

Consultee: Ian Taylor

Event name: Purbeck Local Plan Supplementary Proposed Main Modifications

Consultee reference:

Consultation reference: SMMR19

Supplementary Proposed Main Modification: SMM3

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: See attachment for full response

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM4

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: See attachment for full response

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM6

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: See attachment for full response

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM8

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: No

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: See attachment for full response

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM43

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: See attachment for full response

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Comments on addendum to Habitats Regulation Assessment (SMMCD2), addendum to Sustainability Appraisal (SMMCD3), 5-year housing land supply report (SMMCD4), local housing need update (SMMCD5), policies map paper (SMMCD6) or local plan policies maps (SMMCD7a to SMMCD7k) -

Section or paragraph: N/A

Comments: N/A

Attachment:



Response form for: Purbeck Local Plan Supplementary Proposed Main Modifications consultation

This form is for making representations on the Supplementary Proposed Main Modifications to the Purbeck Local Plan (2018-2034)

The council has opened a consultation into Supplementary Proposed Main Modifications (SMM) published as part of the Consolidated schedule of Main Modifications (SMMCD1) to the Purbeck Local Plan. The council is only accepting comments on the novel supplementary modification and not any earlier modifications which have already been presented as Main Modifications or Further Proposed Main Modifications. This is not an opportunity to raise matters relating to other parts of the Plan that have already been considered by the Inspector during the examination. Weight will not be given to representations that repeat matters that have previously been raised and discussed at hearing sessions or in earlier responses.

Alongside SMM, there is also an opportunity to comment on updated policies maps, the Habitats Regulation Assessment Addendum and Sustainability Appraisal Addendum. The council has also published supporting evidence relating to the SMM, comprising a five-year housing land supply report and an assessment of local housing need.

These documents can be found on-line at www.dorsetcouncil.gov.uk/plpmainmods .

Once the consultation is closed at 11:45pm on 22 December 2022, the council will prepare a summary of the issues raised in representations to the consultation and provide its response. The council's summary, and full copies of the representations, will then be sent to the Planning Inspectors for their consideration. The Inspectors will then make a recommendation around the next stages of the local plan's examination taking account of the issues raised in the representations.

PART A

	Your contact details	Agent's Details (if applicable)
Name	Ian Taylor	
Organisation / Group (if applicable)		
Address line 1	██████████	
Address line 2	██████████	
Town / City	████	
County	████	
Post Code	██████	
E-mail address	██████████	

Group Representations

If your representation is on behalf of a group, ensure the lead representative completes the contact details box above. Also, please state here how many people supports the representation.

Please note:

- The consultation period starts on **10 November 2023** and will last for 6 weeks until 11.45pm on **22 December 2023**.
- Only representations made in this period will be referred to the Planning Inspectors for consideration.
- Responses must be made using this form (sent in the post or attached to an e-mail).
- Respondents must complete Part A of this response form and separate Part B forms for each Supplementary Proposed Main Modification that they might wish to comment on.
- All respondents must provide their name and address and/or email address.
- All forms must be signed and dated.
- Responses cannot be treated as confidential. By making a response you agree to your name and comments being made available for public viewing.
- Information on the council's privacy policy is available on our website at: <https://www.dorsetcouncil.gov.uk/your-council/about-your-council/data-protection/dorset-council-general-privacy-notice.aspx> .

- The council will not accept any responsibility for the contents of comments submitted. We reserve the right to remove any comments containing defamatory, abusive or malicious allegations.
- If you are part of a group that shares a common view, please include a list of the contact details of each person (including names, addresses, emails, telephone numbers and signatures) along with a completed form providing details of the named lead representative.
- The supplementary proposed main modifications, the updated policies map, the Habitats Regulation Assessment Addendum and Sustainability Appraisal Addendum, are available to view on the Council's website at www.dorsetcouncil.gov.uk/plpmainmods. Paper copies of the supplementary proposed main modifications, the updated policies map, the Habitats Regulation Assessment Addendum and Sustainability Appraisal Addendum are available to consult at libraries in Dorchester, Corfe Castle, Lytchett Matravers, Swanage, Upton, Wareham, Wool and Poole.
- If you have questions relating to the consultation, or the process for making a response, please contact the Planning Policy team on 01305 838334 or planningpolicy@dorsetcouncil.gov.uk.
- Response forms returned in the post should reference the **Purbeck Local Plan, Supplementary Proposed Main Modifications Consultation, and be sent to Spatial Planning Team, County Hall, Colliton Park, Dorchester, DT1 1XJ**. Forms can be returned by email, referencing Purbeck Local Plan Supplementary Proposed Main Modifications Consultation, to the email above.
- Please tick the box if you would like to be notified of the following:

Adoption of the Local Plan.

PART B

1. Which Supplementary Proposed Main Modification does your representation relate to?

Separate Part B forms must be completed for each separate Supplementary Proposed Main Modification you wish to comment on.

Supplementary Proposed Main Modifications reference number	SMM8
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2. Do you consider that the Supplementary Proposed Main Modification is:

Legally compliant	Yes		No	no
Sound	Yes		No	no

To be considered legally compliant the Supplementary Proposed Main Modifications must:

- comply with the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019; and
- be appraised for their sustainability.

To be considered sound the local plan as a whole must be:

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

Some or all of these considerations of soundness may be relevant to the Supplementary Proposed Main Modification[s] that you are seeking to make a representation on.

3. Please give details of why you consider the Supplementary Proposed Main Modification is / is not legally compliant or sound. (Please be as precise as possible).

This plan is unsound in its entirety for the following reasons:

Purbeck District Council ceased to exist as a local planning authority in March 2019 (almost 5 years ago). An administrative district is not a local planning authority, has no planning status under legislation, is not empowered to bring forward a local plan. Purbeck is no longer a local plan area.

The evidence base is years out of date to the point it is no longer relevant (predominantly 2018 and earlier). Of course, a consequence of the fact that Purbeck District Council no longer exists means that independent data (evidence) is no longer produced or available. The last available data is 2018 which is too old now to be relevant.

The age of the plan means that it does not include important new policies or legislation, for example the local Planning for Climate Change Policies (Dorset Climate Change and Ecological Emergency) and the Levelling-Up and Regeneration Act 2023. How can we comment on legality of the plan, when legislation is omitted?

The current (adopted) Purbeck Local Plan (PLP1) runs from 2006 – 2027. The Dorset Local Plan is expected to be delivered in 2026 (now subject to the conditions of the Levelling-Up and Regeneration Act). Running two plans in tandem, overlapping in area, with similar implementation dates cannot be a sound idea. So, why have we continued to spend public money on the Purbeck plan?

PLP1 should be considered alongside the draft Purbeck Local Plan. There are locations (including Lytchett Matravers) which have already achieved the housing numbers in PLP1 (ahead of 2027) and the numbers in the draft plan (ahead of 2034). Targets have been achieved ahead of plan and development is at the limits of sustainability. Other locations have not achieved their 2027 and 2034 targets. There are other important issues relating to PLP1, for example, planning policy (NPPF 145) prevents Green Belt boundary changes for the duration of the plan period, meaning that boundaries cannot be reviewed again until 2027 at the earliest. Lytchett Matravers has already achieved its 2027 and 2034 housing targets negating the need to change the Green Belt boundary.

Finally, there is now a huge volume of out of date and conflicting evidence, we have been through multiple modification and consultation processes over the years, and it's near impossible now to make any sense of this plan or why we're doing it. The whole thing is a mess!

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

For the above reasons, the plan cannot be made legally compliant and sound.

PART B

1. Which Supplementary Proposed Main Modification does your representation relate to?

Separate Part B forms must be completed for each separate proposed Main Modification you wish to comment on.

Supplementary Proposed Main Modifications reference number	SMM3
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2. Do you consider that the Supplementary Proposed Main Modification is:

Legally compliant	Yes		No	
Sound	Yes		No	no

To be considered legally compliant the Supplementary Proposed Main Modifications must:

- comply with the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019; and
- be appraised for their sustainability.

To be considered sound the local plan as a whole must be:

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

Some or all of these considerations of soundness may be relevant to the Supplementary Proposed Main Modification[s] that you are seeking to make a representation on.

3. Please give details of why you consider the Supplementary Proposed Main Modification is / is not legally compliant or sound. (Please be as precise as possible).

Purbeck District Council ceased to exist in March 2019, almost 5 years ago. The extinct 5 District Council's were amalgamated into the single Dorset Council. The rationale for this was in part cost saving, but also it would enable different, better decisions to be made by considering Dorset as a whole rather than decisions constrained by redundant District boundaries. This is what we expect the Dorset Local Plan to deliver – better decisions for sustainable development across Dorset as a whole.

Purbeck has the highest concentration of Government designated protected land in Dorset (Green Belt, Flood Zones, World Heritage Coast, Special Protection Areas, Ramsar sites, Sites of Special Scientific Interest, National Nature Reserves). There is very little of Purbeck which is not designated protected land. In contrast, approximately 90,000 hectares (35%) of Dorset Council land area is not designated protected land (according to Government designated protected land figures).

There are no locations in Purbeck that satisfy the 3 sustainable development tests; economic, social, environmental. Locations such as Upton, Wareham and Swanage may be economically and socially sustainable but have significant environmental constraints. Development in villages such as Lytchett Matravers are not economically, socially or environmentally sustainable. The needs of Dorset communities are better served by an economic, social and environmental sustainability strategy for the whole of Dorset.

I think it should be recognised that Upton and Lytchett Matravers are very different situations. Upton is a town within the Green Belt boundary, connected to the Poole conurbation, with healthy and diverse employment, wide ranging community facilities, multiple and good quality travel options. Lytchett Matravers is a village surrounded by Green Belt, some miles from the Poole conurbation (or any other employment centre), very little employment, few community facilities and no real sustainable travel options.

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

The Purbeck Local Plan cannot be made sound. The Dorset Local Plan will achieve these objectives by considering Dorset as a whole.

PART B

1. Which Supplementary Proposed Main Modification does your representation relate to?

Separate Part B forms must be completed for each separate Supplementary Proposed Main Modification you wish to comment on.

Supplementary Proposed Main Modifications reference number	SMM4
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2. Do you consider that the Supplementary Proposed Main Modification is:

Legally compliant	Yes		No	
Sound	Yes		No	no

To be considered legally compliant the Supplementary Proposed Main Modification must:

- comply with the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019; and
- be appraised for their sustainability.

To be considered sound the local plan as a whole must be:

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

Some, or all, of these considerations of soundness may be relevant to the Supplementary Proposed Main Modification[s] that you are seeking to make a representation on.

3. Please give details of why you consider the Supplementary Proposed Main Modification is / is not legally compliant or sound. (Please be as precise as possible).

This settlement hierarchy is taken from PLP1 (2006 – 2027). It is at least 17 years old. Even pre-2006 it was considered overly simplistic as the methodology behind it was a simple facilities count which did not consider the size of communities.

It is wholly inadequate today and not fit for purpose. A far more sophisticated model is needed today considering all settlement sustainability factors; including employment numbers, community infrastructure and sustainable travel adequacy for the size of the population, environmental considerations.

And again, Purbeck District Council boundaries no longer exist and the size and sustainability of Purbeck settlements must now fit into a Dorset settlement hierarchy considering Dorset as a whole.

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

It cannot be made sound. A far more sophisticated settlement model is required which considers all sustainability factors and all settlements within Dorset Council land area.

PART B

1. Which Supplementary Proposed Main Modification does your representation relate to?

Separate Part B forms must be completed for each separate Supplementary Proposed Main Modification you wish to comment on.

Supplementary Proposed Main Modifications reference number	SMM6
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2. Do you consider that the proposed Main Modification is:

Legally compliant	Yes		No	
Sound	Yes		No	no

To be considered legally compliant the Supplementary Proposed Main Modifications must:

- comply with the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019; and
- be appraised for their sustainability.

To be considered sound the local plan as a whole must be:

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

Some or all of these considerations of soundness may be relevant to the Supplementary Proposed Main Modification[s] that you are seeking to make a representation on.

3. Please give details of why you consider the Supplementary Proposed Main Modification is / is not legally compliant or sound. (Please be as precise as possible).

NPPF 146. “Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting it’s identified need for development.”

Dorset Council have failed to demonstrate exceptional circumstances for altering Green Belt boundaries. This has been raised many times by myself and many others, but the Council refuse to respond to these concerns. The reason the Council refuses to discuss this is because they say this was settled by their responses to Inspectors questions in 2019. But this is just not the case, because the answers provided to Inspectors at that time were simply not accurate.

The Council claimed it’s housing background paper and Green Belt Study provided the evidence. Neither of these documents demonstrate that the authority has “examined fully all other reasonable options”. This examination simply does not exist in either of these documents. I would add that both of these documents were produced in 2018 so significantly out of date, and all other options at that time would have been limited to the extinct Purbeck boundaries – any up to date examination of other options should extend to the whole of Dorset.

Within the housing background document, the Council acknowledge the housing need could be met without altering Green Belt boundaries. This in itself is confirmation that exceptional circumstances do not exist.

The Green Belt study offers purely arbitrary opinions on the strategic contribution of different plots of Green Belt land. So what? Irrelevant! Green Belt boundaries do not get changed because of arbitrary opinions on strategic contribution. They are changed because all other reasonable options have been examined fully and exhausted, creating exceptional circumstances. The Green Belt Study makes no contribution to demonstrating exceptional circumstances and is frankly a complete waste of taxpayers money.

Discussions with neighbouring authorities took place in 2018. But of course, those authorities no longer exist – none of them. Today those discussions would be with different authorities who are all in different situations compared to 2018.

I feel very strongly that the Inspectors should reject the evidence presented. This is important, not just for the Purbeck Local Plan, but also to ensure no precedent is set for future local plans. The Green Belt Study is a flawed concept, adds no value and no further public money should be wasted on any similar study.

There is also a very important omission. Policy (NPPF145) specifies that any changes to Green Belt boundaries must endure beyond the plan period. This needs to be clearly stated. If the plan is adopted, boundaries cannot be reviewed again until after 2034.

SANGs are created to benefit Special Protection Areas (SPAs) with the aim of diverting traffic and footfall from SPAs. The Flowers Drove SANG is for the benefit of Upton Heath. This is of no benefit to Lytchett Matravers, the village already has access to the Green Belt and it will potentially generate unwanted traffic. There are public footpaths from every part of Lytchett Matravers across the Green Belt (we are surrounded by Green Belt). No one in the village is going to travel to the Flowers Drove SANG when all we have to do is walk out of our front doors onto a public footpath for access to the Green Belt.

The creation of a SANG is not a consideration for altering Green Belt boundaries. Green Belt boundaries are only altered in exceptional circumstances after all other reasonable options have been examined (and exhausted). But where Green Belt boundaries are altered, policy (NPPF147) requires compensatory improvements. Compensatory improvements will be individual to each community and identified in the Neighbourhood Plan / Neighbourhood Priorities Statement. Lytchett Matravers identified priority is new sport facilities. It is reported that nationally the most common compensatory improvements are sports facilities, cycleways, planting of trees / forests.

Upton Heath has its SANG, Lytchett Matravers needs its compensatory improvements. Dorset Council and the developer seem to be pursuing a cynical approach towards Lytchett Matravers. By siting an unwanted SANG in the village, to satisfy environmental concerns for Upton Heath, the suggestion seems to be this will double up as a compensatory improvement for the village. The SANG is obviously not a compensatory improvement for the village.

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

Dorset Council have not evidenced exceptional circumstances to justify changes to Green Belt boundaries.

It needs to be explicitly stated, if this plan were to be adopted, that Green Belt boundaries cannot be reviewed again until 2034 at the earliest.

Compensatory improvements are required for Lytchett Matravers.

Target housing numbers have already been achieved at Lytchett Matravers, negating the need to alter Green Belt boundaries.

The Government has reaffirmed its commitment to protecting the Green Belt. Green Belt is identified as a matter of national importance requiring enhanced statutory

protection under National Development Management Policies to be developed in 2024. It would be tragic to lose Green Belt at this time.

PART B

1. Which Supplementary Proposed Main Modification does your representation relate to?

Separate Part B forms must be completed for each separate Supplementary Proposed Main Modification you wish to comment on.

Supplementary Proposed Main Modifications reference number	SMM43
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2. Do you consider that the proposed Main Modification is:

Legally compliant	Yes		No	
Sound	Yes		No	no

To be considered legally compliant the Supplementary Proposed Main Modifications must:

- comply with the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019; and
- be appraised for their sustainability.

To be considered sound the local plan as a whole must be:

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

Some or all of these considerations of soundness may be relevant to the Supplementary Proposed Main Modification[s] that you are seeking to make a representation on.

3. Please give details of why you consider the Supplementary Proposed Main Modification is / is not legally compliant or sound. (Please be as precise as possible).

Policy H8 Small settlements next to existing settlements.

I support the policy of limiting the scale of developments, but this policy is most relevant to settlements within the Green Belt given the essential characteristics and aims of Green Belt. I strongly disagree with the exclusion of Green Belt from this policy. UNSOUND.

The essential characteristics of Green Belt include prevention of urban sprawl, prevention of encroachment into the countryside, the permanence of Green Belt openness. The small sites policy aligns perfectly with these characteristics and aims.

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

The policy should include Green Belt settlements, and go further, for Green Belt settlements not only should the scale of the development be limited to these numbers but there should also be limitation on the number of sites per settlement.


PART C

1. Comments on updated policies map, SA or HRA.

Separate Part C forms must be completed for each appraisal or evidence document commented upon, making clear the section or paragraph you're referring to

Document:	
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Please sign and date this form:

Signature: 

Date: 22/12/2023

Consultee: Gerald Rigler on behalf of CPRE

Event name: Purbeck Local Plan Supplementary Proposed Main Modifications

Consultee reference: 1191922

Consultation reference: SMMR20

Supplementary Proposed Main Modification: SMM88

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: See attachment for full response

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM3

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: See attachment for full response

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM4

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: See attachment for full response

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM5

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: See attachment for full response

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM6

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: See attachment for full response

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM8

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: See attachment for full response

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM14

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: See attachment for full response

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM15

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: See attachment for full response

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM16

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: See attachment for full response

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM86

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: See attachment for full response

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM18

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: See attachment for full response

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM25

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: See attachment for full response

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM26

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: See attachment for full response

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM30

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: See attachment for full response

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM46

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: See attachment for full response

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM47

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: See attachment for full response

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM68

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: See attachment for full response

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM77

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: See attachment for full response

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM87

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: See attachment for full response

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Comments on addendum to Habitats Regulation Assessment (SMMCD2), addendum to Sustainability Appraisal (SMMCD3), 5-year housing land supply report (SMMCD4), local housing need update (SMMCD5), policies map paper (SMMCD6) or local plan policies maps (SMMCD7a to SMMCD7k) -

Section or paragraph: N/A

Comments: N/A

Attachment:



The countryside charity
Dorset

Dorset Council Planning Department,
Colliton Park,
Dorchester,
DT1 1XJ.

DORSET COUNCIL
19 DEC 2023
Digital Mail Room

Please reply to:



Dear Sir / Madam,

14th December 2023

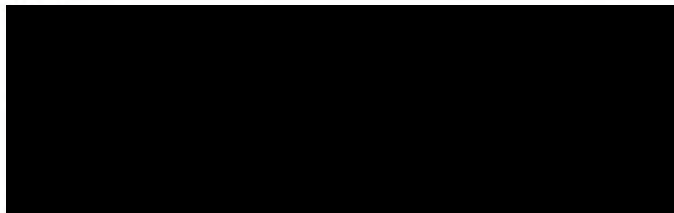
**PURBECK LOCAL PLAN
SUPPLEMENTARY PROPOSED MAIN MODIFICATIONS CONSULTATION**

It is noted that the draft Local Plan for Purbeck (initiated so long ago) is still being processed despite the fact that so much has changed over the years that have elapsed, perhaps crystallized as a result of the experiences generated by Covid.

We do support the concept that “Great weight should be attached to conserving and enhancing landscape and scenic beauty” and believe that protection of bio-diversity and of rare / protected species is an essential element of such conservation and enhancement throughout Dorset as well as in Purbeck.

Please find attached a selected fifty page assemblage of the forms prepared (by Dorset Council) for use by contributors to the required consultation which have now been completed, following due consideration by our local members, in order to assist preparation of the report by The Planning Inspectorate.

Yours faithfully,



Gerald Rigler : Chairman – Purbeck & Poole Group; Dorset CPRE

NB : Please note, whilst every effort has been taken to present accurate information for due consideration, that as we are neither a decision maker nor a statutory consultee, we cannot accept any responsibility for any unintentional errors or omissions. No doubt the decision makers will satisfy themselves on any facts before reaching the appropriate sustainable decision in the “public interest”.

Dorset CPRE | Charity no: 211974
PO Box 9018 | Dorchester | Dorset | DT1 9GY
www.dorset-cpre.org.uk
info@dorset-cpre.org.uk Tel: 0333 577 0360

The Campaign to Protect Rural England exists to promote the beauty, tranquillity and diversity of rural England by encouraging the sustainable use of land and other natural resources in town and country.

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①

Purbeck Local Plan supplementary proposed main modifications

Closes 22 Dec 2023

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RELEVANT FORMS DOWNLOADED for COMPLETION & SUBMISSION (numbered as 1 to 50)

Your details

To ensure an effective and fair examination, it is important that the Examiner and other participants in the examination process are able to know who has made representations on the plan. Dorset Council will therefore ensure that the names of those making representations can be made available (including publication on our website) and taken into account by the Examiner. For this reason, **anonymous comments cannot be accepted**. This means that you will need to complete the following section of the online response form, which asks for details of your name, contact details, and post code.

The Council is not able to treat any of the responses to this consultation as confidential. By making a response you agree to your name and comments being made available for public viewing. [Information on the Council's privacy policy is available on our website](#).

The Council will not accept any responsibility for the contents of comments submitted. We reserve the right to remove any comments containing defamatory, abusive or malicious allegations.

①

If you are part of a group that shares a common view, please include a list of the contact details of each person (including names, addresses, emails, telephone numbers and signatures) and provide this as an attachment to the 'lead response'.

1. What is your name?

Name (Required)

GERALD RIGLER

2. What is your email address?

Email (Required)

[REDACTED]

3. What is your organisation?

Organisation

PURBECK & POOLE GROUP of DORSET CPRE

4. What are your client(s) details (if applicable)?

Client(s) details

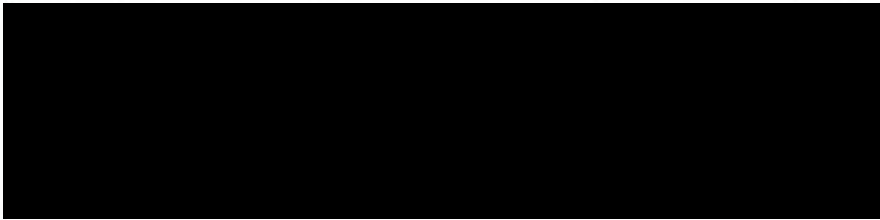
[REDACTED]

5. What is your address?

Post code (Required)

2

Address



6. Responses to this consultation cannot be made anonymously. Please tick the box to declare that you agree to your name and comments being made available for public viewing.

(Required)

I agree to my name and responses being made available for public viewing

7. Let us know if you want to be kept informed about the progress of the Purbeck Local Plan. (If you would like to be kept informed we'll send updates to the email address you have provided)

(Required)

- Keep me informed
- Don't keep me informed

Continue >

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2

Purbeck Local Plan supplementary proposed main modifications

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Foreword - SMM88

Foreword to Purbeck Local Plan

8. Proposed supplementary Main Modification (SMM) 88: Foreword

4

Consolidated schedule of Main Modifications to the Purbeck Local Plan comprising proposed Main Modifications, further proposed Main Modifications and proposed supplementary Main Modifications

Proposed supplementary Main Modification (SMM) 88: Foreword

Submission draft text:

It is with great pleasure that I am able to present the Purbeck Local Plan 2018-2034 Submission Draft. The new Purbeck Local Plan will shape the location and scale of development across the District. Great care and attention has been taken in setting out responses to the wide range of challenges facing Purbeck. These include a changing and growing population and a revised minimum housing target of 168 new homes per year.

The Purbeck Local Plan identifies opportunities for achieving sustainable growth across the District and investment in infrastructure and community facilities. The Purbeck Local Plan, as the spatial planning document, will deliver the priorities of Purbeck's Corporate Plan and is a positive strategy that will enable the successful delivery of thriving places, energy efficient housing, a dynamic economy and social and community infrastructure - maintaining Purbeck as a place where people wish to live, work, stay and visit. The Purbeck Local Plan has been shaped by consultation and engagement involving local people, businesses, community groups and external partners. Extensive and wide-ranging public consultations in 2015, 2016 and 2018 have informed the key issues and those places in the District where change and development can best be accommodated, whilst recognising that the District must also be protected from inappropriate development. An extensive and up-to-date evidence base has also informed the drafting of this plan. This Submission draft Purbeck Local Plan responds to the key challenges facing the District, has considered the responses to previous consultations, and incorporates the findings from the evidence base.

The preferred strategy is to spread new development over the plan period across the District, directing the majority of housing growth to less constrained areas, in particular Wool and Moreton Station in the west of the District, and to the existing towns and key service villages. As well as being the least environmentally constrained, these areas are the more accessible and sustainable locations in the District being those that are the best connected to the public transport and other existing and planned supporting infrastructure. They offer a range of investment opportunities with capacity to accommodate new homes, jobs and will facilitate investment in much needed additional infrastructure including schools and health facilities.

The Purbeck Local Plan contains a number of detailed planning policies that will help deliver the strategy and manage development across the District over the lifetime of this plan. This next round of engagement is focused on the soundness of the

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[Access a screen reader accessible version of proposed supplementary Main Modification 88.](#)

Question:

Do you consider that the supplementary proposed Main Modification 88 is:

Legally compliant (compliant with legislation related to the local plan making process)

Yes

No

} UNKNOWN, SINCE RELEVANT LEGISLATION (AND ASSOCIATED GUIDANCE) IS STILL BEING CLARIFIED

Sound (meets the area's need, is based on evidence, deliverable and consistent with national planning policy and regulations)

Yes

(5)

✓ No

Please give details of why you consider the supplementary proposed Main Modification is / is not legally compliant or sound.

IT IS UNSOUND TO ADOPT PROPOSALS THAT INCLUDE A 40% UPLIFT FACTOR IN HOUSING NUMBERS. REALITY SUGGESTS THAT SUCH A FACTOR WILL DAMAGE PURBECK'S BIO-DIVERSITY AND NOT DELIVER GENUINELY AFFORDABLE HOMES FOR YOUNGER LOCAL WORKING PEOPLE. "SOUNDNESS" REQUIRES PRACTICALITY IN MEETING LOCAL NEEDS.

Please set out what change(s) you consider necessary to make the Supplementary Proposed Main Modification legally compliant and/or sound.

REMOVAL OF ANY 'UPLIFT FACTOR' THAT INCREASES LOCALLY RELEVANT STATISTICS. COMPLIANCE WITH EXPECTED LUH&C ADVICE THAT LOCAL AUTHORITIES SHOULD NOT ALLOW DEVELOPMENTS WHICH WOULD SIGNIFICANTLY ALTER THE CHARACTER AND BIO-DIVERSITY OF THEIR AREAS

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Purbeck Local Plan supplementary proposed main modifications

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Chapter 2: Vision and Objectives, Policy V1: Spatial strategy for sustainable communities - SMM 3, 4, 5, 6 and 8

10. Supplementary main modification to paragraphs 43 - 44 (SMM 3)

7

Consolidated schedule of Main Modifications to the Purbeck Local Plan comprising proposed Main Modifications, further proposed Main Modifications and proposed supplementary Main Modifications

Proposed supplementary Main Modification (SMM) 3: Chapter 2, Vision and Objectives, paragraphs 43 and 44.

Submission draft text:

- 43 The Council has established that delivery of its preferred approach to ensuring that the District's housing needs can be met in sustainable, accessible locations must involve the removal of some land from the green belt at Lytchett Matravers, Upton and Wareham.
- 44 Reflecting the spatial vision and objectives that have been set out, and the clear preference expressed through the 2018 consultation, policies V1 and V2 below set out the overarching spatial strategy for development in Purbeck. Together with the policies for small sites (H8), employment land (EE1 and EE2) and town and local centres (EE3), these policies provide the direction to establish the general distribution of development across the District over the plan period up until 2034.

Justification for Proposed Further Main Modification:

- To ensure that the local plan is consistent with national planning policy and justified. The Further Proposed Main Modification elaborates on the justification for the council's spatial strategy for meeting the area's housing needs in accordance with national planning policy (paragraph 35 b) of the National Planning Policy Framework states that the council should select an appropriate strategy for meeting an area's need for development, taking account of reasonable alternatives and based on proportionate evidence).
- To ensure that the policies in the local plan are clear and unambiguous. This Further Proposed Main Modification will ensure consistency with other policies in the local plan and Further Proposed Main Modifications listed elsewhere in this schedule.
- To ensure that the local plan is effective. The proposed Main Modification includes an updated reference to the council area following local government re-organisation in Dorset in April 2019.
- This SMM supersedes FMM3 previously presented as a further proposed Main Modification.

Amended text

- 43 The Council has established that delivery of its preferred approach to ensuring that ~~the District's~~ **Purbeck's** housing needs can be met in sustainable, accessible locations must involve the removal of some land from the green belt at Lytchett

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[Access a screen reader accessible version of proposed supplementary Main Modification 3.](#)

Question:

Do you consider that the supplementary proposed Main Modification 3 is:

Legally compliant (compliant with legislation related to the local plan making process).

- Yes
 - No
- } UNKNOWN, SINCE RELEVANT LEGISLATION (AND ASSOCIATED GUIDANCE) IS STILL BEING CLARIFIED

Sound (meets the area's need, is based on evidence, deliverable and consistent with national planning policy and regulations).

8

Yes No

Please give details of why you consider the supplementary proposed Main Modification is / is not legally compliant or sound.

IT IS UNSOUND TO RELEASE PROTECTED LAND FROM PROTECTION IN ORDER TO MEET UNSOUND HOUSING TARGETS
EVIDENCE HAS BEEN PROVIDED ABOUT THE QUALITY OF BIO-DIVERSITY (AND INCIDENCE OF PROTECTED SPECIES) AT WOOL. SUCH EVIDENCE RENDERS THE RELEVANT STRATEGY "UN SOUND": LUH&C IMMEDIATE GUIDANCE REFERS

Please set out what change(s) you consider necessary to make the Supplementary Proposed Main Modification legally compliant and/or sound.

11. Supplementary main modification to insert paragraph after paragraph 44 (SMM 4).

9

[Access a screen reader accessible version of proposed supplementary Main Modification 4.](#)

Question:

Do you consider that the supplementary proposed Main Modification 4 is:

Legally compliant (compliant with legislation related to the local plan making process).

- Yes
- No

Sound (meets the area's need, is based on evidence, deliverable and consistent with national planning policy and regulations).

- Yes

10

No

Please give details of why you consider the supplementary proposed Main Modification ~~is~~ is not ~~legally compliant or~~ sound.

DORSET REQUIRES A SOUND LOCAL PLAN AND POSSIBLY SEEKING TO INFLUENCE ANY SUCH PLAN BY REQUIRING RESOURCES TO CREATE A PILOT VERSION (FOR PURBECK) BASED ON OUT-DATED CONSULTATION IS NOT ONLY WASTEFUL BUT ALSO UN-DEMOCRATIC: "UN SOUND".

Please set out what change(s) you consider necessary to make the Supplementary Proposed Main Modification legally compliant and/or sound.

12. Supplementary proposed main modification to Policy V1: Spatial strategy for sustainable communities (SMM5)

11

Consolidated schedule of Main Modifications to the Purbeck Local Plan comprising proposed Main Modifications, further proposed Main Modifications and proposed supplementary Main Modifications

Proposed supplementary Main Modification (SMM) 5: Chapter 2, Vision and Objectives, Policy V1: Spatial strategy for sustainable communities and key diagram

Submission draft policy and 'key diagram':

Policy V1: Spatial strategy for sustainable communities

1. To deliver the Council's vision for Purbeck, the Purbeck Local Plan allocates sites for housing as follows
 - a. Allocated sites
 - Moreton Station - Redbridge Pt - 490 new homes
 - Wool - 470 new homes
 - Lytchett Matravers - 150 new homes
 - Upton - 90 new homes
- See Policies H4, H5, H6 and H7 for more detail about these allocated sites
- b. Neighbourhood plan sites at
 - Wareham - 300 new homes including windfall
 - Bere Regis - 105 new homes
 2. Purbeck's ageing population will be catered for by the provision of two 65 bed care homes - one at Wool and one at Moreton
 3. Employment development will be directed to the strategic employment sites at Dorset Innovation Park and Holton Heath and other

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[Access a screen reader accessible version of proposed supplementary Main Modification 5.](#)

Question:

Do you consider that the supplementary proposed Main Modification 5 is:

Legally compliant (compliant with legislation related to the local plan making process).

- Yes
- No

} UNKNOWN: AS ABOVE

Sound (meets the area's need, is based on evidence, deliverable and consistent with national planning policy and regulations).

12

Yes No

Please give details of why you consider the supplementary proposed Main Modification ~~is~~ is not ~~legally compliant~~ or sound.

- 1) THE PROTECTION OF BIO-DIVERSITY & PROTECTED SPECIES IS INADEQUATE.
- 2) THE CONCEPT OF "SANGS" IS FLAWED, SINCE THEY PROMOTE EXTINCTION OF VALUED SPECIES AND INTRODUCTION OF VERMIN
- 3) CARE HOMES SHOULD NOT BE SITED TO MAXIMISE TRAVEL
- 4) LYTCHETT MATRAVERS SHOULD NOT BELONG SUB-URBAN: A COMMUTER VILLAGE FOR THE DORSET CONURBATION

Please set out what change(s) you consider necessary to make the Supplementary Proposed Main Modification legally compliant and/or sound.

REDUCE HOUSING TARGET TO CONFORM WITH REAL NEED FOR LOCAL PEOPLE, NOT JUST DEVELOPERS KEEN TO SELL DWELLINGS TO 'OTHERS'.

13. Supplementary main modification to paragraphs 45 - 48 (SMM 6)

13

[Access a screen reader accessible version of proposed supplementary Main Modification 6.](#)

Question:

Do you consider that the supplementary proposed Main Modification 6 is:

Legally compliant (compliant with legislation related to the local plan making process).

- Yes
 - No
- } UNKNOWN; AS BEFORE

Sound (meets the area's need, is based on evidence, deliverable and consistent with national planning policy and regulations).

(14)

Yes No

Please give details of why you consider the supplementary proposed Main Modification is / is not legally compliant or sound.

SEE ITEMS '1 to 4' ON PAGE 13

Please set out what change(s) you consider necessary to make the Supplementary Proposed Main Modification legally compliant and/or sound.

14. Supplementary main modification to paragraphs 52-54 (SMM8)

15

[Access a screen reader accessible version of proposed supplementary Main Modification 8.](#)

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Legally compliant (compliant with legislation related to the local plan making process).

- Yes
- No

} UNKNOWN ; AS BEFORE

16

Sound (meets the area's need, is based on evidence, deliverable and consistent with national planning policy and regulations).

Yes No

Please give details of why you consider the supplementary proposed Main Modification ~~is~~ is not ~~legally compliant~~ or sound.

NOT ENOUGH WEIGHT IS ATTACHED TO
GENERATING THE RESPECT FOR
PROTECTION OF BIO-DIVERSITY & VALUED
SPECIES,
ADOPTION OF A PROPOSED HOUSING TARGET
THAT IS TOO HIGH COMPOUNDS THE ISSUE.

Please set out what change(s) you consider necessary to make the Supplementary Proposed Main Modification legally compliant and/or sound.

Continue >

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5

Purbeck Local Plan supplementary proposed main modifications

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Chapter 3: Environment - SMM 14, 15, 16, 86, 18, 19, 20, 21 and 24

15. Supplementary main modification to paragraph 81 (SMM 14)

18

Consolidated schedule of Main Modifications to the Purbeck Local Plan comprising proposed Main Modifications, further proposed Main Modifications and proposed supplementary Main Modifications

Proposed supplementary Main Modification (SMM) 14: Chapter 3, Environment, paragraph 81

Submission draft text:

- 81 In Purbeck, Sites of Scientific Special Interest (SSSI), the Dorset Heaths Special Protection Area (SPA), Dorset heaths Special Area of Conservation (SAC), Dorset Heathlands Ramsar site, Poole Harbour Ramsar site, and Poole Harbour SPA are key sites afforded statutory protection through national and European law. A number of additional designations next to, or potentially affected by, development in Purbeck are of relevance when considering direct and in-combination effects of development in the District.

Justification for proposed Main Modification:

- To ensure that the local plan is legally compliant, consistent with national planning policy and effective. The proposed Main Modification ensures that supporting text provides full details of protected sites within the plan area in accordance with paragraph 174 (a) of the National Planning Policy Framework.
- To ensure that the local plan is clear and unambiguous. The proposed Main Modification provides clarification on habitat sites within the plan area.
- To ensure that the local plan is effective. The proposed Main Modification includes an updated reference to both United Kingdom and European law following European Union (Withdrawal) Act 2016.
- This SMM supersedes MM14 previously presented as a proposed Main Modification.

Amended text:

- 81 In Purbeck, Sites of Scientific Special Interest (SSSI), the Dorset Heaths Special Protection Area (SPA), Dorset Heaths Special Area of Conservation (SAC), Dorset Heathlands Ramsar site, Poole Harbour Ramsar site, **St Alban's Head to Durleston Head and Isle of Portland to Studland Cliffs SACs** and Poole Harbour SPA are key sites afforded statutory protection through national and **national regulations, legislation and where relevant**, European law. A number of additional designations next to, or potentially affected by, development in Purbeck are of relevance when considering direct and in-combination effects of development in the District.

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[Access a screen reader accessible version of proposed supplementary Main Modification 14.](#)

Question:

Do you consider that the supplementary proposed Main Modification 14 is:

Legally compliant (compliant with legislation related to the local plan making process).

- Yes
 No

} UNKNOWN : AS BEFORE

Sound (meets the area's need, is based on evidence, deliverable and consistent with national planning policy and regulations).

19

Yes No

Please give details of why you consider the supplementary proposed Main Modification ~~is~~ is not ~~legally compliant or~~ sound.

"A WATCHING BRIEF" IS INADEQUATE TO
SOUNDLY PROTECT ANYTHING, LET ALONG
A VALUED AREA SUCH AS DORSET.

Please set out what change(s) you consider necessary to make the Supplementary Proposed Main Modification legally compliant and/or sound.

16. Supplementary main modification to insert paragraph before paragraph 83 (SMM 15)

20

Consolidated schedule of Main Modifications to the Purbeck Local Plan comprising proposed Main Modifications, further proposed Main Modifications and proposed supplementary Main Modifications

Proposed supplementary Main Modification (SMM) 15: Chapter 3, Environment, paragraph 83 (insertions and deletions)

Submission draft text:

- 83 Evidence considered through the Habitats Regulations Assessment including Appropriate Assessment demonstrates that the Dorset Heaths are under significant pressure from development. Natural England advises that adverse impacts upon the heathland arise from a range of urban effects, as summarised in the Dorset Heathland Framework 2015-2020 SPD, including damage caused by domestic pets and disturbance by visitors, and equestrian-related development.

Justification for proposed Main Modification:

- To ensure that the local plan is consistent with national planning policy, legally compliant and effective. The proposed Main Modification provides full details of protected sites (in accordance with paragraph 174 a) of the National Planning Policy Framework) within the plan area, and, in accordance with the legal requirements of the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019, screening for likely significant effects undertaken through the council's Habitats Regulation Assessment.
- To ensure that the local plan is clear and unambiguous. The proposed Main Modification provides clarification on habitat sites within the plan area.
- This SMM supersedes MM15 previously presented as a proposed Main Modification.

Amended text:

(insert before paragraph 83):

St Alban's Head to Durleston Head and Isle of Portland to Studland Cliffs SACs

The Dorset coastline is a World Heritage Site and the two SACs form a single unit of cliffed coastline some 40km in length. The cliffs support two internationally important habitats, the vegetated sea cliffs of the Atlantic and Baltic Coasts and the semi-natural dry grassland and scrubland faces. A number of rare species are associated with the grassland. The HRA identifies that there is potential risk from increased recreation, but visits from new development will be a very small

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[Access a screen reader accessible version of proposed supplementary Main Modification 15.](#)

Question:

Do you consider that the supplementary proposed Main Modification SMM 15 is:

Legally compliant (compliant with legislation related to the local plan making process).

- Yes
 No

} UNKNOWN; AS BEFORE

(21)

Sound (meets the area's need, is based on evidence, deliverable and consistent with national planning policy and regulations).

~~Yes~~

No

Please give details of why you consider the supplementary proposed Main Modification ~~is~~ is not ~~legally compliant~~ or sound.

"A WATCHING BRIEF" IS INADEQUATE
— AS PAGE (20)

Please set out what change(s) you consider necessary to make the Supplementary Proposed Main Modification legally compliant and/or sound.

17. Supplementary main modification to additional paragraph inserted after paragraph 85 (SMM 16)

(22)

Consolidated schedule of Main Modifications to the Purbeck Local Plan comprising proposed Main Modifications, further proposed Main Modifications and proposed supplementary Main Modifications.

Proposed Supplementary Main Modification (SMM) 16: Chapter 3, Environment, paragraph 85 (insertions)

Submission draft text:

85 The principle of the heathland buffer areas and a detailed strategy for mitigation are set out more fully within the Dorset Heathland Planning Framework SPD. The approach to mitigation falls into two main areas - managing and encouraging appropriate behaviour when visiting heathland sites and providing alternative areas of green space for recreation. Suitable Alternative Natural Greenspace (SANG) provide new areas of public open space that are convenient and dog friendly providing an alternative to heathland. The overarching aim of the provision of SANGs is to divert visitor pressure to ensure that there is no net increase in recreation pressure on internationally protected heathland.

Justification for proposed Main Modification:

- To ensure that the local plan is legally compliant and effective. The proposed Main Modification provides full details of protected sites within the plan area.
- To ensure that the local plan is legally compliant and effective. The proposed Main Modification is needed to provide clarification and context on the strategy for mitigating the effects of residential development on Dorset heaths.
- To ensure that the local plan is legally compliant. The proposed Main Modification defines the council's commitment to develop an interim strategy and deliver mitigation to avoid adverse impacts (as summarised in the revised Habitats Regulations Assessment) arising from both recreation activity and vehicle emissions on Dorset heaths. The council developed the Interim mitigation strategy for heathland habitat sites (2018/19 to 2023/24) (FMMCD1) during the examination alongside proposed further Main Modifications to policies V2 and I5. The strategy outlines the council's approach to delivery of heathland mitigation projects prior to adoption of the Dorset Council Local Plan.
- This SMM supersedes MM16 previously presented as a proposed Main Modification.

Amended text:

85 The principle of the heathland buffer areas and a detailed strategy for mitigation are set out more fully within the Dorset Heathland Planning Framework SPD. The approach to mitigation falls into two main areas - managing and encouraging appropriate behaviour when visiting heathland sites and providing alternative areas of green space for recreation. Suitable Alternative Natural Greenspace (SANG) provide new areas of public open space that are convenient and dog friendly.

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[Access a screen reader accessible version of proposed supplementary Main Modification 16.](#)

Question:

Do you consider that the supplementary proposed Main Modification 16 is:

Legally compliant (compliant with legislation related to the local plan making process).

- Yes
 No
- } UNKNOWN : AS BEFORE

Sound (meets the area's need, is based on evidence, deliverable and consistent with national planning policy and regulations).

23

Yes

No

Please give details of why you consider the supplementary proposed Main Modification ~~is~~ is not ~~legally compliant~~ or sound.

A SOUND POLICY WOULD AVOID
THE USE OF DISCREDITED TECHNIQUES
SUCH AS "SANGS".

Please set out what change(s) you consider necessary to make the Supplementary Proposed Main Modification legally compliant and/or sound.

18. Supplementary main modification to paragraphs 86 to 91 (SMM 86)

(24)

Consolidated schedule of Main Modifications to the Purbeck Local Plan (comprising proposed Main Modifications, further proposed Main Modifications and proposed supplementary Main Modifications)

Proposed supplementary Main Modification (SMM) 86: Chapter 3, Environment, Paragraphs 86. to 91.

Submission draft text

86. Poole Harbour provides a resource for a variety of local businesses and port activities. The quality of the natural environment in Dorset makes it an attractive place to live, work and for recreation and leisure. However, increasing nitrogen levels from sewage and agriculture are contributing to the growth of algal mats in the harbour, restricting the growth, distribution and variety of important food available for wading birds protected under European law and smothering estuarine habitats. Evidence shows that there are two particular pressures on the harbour: nitrate pollution and recreational issues. The Poole Harbour Nutrient Management Plan identifies a need to reduce nitrogen in the harbour. The majority of nitrogen is generated by agriculture, but a proportion is generated from human sewage.
87. The Council, in planning for population growth and tourism, has to ensure that additional nitrogen from sewerage generated by such developments in the catchment of Poole Harbour is mitigated. Mitigation can be direct through upgrading sewage treatment works or indirect by offsetting the nitrogen generated from new development by taking land out of a nitrogen intensive use, e.g. fields where nitrogen fertiliser is applied, or projects based on alternative technologies to remove nitrogen from water courses or effluent.
88. The joint Nitrogen Reduction in Poole Harbour SPD 2017 sets out an approach to calculating the impact of development and calculation of appropriate developer contributions or other obligations to enable mitigation of the adverse effects of development.
89. Recreational pressures can also have a harmful effect on Poole Harbour. More activity within the harbour and on the shoreline through activities like boating and dog walking, can disturb protected birds. The Council is working with the Borough of Poole on the development of a Recreation in Poole Harbour SPD. This SPD will provide detailed guidance on potential mitigation for development and projects to mitigate potential harm to Poole Harbour.
90. The Poole Harbour Aquatic Management Plan (2006), supported by the Poole Harbour Steering Group of which the Council is a member, considers ways of maintaining sustainable levels of economic and social activity within the harbour and its hinterland, while protecting its natural environment.
91. The Recreation in Poole Harbour SPD is intended to facilitate small developments coming forward which individually

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[Access a screen reader accessible version of proposed supplementary Main Modification 86.](#)

Question:

Do you consider that the supplementary proposed Main Modification 86 is:

Legally compliant (compliant with legislation related to the local plan making process).

Yes

No

} UNKNOWN: AS BEFORE

Sound (meets the area's need, is based on evidence, deliverable and consistent with national planning policy and regulations).

Yes

25

No

Please give details of why you consider the supplementary proposed Main Modification ~~is~~ is not ~~legally compliant~~ sound.

NO MENTION IS MADE OF PHOSPHATE POLLUTION.
THE CONTINUING GROWTH OF ALGAL MATS IN POOLE HARBOUR SHOULD NOT BE IGNORED. IT IS KEY EVIDENCE THAT POLLUTION IS (OR IS NOT) BEING REDUCED.

Please set out what change(s) you consider necessary to make the Supplementary Proposed Main Modification legally compliant and/or sound.

19. Supplementary main modification to paragraph 95 (SMM 18)

26

Consolidated schedule of Main Modifications to the Purbeck Local Plan comprising proposed Main Modifications, further proposed Main Modifications and proposed supplementary Main Modifications

Proposed supplementary Main Modification (SMM) 18: Chapter 3, Environment, paragraph 95

Submission draft text:

Corfe Castle Site of Special Scientific Interest (SSSI)

- 95 Natural England will be consulted on additional residential development proposals within the Corfe Common SSSI 400 metre buffer to assess any potential impact upon the wetland habitat of the southern damselfly, a protected species.

Justification for proposed Main Modification:

- To ensure that the local plan is legally compliant. The proposed Main Modification clarifies the difference in approach between Corfe Common and other protected heathlands designated as Special Protection Areas (SPA), Special Areas of Conservation (SAC) and Sites of Special Scientific Interest (SSSI).
- To ensure that the local plan is effective and legally compliant. The proposed Main Modification outlines the need to screen for likely effects from any new development around Corfe Common, and the requirement for any adverse effects on the integrity of the habitat site to be avoided.
- This SMM supersedes MM18 as previously presented as a proposed Main Modification.

Amended text

Corfe Castle Common Site of Special Scientific Interest (SSSI) (part of the Dorset Heaths SAC and Dorset Heathlands Ramsar)

- 95 Natural England will be consulted on additional residential development proposals within the Corfe Common SSSI 400 metre buffer to assess any potential impact upon the wetland habitat of the southern damselfly, a protected species. Corfe Common is a designated SAC, listed Ramsar site and SSSI, but not a SPA. Its protected wetland and grassland habitats are home to the southern damselfly and the 400m heathland consultation area does not automatically exclude residential development as indicated in Policy E8(a) for all other heathlands. All development within a 400m consultation area will be considered on a site by site basis by Natural England. Residential applications may be acceptable if the likely significant effects on Corfe Common can be avoided/mitigated. Development within 5km of Corfe Common are subject to the same mitigation requirement for impacts on heathlands in

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[Access a screen reader accessible version of proposed supplementary Main Modification 18.](#)

Question:

Do you consider that the supplementary proposed Main Modification 18 is:

Legally compliant (compliant with legislation related to the local plan making process).

- Yes
 No

} UNKNOWN: AS BEFORE

27

Sound (meets the area's need, is based on evidence, deliverable and consistent with national planning policy and regulations).

Yes No

Please give details of why you consider the supplementary proposed Main Modification ~~is~~ is not ~~legally compliant~~ or sound.

IT IS UNSOUND TO TREAT "AVOIDANCES"
AS BEING EQUIVALENT TO "MITIGATION".
THE NEED TO PROTECT BIO-DIVERSITY
& VALUED SPECIES IS A "CONSTRAINT"
ON PLANNING FOR HOUSING.

Please set out what change(s) you consider necessary to make the Supplementary Proposed Main Modification legally compliant and/or sound.

20. Supplementary main modification to Policy E7: Conservation of protected sites (SMM 19)

28

Consolidated schedule of Main Modifications to the Purbeck Local Plan comprising proposed Main Modifications, further proposed Main Modifications and proposed supplementary Main Modifications

Proposed supplementary Main Modification (SMM) 19: Chapter 3, Environment, Policy E7

Submission draft policy

Policy E7: Conservation of protected sites

Development will only be permitted where it would not lead to an adverse effect upon the integrity, either alone or in-combination, directly or indirectly, of nationally, European and internationally protected nature conservation sites.

The Council will determine applications adversely affecting these sites in accordance with the recommendation of the relevant assessments under the Habitats Regulations and Supplementary Planning Documents as appropriate.

Justification for proposed Main Modification:

- To ensure that the local plan is legally compliant and effective. The proposed Main Modification deletes the reference to Supplementary Planning Documents or other standalone documents in the policy as this would give them status as part of the development plan without these documents being subject to the same statutory processes of preparation, consultation and examination (as specified in the Planning and Compulsory Purchase Act 2004 and Town and Country Planning (Local Planning) (England) Regulations 2012).
- This SMM supersedes MM16 as previously presented as a proposed Main Modification.

Amended policy:

Policy E7: Conservation of protected sites

Development will only be permitted where it would not lead to an adverse effect upon the integrity, either alone or in-combination with other plans and projects, directly or indirectly, of nationally, European and internationally protected nature conservation sites.

The Council will determine applications adversely affecting these sites in accordance with the recommendation of the relevant assessments under the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 or any equivalent.

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[Access a screen reader accessible version of proposed supplementary Main Modification 19.](#)

Question:

Do you consider that the supplementary proposed Main Modification 19 is:

Legally compliant (compliant with legislation related to the local plan making process).

- Yes
 No

} UNKNOWN : AS BEFORE

Sound (meets the area's need, is based on evidence, deliverable and consistent with national planning policy and regulations).

(29)



▼ Menu



Purbeck Local Plan supplementary proposed main modifications

Closes 22 Dec 2023

This service needs [more resources](#).

Chapter 4: Housing - SMM 25, 26, 27, 28, 29, 30, 31, 32, 33, 35, 38, 40, 41, 42, 43, 45, 46, 47, 48, 49, 52, 53, 54, 59 and 60

24. Supplementary proposed main modification to paragraphs 110 -111 (SMM 25)

30

Consolidated schedule of Main Modifications to the Purbeck Local Plan comprising proposed Main Modifications, further proposed Main Modifications and proposed supplementary Main Modifications

Proposed supplementary Main Modification (SMM) 25: Chapter 4, Housing, Paragraph 110 and 111 (insertions and deletions)

Submission draft text:

- 110 The 2018 SHMA update indicates a local housing need of 168 homes per year. For the period covered by this Purbeck Local Plan from 2018 to 2034 this equates to the need to provide 2,688 homes across the District. The ratio between median house prices and workplace earnings in Purbeck in 2017 stood at 11:1. To take into account this overall challenge to affordability in Purbeck, in accordance with the government's standard methodology, the local housing need assessment incorporates a 42% uplift to take into consideration the need for affordable housing. Having thoroughly reviewed future opportunities for investment or economic growth in Purbeck, the Council is satisfied that no other special circumstances exist to justify identification of a higher local housing need.
- 111 As highlighted throughout this Purbeck Local Plan, there are a number of significant constraints upon development across the District. Significant areas are protected through environmental and landscape designations or fall within the South East Dorset Green Belt. As part of the plan preparation and site selection process, the Council has considered whether the District has the capacity to meet its assessed local housing need figure in full. A key conclusion from this process was the identification of a requirement to release land previously in the green belt to the east of the District. Prior to reaching this conclusion, the Council assessed all its reasonable options and engaged in discussions with its neighbours, to establish what capacity they might have to provide additional homes that would remove the need for release of green belt in Purbeck. Discussions established that these local authorities were also facing challenges in accommodating their own identified housing needs given the environmental constraints and green belt designations in their areas. Consequently, none of Purbeck's neighbouring councils have offered to meet some of Purbeck's identified housing need.

Justification for proposed Main Modification:

- To ensure consistency with national policy, and guidance: The proposed Main Modification is needed to ensure consistency with the method for calculating the local housing need.
- To ensure that the local plan is justified and positively prepared: The proposed Main Modification reflects updated evidence relating to housing land supply, and the requirement to review capped assessment of housing need.

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[Access a screen reader accessible version of proposed supplementary Main Modification 25.](#)

Question:

Do you consider that the supplementary proposed Main Modification 25 is:

Legally compliant (compliant with legislation related to the local plan making process).

- Yes
- No
- UNKNOWN, SINCE RELEVANT LEGISLATION (AND ASSOCIATED GUIDANCE) IS STILL BEING CLARIFIED*

Sound (meets the area's need, is based on evidence, deliverable and consistent with national planning policy and regulations).

31

Yes

No

Please give details of why you consider the supplementary proposed Main Modification is ~~not~~ ~~legally compliant~~ or sound.

IT IS UNSOUND TO CONTINUE TRYING TO PROMOTE MORE HOUSE BUILDING TO REDUCE PRICES FOR LOCAL PEOPLE, NON-LOCAL DEMAND IS INSATIABLE - THE MORE SO WHEN DEVELOPERS ADVERTISE. SOUNDNESS REQUIRES SATISFYING THE LOCAL NEED FOR APPROPRIATE HOUSING WITH A SUITABLE TARGET.

Please set out what change(s) you consider necessary to make the Supplementary Proposed Main Modification legally compliant and/or sound.

25. Supplementary proposed main modification to Policy H1: Local housing requirement (SMM 26)

32

[Access a screen reader accessible version of proposed supplementary Main Modification 26.](#)

Question:

Do you consider that the supplementary proposed Main Modification 26 is:

Legally compliant (compliant with legislation related to the local plan making process).

- Yes
 - No
- } UNKNOWN, AS BEFORE

Sound (meets the area's need, is based on evidence, deliverable and consistent with national planning policy and regulations).

33

Yes

No

Please give details of why you consider the supplementary proposed Main Modification ~~is~~ is not ~~legally compliant~~ or sound.

THE HOUSING NEEDS OF PURBECK SHOULD, LIKE BCD COUNCIL, BE DERIVED FROM LOCAL INFORMATION NOT OUT-DATED NATIONAL INFORMATION THAT IS SO QUESTIONABLE FOR APPLICATION IN PURBECK.

Please set out what change(s) you consider necessary to make the Supplementary Proposed Main Modification legally compliant and/or sound.

26. Supplementary proposed main modification to paragraph 114 (SMM 27)

34

Sound (meets the area's need, is based on evidence, deliverable and consistent with national planning policy and regulations).

- Yes
- No

Please give details of why you consider the supplementary proposed Main Modification is / is not legally compliant or sound.

Please set out what change(s) you consider necessary to make the Supplementary Proposed Main Modification legally compliant and/or sound.

29. Supplementary proposed main modification to Policy H2: The housing land supply (SMM 30)

[Access a screen reader accessible version of proposed supplementary Main Modification 30.](#)

Question:

Do you consider that the supplementary proposed Main Modification 30 is:

Legally compliant (compliant with legislation related to the local plan making process).

Yes

No

} UNKNOWN: AS BEFORE

Sound (meets the area's need, is based on evidence, deliverable and consistent with national planning policy and regulations).

36

Yes No

Please give details of why you consider the supplementary proposed Main Modification ~~is~~ is not ~~legally compliant~~ or sound.

SUITABLE LAND (UNLIKELY TO INVOLVE EXTINCTION OF RARE SPECIES OR DAMAGE BIO-DIVERSITY), LET ALONE OTHER INFRASTRUCTURE ISSUES IS NOT AVAILABLE AT "MURETON STATION" AND AT "WOOL".

Please set out what change(s) you consider necessary to make the Supplementary Proposed Main Modification legally compliant and/or sound.

30. Supplementary main modification to paragraph 118 (SMM 31)

37

Yes

No

Please give details of why you consider the supplementary proposed Main Modification is / is not legally compliant or sound.

Please set out what change(s) you consider necessary to make the Supplementary Proposed Main Modification legally compliant and/or sound.

40. Supplementary main modification to Policy H10: Part M of Building Regulations (SMM 46)

38

[Access a screen reader accessible version of proposed supplementary Main Modification 46.](#)

Question:

Do you consider that the supplementary proposed Main Modification 46 is:

Legally compliant (compliant with legislation related to the local plan making process).

- Yes
 - No
- } UNKNOWN: AS BEFORE

(39)

Sound (meets the area's need, is based on evidence, deliverable and consistent with national planning policy and regulations).

Yes

No

Please give details of why you consider the supplementary proposed Main Modification ~~is~~ is not legally compliant or sound.

CLIMATE MATTERS REQUIRES PLANS TO
BE SOUND BY EXPECTING BUILDINGS
TO BE WELL INSULATED & NOT
REQUIRES THE USE OF FOSSIL FUELS
WHEN IN USE

Please set out what change(s) you consider necessary to make the Supplementary Proposed Main Modification legally compliant and/or sound.

SUITABLE PROVISIONS ABOUT
USING SOLAR PANELS ON ROOFS
(PLUS HEAT/COLD INSULATION)
SHOULD BE ADDED IN ANY
SOUND PLAN FROM DORSET COUNSELL

41. Supplementary main modification to Policy H11: Affordable Housing (SMM 47)

40

[Access a screen reader accessible version of proposed supplementary Main Modification 47.](#)

Question:

Do you consider that the supplementary proposed Main Modification 47 is:

Legally compliant (compliant with legislation related to the local plan making process).

Yes

No

} UNKNOWN : AS BEFORE

41

Sound (meets the area's need, is based on evidence, deliverable and consistent with national planning policy and regulations).

Yes

No

Please give details of why you consider the supplementary proposed Main Modification ~~is~~ is not ~~legally compliant~~ or sound.

EVIDENCE ABOUT THE VALIDITY OF
A BROWNFIELD REGISTER SEEMS
TO BE MISSING.
DOES THAT REGISTER INCLUDE
EMPTY / UN-USED DWELLINGS ?

Please set out what change(s) you consider necessary to make the Supplementary Proposed Main Modification legally compliant and/or sound.

42. Supplementary main modification to paragraph 170 (SMM 48)

42



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Purbeck Local Plan supplementary proposed main modifications

Closes 22 Dec 2023

This service needs [cookies enabled](#).

Chapter 6: Infrastructure - SMM 68, 69, 71, 72, 76, 77, 87, 78, and 81

54. Supplementary main modification insert additional paragraph after paragraph 230 (SMM 68)



Consolidated schedule of Main Modifications to the Purbeck Local Plan comprising proposed Main Modifications, further proposed Main Modifications and proposed supplementary Main Modifications

Proposed supplementary Main Modification (SMM) 68: Chapter 6, Infrastructure, paragraph 230, insertion

Submission draft text

230 In addition to mitigating the impact of development on heathlands, other essential infrastructure has been identified that is required to meet Habitats Regulations requirements and, thereby, enable development. Development must ensure that it does not add to the over-enrichment of the water in Poole Harbour Special Protection Area (SPA), and mitigate for disturbance to the wildlife of the harbour.

Justification for proposed Main Modification:

- To ensure that the local plan is legally compliant and effective. The proposed Main Modification deletes the reference to Supplementary Planning Documents or other standalone documents in the policy as this would give them status as part of the development plan without these documents being subject to the same statutory processes of preparation, consultation and examination (as specified in the Planning and Compulsory Purchase Act 2004 and Town and Country Planning (Local Planning) (England) Regulations 2012)
- This SMM supersedes MM68 previously presented as a proposed Main Modification.

Amended text:

230 In addition to mitigating the impact of development on heathlands, other essential infrastructure has been identified that is required to meet Habitats Regulations requirements and, thereby, enable development. Development must ensure that it does not add to the over-enrichment of the water in Poole Harbour Special Protection Area (SPA), and mitigate for disturbance to the wildlife of the harbour.

(insert after paragraph 230)

Supplementary Planning Documents (SPD) provide guidance on avoiding or mitigating the impacts of residential and tourism development, equestrian activities on heathland and nutrient enrichment of Poole Harbour. These SPDs support policies E8 Dorset Heathlands and E9 Poole Harbour.

[Access a screen reader accessible version of proposed supplementary Main Modification 68.](#)

Question:

Do you consider that the supplementary proposed Main Modification 68 is:

Legally compliant (compliant with legislation related to the local plan making process)

- Yes
 - No
- } UNKNOWN: AS BEFORE

Sound (meets the area's need, is based on evidence, deliverable and consistent with national planning policy and regulations)

- Yes

44

No

Please give details of why you consider the supplementary proposed Main Modification ~~is~~ is not ~~legally compliant~~ or sound.

THE CONCEPT OF SECURING FINANCIAL CONTRIBUTIONS BY "S106 AGREEMENTS" WILL FAIL TO GAIN MUCH FINANCIAL SUPPORT SINCE NEGOTIATING THEM AWAY IS DEMONSTRABLY EASY, AS MINIMUM PROFIT LEVELS ARE LEGALLY PROTECTED — MAKING "DIS-REGARDING CIL PAYMENTS" AS UNSOUND

Please set out what change(s) you consider necessary to make the Supplementary Proposed Main Modification legally compliant and/or sound.

CLARIFY DEFINITION OF LOW-COST HOUSING : SAY " BELOW 60% OF MARKET RENT "

55. Supplementary proposed main modification to Policy I1: Developer contributions to deliver Purbeck's infrastructure (SMM 69)

(45)

No

Please give details of why you consider the supplementary proposed Main Modification is / is not legally compliant or sound.

Please set out what change(s) you consider necessary to make the Supplementary Proposed Main Modification legally compliant and/or sound.

59. Supplementary proposed main modification to Policy I5: Morden Park strategic suitable alternative natural greenspace (SANG) and holiday park (SMM 77)

46

Consolidated schedule of Main Modifications to the Purbeck Local Plan comprising proposed Main Modifications, further proposed Main Modifications and proposed supplementary Main Modifications

Proposed supplementary Main Modification (SMM) 77: Chapter 6, Infrastructure, Policy I5

Submission draft policy

Policy I5: Morden Park strategic suitable alternative natural green space (SANG) and holiday park

The area shown on the policies map will be developed as a strategic SANG and holiday park subject to agreement between the applicant, the Council and Natural England

Justification for Further Proposed Main Modification:

- To ensure that the local plan is effective. The supplementary Main Modification clarifies those circumstances under which a SANG and holiday park may come forward (either by itself or where necessary and justified alongside enabling development)
- This SMM supersedes MM77 and FMM77 presented as a proposed Main Modification and further proposed Main Modification

Amended policy

Policy I5: Morden Park strategic suitable alternative natural green space (SANG) and holiday park

The area shown on the policies map will be developed as a strategic SANG and holiday park subject to agreement between subject to agreement between the ~~landowner applicant~~ the Council and Natural England. In the event that such an agreement cannot be reached, the Council will either take necessary steps to secure its delivery or secure alternative options for mitigation

The SANG will need to be designed and managed following criteria to be agreed with Dorset Council and Natural England. The key design features include:

- stock proof fencing to enable free running dogs.
- new woodland planting.
- dog access to the stream.

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[Access a screen reader accessible version of proposed supplementary Main Modification 77.](#)

Question:

Do you consider that the supplementary proposed Main Modification 77 is:

Legally compliant (compliant with legislation related to the local plan making process)

- Yes
 - No
- } UNKNOWN, AS BEFORE

Sound (meets the area's need, is based on evidence, deliverable and consistent with national planning policy and regulations)



- Yes

No

Please give details of why you consider the supplementary proposed Main Modification ~~is~~ is not ~~legally compliant~~ or sound.

"SANGS" DAMAGE BIO-DIVERSITY &
 CAN INTRODUCE VERMIN,
 SITING A 'SANG' AT MORDEN IS
 CONSEQUENTLY UNSOUND.

Please set out what change(s) you consider necessary to make the Supplementary Proposed Main Modification legally compliant and/or sound.

(Empty response box)

60. Supplementary proposed main modification to paragraphs 263-265, supporting text for policy I6 (SMM 87)

48

Consolidated schedule of Main Modifications to the Purbeck Local Plan comprising proposed Main Modifications, further proposed Main Modifications and proposed supplementary Main Modifications

Proposed supplementary Main Modification (SMM) 87: Chapter 6, Infrastructure, paragraphs 263 to 265

Submission draft text

- 263 The PLCCG has undertaken a review of healthcare provision, called 'Making Purbeck Fit for the Future'. The project looked at how people in Purbeck can get the best possible health and social care in future. The Purbeck Healthcare Review and the subsequent Clinical Services Review instigated by Dorset CCG, concluded that the NHS should retain the Swanage community hospital, close the beds in Wareham community hospital, and develop a Wareham health hub providing integrated social care and health services, including GP surgery and ambulance station.
- 264 Dorset County Council's Building the Right Assets - an Adult Social Care Accommodation Needs Assessment 2018-2028 identifies the District's needs for adult social care accommodation, respite accommodation, residential and nursing care and key worker housing. Many of these requirements will be delivered as part of the Community Health Hub in Wareham, an associated care village, or developing additional capacity around existing Council owned sites. Currently Dorset County Council is considering using part of the Middle School site for temporary modular housing which can be moved when the health hub project is advanced further.
- 265 The NHS locality team is working closely with Dorset County Council Adult Social Care Team to maximise the use of their assets in Wareham to achieve integrated health and social care. The key sites are the former Middle School site on Worregret Road and NHS property on Streche Road - hospital, GP surgery and ambulance station.

Justification for proposed Main Modification:

- To ensure that the local plan is sound, effective and accurate. The proposed modifications reflect local government re-organisation of Dorset councils in April 2019 and changes in priorities of potential partners in the health and social care hub.
- To ensure that the local plan is effective. The proposed Main Modification includes an updated reference to the council area following local government re-organisation in Dorset in April 2019.

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[Access a screen reader accessible version of proposed supplementary Main Modification 87.](#)

Question:

Do you consider that the supplementary proposed Main Modification 87 is:

Legally compliant (compliant with legislation related to the local plan making process)

- Yes
 - No
- } UNKNOWN, AS BEFORE

Sound (meets the area's need, is based on evidence, deliverable and consistent with national planning policy and regulations)

- Yes
- (49)

No

Please give details of why you consider the supplementary proposed Main Modification ~~is~~ is not ~~legally compliant~~ sound.

THE ISSUE OF HOW TO GET EMERGENCY PATIENTS FROM SAY SWANAGE TO THE FAR EAST OF DORSET (THE REVISED LOCATION OF SEVERE TRAUMA TREATMENTS) WITHIN THE "GOLDEN HOUR" HAS NOT BEEN ADDRESSED YET!

Please set out what change(s) you consider necessary to make the Supplementary Proposed Main Modification legally compliant and/or sound.

61. Supplementary proposed main modification Policy 16: Wareham integrated health and social care (SMM 78)

50

Consultee: Alan Bagley

Event name: Purbeck Local Plan Supplementary Proposed Main Modifications

Consultee reference: 1191476

Consultation reference: SMMR21

Supplementary Proposed Main Modification: SMM5

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: N/A

Does the respondent consider Supplementary Proposed Main Modification is sound: N/A

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: See attachment for full response

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM6

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: No

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: See attachment for full response

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM27

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: No

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: See attachment for full response

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Comments on addendum to Habitats Regulation Assessment (SMMCD2), addendum to Sustainability Appraisal (SMMCD3), 5-year housing land supply report (SMMCD4), local housing need update (SMMCD5), policies map paper (SMMCD6) or local plan policies maps (SMMCD7a to SMMCD7k) -

Section or paragraph: N/A

Comments: N/A

Attachment:

Response form for: Purbeck Local Plan Supplementary Proposed Main Modifications consultation

This form is for making representations on the Supplementary Proposed Main Modifications to the Purbeck Local Plan (2018-2034)

The council has opened a consultation into Supplementary Proposed Main Modifications (SMM) published as part of the Consolidated schedule of Main Modifications (SMMCD1) to the Purbeck Local Plan. The council is only accepting comments on the novel supplementary modification and not any earlier modifications which have already been presented as Main Modifications or Further Proposed Main Modifications. This is not an opportunity to raise matters relating to other parts of the Plan that have already been considered by the Inspector during the examination. Weight will not be given to representations that repeat matters that have previously been raised and discussed at hearing sessions or in earlier responses.

Alongside SMM, there is also an opportunity to comment on updated policies maps, the Habitats Regulation Assessment Addendum and Sustainability Appraisal Addendum. The council has also published supporting evidence relating to the SMM, comprising a five-year housing land supply report and an assessment of local housing need.

These documents can be found on-line at www.dorsetcouncil.gov.uk/plpmainmods .

Once the consultation is closed at 11:45pm on 22 December 2022, the council will prepare a summary of the issues raised in representations to the consultation and provide its response. The council's summary, and full copies of the representations, will then be sent to the Planning Inspectors for their consideration. The Inspectors will then make a recommendation around the next stages of the local plan's examination taking account of the issues raised in the representations.

PART A

	Your contact details	Agent's Details (if applicable)
Name	ALAN BAGLEY	
Organisation / Group <small>(if applicable)</small>		
Address line 1	[REDACTED]	
Address line 2	[REDACTED]	
Town / City	[REDACTED]	
County	[REDACTED]	
Post Code	[REDACTED]	
E-mail address	[REDACTED]	

Group Representations

If your representation is on behalf of a group, ensure the lead representative completes the contact details box above. Also, please state here how many people supports the representation.

Please note:

- The consultation period starts on **10 November 2023** and will last for 6 weeks until 11.45pm on **22 December 2023**.
- Only representations made in this period will be referred to the Planning Inspectors for consideration.
- Responses must be made using this form (sent in the post or attached to an e-mail).
- Respondents must complete Part A of this response form and separate Part B forms for each Supplementary Proposed Main Modification that they might wish to comment on.
- All respondents must provide their name and address and/or email address.
- All forms must be signed and dated.
- Responses cannot be treated as confidential. By making a response you agree to your name and comments being made available for public viewing.
- Information on the council's privacy policy is available on our website at:
<https://www.dorsetcouncil.gov.uk/your-council/about-your-council/data-protection/dorset-council-general-privacy-notice.aspx>

Heading SMM 5 and SMM 27

Despite the reduction in housing needs shown in SMM 27 (2,688 reduced to 976 that is 36% and from 168 to 86 per year). SMM 5 shows no change in the housing allocation for Lytchett Matravers, except for a small wording change to **around** 150 homes.

SMM 5 states Green Belt land is necessary and that there is no alternative to meet the original needs of 2,688 yet, the reduced overall needs removes the need for Green Belt use.

If pro-rata reduction was applied the Lytchett Matravers contribution would be reduced to 54 homes.

SMM 5 states there are no alternative sites available to prevent the use of Green Belt land, yet this was some 6 years ago, and no substantive recent evidence is shown to demonstrate this. Since then much has changed including a massive widening of the area considered now to include all of Dorset following the absorption of Purbeck into Dorset.

3. Please give details of why you consider the Supplementary Proposed Main Modification is / is not legally compliant or sound. (Please be as precise as possible).

Please continue on a separate sheet if necessary.

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

The figures should be revised in line with the changes in SMM 27

Please continue on a separate sheet if necessary.

PART B

1. Which Supplementary Proposed Main Modification does your representation relate to?

Separate Part B forms must be completed for each separate proposed Main Modification you wish to comment on.

Supplementary Proposed Main Modifications reference number	SMM 6
---	-------

2. Do you consider that the Supplementary Proposed Main Modification is:

Legally compliant	Yes		No	<input checked="" type="checkbox"/>
Sound	Yes		No	<input checked="" type="checkbox"/>

To be considered legally compliant the Supplementary Proposed Main Modifications must:

- comply with the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019; and
- be appraised for their sustainability.

To be considered sound the local plan as a whole must be:

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

Some or all of these considerations of soundness may be relevant to the Supplementary Proposed Main Modification[s] that you are seeking to make a representation on.

3. Please give details of why you consider the Supplementary Proposed Main Modification is / is not legally compliant or sound. (Please be as precise as possible).

Please continue on a separate sheet if necessary.

SMM 6

The original search for land in Purbeck was made 6 years ago and then it was deemed necessary to include Green Belt land. Since then much has changed and a new search should be undertaken this time encompassing the whole of Dorset. Consequently your statement "the Council has considered alternative strategies....." is incorrect, never proven and completely out of date: therefore illegal.

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

Please continue on a separate sheet if necessary.

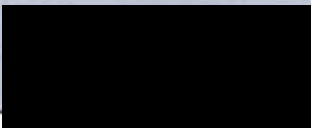
PART C

1. Comments on updated policies map, SA or HRA.

Separate Part C forms must be completed for each appraisal or evidence document commented upon, making clear the section or paragraph you're referring to

Document:	
------------------	--

Please continue on a separate sheet if necessary.

Please sign and date this form:	
Signature: 	Date: 11/12/23

PART B

1. Which Supplementary Proposed Main Modification does your representation relate to?

Separate Part B forms must be completed for each separate Supplementary Proposed Main Modification you wish to comment on.

Supplementary Proposed Main Modifications reference number	SMM 27
--	-----------

2. Do you consider that the Supplementary Proposed Main Modification is:

Legally compliant	Yes		No	<input checked="" type="checkbox"/>
Sound	Yes		No	<input checked="" type="checkbox"/>

To be considered legally compliant the Supplementary Proposed Main Modification must:

- comply with the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019; and
- be appraised for their sustainability.

To be considered sound the local plan as a whole must be:

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

Some, or all, of these considerations of soundness may be relevant to the Supplementary Proposed Main Modification[s] that you are seeking to make a representation on.

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

Please continue on a separate sheet if necessary.

3. Please give details of why you consider the Supplementary Proposed Main Modification is / is not legally compliant or sound. (Please be as precise as possible).

Please continue on a separate sheet if necessary.

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

Please continue on a separate sheet if necessary.

SMM 27

There is a proposed change in housing needs for Purbeck of 2688 reduced to 976 that is 36% and delivery reduced from 168 to 86 per year that is 51%. However housing allocation for Lytchett Matravers remains unchanged at 150 homes - SMM5 refers.

Applying the percentages above would mean The Lytchett Matravers contribution should be reduced to 54 homes.

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

The figures for housing needs
are incompatible with SMM5.

Please continue on a separate sheet if necessary.

PART B

1. Which Supplementary Proposed Main Modification does your representation relate to?

Separate Part B forms must be completed for each separate Supplementary Proposed Main Modification you wish to comment on.

Supplementary Proposed Main Modifications reference number	
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2. Do you consider that the Supplementary Proposed Main Modification is:

Legally compliant	Yes		No	
Sound	Yes		No	

To be considered legally compliant the Supplementary Proposed Main Modification must:

- comply with the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019; and
- be appraised for their sustainability.

To be considered sound the local plan as a whole must be:

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

Some, or all, of these considerations of soundness may be relevant to the Supplementary Proposed Main Modification[s] that you are seeking to make a representation on.

**Additional responses to submission in response to the
Purbeck Local Plan Supplementary Main Modifications
consultation.**

Please add this to my response submission send to you last week.

The statement in the last few days made by Micheal Gove the Secretary of State for Levelling Up, Housing and Communities and the consequent adjustment to the NPPF on Green Belt acquisition clearly negate many of the arguments put forward for the use of Green Belt land in the consultation documents.

Consequently the modifications should reflect this change especially where it refers to the release of currently productive agricultural land, for example the land East of Wareham Road, Lytchett Matravers.

From
Alan Bagley

██████████
████████████████████

Consultee: Goretta Quinn-Bagley

Event name: Purbeck Local Plan Supplementary Proposed Main Modifications

Consultee reference:

Consultation reference: SMMR22

Supplementary Proposed Main Modification: SMM6

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: No

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: See attachment for full response

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM32

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: No

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: See attachment for full response

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Supplementary Proposed Main Modification: SMM40

Does the respondent consider Supplementary Proposed Main Modification is legally compliant: No

Does the respondent consider Supplementary Proposed Main Modification is sound: No

Details of reasons why the respondent considers the Supplementary Proposed Main Modification is/is not legally compliant or sound: See attachment for full response

Changes respondent considers are necessary to make the Supplementary Proposed Main Modification legally compliant or sound: N/A

Comments on addendum to Habitats Regulation Assessment (SMMCD2), addendum to Sustainability Appraisal (SMMCD3), 5-year housing land supply report (SMMCD4), local housing need update (SMMCD5), policies map paper (SMMCD6) or local plan policies maps (SMMCD7a to SMMCD7k) -

Section or paragraph: N/A

Comments: N/A

Attachment:

Response form for: Purbeck Local Plan Supplementary Proposed Main Modifications consultation

This form is for making representations on the Supplementary Proposed Main Modifications to the Purbeck Local Plan (2018-2034)

The council has opened a consultation into Supplementary Proposed Main Modifications (SMM) published as part of the Consolidated schedule of Main Modifications (SMMCD1) to the Purbeck Local Plan. The council is only accepting comments on the novel supplementary modification and not any earlier modifications which have already been presented as Main Modifications or Further Proposed Main Modifications. This is not an opportunity to raise matters relating to other parts of the Plan that have already been considered by the Inspector during the examination. Weight will not be given to representations that repeat matters that have previously been raised and discussed at hearing sessions or in earlier responses.

Alongside SMM, there is also an opportunity to comment on updated policies maps, the Habitats Regulation Assessment Addendum and Sustainability Appraisal Addendum. The council has also published supporting evidence relating to the SMM, comprising a five-year housing land supply report and an assessment of local housing need.

These documents can be found on-line at www.dorsetcouncil.gov.uk/plpmainmods .

Once the consultation is closed at 11:45pm on 22 December 2022, the council will prepare a summary of the issues raised in representations to the consultation and provide its response. The council's summary, and full copies of the representations, will then be sent to the Planning Inspectors for their consideration. The Inspectors will then make a recommendation around the next stages of the local plan's examination taking account of the issues raised in the representations.

PART A

	Your contact details	Agent's Details (if applicable)
Name	GORETTI QUINN-Bagley	
Organisation / Group <small>(if applicable)</small>		
Address line 1	[REDACTED]	
Address line 2	[REDACTED]	
Town / City	[REDACTED]	
County	[REDACTED]	
Post Code	[REDACTED]	
E-mail address	[REDACTED]	

Group Representations

If your representation is on behalf of a group, ensure the lead representative completes the contact details box above. Also, please state here how many people supports the representation.

Please note:

- The consultation period starts on **10 November 2023** and will last for 6 weeks until 11.45pm on **22 December 2023**.
- Only representations made in this period will be referred to the Planning Inspectors for consideration.
- Responses must be made using this form (sent in the post or attached to an e-mail).
- Respondents must complete Part A of this response form and separate Part B forms for each Supplementary Proposed Main Modification that they might wish to comment on.
- All respondents must provide their name and address and/or email address.
- All forms must be signed and dated.
- Responses cannot be treated as confidential. By making a response you agree to your name and comments being made available for public viewing.
- Information on the council's privacy policy is available on our website at:
<https://www.dorsetcouncil.gov.uk/your-council/about-your-council/data-protection/dorset-council-general-privacy-notice.aspx> .

PART B

1. Which Supplementary Proposed Main Modification does your representation relate to?

Separate Part B forms must be completed for each separate Supplementary Proposed Main Modification you wish to comment on.

Supplementary Proposed Main Modifications reference number	6
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2. Do you consider that the Supplementary Proposed Main Modification is:

Legally compliant	Yes		No	<input checked="" type="checkbox"/>
Sound	Yes		No	<input checked="" type="checkbox"/>

To be considered legally compliant the Supplementary Proposed Main Modifications must:

- comply with the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019; and
- be appraised for their sustainability.

To be considered sound the local plan as a whole must be:

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

Some or all of these considerations of soundness may be relevant to the Supplementary Proposed Main Modification[s] that you are seeking to make a representation on.

- The council will not accept any responsibility for the contents of comments submitted. We reserve the right to remove any comments containing defamatory, abusive or malicious allegations.
- If you are part of a group that shares a common view, please include a list of the contact details of each person (including names, addresses, emails, telephone numbers and signatures) along with a completed form providing details of the named lead representative.
- The supplementary proposed main modifications, the updated policies map, the Habitats Regulation Assessment Addendum and Sustainability Appraisal Addendum, are available to view on the Council's website at www.dorsetcouncil.gov.uk/plpmainmods. Paper copies of the supplementary proposed main modifications, the updated policies map, the Habitats Regulation Assessment Addendum and Sustainability Appraisal Addendum are available to consult at libraries in Dorchester, Corfe Castle, Lytchett Matravers, Swanage, Upton, Wareham, Wool and Poole.
- If you have questions relating to the consultation, or the process for making a response, please contact the Planning Policy team on 01305 838334 or planningpolicy@dorsetcouncil.gov.uk.
- Response forms returned in the post should reference the **Purbeck Local Plan, Supplementary Proposed Main Modifications Consultation, and be sent to Spatial Planning Team, County Hall, Colliton Park, Dorchester, DT1 1XJ**. Forms can be returned by email, referencing Purbeck Local Plan Supplementary Proposed Main Modifications Consultation, to the email above.
- Please tick the box if you would like to be notified of the following:

Adoption of the Local Plan.

Part B SMM 36

In Lytchett Matravers the proposed allocation of 150 houses is on Green Belt. Inappropriate erosion of Green Belt is counter to NPPF guidelines.

Purbeck Council have not provided up dated evidence to justify removal of land from Green Belt.

For "Exceptional Circumstances" the Council must demonstrate that all other options have been explored, before removing land from Green Belt – NPPF paragraph 141. Purbeck Council have not done this.

I quote from SMM5:

"Neighbouring councils have stated that they are unable to help Purbeck council meet its housing needs"; this is no longer an issue, following The Government's reorganisation in Dorset in 2019. The area from which to draw appropriate land, not Green Belt, is much bigger for Purbeck, i.e. the whole of Dorset.

The proposed plan is not following appropriate guidelines for legality.

Exceptional circumstances for removing land from Green Belt is not evidenced in this proposal. "Spreading development across Purbeck," does not constitute any sort of exceptional circumstances.

Part B SMM 6

The proposed allocation of 150 houses in Lytchett Matravers is not sustainable.

Lytchett Matravers has neither rail links nor effective bus service.

Purbeck Council's justification for all allocations is that they are in accessible and "sustainable" locations. This is not the case for Lytchett Matravers. The proposed site east of Warehan Road is particularly unsuitable as it is too remote from the village centre.

For sustainability, housing sites need employment. There are no employment opportunities in Lytchett Matravers, therefore this allocation is unsustainable. It is also obviously unsustainable due to the lack of transport links.

Sustainability is not evidenced in this proposed plan. Proposed plans should first give consideration to sites which are well served by public transport.

3. Please give details of why you consider the Supplementary Proposed Main Modification is / is not legally compliant or sound. (Please be as precise as possible).

Please continue on a separate sheet if necessary.

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

To make the proposed plan sustainable, Purbeck / Dorset Council need to seek land for development which has effective transport links and employment opportunities and this should not be Green Belt land.

Please continue on a separate sheet if necessary.

PART B

1. Which Supplementary Proposed Main Modification does your representation relate to?

Separate Part B forms must be completed for each separate Supplementary Proposed Main Modification you wish to comment on.

Supplementary Proposed Main Modifications reference number	32 + 40
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2. Do you consider that the Supplementary Proposed Main Modification is:

Legally compliant	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

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To make the proposed plan
legal Purbeck / Dorset Council
need to prove explicitly, with
an up-dated search for land,
not Green Belt land, that there
are no alternatives to removing
land from Green Belt

Please continue on a separate sheet if necessary.

Part B SMM 32 & 40

I quote from SMM 32:

“new houses in Lytchett Matravers and Upton are also likely to have adverse effects on Poole Harbour Special Protection Area through recreational activity...adverse effects arising from the developments will need to be avoided with mitigation.

The mitigation in this proposed plan for 150 houses in Lytchett Matravers is a SANG on the other side of the village from the main site for 95 houses.

A 7.6 hectare SANG at Flowers Drive (SMM 40) is supposed to avoid adverse effects from the new houses on the national site network (including European sites)!!

Sustainable protection of Poole Harbour from the housing developments is not addressed responsibly, realistically or legally.

3. Please give details of why you consider the Supplementary Proposed Main Modification is / is not legally compliant or sound. (Please be as precise as possible).

Please continue on a separate sheet if necessary.

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

Please continue on a separate sheet if necessary.

