

Wool Parish Neighbourhood Plan

Responses to the Regulation 16 consultation

2 January 2025

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
1	National Highways	2 Oct 2024
2	Environment Agency	7 Oct 2024
3	Defence Infrastructure Organisation	16 Oct 2024
4	Historic England	17 Oct 2024
5	Wool Flora and Fauna	17 Oct 2024
6	Chapman Lily Planning Ltd on behalf of an unnamed client	17 Oct 2024
7	Savills UK Ltd on behalf of Lulworth Estates, Redwood Partnership and A&M Properties	18 Oct 2024
8	Resident #1	7 Sep 2024
9	Resident #2	9 Sep 2024
10	Resident #3	23 Sep 2024
11	Visitor	18 Oct 2024
12	Dorset Council	18 Oct 2024

Summary of responses

Person / organisation	Summary of comments
1. National Highways	<p>We are 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.</p> <p>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.</p>
2. Environment Agency	<p>We have reviewed and support the Wool Neighbourhood Plan 2024 - 2038 (Regulation 16 consultation, draft July 2024). We have no additional comments to make.</p>
3. Defence Infrastructure Organisation (MOD)	<ul style="list-style-type: none"> • 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. • Para 61 – there is no difference in functional terms between areas of Bovington Camp behind the wire and those that are not. The entire functional area forms a single planning unit. • 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.

	<ul style="list-style-type: none"> • It is questionable whether design aspirations in Policy WOOL1 can be implemented at Bovington Camp as ultimately it will be military needs that will take primacy. • The wording of Policy WOOL1 should be altered to reflect that these design principles are aspirational on MOD land. • Policy WOOL8 states that certain community facilities at Bovington are Use Class F2. This is incorrect. The whole of Bovington Camp is a single planning unit and is Sui Generis. • The MOD assets listed in WOOL 8 are not Use Class F2 and as such they should be removed from this policy. • Policy 11(c) <i>“The creation of a direct pedestrian link suitable for all users between Cologne Road and Bovington Neighbourhood Centre”</i> – is a laudable aim, but 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. • As the MOD has no plans to remove the fence within the Wool NP period, the policy wording should be changed to reflect this proposal as an aspiration only or proposes a route that can be achieved without crossing secure MOD areas.
4. Historic England	<p>There are no issues associated with the Plan upon which we wish to comment.</p>
5. Wool Flora and Fauna	<ul style="list-style-type: none"> • Object to the plan. • Wool is not sustainable, despite having a railway station. • Schools are near capacity, the sewage works are not capacity, and Wool is at risk from flooding. • Wool has exceptional biodiversity – this will be harmed by more development.
6. Chapman Lily Planning Ltd	<ul style="list-style-type: none"> • The neighbourhood plan has not been prepared positively for the delivery of much needed housing development allocated by the Purbeck Local Plan. • Supports the Vision.

- Para 10 – Suitable mitigation can combat the impact from development on sensitive sites.
- Para 44 – New development provides opportunities as well as challenges.
- Para 49 – it is unclear how the view that local people don't want housing has been formed. There is a considerable 'silent majority' who do support housing. Suggest adding caveats such as "the response to surveys show that..."
- Paras 52-55 are irrelevant and should be removed. Amend para 55 to state: 'the neighbourhood seeks to ensure that the community of Wool, including future residents, gets as much out of new development as possible...'
- Objective 2 should be amended to "*Housing Provision in Wool Parish should be tailored to meet the needs of existing and future residents.*"
- Table 2, Low Density Residential, concern over "Avoid insensitive redevelopment where built forms become more dominant than the vegetation." – this may frustrate the delivery of much need homes.
- Para 70: "There is a strong concern in the community..." should be amended to "There was some concern noted during community consultation..."
- Policy WOOL2(c) – the requirement for all dwellings to have front gardens should be tempered by the character of the area.
- Policy WOOL2(e) – the additional parking spaces required by this policy may result in unintended consequences such as additional congestion or parking requirement within the village centre. The parking requirement does not support climate change and sustainable development goals.
- Support for Policies WOOL3 and WOOL4.
- Para 111, amend from "the community is extremely concerned about potential impact" to "there was concern

during consultation about the potential impacts of 1000 new houses in the Parish”.

- Policy WOOL5 – it should be clarified that 40% AH is applied only to 10 homes or more. A 50% discount on First Homes is laudable but unlikely to be viable. The local connection policy should make reference to exceptions to ensure it is inclusive and responsible to the needs of the wider population.
- Para 147 – unclear where the evidence is that most people do not want a 1-bedroom flat by choice.
- WOOL6 – support but unclear what is meant by “a balanced provision”.
- WOOL8 – support for policy as it promotes active travel.
- WOOL9 – support for new community infrastructure but further explanation is needed as to how the improvements will be secured. Requiring developers to provide new infrastructure before commencing housebuilding is often not viable. The type of contribution and the trigger points for delivery should be discussed on a case-by-case basis.
- WOOL10 – support the ambition to improve bus services, however further consideration is needed to ensure enhancements are proportionate. Car clubs / better cycle provision may be a better and more achievable ambition.
- WOOL11 – support for improving walking and cycling infrastructure.
- WOOL13 – proposed Local Green Spaces conform with the criteria in NPPF.
- WOOL14 – regarding provision of allotments, care is needed that this doesn’t frustrate the delivery of housing.
- WOOL15 – policy should be removed as it repeats both habitat regulations and local plan policy. Also, the requirement for BNG should be removed from the policy and instead identify locations where biodiversity can be improved.

7. Savills

- Para 44 mentions significant challenges arising from the large amounts of housing development proposed in the

	<p>Purbeck Local Plan. However, this also presents significant opportunities and benefits.</p> <ul style="list-style-type: none"> • WOOL2(a) – concern over the phrase “significant change” which should not be used to withhold consent. Suggest amending “change” to “harmful impacts”. • WOOL2(a) – The phrase “open character” is ambiguous – suggest that it is deleted or the plan defines it. • WOOL2(c) – object to requirement for front gardens – not justified. • WOOL2(e) – suggest amending wording to include ‘appropriate levels of parking’ in line with the most recent Car Parking Strategy adopted by Dorset Council. • WOOL3 – object – as policy is directed at Dorset Council, suggest that it is deleted and discussions had between DC and the parish council. • WOOL5 - object as ‘First Homes’ will no longer be required under the proposed legislation, failing to have regard to national policies and advice in guidance issued by the Secretary of State and should be amended. • WOOL5 – the proposed affordable housing mix is not supported by viability evidence. • WOOL6 – object – requiring “balanced provision” of housing mix is ambiguous. Suggest amending to “a mix of housing sizes ... to meet local needs.” • WOOL7 – burial space appears to be a strategic issue. Suggest policy is removed and instead the matter is considered through the Local Plan.
8. Resident #1	Supports the Neighbourhood Plan.
9. Resident #2	Request for the plan to be easier to understand.
10. Resident #3	Support for the plan. Notes that there is poor mobile coverage in the area.
11. Visitor	Supports improvements to the local bus service.

12. Dorset Council See table below

Section	Dorset Council comments
Vision and Objectives	The Vision and Objectives look positive and have our support.
Table 2, 'Village Gateway'	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.
Policy WOOL1, 2nd sentence	The sentence appears to need some editing to make it easier to read.
Policy WOOL2	<p>We agree with the following points made in the response by Savills:</p> <ul style="list-style-type: none"> • 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. • Regarding "open character" – while the community may wish for lower density development, we are also aware that this is likely to result in greater land uptake in order to meet strategic housing requirements. • 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. However, front gardens are not in every character area or on every property. Therefore, there may be occasions where they are not appropriate. • With respect to car parking, we agree with Savills comments.

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WOOL5 – 1st paragraph	<p>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 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.”</p> <p>The second sentence introduces an alternative tenure mix for Wool. The sentence begins with “Where possible...” which we feel is not sufficiently precise; we suggest amending it to “Where viable...”</p>
WOOL5 – paras 2 to 4	<p>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.</p>
WOOL5 – 2nd para	<p>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.</p>
WOOL7 – Burial space provision in Wool Parish	<p>We support the principle of the policy. However, it is unclear how the policy will work in practice. Without further guidance, it is unclear how a decision maker should apply this policy when determining planning applications.</p>
WOOL8	<p>We suggest where possible avoiding referring to use classes in local policies because they can be amended at short notice.</p> <p>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</p>

Section	Dorset Council comments
	<p>unnecessarily complicated. We suggest that paragraphs 1 to 3 can be simplified.</p> <p>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.</p> <p>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.</p> <p>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."</p> <p>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.</p>
WOOL9	<p>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.</p>
WOOL10	<p>Policy unchanged since Regulation 14. Our comments to that consultation were:</p> <p style="padding-left: 40px;">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</p>

Section	Dorset Council comments
	being considered in the Purbeck Local Plan would not support a new bus services, and that train services offer the best public transport option.
WOOL 11, 1st para	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.
WOOL12	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.
WOOL13	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.
WOOL14 – 1st para	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.