



WAREHAM TOWN COUNCIL – REPORT
Meeting Date: 23 September 2025

Agenda Item: 12

Subject:	Dorset Council Local Plan Consultation
Prepared by:	Wareham Neighbourhood Plan Steering Group (NPSG) and Sam Dickins, Deputy Town Clerk
Purpose of Report:	To consider the Dorset Local Plan Consultation and any recommendations for response.
Background:	<p>Dorset Council is undergoing the creation of its Local Plan to shape how development needs across the Dorset Council area between 2026 and 2043 can be met. The Dorset Local Plan will have considerable impact on how development in Wareham and more broadly in Dorset is approached. Its direction is will also have implications on Wareham's Neighbourhood Plan.</p> <p>The consultation began on 18 August 2025 and closes on 18 October 2025.</p>
Key Points:	<p>Dorset Council's Local Plan Consultation considers a wide range of policies and includes a significant number of proposed developments. A complete overview of the consultation documentation can be found on the Dorset Council website¹.</p> <p>The following document has been produced by the NPSG as a recommended response to the Dorset Council consultation.</p> <p>All Councillors are members of the NPSG, and many have fed into the discussions which have shaped the recommended response.</p> <p>Councillors should thoroughly consider the response and whether the Council wishes to adopt the response as its formal consultation response.</p>
Implications:	<p>Failure to respond to the Local Plan consultation will mean an absence of the Town Council's views for sustainable development in Wareham and expose the town to development the Town Council deems unsuitable.</p> <p>An under-considered response may expose the Town Council to erroneously advocating for unsuitable development.</p> <p>Failure to respond may be viewed by residents as the Town Council not fulfilling its stewardship responsibilities for the town.</p> <p>Unsustainable development in or around Wareham may strain services, liveability, ease of access and sense of place within the town.</p> <p>Failure to respond risks strategic misalignment between the Local Plan and Wareham Neighbourhood Plan, which is currently under development.</p>
Recommendation:	To consider the Dorset Local Plan Consultation and any recommendations for response.

¹ <https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/dorset-council-local-plan>

Draft Recommended Response – Dorset Council Local Plan Options Consultation

Background: This recommended response has been drafted by the Neighbourhood Plan Steering Group as a recommendation to Full Council to adopt as the Town Council's response.

The Dorset Local Plan Options consultation document (dated August 2025) asks 45 questions on a wide variety of planning issues. Wareham Neighbourhood Plan Steering Group's responses to the questions are set out below. No comments are made in relation to questions 5 to 7, 35 to 38, 40 and 42 to 45 which don't affect the Wareham area.

Question 1: Do you have any comments on the proposed vision for Dorset?

The vision should have a stronger commitment to protecting and enhancing the natural environment. At present it says that Dorset Council will 'seek to enhance our natural environment'. The vision should commit the Council to protecting and enhancing the Dorset and Cranborne Chase National Landscapes (AONBs), in the same way that the vision aims to protect 'the large areas of significance for biodiversity' in Dorset, in recognition of the statutory duty placed on it in Section 245 (Protected Landscapes) of the Levelling-up and Regeneration Act 2023 (and the guidance on how relevant authorities should seek to further their purposes).

Question 2: Do you have any comments on the proposed strategic priorities for the Local Plan?

The Local Plan should include a more comprehensive strategic priority relating to the environment. It should commit to protecting and enhancing the Dorset and Cranborne Chase National Landscapes (AONBs), the Jurassic Coast World Heritage site, Conservation Areas and other heritage assets, and promote high quality design which respects the local context and reflects the local distinctiveness of our towns, villages and landscapes.

The exceptional quality of the natural and built environment of Dorset is vitally important to the local economy, especially the hospitality industry and the attraction of high tech businesses, and the wellbeing of residents. This would also provide support for the forthcoming Dorset Design Code.

Question 3: The proposed settlement hierarchy lists the towns and villages that will be the focus for new homes. Are there other settlements where we should plan for new homes? Do you have any comments on whether a settlement is in the right Tier or not?

In the proposed settlement hierarchy, Wareham is placed in Tier 2 – Towns and other main settlements, below the 'large built-up areas' in Tier 1 and above the 'larger villages' in Tier 3. In this context, Wareham is considered to be in the right tier.

Whilst settlements in Tiers 1, 2 and 3 should be the focus for new homes at the strategic level, it is important that the constraints and opportunities around each settlement are properly assessed to determine whether growth would be appropriate, and if so, to establish the

quantum of housing and other uses that could be accommodated sustainably at each settlement.

Question 4: Do you have any comments on the proposed strategy for the South-Eastern area?

The 'proposed strategy' for the South-Eastern area is inadequate and unsound. Most of Section 3.3 describes the characteristics of the South-Eastern Dorset area, with the 'proposed strategy' set out in Paragraph 3.3.5. This is inadequate because it simply sets out the intention to locate growth in the towns and larger villages in the area. The importance of the Dorset National Landscape and the Green Belt are underplayed, although both are mentioned in earlier paragraphs. Without the evidence to justify development within or affecting these areas, which are protected by the law and national planning policy, the strategy is unsound.

The mention of the Dorset National Landscape as a constraint in the southern part of the South-Eastern Dorset area (in Paragraph 3.3.3) is noted. However, it is not explained how the law and national policy may constrain growth. In particular, there is no mention of the implications of the Protected Landscapes duty in Section 245 of the Levelling-up and Regeneration Act 2023, or of the implications of Paragraph 189 of the NPPF, which states that 'the scale and extent of development within all these designated areas [including National Landscapes] should be limited'.

The statement in Paragraph 3.3.4 that the Green Belt is 'a consideration' in the South-East Dorset area underplays its role as a constraint. Paragraph 145 of the NPPF makes it clear that Green Belt boundaries 'should only be altered where exceptional circumstances are fully evidenced and justified'. In order to do this Dorset Council will need to 'demonstrate that it has examined fully all other reasonable options for meeting its identified need for development', as required by Paragraph 147 of the NPPF. Similarly, the statement that the 'release of Green Belt will help to meet the needs of the area' underplays the rigorous review process that needs to be followed to identify 'Grey Belt' areas, that may potentially be released for housing.

The strategy is considered inadequate and unsound because:

- There is no evidence to demonstrate that Dorset Council has applied the Protected Landscapes duty in Section 245 of the Levelling-up and Regeneration Act 2023 (LURA), when preparing the Local Plan;
- The scale and extent of development proposed within (and affecting the setting of) the Dorset National Landscape at Wareham (about 500 new homes), is clearly not 'limited', contrary to Paragraph 189 of the NPPF;
- There is no evidence to demonstrate that Dorset Council has considered 'all other reasonable options' for accommodating growth before considering the release of land from the Green Belt; and
- A review of the Green Belt to identify areas of 'Grey Belt' that could potentially be released for development has yet to be undertaken."

Questions 5-7 are in relation to sites not related Wareham

Question 8: Is there any important infrastructure that needs to be delivered alongside new homes in the Western/Central/South-Eastern/Northern area?

The Local Plan consultation document should say more about infrastructure provision. The main concerns are that the document:

- says very little about the infrastructure needed to create sustainable communities on the identified housing opportunity sites; and
- does not seem to tie in with the proposals in the updated Local Transport Plan currently being consulted on.

The lack of information about infrastructure provision is a particular concern on the larger proposed sites, where the current emphasis seems to be wholly on providing housing. A more integrated approach is required across Dorset, similar to the master planning approach taken north of Dorchester, where infrastructure needs (such as schools and a new local centre) are identified and transport proposals (including a new northern link road) are being put forward.

The Local Plan consultation document should also seek to resolve long-standing issues where the existing population suffers from inadequate infrastructure. In the Wareham area, the key issue is the need for improved health facilities. Policy GS2 in the Wareham Neighbourhood Plan seeks a new healthcare hub on part of the former Middle School site with the aims of improving services and delivering better healthcare outcomes. The healthcare proposals have stalled, which is having on 'knock-on effect' on housing delivery on the site. Dorset Council with partners either needs to resurrect the current proposals, or to re-engage with healthcare providers and the local community to develop new proposals for healthcare facilities to serve the town.

Question 9: The Local Plan sets out a strategy to meet the area's housing needs through allocating sites for new homes, the flexible settlements policy, new settlements and the efficient use of land. Are there any other measures could help to meet housing needs?

Wareham Town Council strongly objects to the housing 'opportunity sites' around Wareham (as identified in Appendix A), and to the proposed new flexible settlements policy. These sites form part of a wider strategy for the South-Eastern Dorset area that is both inadequate and unsound, as explained in response to Question 4. In particular, the strategy and the selection of sites is not supported by sufficient evidence to show that the likely impacts on the Dorset National Landscape and the Green Belt are justified.

The three housing 'opportunity sites' shown in Appendix A have an indicative capacity of about 620 new homes. This increased level of development would:

- add to traffic and congestion on the A351, already one of the busiest roads in Dorset;
- put pressure on existing medical, dental, leisure and other services; and
- be unsustainable as the residents would need to drive to access work, shops and other amenities either in Wareham or in the Bournemouth, Christchurch and Poole conurbation.

The Council also has concerns about, and objects to, each of the individual sites proposed. These concerns and objections are discussed in more detail in the site-specific responses and are summarised below.

Site LA/ARNE/004 to the south of the A352 Worgret Road at Worgret Manor Farm. This site:

- is within the Dorset National Landscape contrary to the Protected Landscapes duty (LURA s245) and where permission should be refused for major development (NPPF para 190).
- is prominent in views from the south and in views into the Dorset National Landscape from the north from the A352;
- immediately adjoins the River Frome Site of Special Scientific Interest (SSSI), which in this area also includes a substantial section of the floodplain; and
- will be severed from the existing built-up area of Wareham by the bypass.

Sites LA/ARNE/002, 003, 005 and 008 to the north of the A352 Worgret Road at Little Farm and west of the railway line at Worgret. These sites:

- are within the Green Belt;
- form part of the setting of the Dorset National Landscape, as they are in a prominent location on the ridge between the Frome and Piddle Valleys;
- immediately adjoin Wareham Common, which is of considerable nature conservation interest and includes three areas designated as SSSI; and
- will be severed from the existing built-up area of Wareham by the bypass.

Site LA/WARE/011 to the west of Westminster Road Industrial Estate. This site:

- is within the Green Belt;
- was considered, but rejected, as a housing site during the preparation of the current Wareham Neighbourhood Plan;
- only has capacity for about 60 dwellings (as opposed to 120 dwellings), based on previous urban design work, which established that the rising ground on the northern part of the site was unsuitable for development; and
- lacks the provision of a Suitable Natural Alternative Greenspace (SANG) on the steeper northern part of the site, which previously had been proposed.

The Council strongly objects to the proposed new flexible settlements policy. It should not form part of the strategy to meet the area's needs and should be deleted from the Local Plan. The Council's reasons for strongly objecting to this policy are set out in more detail in subsequent responses.

Question 10: To what extent do you agree or disagree with the Plan including a lower housing target for the first few years and a higher figure towards the end of the plan period to meet housing needs?

A: Agree XXX

B: Disagree

C I have another suggestion

Wareham Town Council agrees in principle with having a 'stepped' housing requirement, with a higher housing target towards the end of the plan period, but more work needs to be done to develop a 'trajectory' that shows how housing will be delivered over time.

As pointed out in the Local Plan, there is not only a need for Dorset Council to provide more housing sites to meet the 80% increase in the level of housing now proposed, there is also a need for developers to significantly increase delivery. Given the scale of the challenge, for both the Council and the development industry, a stepped approach is sensible.

From the information provided it appears that the overall level of housing provision (70,000 new homes, as set out in Figure 4.1) will hugely exceed what's needed in Dorset (55,182 homes between April 2026 and March 2043).

There is also a lack of clarity about the contribution that will be made from different sources of housing supply. The total supply estimate of 70,000 new homes excludes any delivery from the proposed new 'flexible settlements policy' and from the development of new settlements. Estimates of likely delivery from these sources is required. Figure 4.1 also only indicates whether delivery from each source will be in the short, medium or long term. This needs to be worked up into estimates of what will be delivered year-by-year.

It is essential that the further work outlined above is undertaken in order to produce a credible housing trajectory, which would show how a stepped approach to delivery would work in practice. This further work, and the resultant trajectory, are likely to have wide-ranging implications for the overall strategy to meet housing needs across Dorset and for communities across the County. Given the current lack of information and the extent of the further work needed, it is essential that an additional round of public consultation at Reg. 18 stage is held before the Local Plan is submitted for examination.

Question 11: Where should a policy allowing sites for only affordable homes apply?

A: All of Dorset (BLANK)

B: Only Around those towns and villages listed in the proposed settlement hierarchy (BLANK)

C: Only In the Green Belt (BLANK)

Wareham Town Council considers that a policy allowing sites for only affordable homes (i.e. exception sites for 100% affordable housing) should apply across Dorset. However, Wareham Town Council is concerned that if market housing (with an affordable proportion) can be secured on the edges of towns and villages under the proposed 'flexible settlements policy', then it would be less likely that sites for 100% affordable housing would come forward.

Wareham Town Council also has comments to make on Dorset Council's approach to affordable housing on market-led housing sites.

The Local Plan seeks to deliver 'the maximum viable number' of affordable homes on sites of 10 dwellings or more. However, there is no indication of what percentage this might be either across Dorset, or in different parts of the County. The Council supports the intention to provide a proportion of affordable homes on sites of between 5 and 9 homes in designated rural areas, but again there is no indication of the proportion that might be sought on such sites.

Until a 'percentage figure' for the proportion of affordable homes to be sought on market-led sites is established, it will remain unclear how many affordable homes are likely to be provided in Dorset. Affordable housing for local people is a priority for many communities, and it is likely

that they will have comments to make until there is greater clarity. It is therefore essential that a further round of consultation is undertaken once a 'percentage figure' is established.

Question 12: We have suggested that the Local Plan will not include clear boundaries to define the edges of towns and villages. Instead, the flexible settlements policy would allow new homes to be built around certain towns and villages. How much do you agree or disagree with this approach?

A: Agree

B: Partially Agree

C: Neutral

D: Partially Disagree

E: Disagree XXX

Please provide any further comments or reasoning

Wareham Town Council strongly disagrees with the proposed new flexible settlements policy. It should not form part of the strategy to meet the area's needs and should be deleted from the Local Plan. The key concerns are:

- the lack of clarity about how the policy will be applied on the ground;
- the speculative nature of the policy;
- the unlimited number of sites that may be allowed at an individual settlement; and
- uncertainty about the contribution the policy will make to meeting housing needs.

Introduced following the 1947 Town and Country Planning Act, settlement boundaries have been defined on maps to provide a clear steer on how spatial policy should be applied. In general terms, 'infill' development on sites within a defined boundary is looked upon favourably, whereas in the countryside outside a defined boundary, there is a policy of restraint. The defined boundary clearly establishes which policy should be applied either side of the line.

The proposed new flexible policy seeks to remove settlement boundaries but then seeks to restrict new homes to sites within or adjacent to the edge of the 'continuous built area' of a village. The extent of the 'continuous built area' of a village will not be defined on the maps in the Local Plan, which will inevitably lead to huge uncertainty about whether a particular site is within or outside the 'continuous built area'.

In villages which have a compact form, it may be easier to define the edge of a 'continuous built area' on the ground but in villages that are less compact, particularly those with sporadic development around the edges, the extent of the 'continuous built area' will be the subject of much debate and dispute. This will inevitably require a lot of additional work by development management officers, both in the determination of planning applications and at appeal.

Paragraphs 5.1.3 and 5.1.4 of the consultation document highlight the problem with speculative planning applications allowed under the presumption in favour of sustainable development, 'that are not consistent with the delivery strategies in the adopted local plans'.

This concern will not be addressed by the proposed new policy, which in fact encourages speculative applications. As it is unclear where 'flexible settlement policy sites' will come forward over the plan period, it will be very difficult to ensure that adequate infrastructure is provided in the locations where it is needed.

It is not intended to restrict the number of sites that may come forward at an individual settlement, although it is proposed to limit each site to no more than 30 dwellings. This approach could result in two or more sites coming forward at smaller villages, including villages within the Dorset National Landscape, which risk being swamped by new development.

As it stands, this proposed new policy cannot be relied upon to make any contribution to Dorset Council's housing land supply, but it is clear that there are likely to be major adverse impacts in the event that it is taken forward. Figure 4.1 sets out how much housing will be delivered from different sources of supply and states that the 'supply estimate' from the flexible settlements policy is 'unknown'. The supporting text in Paragraph 4.3.1 also states that 'it is unclear what the delivery rate will be over the plan period' from this source of housing supply.

In the light of the points made above, Dorset Council should not take forward this proposed new policy and settlement boundaries should be retained across Dorset.

Question 13: We propose that the flexible settlements policy will include a limit of 30 homes per site. To what extent do you agree or disagree with this threshold?

A: The limit of 30 homes is about right

B: There should be less homes XXX

C: More homes per site should be allowed

Wareham Town Council strongly objects to the proposed new flexible settlements policy. It should not form part of the strategy to meet the area's needs and should be deleted from the Local Plan. The response to Question 13 is b. There should be fewer homes. In fact, no homes should be permitted under this policy, because it should not be taken forward.

The supporting text identifies a lack of sites being built for between 10 and 30 homes, both in Dorset and more widely. Whilst it is reasonable for Dorset Council to seek to bring forward more sites of this size, the flexible settlements policy is not the right mechanism. Better options exist, in particular Local Plan site allocations and allocations in neighbourhood plans.

For the plan-led system to function properly, Councils need to identify sufficient suitable sites for housing development to meet identified needs. Under this proposed new policy, the onus would be on the development industry to identify those sites. Inevitably, sites will be proposed sporadically across Dorset being developed in a disjointed, incremental fashion, without regard to the wider strategic implications, such as infrastructure provision. The Council needs to take the lead in identifying smaller sites to ensure that growth in Dorset is properly planned.

There is also a key role for neighbourhood plans to play in bringing forward smaller sites. Neighbourhood plans are produced by local communities, which have an in depth understanding of the needs of the community at the parish level. They also have detailed knowledge of the local environment, which makes them ideally placed to ensure that the right homes are provided in the right places. The proposed flexible settlements policy will, in effect,

see developers bypassing the neighbourhood plan system, with the selection of sites and the scale and type of housing being dictated by them, rather than being worked up by neighbourhood plan groups working with their local communities. Dorset Council should facilitate this by encouraging communities to produce neighbourhood plans and by offering them financial support.

Question 14: At a town/village, should one flexible settlement policy site be started, before another one is permitted?

A: Yes

B: No XXX

Please provide any further comments

Wareham Town Council strongly objects to the proposed new flexible settlements policy. It should not form part of the strategy to meet the area's needs and should be deleted from the Local Plan. The response to Question 14 is b. No. In fact, no sites should be permitted under this policy, because it should not be taken forward.

The proposed approach seems to create a loophole, which developers will seek to exploit. Question 13 asks whether the number of homes on a site should be limited to 30, but the supporting text to Question 14 does not seek to limit the number of sites at a settlement. Clearly, if a developer has aspirations to locate more than 30 homes at a settlement, then they would inevitably seek to develop more than one (and perhaps several) 'small sites'.

It seems highly likely that the outcome of this approach would be disjointed incremental growth, without the delivery of supporting facilities and infrastructure. The requirement for construction to commence on a consented development, before another site at the same settlement can be permitted, seems to enshrine this disjointed, incremental approach (with inadequate infrastructure provision) in policy.

Question 15: We have suggested that the flexible settlements policy will only apply to the areas around certain towns and villages, these are those ranked as 'Tier 1, Tier 2 or Tier 3' in our settlement hierarchy. What do you think about the locations where we have suggested that the flexible settlements policy should apply?

Wareham Town Council strongly objects to the proposed new flexible settlements policy. It should not form part of the strategy to meet the area's needs and should be deleted from the Local Plan.

Notwithstanding this objection in principle, it is agreed that growth should be focussed on the Tier 1, 2 and 3 settlements in Dorset (whether or not this policy is taken forward)

Question 16: We have suggested that the flexible settlement policy should only be applied around the 'continuous built-up areas' (i.e. 'densely populated areas with high concentrations of buildings, infrastructure and paved roads') of certain towns and villages. Do you have any comments on our definition of this 'continuous built-up area'?

Wareham Town Council strongly objects to the proposed new flexible settlements policy. It should not form part of the strategy to meet the area's needs and should be deleted from the Local Plan.

Question 17: We have suggested that the flexible settlements policy should not be applied in the Green Belt. What are your thoughts on this?

Wareham Town Council strongly objects to the proposed new flexible settlements policy. It should not form part of the strategy to meet the area's needs and should be deleted from the Local Plan.

In the event that this policy is taken forward, it should not be applied in the Green Belt. However, it should not be applied anywhere else in Dorset either, and particularly not within (or affecting the setting of) National Landscapes.

Question 18: Away from the towns and villages listed in the settlement hierarchy, there may be types of development that we could support. Do you have any comments on this approach and on the types of development that could be supported in the countryside?

It is appropriate to have a policy that supports certain types of development in the countryside, but it is also important this policy establishes that development more generally is 'strictly controlled'.

The text in Paragraph 5.8.2 seems to suggest that the types of development listed would only be permitted in 'exceptional circumstances'. This implies that even the types of development listed (such as agricultural buildings) would not be permitted in 'normal circumstances'. The text should say that development in the countryside will be 'strictly controlled' and restricted to the types of development listed in the policy.

Question 19: We have suggested that the flexible settlements policy should not be applied in places with a recently made neighbourhood plan which includes allocations for new homes. What are your thoughts on this?

Wareham Town Council strongly objects to the proposed new flexible settlements policy. It should not form part of the strategy to meet the area's needs and should be deleted from the Local Plan. Neither Question 19, nor the supporting text, provide a definition of what constitutes a 'recently made neighbourhood plan', which is needed in order to respond to this question in a meaningful way. Notwithstanding these concerns, the flexible settlements policy should not apply in locations where settlement boundaries have been established in a neighbourhood plan, regardless of whether the plan was 'recently made' or not.

Question 20: The Local Plan will retain and protect existing key employment sites, identify new employment sites at locations close to more sustainable settlements, allow for expansion of existing employment sites and allow for new employment sites in suitable locations. Do you have any comments on this approach?

The Council objects to, the proposed new employment sites in the Wareham area. These concerns are summarised below.

EL/WASM/006 – land at Camp Farm, Sandford. Concerns with this site include:

- its location within the Green Belt;
- its location immediately adjacent to areas of existing residential development in Sandford;
- its location adjacent to (either side of) Camp Cottage affecting the setting of a Grade II listed building;
- the likely need for two new junctions (capable of accommodating HGVs) to provide access into the two new areas of employment land either side of Camp Cottage; and
- the likely traffic generation (including HGV vehicles) on a road (the A351) that is already very busy.

EL/WARE/002 – land at Sandford Lane. Concerns about this proposed small (1.23 hectare) extension to the existing industrial estate include:

- its location within the Green Belt;
- its location immediately adjacent to internationally important wildlife habitats, including heathland (at the lower end of Morden Bog) and wetlands (in the Lower Piddle Valley);
- visibility from the nearby Dorset National Landscape;
- visibility from the Bowling Green area of Wareham Walls (a Scheduled Monument); and
- its limited potential for employment development, given its small size and the likely requirement for significant mitigation to address issues such as visual intrusion, impacts on wildlife and potentially flooding.

Question 21: The Local Plan will enable employment land to be developed outside identified sites at certain towns and villages, subject to certain considerations. Do you agree with this approach?

Wareham Town Council supports an approach that encourages employment development on previously developed sites and the re-use or replacement of suitable existing buildings in the countryside; but objects to an approach that would permit new employment sites in the countryside more generally, especially within the Green Belt or on sites within / affecting the setting of Dorset or Cranborne Chase National Landscapes.

Question 22: We have suggested that larger scale housing sites should be required to provide land for employment uses. Proposals for 300 homes or more would be mixed residential and employment developments, with a ratio of 0.25ha of employment space for every 100 homes. How much do you agree or disagree with this approach?

A: Agree

B: Partially Agree XXX

C: Neutral

D: Partially Disagree

E: Disagree

Wareham Town Council partially agrees with this approach but considers that the ratio of 0.25 hectares of employment land per 100 homes should only be used as a starting point for urban design work, that should be undertaken on all major housing sites of 100+ homes.

The approach of providing employment opportunities on larger housing sites is supported because it is likely to secure more sustainable patterns of development. However, urban design work is required to establish what might be acceptable in terms of the quantum, type and location of employment land to be provided. The 'rule of thumb' of 0.25 hectares of employment space per 100 homes would be a useful starting point, but this in itself, is only one small part of designing sustainable mixed-use developments and 'place-making'. Urban design work should respond to the local context, which could result in a mix of uses being proposed that departed from the 'rule of thumb' ratio.

It is some time before the next draft of the Local Plan will be published and during that time urban design work should be undertaken on all sites that total 100 or more new homes to show how mixed-use schemes could be delivered. Dorset Council should take the lead on this work.

Question 23: We have suggested that the Local Plan should include policies to protect the most important existing 'key' employment sites.

A) Do you have any view views on the strategy we have suggested for protecting employment sites?

Wareham Town Council broadly supports the proposed approach and the criteria that will be used to define 'key' and 'non-key' employment sites.

Sandford Lane Industrial Estate (and any extension to it) should be identified as a 'key' employment site, given its size. This employment site is also safeguarded by Policy H11 in the Wareham Neighbourhood Plan. In the light of other policies in the Wareham Neighbourhood Plan, which allow some housing development on parts of the industrial estates at John's Road and Westminster Road, these sites should be identified as 'non-key'. Westminster Road industrial estate includes a very large electricity substation, a household recycling centre, a parking depot for Council refuse trucks and Council winter salt store all of which are not employment uses. It also has a number of vacant units.

The Council objects to the proposed employment site next to Camp Cottage at Sandford (site EL/WASM/006). This site is considered to be wholly inappropriate for employment use.

B) What criteria should we consider when defining 'key' and 'non-key' employment sites?

A: Site size XXX

B: Location XXX

C: Employment use type XXX

D: Accessibility XXX

E: Contribution to meeting economic objectives/needs XXX

F: Market attractiveness XXX

G: Opportunities for growth/expansion XXX

H: The site's status in previous local plans XXX

I: Other XXX (vacancy rates and level of underuse)

Question 24: How do you think we should plan to support town centres in the future?

It is appropriate for the Local Plan to include strategic policies supporting town centres across Dorset, provided these policies do not undermine local approaches, such as the approach taken in the Wareham Neighbourhood Plan. This sets out the desire to have a 'thriving town centre' in the vision and objectives, with a number of detailed policies aiming to achieve that in Chapter 4.

The need to work collaboratively with Neighbourhood Plan Steering Groups to develop strategies for individual town centres, as set out in Paragraph 7.1.4 of the consultation document, is also supported. Car parking is crucial to the attraction of existing town centres, and it is important that free on street parking is retained in Wareham and that the charges for off street parking are kept low.

Question 25: What types of use do you think will be most important for the future of our town centres?

A: Shops (BLANK)

B: Cafes/restaurants (BLANK)

C: Leisure (e.g. cinemas) (BLANK)

D: Offices (BLANK)

E: Cultural (e.g. museums) (BLANK)

F: Community (e.g. libraries) (BLANK)

G: Hotels (BLANK)

H: Other (BLANK)

Despite changes in shopping patterns, in particular online shopping, the retail offer remains the most important factor in securing a thriving town centre, although a diverse range of other uses can also help to boost resilience. In the case of Wareham, good access to free on street and low-cost off-street parking is very important, as it attracts people from a wide rural hinterland, which is often poorly served by public transport.

Paragraph 4.2.1 of the Wareham Neighbourhood Plan notes that the town centre has performed well in recent times, with very few vacant units. It also points to the potential vulnerabilities and highlights the concern that the centre could go into decline if it lost (a) the

range of 'local' independent / specialist stores, (b) good access to parking; and (c) Sainsburys and the Co-op, which both play a vital role in attracting shopping trips to the town centre. Keeping food retailing within the town centre is key to the continued prosperity of the centre whilst out of town food retailing is likely to have a serious adverse effect on the vitality and viability of the centre (see Neighbourhood Plan Policy TC3 and related Cushman & Wakefield Wareham Retail Report). Wareham also has a diverse range of other town centre uses including dining and drinking establishments, a cinema, a museum and a library, which provide resilience and help to maintain vitality and viability.

Question 26: We are suggesting that retail impact assessments should be undertaken for retail development proposals outside the town centres defined in the Plan, that are over the size of a small food store (280 square metres net). How much do you agree or disagree with the introduction of a threshold of 280 square metres for retail impact assessments?

A: Agree XXX

B: Partially Agree

C: Neutral

D: Partially Disagree

E: Disagree

Wareham Town Council agrees with the proposed approach.

The proposed approach would require a retail impact assessment to be produced for any proposal for a shop (or shops) outside a Dorset town centre with a retail floorspace of 280 square metres or more. The Wareham Neighbourhood Plan, Policy TC3 – Resisting Out of Town Retail Floorspace, sets out a threshold of 200 square metres, above which a retail impact assessment is required.

This simplified approach, which would apply across Dorset, sets the threshold based on the definition of a 'large shop' in the Sunday Trading Act 1994. Sunday trading opening restrictions do not apply to shops with a retail floorspace of less than 280 square metres.

The slightly higher threshold that would apply at Wareham under the proposed new approach, is acceptable, as an out-of-centre retail unit in the range 200 to 280 square metres would be unlikely to have a harmful effect on Wareham Town Centre.

Question 27: Should the threshold also apply to leisure uses that are net 280 square metres?

Yes XXX

No

Policy TC3 in the Wareham Neighbourhood Plan only applies to retail development, so at the local level, there is no requirement to produce an impact assessment for an out-of-centre leisure use, of any size, that could have an adverse impact on Wareham Town Centre. Consequently, the proposal to also require an impact assessment for any out-of-centre leisure development with a floorspace of 280 square metres or more, is supported.

Question 28: We are considering whether the Local Plan should include a policy which supports interim or temporary uses pending a permanent use for a vacant town centre building - we have called these 'meanwhile uses'. To what extent do you agree with the introduction of a meanwhile uses policy?

A: Agree

B: Partially Agree XXX

C: Neutral

D: Partially Disagree

E: Disagree

Wareham Town Council partially agrees with this approach. A policy on 'meanwhile uses' should include criteria to ensure that any proposed interim or temporary use in a vacant town centre building would create a lively, active frontage and contribute to the vitality and viability of the town centre.

Question 29: How else can we encourage development on brownfield land, whilst also planning positively to meet our needs for homes and employment land?

Wareham Town Council considers that the best way of encouraging development on brownfield land would be to discourage development on inappropriate greenfield sites elsewhere. This could best be achieved by deleting the proposed flexible settlements policy from the Local Plan.

More urban design work would help to bring forward allocated brownfield sites and ensure that well-designed schemes are worked up by developers. There are examples of such work in the Wareham Neighbourhood Plan, where policies for specific sites set out design criteria accompanied by illustrative 'principles for development' drawings.

The Council notes that such work is being undertaken in Weymouth where there is considerable brownfield land and that substantial Government grant has been achieved. The Wareham Neighbourhood Plan proposes residential development on a number of small brownfield sites within the urban area which would both provide much needed housing in sustainable locations and improve the appearance of vacant and underused sites which detract from the character of the town.

However, from speaking to landowners the issue preventing redevelopment of small brownfield sites is one of viability, especially where there are abnormal costs such as ground remediation. One very helpful action Dorset Council could take to assist small towns is setting up a "small sites" brownfield grant scheme, perhaps with the support of Homes England or another Government agency, which would incentivise landowners to bringing forward such sites across the County thus helping the communities achieve their aspiration set out in their Neighbourhood Plans, assist the Council in achieving its housing requirement and improving the environment of our towns.

Question 30: To what extent do you agree with taking land out of the Green Belt to help meet our development needs?

A: Agree

B: Partially Agree

C: Neutral

D: Partially Disagree

E: Disagree XXX

Please provide any further comments or reasoning

Wareham Town Council objects to the proposal that land should be taken out of the Green belt to meet development needs.

Paragraph 147 of the NPPF requires a Council to 'be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development' before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries. However, no evidence has been published to demonstrate that 'all other reasonable options' to accommodate development outside the Green Belt have been examined fully. have been considered or to show that 'exceptional circumstances' exist.

Even if 'exceptional circumstances' can be demonstrated, a Council is required to follow a 'sequential approach' in the search for land that may be suitable for release. Paragraph 148 of the NPPF says 'where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt, which is not previously developed, and then other Green Belt locations'. This requires a Green Belt Review to be undertaken, in accordance with Government guidance produced in February 2025.

At the current time, the Green Belt review has not been produced, and no maps are available to show the location of potential areas of grey belt. Without such information (and evidence to show that 'exceptional circumstances' exist), a meaningful response to Question 30 cannot be made. This highlights the need for a further round of informal public consultation (Regulation 18) once this information is available and before the Local Plan is submitted for examination.

Question 31: We have suggested that the Local Plan should include a flexible settlements policy which would allow new homes around certain towns and villages. What impact, if any, do you think the proposed flexible settlements policy might have on opportunities for self-build homes?

A: High Impact

B: Some Impact

C: No Impact XXX

Wareham Town Council strongly objects to the proposed new flexible settlements policy. It should not form part of the strategy to meet the area's needs and should be deleted from the Local Plan. The policy is likely to have no impact on opportunities for self-build homes. It is highly unlikely that this policy will provide more opportunities for self-build homes, because

such developments are likely to be less profitable than market-led housing schemes. Landowners will therefore seek to promote market-led schemes on speculative sites on the edges of towns and villages in preference to schemes for self-build homes.

Question 32: Is there anything else we should do to increase the supply of self-build plots?

Policy HOUS6 of the 2021 Draft Dorset Council Local Plan sought to promote the provision of self-build homes. A similar policy would be more likely to deliver self-build homes than the proposed flexible settlements policy and should be included in the plan.

Question 33: We have suggested that housing requirements for neighbourhood plan areas should be finalised at the next stage of preparing the Local Plan. This is likely to involve consideration of sites with planning permission, local plan allocations and unplanned development. To what extent do you agree or disagree with the proposed approach?

A: Agree

B: Partially Agree

C: Neutral

D: Partially Disagree

E: Disagree XXX

Wareham Town Council objects to the approach of not finalising housing requirements for neighbourhood areas until the Local Plan is ready for submission at Reg 19 stage. At the present time, Dorset Council has not worked up a detailed methodology and has not produced any draft neighbourhood area housing requirements. Once this work has been undertaken, it will be important to engage with local Councils on an informal basis, before the Local Plan is submitted for examination.

It is important that there is alignment between the new Local Plan and Neighbourhood Plans to ensure that there is a consistent policy framework for the determination of planning applications. During the preparation of the Wareham Neighbourhood Plan, collaborative working was undertaken to ensure that the plans at different levels were consistent, having regard to extant planning permissions, any new local plan allocations, any large windfall sites, and an estimate of what might be delivered on small infill plots. This approach would be undermined if there is no dialogue between the Council and local communities on the methodology and the draft neighbourhood area housing requirements, before the Local Plan is submitted.

Question 34: Should the housing requirement figures for neighbourhood plan areas outside the Green Belt, include an allowance for sites that could come forward through the flexible settlements policy?

A: Yes

B: No XXX

Please provide any further comments or reasoning

Wareham Town Council strongly objects to the proposed new flexible settlements policy. It should not form part of the strategy to meet the area's needs and should be deleted from the Local Plan (b. No).

Questions 35 to 38 are not in relation to Wareham

Question 39: We have identified opportunity sites which could deliver more homes to help meet Dorset's housing needs. Do we need to change the approach to mitigating impacts on protected Dorset Heaths habitat sites as part of planning to meet increased housing needs?

A: Yes

B: No XXX

Please provide any further comments or reasoning

Wareham Town Council supports the current approach to mitigating impacts on protected Dorset Heaths habitat sites. This view is supported by the evidence quoted in the consultation document and by anecdotal evidence that SANGs in locations, such as: Bog Lane; Lytchett Fields, Upton; and Wild Woodbury are well used.

Question 41: We have outlined some areas which could be appropriate for wind turbines, ground mounted solar panels and battery energy storage. To what extent do you agree or disagree with identifying broad areas of opportunity for wind, solar and battery energy storage?

A: Agree (BLANK)

B: Partially Agree (BLANK)

C: Neutral (BLANK)

D: Partially Disagree (BLANK)

E: Disagree (BLANK)

Please provide any further comments or reasoning

The evidence to support this approach, including the background paper, was not available at the start of the consultation period and even by mid-September 2025, the strategic assessments of potential locations for renewables (see footnote 35) had not been published. As a result, respondents (including the Council) have had limited time to consider the documentation.

Paragraph 4.1.1 of the background paper indicates that the consultation document is based on the 'early outputs' of the strategic assessments. These outputs do not seem to have properly considered environmental matters, as many of the areas for renewables are not suitable. These 'early output' maps need to be withdrawn, as they are misleading and unsound. The Council's key concerns relate to:

- the potential impacts on National Landscapes, which have not been properly considered;
- the potential impacts on internationally important wildlife sites, in particular heathland sites in Wareham Forest, and the potential conflicts with the Wareham Arc nature recovery project; and
- the potential impacts on woodland areas.

In the Council's view, the arbitrary approach to identifying potentially suitable areas for wind turbines in National Landscapes and only having 'due regard' to their impacts when planning applications are submitted, do not reflect the requirements of the statutory protected landscapes duty in Section 245 of the Levelling-up and Regeneration Act 2023, which requires relevant authorities to seek to further the purposes of Protected Landscapes.

Significant areas within Wareham Forest are identified as being potentially suitable for large and medium scale wind turbines. The maps in Appendix D are small-scale but appear to exclude areas designated as being internationally important for wildlife. However, these sites exist within a mosaic of open heathland and forest, where the wildlife interest extends well beyond the designated sites. As a result Wareham Forest, and much of the land to the north and west of Wareham is included in the Wareham Arc (Reference 1 below), which was one of the first landscape recovery projects in the Landscape Recovery Scheme, created by DEFRA. It is highly likely that large or medium wind turbines would conflict with proposals to restore nature in the Wareham Arc area.

(Reference 1: <https://storymaps.arcgis.com/stories/8688c3f7354c4f9c944d6f5d2d3f8697>)