled since 2000.

These high housing costs hurt ordinary working people the most. In total more than 2.2 million working households with below-average incomes spend a third or more of their disposable income on housing.

This means they have less money to spend on other things every month, and are unable to put anything aside to get together the sums needed for a deposit."

The policy in the Plan, and subsequent policies, do nothing to put these intentions into practice. Average salaries in Purbeck require house prices, or rents based on them, to be no more than circa £150,000 and probably less.

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

The Council should revise the Plan to redirect the type of housing to be built to those which people in Purbeck on average salaries/wages can afford to buy or rent. In the meantime it will have to seek out and adopt the means to fund this provision including borrowing, compulsory purchase, council housing, Housing Associations etc.

(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?

The Inspector may wish to discuss these comments.

Comment

Consultee	Mr Bernard White (1186981)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Bernard White (1186981)
Comment ID	PLPP80
Response Date	28/11/18 20:52
Consultation Point	Policy H9: Housing mix (View)
Status	Processed
Submission Type	Web
Version	0.2

Are you responding on behalf of a group? No

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

Which policy / paragraph number / policies map does your comment relate to? H9

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)

My comments on Policy H3 are also applicable here.

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)

My comments on Policy H3 are also applicable 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? Yes

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

My comments on Policy H3 are also applicable here.

Comment

Consultee	Mr Bernard White (1186981)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Bernard White (1186981)
Comment ID	PLPP81
Response Date	28/11/18 20:53
Consultation Point	Affordable housing need (View)
Status	Processed
Submission Type	Web
Version	0.2
Are you responding on behalf of a group?	No

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

Which policy / paragraph number / policies map does your comment relate to? Paragraph 161of the Plan

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

Do you consider that the Local Plan is sound? No

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

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

"The provision of affordable housing is a major priority for Purbeck District Council" Comment - it is the raison d'être of the White Paper "Fixing our Broken Housing Market" February 2017.

"The Council recognises that, because of average local incomes, some people cannot access appropriate homes, even those classed as affordable." Comment - The Plan, in para 168, states that 90% of the assessed housing need could be filled by those in this category. Hardly "some people".

"These documents provide a sound understanding of affordable housing need and the level of provision that can be secured viably across the District and from specific sites." Comment - The Council needs to look again at the question of viability in order to meet the needs of local residents as it purports to be aiming to do.

Comment

Consultee	Mr Bernard White (1186981)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Bernard White (1186981)
Comment ID	PLPP82
Response Date	28/11/18 20:54
Consultation Point	Affordable housing need (View)
Status	Processed
Submission Type	Web
Version	0.2

Are you responding on behalf of a group? No

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

Which policy / paragraph number / policies map does your comment relate to? Paragraphs 162 to 165

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)

Given that "that the overall net affordable housing requirement for Purbeck would be 149 affordable homes per year. Even allowing for the 40% uplift apportioned to the District's local housing need assessment, this is almost 90% of the identified housing requirement." (Para 164), it is unacceptable to conclude that " The Council will work proactively with landowners and developers to secure a

minimum 10% affordable home ownership on major sites as informed by the NPPF." This is palpably not meeting the needs of local residents nor addressing local housing need.

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

The Council to revisit the level of provision that can be secured viably.

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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 in more detail my objection.

Comment

Consultee	Mr Bernard White (1186981)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Bernard White (1186981)
Comment ID	PLPP83
Response Date	28/11/18 20:55
Consultation Point	Policy H14: Second homes (View)
Status	Processed
Submission Type	Web
Version	0.2

Are you responding on behalf of a group? No

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

Which policy / paragraph number / policies map does your comment relate to? H14

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

Do you consider that the Local Plan is sound? No

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

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

This policy should apply throughout 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)

Provide for the policy to apply outside the AONB.

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

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

Comment

Consultee	Mr Bernard White (1186981)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Bernard White (1186981)
Comment ID	PLPP84
Response Date	28/11/18 20:56
Consultation Point	Chapter 7: Implementation, delivery and monitoring (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? Paragraph 271

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

Do you consider that the Local Plan is sound? No

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

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

The following stated consequences are misplaced:

"Consequently the housing market has been identified as one of the most significant barriers holding back economic growth and harming the social fabric of the country. Therefore, the challenge through the policies in this plan is to manage growth whilst safeguarding the quality of the environment for the health and wellbeing of today and future generations."

The primary consequence of the failing housing market is the inability of people to have a home and the detrimental effects on their quality of life. The Council's misjudgement goes to the heart of the Plan.

Comment

Consultee	Mr Bernard White (1186981)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Bernard White (1186981)
Comment ID	PLPP85
Response Date	28/11/18 20:56
Consultation Point	Chapter 7: Implementation, delivery and monitoring (View)
Status	Processed
Submission Type	Web
Version	0.2
Are you responding on behalf of a group?	No

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

Which policy / paragraph number / policies map does your comment relate to? paragraph 273

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)

"Ensuring successful implementation of this Purbeck Local Plan is vital to giving the opportunities for affordable homes and jobs that residents need. Having an up to date plan in place will facilitate appropriate development to proceed in a timely manner."


Comment - The Plan demonstrably does not give opportunities for the affordable homes which residents need. Only 10% of new homes will be affordable, or is it 40%?

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

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

Comment

Consultee	Mr and Mrs Ian and Vera White (1190758)
Email Address	
Address	unkown unknown unknown
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr and Mrs Ian and Vera White (1190758)
Comment ID	PLPP149
Response Date	30/11/18 16:36
Consultation Point	Vision (View)
Status	Processed
Submission Type	Letter
Version	0.1

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

Comment

Consultee	Mr and Mrs Ian and Vera White (1190758)
Email Address	████████████████████
Address	unkown unknown unknown
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr and Mrs Ian and Vera White (1190758)
Comment ID	PLPP153
Response Date	30/11/18 16:49
Consultation Point	Vision (View)
Status	Processed
Submission Type	Letter
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:

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

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)

Quality of life for the local community will not be improved by implementation of the plan. It will be considerably reduced for those living adjacent to the larger proposed developments in Wool and Moreton. NB not qualified to comment on legality but had to put something.

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 best way to maintain present quality of life to vastly reduce the number of houses proposed.

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

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

Comment

Consultee	Mr and Mrs Ian and Vera White (1190758)
Email Address	
Address	unkown unknown unknown
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr and Mrs Ian and Vera White (1190758)
Comment ID	PLPP155
Response Date	30/11/18 16:49
Consultation Point	Policy H1: Local housing requirement (View)
Status	Processed
Submission Type	Other
Version	0.1

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

Comment

Consultee	Mr and Mrs Ian and Vera White (1190758)
Email Address	████████████████████
Address	unkown unknown unknown
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr and Mrs Ian and Vera White (1190758)
Comment ID	PLPP159
Response Date	30/11/18 17:06
Consultation Point	Policy H1: Local housing requirement (View)
Status	Processed
Submission Type	Letter
Version	0.4
Are you responding on behalf of a group?	No

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

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? H1

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)

It is not sound to apply a national housing policy indiscriminately across the country. Houses should be built to satisfy local need. There is no evidence to suggest that Purbeck needs 3000+ houses. In the case of Wool 'local' need currently is for about 30 houses. There is no evidence that the local population growth or increase in local employment can justify 470 houses in the village, nor any which

may be added in the 'small site' numbers. Most occupants of these houses who work will need to commute so increasing the pressure on local roads and transport. (see comment under Policy H5). The plan is unclear in respect of about 900 house to be allocated to 'small sites' These could be anywhere in Purbeck so increasing uncertainty and concern to the whole population.

Comment

Consultee Mr and Mrs Ian and Vera White (1190758)

Email Address [REDACTED]

Address

unkown
unknown
unknown

Event Name

Purbeck Local Plan Pre-submission Draft

Comment by

Mr and Mrs Ian and Vera White (1190758)

Comment ID

PLPP166

Response Date

30/11/18 17:06

Consultation Point

Policy H5: Wool ([View](#))

Status

Processed

Submission Type

Letter

Version

0.4

Are you responding on behalf of a group?

No

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

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?

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)

Environment - it is proposed that 300 houses and a care home be built on organically farmed land to the South of the A352. This is ecologically unsound. It removes valuable agricultural land from production of food for the rising population, while at the same time much uncertainty exists regarding import of

food for the rising population, while at the same time much uncertainty exists regarding import of food from Europe following Brexit. This development will create a hard catchment area for rainwater which will run directly into the river Frome carrying road pollution and sediment with subsequent ecological damage to the river and downstream to Poole Harbour. No independent ecological studies have been carried out as far as we are aware. Earlier consultations - the last consultation concluded that Option A (470 houses for Wool) to be the favoured option. This did not account for the fact that in Wool only 30% of respondents chose Option A but 60% chose none of the options. This is not an endorsement of Option A. It shows that the democratic choice of the Wool community has been ignored.

Previous consultations made no mention of a care home. This would likely be the largest building in the development, unlikely to be 'sympathetic and in keeping with the local architecture and scale'. No mention is made of how it would be funded or managed, it may just be a speculative building by the developer. So far as we are aware no local agencies such as the surgery or social services have been consulted on the need for, or size, of a care home.

Infrastructure - the plan is unsound as it does not give any guarantees that adequate infrastructure improvements will be made to support the numbers of houses proposed. Wool surgery is overload at present. Assumptions are made that local schools can be expanded without explaining how or where. We understand sewerage disposal is currently a problem, will the sewerage works be expanded?

Traffic - An additional 470 houses in Wool, and those in the rest of Purbeck, will result in huge increase in traffic and consequent pressure on the current road system. There appears to be no intention to improve the road system in the area to accommodate this. Mention of 'alternative routes' is irrelevant. There is no viable alternative to the A352 level crossing in Wool. In the wider area there are several other pinch points on route from Wool and Moreton to Poole and Bournemouth so commuting to these areas will become more than difficult than at present.

The railway service from Wool is being reduced at present. No mention has been made for increasing the rail service to meet the higher demands for Wool and the rest of 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)

All these aspects need to be reviewed.

Comment

Consultee	Mr and Mrs Ian and Vera White (1190758)
Email Address	████████████████████
Address	unkown unknown unknown
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr and Mrs Ian and Vera White (1190758)
Comment ID	PLPP175
Response Date	30/11/18 17:06
Consultation Point	Chapter 4: Housing (View)
Status	Processed
Submission Type	Letter
Version	0.4
Are you responding on behalf of a group?	No

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

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? Paras 151/2

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)

For houses to be 'affordable' to those on local average income the costs of a house would have to be around 150,000 pounds. The average cost of houses in Purbeck is around £250K. There is no way developers will be able to offer houses at £150K if the houses are to be of reasonable quality. Past

consultations have mentioned up to 50% houses being affordable, the whole question of 'affordable' houses is confusing.

In Poundbury there are a number 'affordable' houses which have not been sold.

Consideration should be given to building council/social 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)

Consideration should be given to building council/social housing

Comment

Consultee	Mr Andrew Wilson (1187806)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Andrew Wilson (1187806)
Comment ID	PLPP170
Response Date	30/11/18 17:39
Consultation Point	Policy H5: Wool (View)
Status	Processed
Submission Type	Other
Version	0.8
Files	H5-Wilson-PLPP170.pdf

Are you responding on behalf of a group? No

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

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

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)

See attachment

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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?

I would like the opportunity to explain why I consider that the proposals are inherently flawed because the process and successive consultations have caused and compounded misunderstandings and disingenuity in several areas. I wish also to discuss with the inspector how difficult and alienating the consultation has been, leading many people NOT to respond!

I WANT

RELATED TO H15 POLICY

SIX THINGS THAT YOU NEED TO TELL THE LOCAL PLAN INSPECTOR

Affordability

This Plan is unsound as it perpetuates the myth that building 470 homes in Wool will somehow provide houses that local people can afford. The January 2018 consultation said: "The average cost of a house in Purbeck is £250,000". That's seventeen times the average salary in Purbeck. To be genuinely affordable (for rent or purchase) a house needs to cost £150,000. The Plan presents no evidence that building 470 houses in Wool will cause house prices to drop by 40%.

Numbers

The Plan lacks clarity. A third of the proposed houses (933 of 2,688) are on unspecified 'small sites' which could be anywhere in Purbeck. How can that be called 'a Plan'?

Infrastructure

The plan should be challenged because it fails to offer any definitive guarantees in terms of infrastructure that will be required to support the number of houses being proposed for Wool (which does not include any 'add-ons' that could well appear on 'smaller sites'). The plan merely assumes that the current schools can be adequately expanded; no mention is made of the ability (or otherwise) to expand the already overloaded sewage works; whilst there is at least acknowledgement that there will be increased traffic, noting previous surveys and pressure on the level crossing given that many new residents will commute to the Poole/Bournemouth conurbation, the only mitigation suggested is to encourage motorists to seek alternative routes;

Environment

There is little, if any, acknowledgement of the disastrous effect that such large scale (and unnecessary) development will have on the environment in terms of the destruction of the current bio-diverse habitats that now exist. There has been no satisfactory environmental or ecological study carried out by reputable bodies or outside experts. The suggestions for mitigation of the impact on the environment (for example the provision of a SANG) have been ill-considered, and according to expert opinion, would not address the problem that the proposed development would cause.

Health Care

The sudden inclusion in the plans for Wool of a 65 bed care home should be challenged. There is no reference to or mention of the proposal to build such a facility in Wool in any of the previous consultation documents. In addition, the legality of its inclusion should be questioned on the grounds that it would appear that none of Social Services, the local Surgery, NH5 Dorset or the CCG were involved in any form of discussion or consultation, leading one to conclude that it has been added as a purely speculative commercial venture by the would-be developer. It would likely be the biggest building in Wool, which directly contravenes the planning principle found elsewhere in the Pre-Submission Policy Document that any development should be sympathetic and in keeping with local architecture and scale of building.

Consultation January 2018

The Plan talks about the results of the January 2018 consultation and says 'the most favoured option' was Option A. Technically this is correct; but when asked what was their preferred option, 35% of respondents chose option A, 28% chose None. And in Wool, whilst 30% chose Option A, 60% said None. That is far from a ringing endorsement for this Plan by any measure. In terms of Wool therefore, the process has been legally and morally questionable because it has repeatedly denied the stated democratic wishes of the community.

This Consultation

Like all the previous consultations, this one is severely flawed and there is evidence to suggest that it too has been designed to prevent large numbers of the community from responding easily and fully. The first consultation, for example, contained the erroneous and deceptive comment that "there was significant support for 1000 houses in Wool"; the second consultation persisted with the apparent impression that there would be between 40% and 50% of all houses built being affordable; all the consultations and attendant publicity have been deliberately vague – and therefore potentially misleading – over infrastructure (for example continuing to state that "a bypass could be considered"); the insistence on an 'online' response to this consultation is seen to be discriminatory and disenfranchising.

Disclaimer: Although this document is co-authored by [REDACTED], it should be made clear that the views expressed here are in no way

members of Wool Parish Council, it should be [REDACTED] council.

30/11/18

Comment

Consultee	Mr Andrew Wilson (1187806)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Andrew Wilson (1187806)
Comment ID	PLPP668
Response Date	30/11/18 17:39
Consultation Point	Policy H11: Affordable housing (View)
Status	Processed
Submission Type	Other
Version	0.2
Files	H5-Wilson-PLPP170.pdf

Are you responding on behalf of a group? No

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

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

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)

See attachment

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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?

I would like the opportunity to explain why I consider that the proposals are inherently flawed because the process and successive consultations have caused and compounded misunderstandings and disingenuity in several areas. I wish also to discuss with the inspector how difficult and alienating the consultation has been, leading many people NOT to respond!

Comment

Consultee	Mr Andrew Wilson (1187806)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Andrew Wilson (1187806)
Comment ID	PLPP669
Response Date	30/11/18 17:39
Consultation Point	Policy H2: The housing land supply (View)
Status	Processed
Submission Type	Other
Version	0.1
Files	H5-Wilson-PLPP170.pdf

Are you responding on behalf of a group? No

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

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

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Comment

Consultee	Mr Andrew Wilson (1187806)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Andrew Wilson (1187806)
Comment ID	PLPP670
Response Date	30/11/18 17:39
Consultation Point	Policy I1: Developer contributions to deliver Purbeck's infrastructure (View)
Status	Processed
Submission Type	Other
Version	0.1
Files	H5-Wilson-PLPP170.pdf

Are you responding on behalf of a group? No

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

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

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

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See attachment

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I WANT

RELATED TO H/S POLICY

SIX THINGS THAT YOU NEED TO TELL THE LOCAL PLAN INSPECTOR

Affordability

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Numbers

The Plan lacks clarity. A third of the proposed houses (933 of 2,688) are on unspecified 'small sites' which could be anywhere in Purbeck. How can that be called 'a Plan'?

Infrastructure

The plan should be challenged because it fails to offer any definitive guarantees in terms of infrastructure that will be required to support the number of houses being proposed for Wool (which does not include any 'add-ons' that could well appear on 'smaller sites'). The plan merely assumes that the current schools can be adequately expanded; no mention is made of the ability (or otherwise) to expand the already overloaded sewage works; whilst there is at least acknowledgement that there will be increased traffic, noting previous surveys and pressure on the level crossing given that many new residents will commute to the Poole/Bournemouth conurbation, the only mitigation suggested is to encourage motorists to seek alternative routes;

Environment

There is little, if any, acknowledgement of the disastrous effect that such large scale (and unnecessary) development will have on the environment in terms of the destruction of the current bio-diverse habitats that now exist. There has been no satisfactory environmental or ecological study carried out by reputable bodies or outside experts. The suggestions for mitigation of the impact on the environment (for example the provision of a SANG) have been ill-considered, and according to expert opinion, would not address the problem that the proposed development would cause.

Health Care

The sudden inclusion in the plans for Wool of a 65 bed care home should be challenged. There is no reference to or mention of the proposal to build such a facility in Wool in any of the previous consultation documents. In addition, the legality of its inclusion should be questioned on the grounds that it would appear that none of Social Services, the local Surgery, NH5 Dorset or the CCG were involved in any form of discussion or consultation, leading one to conclude that it has been added as a purely speculative commercial venture by the would-be developer. It would likely be the biggest building in Wool, which directly contravenes the planning principle found elsewhere in the Pre-Submission Policy Document that any development should be sympathetic and in keeping with local architecture and scale of building.

Consultation January 2018

The Plan talks about the results of the January 2018 consultation and says 'the most favoured option' was Option A. Technically this is correct; but when asked what was their preferred option, 35% of respondents chose option A, 28% chose None. And in Wool, whilst 30% chose Option A, 60% said None. That is far from a ringing endorsement for this Plan by any measure. In terms of Wool therefore, the process has been legally and morally questionable because it has repeatedly denied the stated democratic wishes of the community.

This Consultation

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members of Wool Parish Council, it should be [REDACTED] Council.

30/11/18

Comment

Consultee	Mr Andrew Wilson (1187806)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Andrew Wilson (1187806)
Comment ID	PLPP671
Response Date	30/11/18 17:39
Consultation Point	Policy E10: Biodiversity and geodiversity (View)
Status	Processed
Submission Type	Other
Version	0.1
Files	H5-Wilson-PLPP170.pdf

Are you responding on behalf of a group? No

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

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

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)

See attachment

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I WANT

RELATED TO H/S POLICY

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members of Wool Parish Council, it should be [REDACTED] Council.

30/11/18

Comment

Consultee	Mr Andrew Wilson (1187806)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Andrew Wilson (1187806)
Comment ID	PLPP672
Response Date	30/11/18 17:39
Consultation Point	Arrangements for commenting on the Presubmission Purbeck Local Plan timings and next steps (View)
Status	Processed
Submission Type	Other
Version	0.2
Files	H5-Wilson-PLPP170.pdf
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	H5
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)

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I WANT

RELATED TO H/S POLICY

SIX THINGS THAT YOU NEED TO TELL THE LOCAL PLAN INSPECTOR

Affordability

This Plan is unsound as it perpetuates the myth that building 470 homes in Wool will somehow provide houses that local people can afford. The January 2018 consultation said: "The average cost of a house in Purbeck is £250,000". That's seventeen times the average salary in Purbeck. To be genuinely affordable (for rent or purchase) a house needs to cost £150,000. The Plan presents no evidence that building 470 houses in Wool will cause house prices to drop by 40%.

Numbers

The Plan lacks clarity. A third of the proposed houses (933 of 2,688) are on unspecified 'small sites' which could be anywhere in Purbeck. How can that be called 'a Plan'?

Infrastructure

The plan should be challenged because it fails to offer any definitive guarantees in terms of infrastructure that will be required to support the number of houses being proposed for Wool (which does not include any 'add-ons' that could well appear on 'smaller sites'). The plan merely assumes that the current schools can be adequately expanded; no mention is made of the ability (or otherwise) to expand the already overloaded sewage works; whilst there is at least acknowledgement that there will be increased traffic, noting previous surveys and pressure on the level crossing given that many new residents will commute to the Poole/Bournemouth conurbation, the only mitigation suggested is to encourage motorists to seek alternative routes;

Environment

There is little, if any, acknowledgement of the disastrous effect that such large scale (and unnecessary) development will have on the environment in terms of the destruction of the current bio-diverse habitats that now exist. There has been no satisfactory environmental or ecological study carried out by reputable bodies or outside experts. The suggestions for mitigation of the impact on the environment (for example the provision of a SANG) have been ill-considered, and according to expert opinion, would not address the problem that the proposed development would cause.

Health Care

The sudden inclusion in the plans for Wool of a 65 bed care home should be challenged. There is no reference to or mention of the proposal to build such a facility in Wool in any of the previous consultation documents. In addition, the legality of its inclusion should be questioned on the grounds that it would appear that none of Social Services, the local Surgery, NH5 Dorset or the CCG were involved in any form of discussion or consultation, leading one to conclude that it has been added as a purely speculative commercial venture by the would-be developer. It would likely be the biggest building in Wool, which directly contravenes the planning principle found elsewhere in the Pre-Submission Policy Document that any development should be sympathetic and in keeping with local architecture and scale of building.

Consultation January 2018

The Plan talks about the results of the January 2018 consultation and says 'the most favoured option' was Option A. Technically this is correct; but when asked what was their preferred option, 35% of respondents chose option A, 28% chose None. And in Wool, whilst 30% chose Option A, 60% said None. That is far from a ringing endorsement for this Plan by any measure. In terms of Wool therefore, the process has been legally and morally questionable because it has repeatedly denied the stated democratic wishes of the community.

This Consultation

Like all the previous consultations, this one is severely flawed and there is evidence to suggest that it too has been designed to prevent large numbers of the community from responding easily and fully. The first consultation, for example, contained the erroneous and deceptive comment that "there was significant support for 1000 houses in Wool"; the second consultation persisted with the apparent impression that there would be between 40% and 50% of all houses built being affordable; all the consultations and attendant publicity have been deliberately vague – and therefore potentially misleading – over infrastructure (for example continuing to state that "a bypass could be considered"); the insistence on an 'online' response to this consultation is seen to be discriminatory and disenfranchising.

Disclaimer: Although this document is co-authored by [REDACTED], it should be made clear that the views expressed here are in no way

members of Wool Parish Council, it should be [REDACTED] Council.

30/11/18

Comment

Consultee	Mr David Wilson (1191225)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr David Wilson (1191225)
Comment ID	PLPP429
Response Date	03/12/18 16:13
Consultation Point	Housing (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?	Housing
Do you consider that the Local Plan is legally compliant?	Yes
Do you consider that the Local Plan is sound?	Yes
Do you consider that the Local Plan complies with the duty to co-operate?	Yes

Comment

Consultee	Mr Stuart Wilson (1191272)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mr Stuart Wilson (1191272)
Comment ID	PLPP561
Response Date	03/12/18 23:35
Consultation Point	Policy H8: Small sites next to existing settlements (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	Housing H8
Do you consider that the Local Plan is legally compliant?	Yes
Do you consider that the Local Plan is sound?	No
Do you consider that the Local Plan complies with the duty to co-operate?	Yes

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

Policy H8 fails to provide specific and adequate guidance on development for settlements and cannot therefore qualify other policies in the Local plan, such as the Vision V1, Landscape or Housing H2. It

is based on erroneous and inadequate evidence in the SHLAA, which fails to identify 933 dwellings from Small Sites and has incorrectly and inconsistently evaluated individual Small Sites based on high level desk research. The SHLAA (which is an evolving document) is a proactive call to land owners and developers to propose sites for consideration (para 33 and Appendix A) and this inevitably provides some momentum. The NPPF defines deliverable sites as 'available now, offer a suitable location for development now and be achievable with a realistic prospect that housing will be delivered on the site within five years' (para 42). With the Local Plan delivery being front loaded (Local Plan para 117, p50), this puts some urgency on the need to clarify small site allocations. It does not provide protection to the local communities in smaller settlements and needs amendment to policies H2 and H8. The SHLAA only identifies a potential 433 out of 933 dwellings. This includes windfall sites within those settlements. I would suggest that the entire windfall across PDC should be included to minimise impact on such settlements. Also, PDC have only included 784 windfall dwellings over the plan period (p3, Table 1). This is at the lowest end of the range (the higher end is 1184) and Purbeck has "a strong track record of delivering windfall" (para 37). PDC were actively encouraged to consider windfall in the 2016 consultation. They have based their conservative estimate on 49 units per annum, but the long term trend is 74 units per annum (para 39) - the difference would more than cover the requirement from small sites at 17 per annum (para 34). Also, the large site (SHLAA/0065, p150) for West Lulworth was rejected on specific grounds. Why have such grounds not been applied to the small sites? The only basis of consideration seems to be proximity to a settlement (para 16) and not the "other constraints" outlined in the SHLAA (para 15), such as AONB, TPOs, conservation areas, listed buildings, groundwater source zones, Purbeck Heritage Coast, SNCI (SSSI is relevant for Bindon Hill), regionally important Geological Sites, etc. Many of these "other constraints" would apply to the West Lulworth small sites. Whilst PDC have said that any one of these constraints do not necessarily preclude inclusion, there must be a point at which the cumulative assessment falls in favour of rejection rather than inclusion? Para 14 identifies "absolute constraints" for rejection: Flood risk zones 2/3; 400m of a protected heathland. Has the desk research adequately covered this issue for Small Sites? The SHLAA has made a broad assumption of housing density - 30 dwellings per hectare - across all sites (para 13). Individual sites, if taken forwards for consideration for allocation, will need to be reviewed in line with more detailed evidence. I would contend that a number of the West Lulworth sites will fail to yield 30 dph based on the immediate adjacent housing densities to conform with the vernacular for that location. This would also call into question the SHLAA assumptions on delivery.

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 should be revised to properly identify the number of dwellings required from Small Sites, taking into account an accurate measure of Windfall Sites. This will alleviate the pressure on Small Sites in the present SHLAA and Local Plan. Each Small Site should be properly and consistently evaluated to ensure it meets the development restrictions outlined in the Vision, Landscape and other Housing sections of the Local Plan. Policy E8 should include specific criteria for cumulative Small Site development in any one settlement. This could include:

- 1 No more than two Small Sites per individual settlement from the Plan commencement period
- 2 No more than 10% of dwellings growth from the Plan commencement 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?

The Local Plan is largely silent on Key Service Villages and Small Sites, yet this ambiguity and omission could have a material impact on such settlements. These need to be adequately represented in the Examination in Public which will otherwise be dominated by the larger towns and Large Sites.

Comment

Consultee	Mrs Valerie Wilson (1190704)
Email Address	██
Address	Unknown Unknown Unknown
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Mrs Valerie Wilson (1190704)
Comment ID	PLPP142
Response Date	30/11/18 15:22
Consultation Point	Purbeck Local Plan Pre-submission Draft (View)
Status	Processed
Submission Type	Other
Version	0.4
Are you responding on behalf of a group?	No

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

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? Policy 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)

This plan is unsound as it perpetuates the myth that building 470 homes in Wool will somehow provide houses that locl people can afford. the January 2018 consultation said: "the average cost of a house in Purbeck is £250,000". That's seventeen times the average salary in Purbeck. To be genuinely

affordable (for rent or purchase) a house needs to cost £150,000. The Plan presents no evidence that building 470 houses in Wool will cause house prices to drop by 40%.

The plan talks about the results of the January 2018 consultation and says 'the most favoured option' was Option A. Technically this is correct; but when asked what was their preferred option, 35% of respondents chose option A, 28% chose None. And in Wool, whilst 30% chose Option A, 60% said None. That is far from a ringing endorsement for this Plan by any measure. In terms of Wool therefore, the process has been legally and morally questionable because it has repeatedly denied the stated democratic wishes of the community.

Like all the previous consultations, this one is severely flawed and there is evidence to suggest that it too has been designed to prevent large numbers of the community from responding easily and fully. The first consultation, for example, contained the erroneous and deceptive comment that "there was significant support for 1000 houses in Wool"; the second consultation persisted with the apparent impression that there would be between 40% and 50% of all houses built being affordable; all the consultations and attendant publicity have been deliberately vague - and therefore potentially misleading.

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 houses must be affordable to enable families to stay together.

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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