

Wool Parish Neighbourhood Plan

Responses to the Regulation 16 consultation

21 October 2024

The Regulation 16 consultation was held between 6 September and 18 October 2024 (6 weeks). Twelve responses were received during this time, as detailed in the table below.

No.	Organisation / Name	Date received
Representation number: 1	National Highways / G Gallacher	2 Oct 2024
Representation number: 2	Environment Agency / B Sherrard	7 Oct 2024
Representation number: 3	Defence Infrastructure Organisation / J Billingham	16 Oct 2024
Representation number: 4	Historic England / D Stuart	17 Oct 2024
Representation number: 5	Wool Flora and Fauna / R Palmer	17 Oct 2024
Representation number: 6	Chapman Lily Planning Ltd / P Gatehouse	17 Oct 2024
Representation number: 7	Savills UK Ltd / S Beuden on behalf of Lulworth Estates, Redwood Partnership and A&M Properties	18 Oct 2024
Representation number: 8	(Resident) / R Webb	7 Sep 2024
Representation number: 9	(Resident) / P Kirkbride	9 Sep 2024
Representation number: 10	(Resident) / P Goldsmith	23 Sep 2024
Representation number: 11	(Future resident) / E McLarnon	18 Oct 2024
Representation number: 12	Dorset Council / P Reese	18 Oct 2024

Representation number: 1

From: Gaynor Gallacher, Assistant Spatial Planner

Organisation: National Highways

Submitted: 2 October 2024

Method of submission: Online portal

Comments:-

Thank you for providing National Highways with the opportunity to comment on the submission version of the Wool Neighbourhood Plan.

National Highways is responsible for operating, maintaining and improving the strategic road network (SRN) which in this case comprises the A35/A31 trunk road corridor which passes approximately 8 – 15 km to the north and west of the plan area. Connections to the SRN are provided via the local road network, primarily to junctions at Bere Regis, Puddletown and Dorchester.

Having reviewed the plan's proposed policies, we consider that these are unlikely to lead to a scale of development that would adversely impact on the safe and efficient operation of the SRN, in accordance with policy contained within DfT Circular 01/2022 "The strategic road network and the delivery of sustainable development". We therefore have no specific comments to offer but are generally supportive of policies 10, 11 and 12 which seek to improve the provision and take up of sustainable travel modes.

In terms of the emerging Dorset Council Local Plan, National Highways will look to work with the Council in developing their transport evidence base to understand the impact of their proposed spatial strategy on the SRN, and any requirements for mitigation at key strategic junctions which may be necessary to accommodate proposed growth.

This does not however prejudice any future responses National Highways may make on site specific applications as they come forward through the planning process, which will be considered by us on their merits under the prevailing policy at the time.

Representation number: 2

From: Bob Sherrard, Planning Advisor

Organisation: Environment Agency

Submitted: 7 October 2024

Method of submission: Email

Comments:-

We have reviewed and support the Wool Neighbourhood Plan 2024 -2038 (Regulation 16 consultation, draft July 2024). We have no additional comments to make.

Representation number: 3

From: Joanne Billingham, Senior Town Planner

Organisation: Defence Infrastructure Organisation, Ministry of Defence

Submitted: 16 October 2024

Method of submission: Email and Online portal

Comments:-

We thank the Council for the opportunity to comment on the above consultation. Please find set out below specific representations submitted on behalf of the Secretary of State for Defence. Please note that these comments should be read in addition to any provided by colleagues in respect of MOD Safeguarding interests. The comments set out below relate to wider MOD estate related interests.

Background

The Defence Infrastructure Organisation (DIO), on behalf of the Ministry of Defence (MOD) welcomes the opportunity to comment on the Wool Neighbourhood Plan 2024 – 2038 Regulation 16 Consultation (Wool NP). DIO manages the Defence Estate on behalf of the MOD.

The MOD welcome the opportunity to work closely with Planning Authorities in the development of policies and strategies, including emerging Neighbourhood Plans. As recognised in the National Planning Policy Framework, it is important that Planning Authorities consult with the MOD during the preparation of their plans and take account of operational sites.

I would like to draw your attention to paragraph 101 of the National Planning Policy Framework (Dec 2023) which states:

“Planning policies and decisions should promote public safety and take into account wider security and defence requirements by:… b) recognising and supporting development required for operational defence and security purposes, and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.”

The MOD Operational Establishment of Bovington Camp and a number of areas of Service Families Accommodation (SFA) are within the Wool NP Designated Area. Bovington Camp is a core military base and is currently undergoing major investment. I include a map of the

operational area of Bovington Camp below as it is relevant to the representations in section 2.

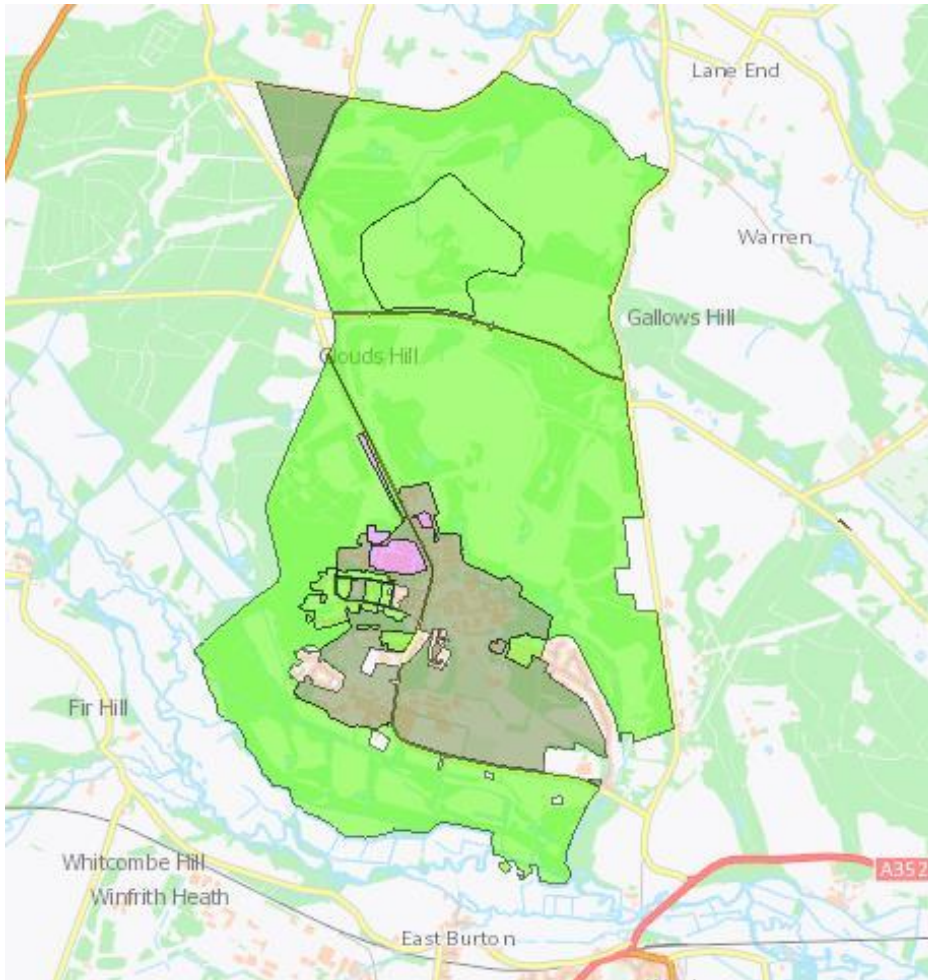


Fig 1 The Functional area of Bovington Camp

The MOD is supportive in principle of the preparation of a neighbourhood plan for Wool, however, there are a number of points of concern to the MOD contained within the Reg 16 Plan.

Representations

Paragraph 61 of the Wool NP Para 61

Para 61 of the Wool NP states the following:

"61. Bovington sits apart and has been developed alongside and been wholly influenced by the development of the Bovington Camp. Much of the fabric of Bovington has developed to service and provide amenities to people working for the ministry of defence establishment there. That said, there is a delineation between operational areas (behind the wire) and public areas. For public areas, the neighbourhood plan can

address any requirements to support improvements to the environment of Bovington through good design.”

This misrepresents the functional area of Bovington camp. The map in Figure 1 shows the extent of the MOD land at Bovington Camp, which consists of all the coloured parcels of land ie those coloured green, brown and pink. There is no delineation between those that are behind the wire and those that are not and the functional area forms the ‘planning unit’. According to the Town and Country Planning (Use Classes) Order 1987 as amended, the whole planning unit of Bovington Camp is Sui Generis and all buildings are subsidiary to that main use.

Furthermore, the wording in the Wool NP should be altered from ‘public areas’ to ‘publicly accessible’ areas of Bovington Camp to accurately reflect their status as MOD land.

Paragraph 64 of the Wool NP and Policy WOOL 1

The Design Policies section of the Wool NP seeks to document design styles and design opportunities in the built environment of Bovington, Wool and East Burton Villages. The MOD welcomes the exclusion of the MOD Estate at Bovington Camp (behind the wire) as it states in para 64 it: *“has not been considered in this work owing to (it’s) unique position and strategic status”*

Whilst the MOD understands the ambition of the Wool NP to support improvements to what it terms ‘the public areas’ of Bovington Camp, through good design, neighbourhood plans should also be prepared in a way that is deliverable. It is questionable whether these aspirations can be implemented to those areas as ultimately it will be military needs that will take primacy. As stated above in paragraph 2.1.3 these areas should be referred to as ‘publicly accessible areas’ rather than as ‘public areas’ to reflect their status as MOD land.

The MOD respectfully submits that the wording of Policy WOOL 1 is altered to reflect that these design principles are aspirational on MOD land.

Additionally, there are a number of areas of Service Families Accommodation at Bovington that are included in the Character Area appraisal. The MOD request that Annington Homes, as lease holders, should be consulted upon any policy affecting their properties.

Wool NP Policy WOOL 8

Wool NP Policy WOOL 8 seeks the Protection of Sites in Local Community Use, Use Class F2. The MOD takes no view on the policy per se, but has the following comments to make regarding those assets owned by the MOD identified in the policy. These are:

- h) *Bovington Community Hall, King George V Road, Bovington*
- i) *Play area, Elles Road, Bovington*
- j) *Play area, Swinton Avenue, Bovington*
- k) *Skatepark and MUGA, Swinton Avenue, Bovington*
- l) *Bovington Store, King George V Road, Bovington*

The Use Class of these assets has been incorrectly identified within the Wool NP. The whole of the Bovington camp functional area, as shown in fig 1, is the 'planning unit'. Bovington Camp is Sui Generis and all MOD assets within that are subsidiary to the main use and therefore Sui Generis. The MOD objects to any policy or description within the Wool NP that assigns a different use class to MOD assets.

The MOD assets listed in WOOL 8 are not Use Class F2 and as such they should be removed from this policy.

WOOL NP Policy WOOL 11

Part C of Policy WOOL 11 seeks:

"c) The creation of a direct pedestrian link suitable for all users between Cologne Road and Bovington Neighbourhood Centre."

Whilst this is a laudable aim, it is unclear how this can be achieved as a direct route would involve entering the secure, fenced off area of Allenby Barracks within Bovington Camp.

The MOD has no plans to remove the fence within the Wool NP period. Therefore, the MOD respectfully submits that the policy wording reflects this proposal as an aspiration only or proposes a route that can be achieved without crossing secure MOD areas.

Conclusion

The MOD respectfully submits:

- i. that the functional area of Bovington Camp as shown in figure 1 is reflected in the Wool NP and that the wording of paragraph 61 is altered as follows (new text in capitals):

"61. Bovington sits apart and has been developed alongside and been wholly influenced by the development of the Bovington Camp. Much of the fabric of Bovington has developed to service and provide amenities to people working for the ministry of defence establishment there. That said. ~~there is a delineation between operational areas (behind the wire) and public areas. For public areas,~~ ~~the~~ THERE ARE AREAS ACCESSIBLE TO THE PUBLIC OUTSIDE OF THE MORE

SECURE AREAS. THERE MAY BE OPPORTUNITIES FOR THE neighbourhood plan TO WORK WITH THE MOD TO ~~can~~ address any requirements to support improvements to the environment of Bovington's PUBLICALLY ACCESSIBLE AREAS through good design.”;

- ii. that the wording of Policy WOOL 1 is altered to reflect that these design principles are aspirational on MOD land;
- iii. that the following MOD assets, which are Sui Generis, are removed from Policy WOOL 8:
 - h) *Bovington Community Hall, King George V Road, Bovington*
 - i) *Play area, Elles Road, Bovington*
 - j) *Play area, Swinton Avenue, Bovington*
 - k) *Skatepark and MUGA, Swinton Avenue, Bovington*
 - l) *Bovington Store, King George V Road, Bovington ;and*
- iv. that the Wool NP Policy WOOL 11 (c) provides route details for the direct pedestrian link between Cologne Road and Bovington Neighbourhood centre. Proposals crossing the secure areas of Allenby Barracks are not achievable within the plan period and should be removed from the Wool NP.

The DIO on behalf of the MOD would welcome further opportunity to discuss the points above with the Parish Council and their Advisors and to find the amendments necessary for the removal of these objections.

The DIO also respectfully requests that I am contacted about the EiP or further iterations of the Wool Neighbourhood Plan using the contact details at the top of the page.

Representation number: 4

From: David Stuart, Historic Places Adviser

Organisation: Historic England

Submitted: 17 October 2024

Method of submission: Email

Comments:-

Thank you for your Regulation 16 consultation on the submitted version of the Wool Neighbourhood Plan.

I can confirm that there are no issues associated with the Plan upon which we wish to comment.

Representation number: 5

From: Rachel Palmer, chairman

Organisation: Wool Flora and Fauna

Submitted: 17 October 2024

Method of submission: Online portal

Comments:-

I object to the following in this plan.

277 Just because Wool has a railway station does not make it sustainable. The primary school is near to its capacity, The sewage works is also near capacity. The railway station does not take residents to access hospitals at Poole or Dorchester, there is quite a walk. As seen in the photographs in the Wool Plan it is subject to extreme flooding.

Even with the present situation sewerage effluent enters the River Frome SSSI. There are detrimental levels of nitrate causing pollution as shown by the decrease in populations of Atlantic Salmon and algal greening of the mud flats in Poole Harbour SPA. Any offset measures will not solve the immediate problem or allow for increased sewerage as there is a time lag.

Wool has exceptional biodiversity- see; Proceedings of the Dorset Natural History and Archaeological Society 2022, vol 143 by Dr Tony Warne. What shows for one group of animals holds for others such as Bats. Wool has 10 of 15 British species recorded on development sites including the rare Leislars Bat and Barbastelle.

Wool 15

Wool has an exceptional habitat mosaic accounting for its exceptional biodiversity. So already there is connectivity until broken by development- there is therefore no need for more networks.

All the development proposed is on organic farmland of at least 20 years standing. 30% more biodiversity than on conventionally farmed fields, Offset again does not allow for the time lag in which the hoped for biodiversity gain takes to develop.

I do not disagree on the whole with points on which it will have no effect made in the Parish Plan draft. There are consistent efforts to help compensate for damage resulting from the choice of Wool for the large housing allocation (470 plus retirement Home) however perhaps the plan can stop even more houses 400+ waiting in the wings in the Dorset Plan.

the following therefore should act as a consideration against mere houses; Sewage pollution, Flooding, gaps in infrastructure (school) and the strongly expressed views of local residents against the development resulting in turning Wool from a village into a commuter town.

Representation number: 6

From: Phillippa Gatehouse Palmer, senior planner

Organisation: Chapman Lily Planning Ltd

Submitted: 17 October 2024

Method of submission: Online portal

Comments:-

Please see attached letter dated 14th October 2024 clarifying that the neighbourhood plan has been prepared in an aspirational manner and that care and further consideration of proposed infrastructure delivery is needed to ensure that it does not result in housing delivery becoming unviable. Chapman Lily Planning on behalf of the client consider the plan to largely meet the Basic Conditions but provide recommendations for modification to overcome concerns.

Dear Sir / Madam

I herein respond on behalf of our Client.

In preparing this response, Chapman Lily Planning Ltd have been cognisant of the guidance set out in the National Planning Policy Framework ["NPPF"] and Planning Practice Guidance ["PPG"].

Paragraph 28 of the NPPF has regard to non-strategic policies, stating that '*Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure and community facilities at a local level, establishing design principles, conserving and enhancing the natural and historic environment and setting out other development management policies*'.

Paragraph 29 of the NPPF states that '*Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan. Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies*'.

Paragraph 30 states that '*once a neighbourhood plan has been brought into force, the policies it contains take precedence over existing non-strategic policies in a local plan covering the*

neighbourhood area, where they are in conflict; unless they are superseded by strategic or non-strategic policies that are adopted subsequently.

Paragraph 36 of the NPPF states that the 'tests of soundness will be applied to non-strategic policies in a proportionate way, taking into account the extent to which they are consistent with relevant strategic policies for the area'.

Paragraph 37 has direct regard to Neighbourhood Plans, requiring them to meet certain '**Basic Conditions**' and other legal requirements before they come into force. This includes (as set out in paragraph 8 of schedule 4b of the Town and Country Planning Act (as amended)).

- a. having regard to national policies and advice contained in guidance issued by the secretary of State, it is appropriate to make the order
- b. having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order,
- c. having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order,
- d. the making of the order contributes to the achievement of sustainable development
- e. the making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area),
- f. the making of the order does not breach, and is otherwise compatible with, [retained EU obligations], and
- g. prescribed conditions are met in relation to the order and prescribed matters have been complied with in connection with the proposal for the order.

Compliance with the Basic Conditions

Main Issues

Paragraph 041 (Reference ID: 41-041-20140306) of the NPPG makes it clear that a Neighbourhood Plan should be;

- *drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications.*
- *concise, precise and supported by appropriate evidence.*

In my opinion the emerging Neighbourhood Plan has been largely prepared in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 and NPPF 2023 but requires amendments to better support a sustainable future for Wool Parish.

The Draft Wool NP is underpinned by a raft of technical studies, appraisals, assessments and the submission is accompanied by a Basic Condition Statement purporting to show that the neighbourhood Plan has regard to National and Local Policy.

A review of the Neighbourhood Plan is set out below chronologically, using chapter headings of the Neighbourhood Plan.

Draft Foreword

The client considers that the foreword provides a platform for the Wool Parish Council to outline their displeasure for new housing. The statement *'it is overwhelmingly clear that residents of the parish oppose the number of housing proposed by Dorset Council'* provides a sweeping brush over a large group of people who are in general support of housing, for example, 161 people in their 2019 survey 'would like' housing. Further clarity is requested regarding the sample size, as the headline results (Table 2 of the supporting consultation report) provide figures above the 201 sample size noted in paragraph 10.

It is clear from the tone of the Foreword, that the neighbourhood plan has not been prepared positively for the delivery of much needed housing development allocated by the Purbeck Local Plan. This raises the spectre that new development is to be viewed negatively, something I feel persists through the Draft Wool NP.

The client does however applaud the NPSG for 'Our Vision' which states that *'the neighbourhood plan Vision is to ensure that the essential characteristics of Wool Parish which local people value and support are retained and where possible enhanced, whilst services are improved with better connections between settlements, and local housing needs for all sections of the community are better met'*.

Draft Potentially Significant Environmental Impacts

The client requires 'Area's of Outstanding Natural Beauty' to be replaced with 'National Landscapes'.

Paragraph 10 has been worded to insinuate that additional development will affect sensitive sites and / or create additional visitor pressure. Suitable mitigation can combat this.

Draft Local Plans context

The Client requests that reference to the Purbeck Local Plan Part 1 adopted in November 2012 is removed.

Draft Vision and Objectives for the Neighbourhood Plan

Paragraph 44 states '*the Parish of Wool faces significant challenges arising from the potential for large amounts of planned housing development proposed in the Purbeck Local Plan 2018-2034*'.

The client seeks to amend this to '*the Parish of Wool faces significant challenges and opportunities for planned housing development proposed in the Purbeck Local Plan*' better reflecting benefits of housing delivery for existing and future residents of Wool.

Paragraph 49 states '*it is clear they are not wanted by local people at anything like this scale*'. It is unclear as to how this opinion has been formed, when as outlined above, a high level of responses within the Neighbourhood Plan consultation clarified that they '*would like housing*'. Similarly, while best efforts by the Town Council to actively engage with the community should be applauded, the number of consultation responses received is still very low considering that the population of the parish is 5400 people. Thus the responses received do not necessarily represent the 'majority'. It is important for the Neighbourhood Plan to avoid sweeping statements and to acknowledge that there is a considerable 'silent majority'. As such, the Client recommends that similarly to paragraph 47, proceeding paragraphs are caveated with '*the response to surveys show that..*'

The Client considers that paragraph 52 - 55 is irrelevant and should be removed. Paragraph 55 should then be amended to state '*the neighbourhood seeks to ensure that the community of Wool, including future residents, gets as much out of new development as possible...*'.

Draft Vision and Objectives

Draft Objective 2 should be amended to '*Housing Provision in Wool Parish should be tailored to meet the needs of existing and future residents*'.

Draft Design Policies for Wool Village, East Burton Village and Bovington

Low density residential priorities to protect and enhance character include;

- Support potential for limited infill development on gap sites or large plots.
- Take opportunities to replace lower quality buildings through redevelopment.
- Protect the low-density character and important vegetation in determining proposals for the intensification of development through infilling or redevelopment of existing plots at greater densities.

- Consider the contribution and informal qualities of existing tracks and lanes in development proposals that would resurface and widen them or which would remove verges and create pavements.
- Avoid insensitive redevelopment where built forms become more dominant than the vegetation.

The Client considers that further clarification is needed with regards to '*where built form becomes more dominant than the vegetation*'. If this references trees, The Client considers that this should be referenced to trees, otherwise built form may always be considered more dominant and subsequently frustrate the delivery of much needed homes.

Draft Residential Development Density and Form

Paragraph 70 states that '*there is a strong concern in the community that the design of development...*'. This should be amended to state '*there was some concern noted during community consultation that the development on strategic housing allocation sites may...*'

Paragraph 83: Grammatical correction – please close brackets after '*with appropriate density of development to be decided on a site-by-site basis*'.

Paragraph 86 needs to be updated to reflect which policy it refers to. It currently states '*Error! Reference source not found*'.

Draft Policy WOOL 2

Draft Policy WOOL 2 states that '*... e) the design of car parking should reflect the number of cars likely to be parked in the development and should avoid impacts on residential amenity that can result from lack of sufficient car parking*'.

The Client recognises that there is a careful balance to be made between accommodating vehicles within new development and restricting vehicle use within new developments. It is considered that the additional spaces required as part of the Draft Neighbourhood Plan may result in unintended consequences such as additional congestion or parking requirement within the village centre. It is considered that an alternative approach such as promoting car clubs, cycle parking and public transport may be more appropriate in changing the area's current car culture. Draft Policy WOOL 2 does not sit comfortably, requiring new residential development to use a demand based model rather than a design for the future approach which would seek to reduce the number of cars within a development. The proposed parking requirements do not support climate change and sustainable development goals.

The requirement for all dwellings to have a front garden between dwellings and the street should be tempered by the character of the area and to ensure that the Wool NP accords with paragraph 129 of the NPPF, making optimal use of the potential of each site.

Draft Policy WOOL 3

The Client acknowledges the benefits of contributing to improvements in the local environment. The Client supports Draft Policy WOOL 3.

Draft Policy WOOL 4

The Client supports Draft Policy WOOL 4.

Draft Chapter 5 – Introduction

The Client requests that paragraph 108 is updated to state *'Dorset Council expects to adopt a new Dorset-wide Local Plan in 2027'*.

The Client requests that paragraph 111 is amended from *'the community is extremely concerned about potential impacts'* to state *'there was concern during consultation about the potential impacts of 1000 new houses in the Parish'*.

Draft Policy WOOL 5

In accordance with the Purbeck Local Plan, WOOL 5 seeks a proportion of 40% affordable housing from qualifying developments. It should be made clear that this 40% is applied only to 10 homes or more, with the proportion of affordable housing on sites with housing numbers between 2-9 being 20% affordable in accordance with the Purbeck Local Plan Policy H11. Requiring a 50% discount on first homes is a laudable ambition but is unlikely to be viable. The Client suggests that this should be set as an ambition rather than 'where possible' or '30% discount and above on first homes is supported'.

Regarding the proposed local connection policy, it is suggested that reference is made to exceptions. These exceptions (a-q) are set out in the Dorset Council Housing Allocations Policy 2021-2026 and include for example those who are assessed as having urgent (emergency) need due to imminent risk of violence, those who are part of a witness protection scheme, and for those who are homeless within the meaning of Part 7 Housing Act 1996 and Dorset Council has accepted a full housing duty. This is important to ensure that rhetoric is inclusive and responsible to the needs of the wider population.

Draft Affordable Housing Type and Size Policy

Paragraph 147 should remove the sentence '*most people would probably not want a 1-bedroom flat by choice and would want at least a 2-bedroom dwelling...*' as it is unclear how this has been evidenced and is set out as an assumption.

Draft Policy WOOL 6

While the Client is unclear as what is meant by 'a balanced provision', they support the sentiment of providing a range of house types and sizes to meet the identified housing needs in Wool.

Draft Policy WOOL 8

The Client applauds the steering group for their commitment to active travel and the reference to 'walkable neighbourhoods'. The draft policy supports the provision of new housing on sites larger than 1ha being within walking distance (800m) of local grocery shops. This draft policy would support sustainable development and meets Basic Conditions (d and e).

Draft Policy WOOL 9

The Client supports the provision of new community infrastructure to ensure the sustainability of Wool Parish. The Client considers that further explanation as to how the improvements will be secured and their trigger is needed. The summary infrastructure report for Wool Neighbourhood Plan concludes that provision should be required prior to housebuilding being commenced. This is often not viable for developers and does not support SME house builder companies. The Client considers that discussions for both the type of contribution and trigger points for the delivery of infrastructure should be discussed on a case-by-case basis between the developer, Local and Parish Council.

Draft Policy WOOL 10

The Client supports the ambition to improve bus services in the Wool Parish. Further consideration is needed to ensure enhancements are proportionate. Dorset Council has already determined that no additional bus services are required to support the additional dwellings proposed through housing allocations, though it is noted that in the supporting document 'Bus Survey Summary' that 38.5% of 191 people responding (i.e. 66 people) would be prepared to pay more Council Tax for a bus service). Should these services be delivered, consideration will be needed as to how much money will be used to fund additional bus services, over how many years and how these improved bus services will be supported following the end of developer contributions. It is noted that policy states 'new major

developments are encouraged...' however considering car clubs / better cycle parking provision may be a better and more achievable ambition.

Draft Cycling Network Conditions and Setting Priorities for Improvement

Paragraph 241 has a hyperlink directing users to paragraph 245. This should be removed as it is not relevant.

Draft Policy WOOL 11

The Client applauds the steering group for their commitment to improving walking and cycling infrastructure.

Draft Policy WOOL 13

Draft Policy WOOL 13 has regard to Local Green Space Sites. It is noted that the Parish do not know who owns the proposed local green spaces and further advertising to ensure no other parties have interest in the land should be encouraged. The Client considers that the proposed greenspaces conform with the criteria within paragraph 106 of the NPPF, holding local significance. As such it is considered that Draft Policy WOOL 13 meets criteria D and E of the Basic Conditions.

Draft Policy WOOL 14

Draft Policy WOOL 14 requires regard to the provision of allotments. Care is needed during the determination of each application that this does not prevent or frustrate the delivery of housing.

Draft Policy WOOL 15

Reference to development having an adverse effect on the integrity European Sites should be removed as this is repetition of both habitat regulations and local plan policy. It is also considered that the requirement for BNG is removed and instead locations where biodiversity features / networks could be improved could be identified in Wool.

Conclusion

It is clear that the Neighbourhood Plan has been prepared in an aspirational manner. Care and further consideration of proposed infrastructure delivery is required to ensure it does not result in housing development becoming unviable. This would clearly be in conflict with policies set out within the NPPF, which seeks to realise the Governments goal of significantly boosting housing supply.

I trust that the information set out above assists in the Examiner's recommendation and the Neighbourhood Plan Group in arriving at a plan which meets the tests of the Basic Conditions.

On Behalf of the Client, we would welcome at the Examiner's discretion, the opportunity to participate in the Examination Process.

Representation number: 7

From: Sarah Beuden, director

Organisation: Savills UK Ltd on behalf of Lulworth Estates, Redwood Partnership and A&M Properties

Submitted: 18 October 2024

Method of submission: Online portal

Comments:-

Please see representation submitted for full comments.

Paragraph 5.26 in representation: The landowners object to draft policy WOOL 5 as 'First Homes' will no longer be required under the proposed legislation, failing to meet the basic conditions of a Neighbourhood Plan under (a) having regard to national policies and advice in guidance issued by the Secretary of State and should be amended.

Paragraph 6.5 in representation: The Landowners have concerns about the draft policies WOOL 2; WOOL 3; WOOL 5 and WOOL 6. This representation therefore objects to the wording of these policies and has offered alternative phrasing or removal.

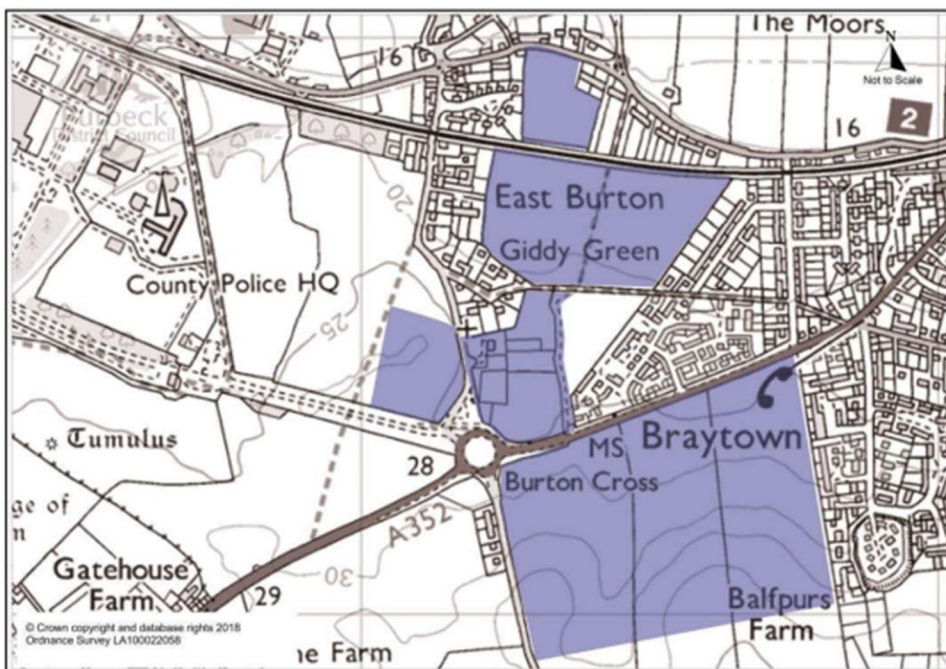
Paragraph 6.6 in representation: The allocated site can help deliver the community infrastructure, improvements to transport infrastructure and other contributions as highlighted in the Wool Parish Neighbourhood Plan. However, it is considered that these four policies should be amended to assist the development of the allocated site, along with other potential future development opportunities in the sustainable settlement of Wool.

SAVILLS' FULL COMMENTS FOLLOW OVER THE NEXT 16 PAGES

1. Introduction

- 1.1. This representation has been prepared by Savills on behalf of Lulworth Estate, Redwood Partnership and A&M Properties (collectively known as ‘the landowners’) in response to the Regulation 16 consultation of the Wool Parish Neighbourhood Plan.
- 1.2. The Landowners’ interests collectively include that which is allocated for new homes and associated infrastructure under Policy H5 Wool (hereafter referred to as ‘the Site’) in the adopted Purbeck Local Plan (July 2024).
- 1.3. Policy H5: Wool relates to the following areas of land (refer to figure 1 below):
 - Land to the west of Chalk Pit Lane and Oakdene Road
 - Land to the north east of Burton Cross Roundabout
 - Land to the north west of Burton Cross Roundabout
 - Land to the north of the railway line

Figure 1 Screenshot of the allocated development site within the Purbeck Local Plan 2018 - 2034



- 1.4. Whilst the Landowners support the Vision and Objectives for Wool Parish as set out in the draft Wool Parish Neighbourhood Plan (WPNP), they are mindful that the site at Wool has been allocated under a strategic policy in the newly adopted Purbeck Local Plan (PLP) and in fact, many of the policies contained within the newly adopted PLP are strategic in nature, as set out under paragraph 3 of the PLP.

- 1.5. Given the recent adoption of the PLP and allocation of the site, it is necessary to consider paragraph 16 of the NPPF, which states that plans should serve a clear purpose avoiding unnecessary duplication of policies that apply to a particular area. In addition, it is also necessary to consider whether any of the policies in the plan potentially have a conflict with the site's allocation under strategic Policy H5 (Wool) and any other strategic policies within the PLP, given that the Neighbourhood Plan, once adopted, will form part of the statutory development plan, but only non-strategic policies will take precedence over adopted strategic policies if there is a conflict. The provisions of the NPPF have therefore been a key consideration in the drafting of these representations on the basis that it is the objective of Wool Parish to be found sound.
- 1.6. The representation is structured as follows:
- **Section 2** Summary of site opportunity and review of Regulation 14 responses
 - **Section 3** Proposed reforms to the National Planning Policy Framework
 - **Section 4** The housing land supply position in Dorset
 - **Section 5** Representation to the Wool Parish Neighbourhood Plan (2024-2038)
 - **Section 6** Conclusion
 - **Section 7** Appendix

2. Summary of site opportunity and review of Reg 14 responses

- 2.1. The landowners have previously submitted comments separately (Lulworth Estates and Savills on behalf of Redwood Partnerships) supporting the site and land to the west of East Burton to the Wool Parish Regulation 14 consultation (15 January 2024 to 29 February 2024).
- 2.2. In addition, as part of the submission to Dorset Council's Regulation 18 consultation, the Landowners have prepared and submitted a vision document (dated March 2021) indicating how the proposed development envisaged by the allocation under Policy H5 of the PLP can be accommodated on the site, incorporating placemaking principles to integrate into the Wool Parish and provide a high quality place to live.
- 2.3. The site has been allocated to deliver circa 470 new homes, of which 40% are required to be affordable homes; a circa 65 bed extra care facility; community facilities; a new convenience retail store; a 37 ha SANG and other green infrastructure; improvements to historic assets; and public transport improvements to promote sustainable travel and connections to local employment. The site is in a sustainable location with good strategic road links, local bus services and train services to Weymouth, Dorchester, Bournemouth, Southampton (and Southampton Airport), Winchester, Woking and London Waterloo.
- 2.4. In the last iteration of Dorset Council's emerging Local Plan (Regulation 18), Wool is recognised as an appropriate and sustainable location for development. It is noted that paragraph 10 of the draft WPNP states that the NP will not allocate further sites and that these should come forward as part of the Dorset Local Plan process. As such, these representations are focused on the policies that relate to the existing and adopted allocation under Policy H5: Wool.

3. Proposed reforms to the National Planning Policy Framework

3.1. On 30 July 2024 the Ministry of Housing, Communities and Local Government published proposed changes to the National Planning Policy Framework (NPPF). Key changes include:

- Making housing targets mandatory.
- Implementing a new standard method formula to ensure local plans are ambitious enough to support the Government’s manifesto commitment of 1.5 million new homes in this Parliament.
- Identify grey belt land within the Green Belt, to be brought forward for homes and other important development through both plan and decision-making.
- Deliver affordable, well-designed homes, with new “golden rules” for land released in the Green Belt to ensure release delivers in the public interest.
- Make wider changes to ensure that local planning authorities are able to prioritise the types of affordable homes their communities need and that the planning system supports a more diverse housebuilding sector.
- Support economic growth.
- Deliver community needs to support society and the creation of healthy places.
- Support clean energy and the environment, including through support for onshore wind and renewables.

3.2. Of particular relevance to the WPNP and wider Dorset is a new standard method formula which produces a housing target of 3,320 homes per annum for Dorset, which is an increase of 1,527 dwellings per annum on the previous formula. It also provides that mix of tenure housing sites should be supported because of the range of benefits that they can bring, including creating diverse communities and supporting timely build-out rates (paragraph 69). In addition, it states that a mix of affordable housing should be provided to meet local needs across both affordable housing for rent and affordable home ownership tenures (paragraph 66).

3.3. The draft NPPF was accompanied by a Written Ministerial Statement (WMS) from the Rt Hon Angela Rayner titled ‘Building the homes we need’. The WMS identified that the UK is in the middle of an acute housing crisis, with home ownership out of reach for too many. It states that planning reforms are central to economic growth and are needed to improve affordability and build 1.5 million homes over the next five years. It highlights that there is a need for a variety of ownership options, tenures and affordable housing to be provided.

3.4. It is noted that a Written Ministerial Statement published on 30 July 2024 states as part of the changes to the NPPF, the Government indicated the removal of the requirement for “*a minimum of 25% of affordable homes units secured through developer contributions should be First Homes*”¹ as set out in the 24 May 2021 Written Ministerial Statement. Consequently, there is no longer a policy requirement at the national level to deliver First Homes as confirmed by the 30 July 2024 Written Ministerial Statement.

3.5. The WMS is now a material consideration in plan-making and decision-taking.

¹ Please see: <https://www.gov.uk/government/consultations/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system#chapter-4--a-new-standard-method-for-assessing-housing-needs>

4. The housing land supply position in Dorset

- 4.1. On 26 September 2024, Dorset Council received the Planning Inspector's report on its Annual Position Statement², which was submitted in July 2024. The Inspector confirms that Dorset Council can demonstrate a housing land supply of 5.02 years and they can rely upon this statement until 31 October 2025.
- 4.2. This is the first time since Dorset became a unitary authority in April 2019 that the Council has had a combined housing land supply position, which combines the former authority area, including Purbeck. The current position equates to 8,999 new dwellings over the next five years based on a current annual target of 3,320 dwellings per annum.
- 4.3. The Government published new draft housing targets for all authorities in July 2024. The new draft housing target for the Dorset Council area is calculated to be 3,320 dwellings per annum. This figure was published following the submission of Dorset's Annual Position Statement but indicates that Dorset will not have a 5YHLS position post-October 2025. The increased housing targets will mean that Dorset Council will need to identify and provide an additional 1,527 dwellings per annum across the county during the plan period. If the new methodology for calculating housing targets is adopted, Dorset Council would only have a housing land supply of 2.79 years.
- 4.4. Purbeck Local Plan (2018 - 2034) aims to provide 2,976 homes over the plan period, which equates to 186 dwellings per year within Purbeck. This means that 54% of 186 (existing dwellings per annum) calculates an increase of 100 dwellings per annum increase during the Purbeck plan period. Therefore, the potential increase is 286 dwellings per annum to be provided for Purbeck.
- 4.5. Whilst Dorset Council Local Plan will be looking at this housing provision countywide, the former Purbeck area would have to absorb some of this housing expectation. By supporting the housing growth within Wool, the allocated site would provide a valuable contribution to this housing requirement.

² Annual Position Statement found at <https://www.dorsetcouncil.gov.uk/documents/d/guest/240927-dorset-council-confirmed-annual-position-statement-2024-main-report>

5. Representation to the draft Wool Parish Neighbourhood Plan

5.1. This section sets out the Landowner's representation of the draft policies within the draft Wool Parish Neighbourhood Plan (WPNP). In drafting these representations, the landowners have had regard to the strategic policies within the adopted Purbeck Local Plan (PLP) and both published and emerging national planning policies.

5.2. Paragraph 10 of the draft WPNP explicitly states that the neighbourhood plan does not allocate any sites for development. Paragraph 44 states that:

'The parish of Wool faces significant challenges arising from the potential for large amounts of planned housing development proposed in the Purbeck Local Plan 2018 – 2034 and emerging Dorset Local Plan, which would alter the character of Wool and East Burton... It has major military site and faces challenges to provide transport connections and services so military families can access services and facilities...' (Paragraph 44)

5.3. Whilst the Landowners acknowledge that any large-scale development has its challenges, the development would also present significant opportunities and benefits in which they are located. With regards to the Land at Wool (as set out in adopted policy H5: Wool of the PLP) this includes 470 new homes; around 65 extra care units; community facilities and contributions to supporting infrastructure in a sustainable location.

5.4. These opportunities and benefits would support the future growth of Wool (either via new development or through existing residents of Wool) which are highlighted within the WPNP, e.g. expansion of the D'Urberville Centre or additional convenience space. The allocated site at Wool aims to provide a range of services and houses to support a sustainable location and to work positively with Wool Parish Council and Dorset Council to achieve the objectives of both plans. However, the Landowners have concerns over specific policies within the WPNP that should be addressed before examination.

5.5. The comments are written below each policy header and a summary table can be found within the **Appendix** for each of the landowners' comments per policy.

Policy WOOL 1- Design Principles for New Development in Wool Parish

5.6. Draft Policy Wool 1 states that proposals for new development in Wool Parish should, through their design, have regard to the priorities to protect and enhance character set out in Table 2 of the draft WPNP. Proposals demonstrate the inclusion of details and use of materials on new buildings and boundary treatments, which are of good quality and are durable.

5.7. The allocated site 'Land at Wool' is not included within the character areas identified in Figure 12, therefore the assumption is that this policy does not apply to the allocation. On this basis, the site as allocated under Policy H5 of the adopted PLP is excluded from this draft policy and therefore has no overriding objection. The Landowners reserve the right to provide further representations if this is not the case.

- 5.8. The Landowner intends that any forthcoming planning application for development at Wool incorporates high-quality design and is required under adopted policies within the adopted PLP.

Policy WOOL 2 – New Residential Development Form

- 5.9. Draft policy WOOL 2 states that proposals for new residential development in Wool Parish should demonstrate positive approaches to delivering good residential amenities. The draft policy further outlines five criteria (a-e) that a proposed development should demonstrate. Whilst the Landowners agree that new residential development in Wool Parish should demonstrate positive approaches to deliver good residential amenity, the landowners object to the following parts of the draft policy.
- 5.10. Whilst the landowners agree that the height of new development should not be overbearing in relation to neighbouring development, it is considered that the second part of the sentence under criterion ‘a’ is ambiguous. The second half of criterion ‘a’ states ‘...*should not result in significant changes of character and should aim to create an open character to new developments*’. The words ‘*significant changes*’ give the impression that all ‘*significant changes*’ are negative. There are instances where significant changes can be important for improving the local character, e.g. conversion of a derelict building into its former use which would reinstate the design, making a significant change to the local character. Change itself is not a reason to withhold planning consent, whereas harm is. As such, the word ‘*change*’ should be removed and should be replaced with the word ‘*harmful*’.
- 5.11. Additionally, the phrasing ‘*open character*’ is not defined within the draft WPNP and provides an unclear view of the design principles that Wool Parish deems acceptable. The wording is considered to be too ambiguous and the draft WPNP should either provide a definition for ‘*open character*’ or clarify the objectives of this design criterion. Further reasoning or justification is required as to what constitutes an open character.
- 5.12. The Landowners **object** to the wording of criteria ‘c’ where the draft policy states that private front gardens should be provided between dwellings and the street. There is no justification why all new development should include private front gardens on every plot. There are numerous examples where front gardens are not provided in successful and well-designed places, such as Poundbury and Dorchester. More locally, the immediate roads to the site named ‘The Poppies’ and ‘Dorchester Road’ under the ‘neo-vernacular style housing’ character area (under draft policy WOOL 1), have dwellings located close to or on the public footpath. It is therefore unevidenced that there is a requirement to provide private front gardens for all dwellings.
- 5.13. Under criteria ‘e’, the Landowners do not object to the provision of car parking, however, the landowners consider that an appropriate level of car parking should be provided to not exacerbate issues, such as on-street parking on neighbouring streets. Car parking provision is covered by criterion (i) of adopted policy I2 of the adopted PLP which confirms that the car parking provision would need to comply with The Residential Car Parking Provisions – Local

Guidance for Dorset (May 2011)³ as confirmed within the PLP paragraph 125 (page 58) and specific criteria under Policy H5: Wool.

5.14. It is considered that the wording in Policy I2 and the Residential Car Parking Provisions on parking provision for the allocated development would reflect the parking levels in line with guidance, not reflecting the size of the dwellings as per the wording from draft policy WOOL 2. It is suggested that the wording of criterion 'e' be amended to include 'appropriate levels of parking' in line with the most recent Car Parking Strategy adopted by Dorset Council.

5.15. The landowners therefore **object** to the draft policy wording WOOL 2 and suggest the following modification:

"...a) The height of new development should not be overbearing in relation to neighbouring development, should not result in significant ~~changes~~ harmful impacts to the character of the area and should aim to create a design that respects the character of the area...

... c) where appropriate, private front gardens should be provided between dwellings and the street in order to reflect upon local characteristics of the wider area. Street patterns should be ~~understandable~~ legible and designed to provide private rear garden space where overlooking is minimised ..."

...e) The design of car parking provision should reflect ~~the number of cars likely to be parked in the development and should avoid impacts on residential amenity that can result from lack of sufficient car parking upon the car parking strategy as agreed by the Local Planning Authority...~~"

Policy WOOL 3 – Improvements to the Local Environment

5.16. Draft policy WOOL 3 states that Dorset Council should have regard to the need for improvements to the provision and management of flood protection and drainage infrastructure. Whilst the landowners consider that developments should improve the wider environment where necessary, viable and sustainable, this policy is directed towards Dorset Council's priorities for spending contributions. Contributions would be secured under Policy I1 of the adopted PLP, which is a strategic policy and is outside the control of individual applicants. Concerning the land at Wool allocated under Policy H5 of the adopted PLP, which is also a strategic policy, there are specific requirements for any development to make contributions towards D'Urberville Hall community facility or explore opportunities to provide a community hub; improvements to defined walking and cycling routes; improvements to the travel interchange at Wool Railway Station to include additional car parking, secure cycle storage, and electric vehicle charging; provide financial contributions towards education and transport improvements.

5.17. Policies E4 and E5, which are strategic policies under the adopted PLP address flood risk and sustainable drainage issues and require qualifying development to assess and mitigate any potential impacts of development on flood risk and provide adequate drainage, including Sustainable Drainage Systems. It is understood that Parish Councils get a percentage of CIL monies from development in their parishes under the CIL regs, which can be

³ Please see <https://www.dorsetcouncil.gov.uk/documents/35024/291099/Car+parking+study+volume+1.pdf/d4eb2674-fd38-52c5-afe4-91a42d5304a2>

used towards the Parish's priorities. It is suggested that given this policy (as written) is directed at Dorset Council as a request for monies to be prioritised/ coordinated, that the policy be removed, and discussions had between Dorset Council and the Parish on the priorities for Wool.

- 5.18. As such, the Landowners **object** to draft policy WOOL 3 and suggest that this policy be removed from the draft WPNP.

Policy WOOL 4 – Environmental Performance of Buildings

- 5.19. Draft policy WOOL 4 states that, with regard to Dorset Council's Sustainability Checklist (a validation requirement for every planning application which meets its criteria, V17 updated 19 September 2024), new buildings and alterations/ extensions to existing buildings are expected to achieve high standards of environmental performance. Draft policy WOOL4 goes on to state that new development design in Wool should be future-proofed to support the achievement of lower carbon emissions, improved infrastructure, better heat management and lower operating costs with new heating and energy generation technologies.

- 5.20. The Landowners support the provision of well-designed buildings and places and the incorporation of technology to achieve high-quality, energy-efficient developments. The most appropriate sustainability strategy for a site depends on its individual characteristics, locality, constraints and opportunities. The policy should reflect this to enable flexibility for developments to present the most feasible, viable and sustainable approach, reacting to any advances in technology over the plan period.

Policy WOOL 5 – Affordable Housing Tenure

- 5.21. Land at Wool as allocated under Policy H5 of the adopted PLP is required to provide 40% of housing as affordable housing, so the policy is consistent with strategic Policies H3 and H11 of the adopted PLP. Paragraph 189 of the adopted PLP states that the proposed mix of housing tenures set out in the affordable housing policy has been tested through the Council's area-wide viability assessment. Policy H11 states that, subject to viability, requires (emphasis added) the following affordable housing mix to be provided:

- 10% social rented housing
- 65% affordable rented housing
- 25% affordable home ownership

- 5.22. It is noted that Policy WOOL 5 looks to provide 35% of the homes as affordable home ownership, as opposed to the 25% required in Policy H11. This is based on the Wool Housing Needs Assessment (June 2023) and the draft policy states that, where possible the 35% should be delivered as 25% first homes and 10% shared equity. It is noted that a Written Ministerial Statement published on 30 July 2024 states as part of the changes to the NPPF, the Government indicated the removal of the requirement for *“a minimum of 25% of affordable homes units*

*secured through developer contributions should be First Homes*⁴ as set out in the 24 May 2021 Written Ministerial Statement. Consequently, there is no longer a policy requirement at the national level to deliver First Homes as confirmed by the 30 July 2024 Written Ministerial Statement.

- 5.23. In addition, whilst Policy H11 states that local planning policies may set locally specific requirements relating to the tenure mix of affordable housing, this needs to be justified with robust local evidence. Whilst the Wool Housing Needs Assessment suggests that the need would be for 35% affordable home ownership and 65% affordable rented housing, this is not supported by any additional viability evidence (which Policy H11 was supported by) and does not take account of the recently published Ministerial Statement, as the Wool Needs Assessment was published before this was issued.
- 5.24. It is also proposed under draft Policy WOOL 5 that the 10% social rented required under Policy H11 be absorbed into the 65% affordable rented housing, which is not evidenced at all given the Wool Housing Needs Assessment concurs with the adopted PLP that 65% of affordable housing should be affordable rented. It is considered that in light of there being no updated viability information to support a revised tenure mix and the recent WMS, the revised affordable tenure mix proposed is removed as it is considered this conflicts with strategic Policy H11. The adopted Policy H11 as currently written allows the flexibility to amend the tenure mix.
- 5.25. The Landowners do not have any objection to Wool Parish requesting that housing allocations for Affordable Housing Ownership be prioritised to people with local connections, in order to foster sustainable communities. Clearly, if there is no-one on the waiting list for affordable housing when these properties become available, then the Landowners assume that the criteria will apply to those geographically closest to the Wool Parish. On this basis, it is considered that the policy should be renamed to ‘Affordable Housing Ownership’.
- 5.26. Therefore, the landowners **object** to draft policy WOOL 5 as ‘First Homes’ will no longer be required under the proposed legislation, failing to meet the basic conditions of a Neighbourhood Plan⁵ under (a) having regard to national policies and advice in guidance issued by the Secretary of State and should be amended as follows:

“Wool 5 – Affordable Housing ~~Tenure~~ Ownership...

...Where possible, the affordable housing ~~tenure~~ ownership– split should be made on the following basis:

Shared equity homes should form no more than 10% of affordable housing provision in Wool Parish. Equity Stakes should be set as a 10% minimum.

⁴ Please see: <https://www.gov.uk/government/consultations/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system#chapter-4--a-new-standard-method-for-assessing-housing-needs>

⁵ Please see <https://www.gov.uk/guidance/neighbourhood-planning--2#basic-conditions-for-neighbourhood-plan-to-referendum>

Social rent, affordable rented housing and affordable home ownership should form 90% of the affordable housing provision through new development in Wool Parish. Social rented homes should be provided in larger schemes to ensure that provision is made for lower quartile income households...

Policy WOOL 6 – Housing types and sizes in Wool Parish

- 5.27. Draft policy WOOL 6 states that major planning applications for new housing in Wool Parish should include balanced provision of 1 bedroom and 4+ bedroom dwellings alongside 2-3 bedroom dwellings to meet identified housing needs in Wool. Adopted policy H9 in the PLP states that the Council will expect new market housing to support the delivery of the housing mix identified through the Strategic Housing Market Assessment 2015, its update in 2018 or other recent evidence.
- 5.28. It is recognised that Policy H9 (Housing Mix) of the adopted PLP states that local policies in neighbourhood development plans should support the general principles around providing the sizes and types of homes needed in Purbeck. This mix is supported by the most up-to-date SHMA and is set out in paragraph 176 of the adopted PLP. Whilst it is acknowledged that a Local Needs Assessment has been undertaken for Wool, on recommending housing mix, this assessment considers need against current housing stock, which to its own admission, is a blunt indication of future need and that it might not be advisable to restrict future housing delivery too strictly to smaller or larger dwellings, just because these are sparse in the locality. As such, it is considered that the policy be reworded to reflect the need for a range of housing sizes as it is ambiguous to require a ‘balance’.
- 5.29. The landowners therefore **object** to draft policy WOOL 6 and suggest the following draft policy wording:
- ‘Major Planning Applications for new housing within the Wool Parish should include a mix of housing sizes including 1, 2, 3 and 4+ bedroom dwellings to meet local needs taking account of up-to-date evidence’*

Policy WOOL 7 – Burial Space Provision in Wool Parish

- 5.30. Whilst the landowners recognise the evidence base produced by the Wool Parish on this issue, it seems that this is more of a strategic issue with the requirement for land allocations for the specialist requirements, concerning the provision of any additional burial space, to be considered. In addition, such space may be provided to serve additional parishes in addition to Wool. On the basis that the WPNP is not allocating land, it is considered that the WPNP lodges its evidence to the forthcoming Dorset Local Plan on the basis that burial space provision potentially requires land identification/ allocation on a more strategic basis through the Local Plan process. On that basis, whilst the landowners do not have any in principle objection, it is considered that this policy could be removed and instead included for consideration through the Local Plan.

Policy WOOL 8 – Protection of sites in local community use

- 5.31. Within the draft policy wording of WOOL 8, it says that *‘new residential development within the NP on sites larger than 1 hectare should be planned to promote walkable neighbourhoods and active travel. Local grocery shops should exist or be provided within 800m of the whole of the development’*. The Landowners recognise that local facilities are important for sustainable and inclusive communities and support the principle of walkable

neighbourhoods. Under Policy H5 of the adopted PLP, the allocated Land at Wool will provide contributions towards the improvement of the D'Urberville Hall community facility and provide circa 350sqm of **convenience** (emphasis added) retail space.

- 5.32. It is acknowledged that such convenience space is important for neighbourhoods and to the changing patterns of grocery shopping and working practices. Shoppers are becoming much more reliant on local stores and grocery operators are subsequently capitalising on the increasing desire for a retail offering closer to home and strengthening their foothold within local neighbourhoods, which in turn makes neighbourhoods more sustainable, walkable and vibrant places to be, as well as increasing local job opportunities in retail.

Policy WOOL 9 – Priorities for new community infrastructure and services for Wool Parish

- 5.33. It is recognised that draft policy WOOL 9 relates to the provision of community infrastructure and services in Wool Parish derived from the impacts that future development has on the capacity of community services. Draft policy WOOL 9 states six areas where priority improvement needs to be had. Financial contributions and community infrastructure provision should be achieved from the development (as per Policy H5: Wool allocation description) and could be addressed through an S106 agreement.

Policy WOOL 10 – Bus services for Wool Parish

- 5.34. As stated in draft policy WOOL10, new major developments are encouraged to provide financial contributions towards the creation of new local bus services and bus stops to connect Bovington to the Dorset Innovation Park via Wool Station.
- 5.35. The Landowners support strong connections and linkages between employment and housing development and support sustainable transport practices. Under Policy H5 of the adopted PLP, residential development proposals for the land allocated, will be expected to improve accessibility between the sites and nearby services (including Wool Railway Station and Dorset Innovation Park) and facilities, by forming or improving defined walking and cycling routes, and will provide financial contributions towards improvements to the travel interchange at Wool Railway Station to include additional car parking, secure cycle storage, and electric vehicle charging points. As such, it is considered that the development at Land at Wool will contribute towards meeting the objectives of this policy in promoting sustainable travel options for commuters.

Policy WOOL 11- Improvements to walking and cycling infrastructure in Wool Parish

- 5.36. Draft policy WOOL 11 states that Dorset Council should have regard to the need for improvements to cycling infrastructure and pedestrian routes in Wool Parish. The draft policy states that this should include positive consideration of opportunities to improve infrastructure on seven different routes identified in the list within draft policy WOOL 11. Financial contributions and community infrastructure provision should be achieved from the development (as per Policy H5: Wool allocation description) and could be addressed through an S106 agreement.

5.37. It is recognised that it is important to ensure that the necessary infrastructure supports additional development and this can also benefit the wider community. Under Policy H5 (Wool) of the adopted PLP, development is already required to:

- Improve accessibility between the sites and nearby services (including Wool Railway Station and Dorset Innovation Park) and facilities by forming or improving defined walking and cycling routes.
- Provide financial contributions towards improvements to the travel interchange at Wool Railway Station to include additional car parking, secure cycle storage, and electric vehicle charging points.
- Include details in a traffic statement or assessment of improvements to the local road network (C6) and a program to reduce volumes of traffic on the A351 by encouraging use of the C6 road.
- Explore opportunities to deliver a new footpath link to Burton Road.
- Explore opportunities to deliver a new footpath link through the land between Sandhills Crescent and East Burton Road.

5.38. As such, it is considered that consideration has already been given to improving the relevant transport infrastructure in respect of the allocated land as set out under Policy H5.

Policy WOOL 12- Improvements to Wool Rail Station

5.39. Draft policy WOOL 12 states that within the determination of planning applications and prioritising investment opportunities, Dorset Council should have regard to broader requirements identified in the WPNP for improvements to Wool Railway Station. As stated in paragraph 5.35 in this representation above, under Policy H5 of the adopted PLP, residential development proposals for the land allocated will be expected to improve accessibility between the sites and nearby services (including Wool Railway Station and Dorset Innovation Park) and facilities. One of the criteria for the allocated site is to provide financial contributions towards improvements to the travel interchange at Wool Railway Station. As such, it is considered that the development at Land at Wool will contribute towards meeting the objectives of this policy in promoting sustainable travel options for commuters.

Policy WOOL 13- Local Green Space Sites

5.40. Draft policy WOOL 13 identifies sites as detailed in Appendix B, which are designated as local Green Spaces. The land at Wool does not fall into one of these areas and therefore, the Landowners have no comments to make on this draft policy WOOL 13.

Policy WOOL 14- Allotments for Wool Parish

5.41. As this relates to future local plan proposals, this would not impact the development under the proposed allocation. As such, the Landowners have no comments to make on this draft policy WOOL 14.



Policy WOOL 15 – Biodiversity Net Gain Opportunities for Wool Parish

5.42. This draft policy is in line with national legislation. As such, the Landowners have no comments to make on this draft policy WOOL 15.

6. Conclusion

- 6.1. This representation reiterates the allocated site at Wool as shown in adopted policy H5 of the Purbeck Local Plan. This site has already been allocated for development, however the Landowners wish to provide further comments on the draft WOOL policies, following on from their response to the Regulation 14 Consultation (January to February 2024).
- 6.2. Dorset Council benefits from the agreed Annual Position Statement which confirms that Dorset has a 5-year housing land supply of 5.02 years. This protection lasts until 31 October 2025.
- 6.3. The latest housing figure for Dorset Council area is calculated to be 1,793 dwellings per annum. Under the proposed methodology for calculating housing under the draft NPPF consultation, Dorset Council would need to provide for 3,320 dwellings per annum. If the new methodology for calculating housing targets was adopted, Dorset Council would only have a housing land supply of 2.79 years.
- 6.4. Purbeck Local Plan (2018 - 2034) aims to provide 2,976 homes over the plan period which equates to 186 dwellings per year within Purbeck. Using the similar percentage increase as Dorset Council (54%), this means that the Purbeck area of Dorset Council may have a potential increase of 286 dwellings per annum.
- 6.5. The Landowners have concerns about the draft policies WOOL 2; WOOL 3; WOOL 5 and WOOL 6. This representation therefore **objects** to the wording of these policies and has offered alternative phrasing or removal.
- 6.6. The allocated site can help deliver the community infrastructure, improvements to transport infrastructure and other contributions as highlighted in the Wool Parish Neighbourhood Plan. However, it is considered that these four policies should be amended to assist the development of the allocated site, along with other potential future development opportunities in the sustainable settlement of Wool.

7. Appendix

7.1. Table of Responses to Policies

Draft Policy Reference	Title of draft Policy	Reponse	Amendments (where necessary)
WOOL 1	Design Principles for New Development	No comment	
WOOL 2	New Residential Development Form	Object	The landowners therefore object to the draft policy wording WOOL 2 and suggest the following modification: "...a) The height of new development should not be overbearing in relation to neighbouring development, should not result in significant changes harmful impacts to the character of the area and should aim to create a design that respects the character of the area... ... c) where appropriate, private front gardens should be provided between dwellings and the street in order to reflect upon local characteristics of the wider area. Street patterns should be understandable legible and designed to provide private rear garden space where overlooking is minimised ..." ...e) The design of car parking provision should reflect the number of cars likely to be parked in the development and should avoid impacts on residential amenity that can result from lack of sufficient car parking upon the car parking strategy as agreed by the Local Planning Authority..."
WOOL 3	Improvements to the Local Environment	Object	The Landowners object to draft policy WOOL 3 and suggest that this policy be removed from the draft WPNP.
WOOL 4	Environmental Performance of Buildings	No comment	
WOOL 5	Affordable Housing Tenure	Object	The landowners object to draft policy WOOL 5 as 'First Homes' will no longer be required under the proposed legislation, failing to meet the basic conditions of a Neighbourhood Plan under (a) having regard to national policies and advice in guidance issued by the Secretary of State and should be amended as follows: "Wool 5 – Affordable Housing Tenure Ownership... ...Where possible, the affordable housing tenure ownership– split should be made on the following basis: - Shared equity homes should form no more than 10% of affordable housing provision in Wool Parish. Equity Stakes should be set as a 10% minimum. - Social rent, affordable rented housing and affordable home ownership should form 90% of the affordable housing provision through new development in Wool Parish. Social rented homes should be provided in larger schemes to ensure that provision is made for lower quartile income households..."
WOOL 6	Housing types and sizes in Wool Parish	Object	The landowners therefore object to draft policy WOOL 6 and suggest the following draft policy wording: 'Major Planning Applications for new housing within the Wool Parish should include a mix of housing sizes including 1, 2, 3 and 4+ bedroom dwellings to meet local needs taking account of up-to-date evidence'

WOOL 7	Burial Space Provision in Wool Parish	No comment	
WOOL 8	Protection of Sites in Local Community Use	No comment	
WOOL 9	Priorities for new community infrastructure and services for Wool Parish	No comment	
WOOL 10	Bus services for Wool Parish	No comment	
WOOL 11	Improvements to walking and cycling infrastructure in Wool Parish	No comment	
WOOL 12	Improvements to Wool Rail Station	No comment	
WOOL 13	Local Green Space Sites	No comment	
WOOL 14	Allotments for Wool Parish	No comment	
WOOL 15	Biodiversity Net Gain Opportunities for Wool Parish	No comment	

Representation number: 8

From: Rodd Webb

Submitted: 7 September 2024

Method of submission: Online portal

Comments:-

I Support the Neighbourhood Plan

Representation number: 9

From: Peter J Kirkbride

Submitted: 9 September 2024

Method of submission: Online portal

Comments:-

Please in English , what is the PLAN

no legalise, just good old fashion

ENGLISH PLEASE

As Mr Kirkbride appeared to be seeking further assistance rather than responding to the content of the plan, Dorset Council sent the following email to him on 10 September 2024:

Dear Mr Kirkbride,

I have seen your comment submitted last night regarding the Wool Neighbourhood Plan. I fully understand the sentiment, as the planning system is complicated, especially to anyone outside of the planning profession. I do apologise. While we do our best to write things in plain English in order to make things accessible, it's not always possible. In this instance, the neighbourhood plan has to follow a process set out in legislation, and so it is important that we use some of the legal language to explain this. Also, we can only consult on the material that has been submitted to us.

The neighbourhood plan has been produced by Wool Parish Council. They have produced a summary of the Plan, including a summary of its 15 policies. While this wasn't submitted to us, it can be viewed on this website: <https://www.woolparishnp.com/copy-of-plan>

My suggestion would be to start with the summary that the parish council have produced, and then decide whether you wish to look at the submitted neighbourhood plan in more detail. Ideally, your comments should refer to parts of the submitted plan, and whether you support or oppose them.

With regards to your submitted comment, if you take no further action, then this will be passed to the independent examiner who is appointed to assess the plan. The examiner's job is to make sure that the neighbourhood plan complies with all the relevant pieces of legislation. As such, he/she is unlikely to be able to act on your request for a simplified

version of the plan. Bearing this in mind, would you still like your comment to be passed to the examiner, or would you like to retract it? If you are currently unsure, you have until the consultation deadline of 18 October to decide.

Please let me know if you have any further questions regarding the Wool Neighbourhood Plan consultation.

Mr Kirkbride acknowledged Dorset Council's email on 14 September 2024, but has provided no further response.

Representation number: 10

From: Pauline Goldsmith

Submitted: 23 September 2024

Method of submission: Online portal

Comments:-

Firstly I would like to say I fully support the plan and appreciate the hard work that has gone into it.

I would just like to comment that no mention is made of the extremely poor internet and mobile coverage in the area - apologies if this is not to be covered by the Neighbourhood plan.

We have only been here 2 years but have heard constant complaints in shops and pubs that people cannot make calls or go online. We ourselves struggle to make/take calls on EE. This possibly affects decisions to move here?

I've been in touch with EE and been told there is not a problem here, which I disputed. Maybe a complaint from the parish council to [REDACTED] would help (he is the CEO off EE).

Representation number: 11

From: Edward McLarnon

Submitted: 18 October 2024

Method of submission: Online portal

Comments:-

I visit Wool frequently and I will be moving there permanently in the next year.

I lived in Swanage in the late 1960s. Each working day I travelled by bus from Swanage to AEA Winfrith (the Innovation Park). The bus was packed when it arrived at its destination. We need to understand the circumstances that made bus travel successful in the 1960s and apply those lessons to the present day.

I therefore support:

Para 56 Objective 4

Para 92 I disagree with the Purbeck Local Plan in the lack of a requirement for local bus services

Para 205 I agree with the views of residents

Para 217 I fully support a Weymouth to Poole bus service

Paras 218, 219 and 220 I fully support more local bus services

Para 224 I find the Purbeck Local Plan depressing in its lack of foresight in bus travel.

Para 226 I fully support the Wool 10 statement

Para 251 Wool 11 I support the ambition, but currently cycling is just too dangerous for me.

Representation number: 12

From: Philip Reese, Senior Planning Policy Officer

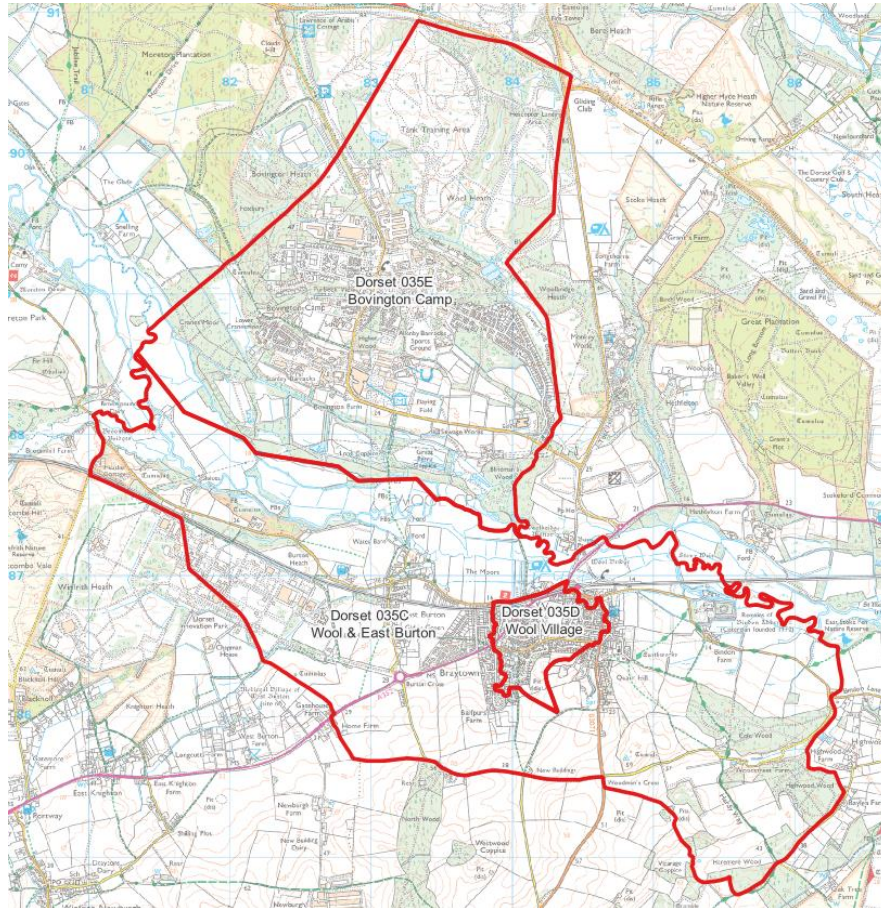
Organisation: Dorset Council

Submitted: 18 October 2024

Comments:-

Dorset Council welcomes progress of the Wool parish neighbourhood plan, and supports its vision and objectives. We have commented on earlier versions, including the regulation 14 version (as evidenced by the submitted consultation report), and are pleased to see that many of our comments have been taken on board. We hope that these latest comments will help to finalise the plan ready for referendum.

Section	Our comments
Para 14	As noted in the second bullet point, the new Purbeck Local Plan (2018 to 2034) (PLP) was adopted on 18 July 2024. This paragraph could be updated to make it clear that the new PLP has been adopted and fully replaces the older Purbeck Local Plan (2006 to 2027).
Para 16	We note the addition of a list of Supporting Documents – we consider this a useful addition and responds to one of our comments at the Regulation 14 stage. Note that item (j) appears to have a typo: “Guidance for the assessment of Cycling Infrastructure Requirements- energy ”
Para 19	We note the extensive consultation work that has taken place to date, which we welcome. This paragraph is almost unchanged since the Regulation 14 draft. This means that it doesn’t include reference to the Regulation 14 consultation which took place between January and February 2024, which appears to be an oversight.
Para 22 and Section 2 generally	For reference, the unrounded 2021 Census population for Wool is 5,378, and the number of households is 2,044. For Census data, Wool parish consists of three lower super output areas (LSOA) as shown on this map (similar to Figure 7 in the plan):



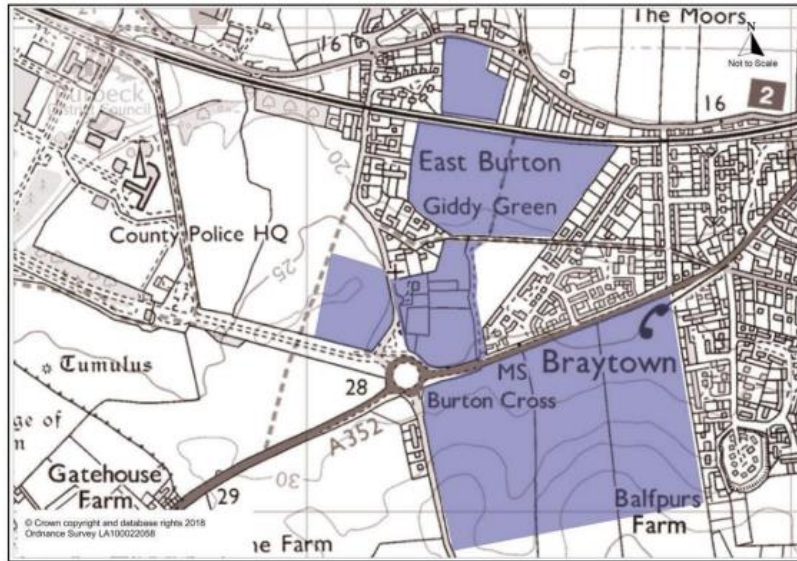
The table below shows that nearly half the population of Wool parish live in the Bovington Camp LSOA, and of those 315 live in communal accommodation.

LSOA	Wool & East Burton	Wool Village	Bovington Camp
Total residents	1,652	1,158	2,564
Residents who live in a communal establishment	0	0	315

Bovington Camp is an army base. It will consequently have a younger, more male population who are likely to be there on a temporary basis, as can be seen from the following Census 2021 statistics.

LSOA	Wool & East Burton	Wool Village	Bovington Camp
Male residents (%)	48.9%	48.9%	54.7%
Residents aged 16-39 (%)	23.3%	20.2%	42.0%
Residents aged 65+ (%)	26.8%	33.3%	6.8%

	Residents who were in the same address one year before the 2021 Census (%)	90.0%	91.9%	84.2%
	Households with no car or van	9.2%	16.6%	7.4%
	<p>As might be expected, there are clear demographic differences between Bovington Camp and the rest of Wool parish. We feel it is a missed opportunity that this section does not do more to highlight those distinctions, as it would help give a better understanding of the plan area, would provide context to the section on Indices of Multiple Deprivation (paras 27–34), and may influence subsequent policy responses in the plan.</p>			
Vision and Objectives (bottom of page 19)	The Vision and Objectives look positive and have our support.			
Para 62	<p>This paragraph discusses the site allocations in the Purbeck Local Plan. It might help to include an annotated map so that the reader has a clearer idea which views are going to be impacted. Rather confusingly, the text in this paragraph refers first to “site allocations” (plural) and then to “the site” (singular). The map below (from page 75 of the Purbeck Local Plan) shows that the allocations can be understood to consist of several parcels of land, separated by physical features such as the A352 and the railway line. The impact that development of these parcels will have on views and the wider landscape will vary.</p>			



Para 64

This refers to the Dorset Innovation Park Enterprise Zone and the MOD Estate at Bovington Camp (behind the wire) as not being considered in this work. We have a GIS layer for the Enterprise Zone, so I can confirm that is not included in the map for Wool in Figure 12 (it lies further to the west). However, we don't have a GIS layer for MOD Estates, so I am unable to confirm whether the map for Bovington (also in Figure 12) does indeed exclude all areas "behind the wire". It might be useful if the perimeter of the MOD estate at Bovington can be confirmed, and if possible, added to the map. (Note that the response from the Defence Infrastructure Organisation does include a map, which may be of use here.)

Figure 12

While we appreciate that the map of character areas in Wool has been lifted out of a third party document, we find the description of the historic core of the village as "Wool village" confusing. This is because it sounds like the whole village and not a small portion of it. We suggest it may be helpful to re-name this area something more descriptive, such as "Wool Historic Centre/Core".

**Table 2,
second row,
'East Burton
Village'**

"Avoid infill development within plots with large gardens that would change the character of Wool Village."

This appears to be a copy-and-paste from the row above. If the same design guidance applies to the East Burton area, then the text should be amended accordingly.

<p>Table 2, third row, 'Ribbon Development'</p>	<p><i>"Avoid poorly designed extensions or conversions <u>that</u> could detract from the appearance of these areas."</i></p> <p>There appears to be a missing word in this sentence.</p>
<p>Table 2, 'Giddy Green'</p>	<p><i>"Avoid infill development within plots with large gardens that would impact on the low density and green character <u>of this</u>."</i></p> <p>Sentence is either unfinished or the last two words are superfluous and can be deleted.</p>
<p>Table 2, 'Village Gateway'</p>	<p>It is noted that there are a number of aspirations for improving this area, which is currently a large roundabout in an otherwise undeveloped area. We suggest it is made clearer that the PLP allocates land on three sides of this roundabout and so it is an area of change. These allocations could perhaps be added to the map in Figure 12.</p>
<p>Policy WOOL1, 2nd sentence</p>	<p><i>"Proposals demonstrate the inclusion of details and use of materials on new buildings and boundary treatments which are of good quality and are durable."</i></p> <p>The sentence appears to need some editing. Could be amended to "Proposals <u>should</u> demonstrate...." A plainer English version might be: "New buildings and property boundaries should use good quality and durable materials. Planning applications should include details of these."</p>
<p>Policy WOOL2</p>	<p>We have considered the response from Savills regarding this policy as they represent the landowners of the local plan residential allocations at Wool. In paragraphs 5.9 to 5.15 of their representation they raise concerns that certain parts of this policy could impact on the successful delivery of the allocated sites, and suggest a small number of amendments. As the local planning authority, we too are cautious about additional policy requirements that may jeopardise the delivery of a strategic allocations, but at the same time we are mindful of the needs and desires of the local community as expressed in the draft neighbourhood plan.</p> <p>With respect to points made in the Savills response:</p> <ul style="list-style-type: none"> • We agree with para 5.10. It is not possible to build new housing estates without there being a significant change to the character

of the area; instead, the focus should be on whether the new development results in significant **harm** to the area.

- We note their comments in para 5.11 regarding the definition of “open character”. It should be noted that the only other reference to open character in the draft WNP is in the eighth bullet point of para 71, which relates it to “low massing to most parts of Wool”. While the community may wish for lower density development, as the local planning authority we are also aware that this is likely to result in greater land uptake in order to meet strategic housing requirements. We refer the examiner to para 128 of NPPF which requires planning policies and decisions to support development that makes “efficient use of land”, but at the same time take into account, *inter alia*, “the desirability of maintaining an area’s prevailing character and setting,” and “the importance of securing well-designed and beautiful, attractive and healthy places.
- With regards to para 5.12, we believe there are many reasons to introduce the requirement for private front gardens. Private gardens in urban settings offer multiple benefits for the environment and society. In addition to benefits to people’s health and wellbeing due to allowing for informal social interaction, planting in front gardens can mitigate local flooding and urban heat islands. Character is also a reason. Some of the character areas in the assessments undertaken by the parish note the use of front gardens.
- At a recent design seminar, Nicholas Boys Smith (Chair, Office for Place) offered the following pieces of evidence in support of “modest front gardens”:
 - A Copenhagen study of two parallel streets (one with and one without front gardens) found **twelve times as much neighbourly activity in the street with front gardens versus the one without**
 - Another Copenhagen study found that **35% more people used outdoor areas with front gardens than those without**

	<ul style="list-style-type: none"> ○ An Australian study of similar streets in a neighbourhood found that 69% of neighbourly interactions took place in or adjacent to the modest front gardens • However, front gardens are not in every character area or on every property. Therefore, as Savills state, there may be occasions where they are not appropriate. Perhaps altering the wording would be acceptable to the community if there is insufficient justification for their provision in every location. For example, street planting and trees could be required where front gardens cannot be provided. • With respect to car parking, we agree with Savills comments and suggestions in paras 5.13 and 5.14.
<p>Policy WOOL3, 1st paragraph</p>	<p>The requirement to have regard to flood and drainage infrastructure is noted. It should also be noted that a key principle of flood management policy is set in NPPF para 173, which states: “When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere.”</p>
<p>Policy WOOL3, 2nd paragraph</p>	<p>Missing ‘and’ in the second sentence: “This should include positive consideration of opportunities to improve the co-ordination and provision of facilities, buildings, surfacing, landscaping/planting, street furniture, boundary treatments, car parking, <u>and</u> the local public realm across Wool and in the following key locations:”</p>
<p>Para 105 and Policy WOOL4 – Environmental performance of buildings</p>	<p>We note the addition of reference to Dorset Council’s Sustainability Checklist in supporting text and policy. Just to recap our Regulation 14 comments, Dorset Council has published a number of documents under the heading ‘Planning for climate change’.¹ These consist of:</p> <ul style="list-style-type: none"> • Interim guidance and position statement & separate appendix B - This is to help decision makers weigh up the benefits of addressing climate change with other material considerations. It addresses sustainable design and construction and planning for renewable energy schemes.

¹ Available from dorsetcouncil.gov.uk/planning-for-climate-change

- [Sustainability checklist and guidance](#) - This sets out questions for applicants to check in relation to their schemes' sustainable design and construction.
- [Listed buildings and energy efficiency - what you can do for climate change](#) - This is to help householders with what you can do to increase energy efficiency in listed buildings and understand what you would need consent for.

In Dorset it became a requirement to submit a Sustainability Checklist and Statement from 15 January 2024 for the following types of development:

- New residential/the creation of additional residential units including change of use/conversion, replacement dwellings and holiday accommodation including hotels.
- New non-residential development including commercial, office, storage and distribution, retail, industrial, waste, community or leisure and educational development including extensions of over 10% additional gross internal floorspace including proposals for a change of use to any of these uses.
- New or replacement agricultural buildings.
- Mixed use development.

The checklist and statement should demonstrate how sustainable design and construction have been considered, including:

- reducing energy consumption and carbon emissions
- minimising waste
- increasing recycling
- conserving water resources
- incorporating green infrastructure
- sustainable drainage, minimising pollution
- maximising the use of sustainable materials
- adaptation to climate change
- sustainable travel

Applicants for householder development are also encouraged to consider relevant parts of the checklist and submit either a completed checklist or

	include within their planning statement information to demonstrate how climate change has been taken into consideration.
Para 108	As noted in para 15, the Dorset Council Local Plan is currently scheduled for adoption in 2027.
Para 112	The second sentence essentially repeats what was said a few lines above (in para 108). The first sentence isn't strictly necessary here, but might more usefully be moved to para 108.
Para 114	<p>This sentence/paragraph appears to refer to Purbeck Local Plan (PLP) Policy H11 'Affordable Housing', which states:</p> <p style="padding-left: 40px;">Local policies in neighbourhood development plans should support the delivery of affordable homes needed in Purbeck, as required through this policy. Local planning policies may set locally specific requirements relating to the tenure mix of affordable housing where justified with robust local evidence.</p> <p>Policy H11 is then explicitly referred to in Para 117. We recommend that the purpose and meaning of Para 114 is clarified.</p>
Para 114, 2nd and 3rd sentences	<p>It is ambiguous whether these sentences are referring to tenure mix (the subject of the first sentence), or housing mix (which is the subject of the next paragraph). For reference, the strategic local plan policy for housing mix is PLP Policy H9 'Housing Mix', which states:</p> <p style="padding-left: 40px;">Local policies in neighbourhood development plans should support the general principles around providing the sizes and types of homes needed in Purbeck. Where justified with robust local evidence, local policies in neighbourhood plans may set distinct local requirements on the mix of different sizes and types of homes. Where neighbourhood plans set a distinct local requirement on the type of homes proposed this must be done in agreement with local health and social care providers.</p> <p>However, Policy H11 'Affordable Housing' may make more sense here. It states:</p> <p style="padding-left: 40px;">To reflect the latest evidence of housing need and national policy, the Council will seek to secure the following tenure mix for</p>

affordable housing provision, which will provide 10% of affordable home ownership overall (to include intermediate tenures such as shared ownership, discount market value and starter homes). Any variation to the identified tenure mix will be considered on specific sites, in consultation with the Council's housing strategy team and registered providers, where necessary to secure the most appropriate and deliverable mix of affordable housing tenures.

Para 133

This paragraph appears to largely repeat paras 118 to 120 above – consider consolidating.

We're also aware that the new government has signalled that it intends to remove the minimum requirement for First Homes, and instead give additional emphasis to social and affordable rent tenures. See paragraph 5 of Chapter 6 of the July 2024 consultation: [Proposed reforms to the National Planning Policy Framework and other changes to the planning system - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system)

WOOL5 – 1st paragraph

As noted in para 137, Policy H11 of the Purbeck Local Plan sets out a range of affordable housing requirements based on size and site type. The following table is an extract of Policy H11:

Number of homes or site area	Greenfield sites	Brownfield sites
2-9 (applies Purbeck wide, except for the following areas which are not designated as rural: Lytchett Minster, Upton and Wareham Town Councils)	20%	20%
10 homes or more, or more than 0.5ha inside settlements	40% on-site	30% on-site

The first sentence of policy WOOL5 gives the impression that 40% affordable housing will be required in all cases. This is misleading and incorrect. We also question whether it is appropriate to try to repeat or para-phrase local plan policy in neighbourhood plan policy. We suggest either deleting this sentence or amending it to: "Affordable housing provided in Wool Parish should be secured in ~~a proportion of 40% from qualifying developments in~~ accordance with policy H11 of the Purbeck Local Plan 2018-2034."

The second sentence introduces an alternative tenure mix for Wool; as noted above, Policy H11 allows neighbourhood plans to do this where

	justified with robust local evidence. The sentence begins with “Where possible...” which we feel is not sufficiently precise; we suggest amending it to “Where viable...”
WOOL5 – paras 2 to 4	Paragraphs 2, 3 and 4 appear to be part of a list started by the colon at the end of paragraph 1. As such, it would be reasonable to expect them as a bullet point list. Without the bullet points, you have to guess the extent of the list.
WOOL5 – 2nd para	We note the 50% discount on First Homes, which is greater than the national minimum of 30% discount. This is likely to impact the viability of development. If a scheme is not viable, then the number of affordable homes required on-site is likely to be reduced until it is viable.
WOOL6 – Housing types and sizes in Wool Parish	As noted above, PLP Policy H9 allows for neighbourhood plans to set distinct local requirements on the mix of different sizes and types of homes.
Para 172	It should be noted that PLP Policy H5 ‘Wool’ expects housing development at Wool to provide around 350sqm of convenience retail space.
Figure 21	It might be useful if a key/legend could be provided to the map to explain what the symbols mean (for example, red dots = shops, red circles = 800m radius of shops, green lines = footpaths, etc)
WOOL7 – Burial space provision in Wool Parish	<p>The policy appears to be compatible with PLP Policies I1 and I7.</p> <p>Policy I1 states: “The Council will work with its partners, funding bodies and infrastructure providers to secure the infrastructure required to enable sustainable growth to meet the needs of Purbeck.”</p> <p>Policy I7 states: “Where shortfalls in the capacity of existing community facilities and services are identified, appropriate developer contributions will be sought to ensure adequate funding is available to accommodate the impacts of the development.”</p> <p>We therefore support the principle of the policy.</p>

We note that since the Regulation 14 draft, the policy has been amended to remove references to a cemetery and to cremation ash plots. It instead refers solely to burial space provision, despite the supporting text and Table 6 above referring to the shortage of cremation ash plots. It needs to be confirmed whether this is intentional. We suggest that the policy might be better rephrased to refer to cemetery space, so that it is clear that it covers both burial and cremation plots.

That matter aside, it is unclear how the policy will work in practice. It's assumed that the purpose of the policy is to collect financial contributions from new residential development to be put towards providing new burial/cemetery space. This raises various questions, in particular, how much will new cemetery space cost, and how do you calculate what is the fair and proportional amount for new development to contribute towards this cost (bearing in the tests for planning obligations set out in NPPF para 57 which essentially summarises the legal position). To answer the first question, it would be useful if the current provider of cemetery space (which appears to be the Parochial Church Council) could provide an estimate of costs for their preferred option. That would go a long way to understanding the potential viability implications of implementing this policy. Without further guidance, it is unclear how a decision maker should apply this policy when determining planning applications (contrary to paragraph 041 of the PPG on neighbourhood planning).

WOOL8

We suggest that it is usually best to avoid referring to use classes in local policies, simply because they can be significantly amended at very short notice (which was the case when use classes F1 and F2 were created). The first three paragraphs of this policy essentially try to do the same thing, which is to protect sites that are important to the local community. The first paragraph focuses on F2 uses, and seems to give them greater protection than F1 uses in the second paragraph because it does not allow for their loss, even if they are no longer required. This seems unreasonable and risks creating sites that need to change their use in order to remain viable. The third paragraph, covering grocery shops that fall within F2, offers a similar level of protection to the second paragraph.

This seems unnecessarily complicated. We suggest that paragraphs 1 to 3 can be simplified and combined into something like:

Proposals that will result in either the loss of or cause significant harm to a local community facility will be resisted, unless it can be clearly demonstrated that the community facility is no longer financially viable. Unless agreed by the Council, this will require a site to be genuinely marketed for a continuous period of at least 9 months at a price that reflects its existing or last use.

The following sites/properties are considered to be local community facilities...

The supporting text could explain that local community facilities will include all the F2 uses as well as some F1 uses that provide wider community facilities. (The representation made by DIO claims that the entire Bovington Camp, including play areas, is sui generis. This supports our suggestion that the policy seeking protection of local community facilities should not refer to specific use classes.) The supporting text could also provide further detail on what evidence is needed to demonstrate that a site is no longer financially viable and that a suitable buyer cannot be found. Suggestions for the detail in the supporting text include the following points:

- The site has been continually marketed for its existing use (including other permitted uses) for 9 months over the last 12 months prior to the application being submitted.
- All opportunities to re-let/re-occupy the site have been fully explored.
- The site has been marketed using a variety of methods and marketing tools available that are likely to attract future occupiers (including advertising boards, online marketing and mailshots).
- The site has been marketed at a price which is considered reasonable (i.e. using recent and similar transactions) for existing use and other suitable alternative uses agreed with the Council (applicant should submit at least 3 recent comparables).
- Issues with re-occupying/ letting/ selling: When prospective owners/ tenants showed interest in the premises, why did they not

pursue it any further? A full list of interest parties and their reasons for not pursuing this premises further for its permitted uses would need to be submitted.

We assume that the community would support proposals that improve any community facility, and not just shops. Therefore, the fourth paragraph can be made more generic and rephrased to: "Applications for development to improve local community facilities, including shops, will be supported in principle."

The final paragraph of policy WOOL8 is in general conformity with PLP Policy H5, which requires new convenience retail space to be provided alongside new residential development, and also requires improved accessibility between the allocated sites and nearby services.

WOOL9

We had concerns at Regulation 14 stage that this policy did not meet the tests regarding planning obligations, as set out in NPPF para 57. We are pleased to see that the draft policy has been amended, and now includes the words "where relevant and feasible". As the policy clearly refers to the implementation of strategic policies I1, I4 and I7, it can be considered to be in general conformity with the local plan and, therefore, it has our support.

The policy should also be seen in the context of PLP Policy H5 which expects residential development on the allocated sites at Wool to:

- provide contributions towards improvements at the D'Urberville Hall community facility or explore opportunities to provide a community hub (H5 d.);
- improve accessibility between the sites and nearby services (including Wool Railway Station and Dorset Innovation Park) and facilities by forming or improving defined walking and cycling routes (H5 e.);
- provide financial contributions towards improvements to the travel interchange at Wool Railway Station to include additional car parking, secure cycle storage, and electric vehicle charging points (H5 f.);

	<ul style="list-style-type: none"> • provide financial contributions for education (as required by Policy I1) other than for extra care units where an applicant is able to demonstrate that it would be unnecessary and unreasonable to seek contributions (H5 i.); • provide and manage in perpetuity a SANG totalling 32.7 hectares (H5 k.). <p>Therefore, there is already a substantial list of infrastructure requirements for residential development on allocated sites in Wool.</p>
Figure 22	The diagram of bus services appears to have been updated since the Regulation 14 stage. In small print at the bottom it says, “Published by Friends of Wool Station, May 2024”, however the caption underneath still says, “Source: Friends of Wool Station, June 2023”.
WOOL10	<p>Policy unchanged since Regulation 14. Our comments to that consultation were:</p> <p>We note the policy and have no specific comments but query whether sufficient contributions are likely to be achieved from development in order to pump prime a new service (operators of bus services to advise on this matter). Note the comments in the infrastructure delivery plan prepared for submission with the Purbeck Local Plan (2019) suggests the quantities of development being considered in the Purbeck Local Plan would not support a new bus services, and that train services offer the best public transport option.</p>
Para 238	There appears to be a typo at the beginning of this paragraph. Perhaps it should read “Figure 23. This shows the influence...”
WOOL 11, 1st para	<p>There appears to be missing punctuation on the last sentence. Suggest amending to: “This should include positive consideration of opportunities to improve infrastructure on the following routes, as detailed in Table 8.”</p> <p>Otherwise, as the policy refers to the implementation of strategic policy I2, it can be considered to be in general conformity with the local plan and, therefore, it has our support.</p>

WOOL12	<p>As the policy refers to the implementation of strategic policies I2 and H5, it can be considered to be in general conformity with the local plan and, therefore, it has our support.</p> <p>The final sentence of the policy is missing a full stop.</p>
WOOL13	<p>We note that this policy has been modified following our comments to Regulation 14. This includes wording to protect the sites that is consistent with national green belt policy, and the deletion of one proposed LGS site as it is already registered as a village green. We also note that the supporting evidence supplied in Appendix B has been expanded. The amended policy has our support.</p>
WOOL14 – 1st para	<p>As the policy refers to the implementation of strategic policies I1, I7 and H5, it can be considered to be in general conformity with the local plan and, therefore, it has our support.</p>
WOOL14 – 2nd para	<p>This is a slightly unusual policy, as instead of trying to influence the determination of planning applications, it is seeking to influence policies in the future local plan. Paragraph 006 of the PPG on Plan Making provides some guidance on this; it states:</p> <p style="padding-left: 40px;">Where a neighbourhood plan has been brought into force, the local planning authority should take its policies and proposals into account when preparing the local plan. Local plan policies should not duplicate those in the neighbourhood plan, and do not need to supersede them unless changed circumstances justify this. It is important for local plans to make appropriate reference to neighbourhood plan policies and proposals, and similarly for neighbourhood plans to acknowledge local plan policies that they relate to.</p> <p>However, it should also be recognised that the policies in the local plan cannot be bound by policies in a neighbourhood plan, in the same way that neighbourhood plans must be in general conformity with strategic policies in the local plan. NPPF paragraph 30 explains that a neighbourhood plan’s policies can be superseded by the adoption of a more recent plan. It states:</p>

Once a neighbourhood plan has been brought into force, the policies it contains take precedence over existing non-strategic policies in a local plan covering the neighbourhood area, where they are in conflict; unless they are superseded by strategic or non-strategic policies that are adopted subsequently.

Para 277

As mentioned in our Regulation 14 comments, the issue of nutrient neutrality is a complex and constantly evolving area which is affecting multiple areas in Dorset and across the country. One recent step has been that the SPD on Nutrient Reduction in Poole Harbour was withdrawn by Dorset Council in September. This is because it was no longer considered to offer a robust mechanism for delivering nitrogen mitigation in the Poole Harbour catchment. We, therefore, recommend that the final sentence of this paragraph is deleted.

For further information, updates on the issue of nutrient neutrality are being posted on the Dorset Council web site:

dorsetcouncil.gov.uk/nutrient-neutrality-1

WOOL15

Response from the Natural Environment Team (NET):

Dorset Council's Natural Environment Team were broadly supportive of this policy at Regulation 14 stage.