

Comment

Consultee	Dr Cindy Wood (1190128)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dr Cindy Wood (1190128)
Comment ID	PLPP247
Response Date	02/12/18 15:28
Consultation Point	Policies List (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No

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

Which policy / paragraph number / policies map does your comment relate to?	Policy V2
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Do you consider that the Local Plan is legally compliant?	No
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Do you consider that the Local Plan is sound?	No
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Do you consider that the Local Plan complies with the duty to co-operate?	No
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Please give details of why you consider this part of the Local Plan is / is not legally compliant, sound or fails to comply with the duty to co-operate. (Please be as precise as possible)

Clause 45 proposes to remove land from Green Belt protection but the NPPF states that this can only be done if there are VERY SPECIAL CIRCUMSTANCES (Green Study Clause 11) - these are not demonstrated in thsi document.

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

These sites need to be withdrawn under these circumstances as the VERY SPECIAL CIRCUMSTANCES have not been demonstrated - and therefore the Plan is non compliant with NPPF.

This is backed up by Purbeck District Council's OWN assessment of the Green Belt parcels 18 and 20 which score these sites as HIGH in their openness, value to the countryside and role in safeguarding the countryside. Truncating these for development is a direct contradiction in the Plan and they therefore need to be removed.

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

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If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Yes

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

To reiterate the points above

Comment

Consultee	Dr Cindy Wood (1190128)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dr Cindy Wood (1190128)
Comment ID	PLPP248
Response Date	02/12/18 15:35
Consultation Point	Policies List (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No

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

Which policy / paragraph number / policies map does your comment relate to?	Policy H6
Do you consider that the Local Plan is legally compliant?	No
Do you consider that the Local Plan is sound?	No
Do you consider that the Local Plan complies with the duty to co-operate?	No

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

Policy H6 does not address the needs of the village of Lytchett Matravers.

The village school, Lytchett Matravers Primary School, is already full and at capacity and this means that financial contributions will be required for both costing and building the necessary extensions to

fit an increased population. This document does not acknowledge this need and present position nor provide any idea of where funds for these building works will forthcoming.

Likewise the Adams Practice in the village (the only doctors' surgery) is also at capacity, a point made by the Clinical Commissioning Group, and as above this Plan does not address this situation nor provide a means of remedying it. The contribution of £80 per house would only yield £12,00 to expand the surgery - a completely inadequate amount.

This sum is seriously short of any meaningful contribution to this area of essential village life.

This document does not address the needs of the village if extra housing is imposed

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The sites in this village need to be removed as the current infrastructure of the village is inadequate to support it and the Plan does not outline how these will be remedied.

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To reiterate the points above

Comment

Consultee Dr Cindy Wood (1190128)
Email Address [REDACTED]
Address [REDACTED]
Event Name Purbeck Local Plan Pre-submission Draft
Comment by Dr Cindy Wood (1190128)
Comment ID PLPP249
Response Date 02/12/18 15:45
Consultation Point Policies List ([View](#))
Status Processed
Submission Type Web
Version 0.1

Are you responding on behalf of a group? No

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

Which policy / paragraph number / policies map does your comment relate to? Policy H6

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

Do you consider that the Local Plan is sound? No

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

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

This Plan does not take into account the reality in Lytchett Matravers.

The plan for 150 extra houses without any supporting infrastructure does not deal with the extra c.590 houses already in the |Plan nor the 84 houses that have been built/are being built in the village since

2012. While I understand that this 'windfall' does not get included in the previous Plan - this level of additional housing in the village, which also needs to consider the 11 currently in the planning process, need to be acknowledged and sued against any further development.

The current infrastructure of Lytchett Matravers is only just adequate, not only in the provision of schooling and doctors, but also in traffic levels. The village has a minimum public transport system - which does not currently offer any villagers an option to get to Poole at 9.00am. There are no alternative travel options beyond using cars.

The additional housing since 2012 has meant that the exits onto the A35 and A350 at peak hours is already difficult. The Plan does not acknowledge these problems nor choose sites with better public transport options over the ones in Lytchett Matravers. The traffic impact has not been considered in light of the public transport provisions in the area and this is a serious lack of consideration of an important aspect of housing need and provision.

The housing options for this village are unsustainable and will increase a reliance on car travel making traffic problems for the entire local area. These sites are unsuitable for that reason.

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Remove these sites from the Plan - as they do not offer sustainable transport options and increase a reliance on car travel across the District.

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

Reiterate the points above

Comment

Consultee	Mrs Catherine Brabner-Evans (1191053)
Email Address	[REDACTED]
Company / Organisation	Woodland Trust
Address	Woodland Trust Kempton Way Grantham NG31 6LL
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Woodland Trust (Mrs Catherine Brabner-Evans - 1191053)
Comment ID	PLPP663
Response Date	03/12/18 13:08
Consultation Point	Policy I3: Green infrastructure, trees and hedgerows (View)
Status	Processed
Submission Type	Web
Version	0.2
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	Policy I3: Green Infrastructure, Trees and Hedgerows
Do you consider that the Local Plan is legally compliant?	Yes
Do you consider that the Local Plan is sound?	No
Do you consider that the Local Plan complies with the duty to co-operate?	Yes

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The Woodland Trust does not feel that this Policy is sufficiently robust in its intention to retain, replace and plant additional trees and hedgerows. The loss of priority habitats, through fragmentation, lack of management, threats from pests and diseases and the ongoing pressure from both development and from climate change requires a robust intervention to promote nature recovery networks. The solution based on Lawton in the context of woodland habitats, is buffering existing areas of woodland and new planting of trees, woods and hedgerows to create nature corridors for connectivity. Trees in an urban landscape have extensive environmental, health and economic benefits. These include supporting sustainable urban drainage systems, urban cooling and improving the energy efficiency of buildings. Urban trees can reduce air and noise pollution and help reduce wind speeds. They also provide vital nature corridors, linking green spaces through the towns and cities to the countryside beyond. Trees can have a high 'amenity value' bringing beauty and a sense of wellbeing into even our most built up urban centres.

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The Woodland Trust would like to see this Policy specifically include a robust statement requiring the retention, replacement and provision of additional trees and hedgerows.

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Consultee	Mrs Catherine Brabner-Evans (1191053)
Email Address	[REDACTED]
Company / Organisation	Woodland Trust
Address	Woodland Trust Kempton Way Grantham NG31 6LL
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Woodland Trust (Mrs Catherine Brabner-Evans - 1191053)
Comment ID	PLPP664
Response Date	03/12/18 13:11
Consultation Point	Policy H5: Wool (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	Policy H5: Development at Wool
Do you consider that the Local Plan is legally compliant?	No
Do you consider that the Local Plan is sound?	No
Do you consider that the Local Plan complies with the duty to co-operate?	Yes

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The Woodland Trust objects to the proposed use of Coombe Wood as a SANG as mitigation of the development at Wool. Coombe Wood (grid ref: SY833846) is an area of ancient woodland designated as mainly Plantation on Ancient Woodland Sites (PAWS) with areas of Ancient Semi-Natural Woodland (ASNW).

Coombe Wood is a planted ancient woodland site. We would always consider this on an equal footing to ancient woodland because of its potential for restoration. To put forward such a special irreplaceable woodland site as a SANG to mitigate the impacts of development is not acceptable. We would urge Purbeck District Council to go back to the landowner/developer seeking an alternative SANG option which will avoid adverse impacts on the ancient woodland and encourage restoration here instead.

While the Trust certainly doesn't want to discourage the public from experiencing and visiting ancient woodland, we do have some serious concerns regarding ancient woodland being designated as SANGS.

Approximately one quarter of priority UK BAP species are associated with woodland habitats. Forests, woods, and trees make a significant contribution to biodiversity, and ancient sites are recognised as being of particular value. Due to their longevity, ancient woodlands are more species rich, and are often refuges for specialist woodland species that struggle to colonise new areas.

As an irreplaceable habitat, ancient woodland cannot be re-created and should not be offered up as an area of greenspace that could potentially be subjected to the significantly damaging impacts of high footfall and other intensive recreational activity.

The designation of this large ancient woodland as SANGS could have considerably adverse consequences for the health and long-term retention of the wood. Coombe Wood would likely become less of a local amenity and more available to visitors from a wider area, resulting in an intensification of recreational activity and higher footfall. Unfortunately, the Trust is not unused to seeing cases in which heavy footfall and improper management has resulted in serious deterioration of ancient woodland areas that are similar to Coombe Wood in size.

Potential impacts of development on planted ancient woodlands include:

- 1 Intensification of the recreational activity of humans and their pets can result in disturbance to breeding birds, vegetation damage, trampling, litter, and fire damage.
- 2 Fragmentation as a result of the separation of adjacent semi-natural habitats, such as small wooded areas, hedgerows, individual trees and wetland habitats.
- 3 Noise, light and dust pollution occurring from adjacent development, during both construction and operational phases.
- 4 Adverse hydrological impacts can occur where the introduction of hard-standing areas and water run-offs affect the quality and quantity of surface and ground water. This can result in the introduction of harmful pollutants/contaminants into the woodland.
- 5 Development provides a source of non-native plants and aids their colonisation.
- 6 Where gardens abut woodland or the site is readily accessible to nearby housing, there is an unfortunate tendency for garden waste to be dumped in woodland and for adjacent landowners to extend garden areas into the woodland.
- 7 Any effect of development can impact cumulatively on ancient woodland – this is much more damaging than individual effects.

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As the revised NPPF significantly strengthens the protection for ancient woodland and veteran trees we would strongly urge Purbeck to abandon the proposal to use Coombe Wood as a SANG for the development at Wool and seek an alternative solution which will not impact on ancient or veteran trees.

This is a matter of principle for the Woodland Trust. As the UK's leading woodland conservation charity, the Trust aims to protect native woods, trees and their wildlife for the future. Through the restoration

and improvement of woodland biodiversity and increased awareness and understanding of important woodland, these aims can be achieved.

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

We would urge Purbeck District Council to go back to the landowner/developer seeking an alternative SANG option which will avoid adverse impacts on the ancient woodland and encourage restoration here instead.

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Comment

Consultee	Mrs Catherine Brabner-Evans (1191053)
Email Address	[REDACTED]
Company / Organisation	Woodland Trust
Address	Woodland Trust Kempton Way Grantham NG31 6LL
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Woodland Trust (Mrs Catherine Brabner-Evans - 1191053)
Comment ID	PLPP665
Response Date	03/12/18 13:05
Consultation Point	Policy E10: Biodiversity and geodiversity (View)
Status	Processed
Submission Type	Web
Version	0.2

Are you responding on behalf of a group? No

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

Which policy / paragraph number / policies map does your comment relate to? Policy E10

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

Do you consider that the Local Plan is sound? No

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

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

The Woodland Trust objects to Paragraph 79 and Policy E10 on the grounds that it does not adequately protect irreplaceable ancient woodland as required by the revised NPPF. NPPF paragraph 175 clearly states:

'When determining planning applications, local planning authorities should apply the following principles: [...]

- 1 *c) Development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons⁵⁸ and a suitable compensation strategy exists;'*

Ancient woodland is defined as an irreplaceable natural resource that has remained constantly wooded since AD1600. The length at which ancient woodland takes to develop and evolve (centuries, even millennia), coupled with the vital links it creates between plants, animals and soils accentuate its irreplaceable status. The varied and unique habitats ancient woodland sites provide for many of the UK's most important and threatened fauna and flora species cannot be re-created and cannot afford to be lost. As such, the Woodland Trust aims to prevent the damage, fragmentation and loss of these finite irreplaceable sites from any form of disruptive development.

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

Policy E10 must be amended to give stronger protection to ancient woodland, ancient trees outside woods and veteran trees in keeping with the requirements of the revised NPPF.

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Comment

Consultee	Mrs Catherine Brabner-Evans (1191053)
Email Address	[REDACTED]
Company / Organisation	Woodland Trust
Address	Woodland Trust Kempton Way Grantham NG31 6LL
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Woodland Trust (Mrs Catherine Brabner-Evans - 1191053)
Comment ID	PLPP666
Response Date	03/12/18 13:05
Consultation Point	Policy E6: Coastal change management areas (CCMAs) (View)
Status	Processed
Submission Type	Web
Version	0.2
Are you responding on behalf of a group?	No
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	Policy E10
Do you consider that the Local Plan is legally compliant?	No
Do you consider that the Local Plan is sound?	No
Do you consider that the Local Plan complies with the duty to co-operate?	Yes

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Comment

Consultee	(1187112)
Email Address	████████████████████
Company / Organisation	Wool Flora and Fauna Group
Address	14 Cologne Road Bovington Wareham BH20 6NR
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Wool Flora and Fauna Group (- 1187112)
Comment ID	PLPP111
Response Date	29/11/18 16:55
Consultation Point	Policy E7: Conservation of protected sites (View)
Status	Processed
Submission Type	Web
Version	0.3
Are you responding on behalf of a group?	No
If yes, how many people do you represent?	1
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	E7
Do you consider that the Local Plan is legally compliant?	No
Do you consider that the Local Plan is sound?	No
Do you consider that the Local Plan complies with the duty to co-operate?	No

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Policy E7 Impacts on Nationally and Internationally important sites.

The development of 470 extra homes in Wool is ambitiously projected to be nitrogen neutral. But the existing system is at maximum capacity from several aspects. The existing Wool sewage works treatment works is at full capacity processing sewage from Wool, Bovington, East Burton and Lulworth so that at times the smell is perceptible at the Seven Stars pub at West Burton. The feeder sewers are at full capacity especially where they pass under the railway and blockages occur causing flooding of sewage into the road and adjacent properties. When there are severe weather events there can be a backup of sewage. The drainage from the Purbeck Gate development has simply exacerbated the problems. There are already proposals in earlier plans that could result in another 350 houses contributing to Wool sewage works. In para 221 it states "as Purbeck continues to grow infrastructure will come under increased pressure" but it fails to acknowledge that the system is under excessive pressure now.

Wool will need a new sewage works and the feeder sewers will need replacement. Wool sewage works is present constrained by being adjacent to part of River Frome SSSI and there is little space for expansion which will need to have nitrate stripping to conform to nitrate neutrality policy. The replacement feeder sewers will cross least fit 1 km of land where biodiversity damage could occur.

An Infrastructure Delivery Plan is referred to but does not seem to be available yet so a definitive assessment of this plan and its implications is not possible at present.

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

The plan is all about housing and does not get to grips with the infrastructure. Infrastructure proposals need to be judged with the housing proposals not come later when the potentially damaging issues have already been decided.

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

I lack confidence in Purbeck District Council

Comment

Consultee	(1187112)
Email Address	████████████████████
Company / Organisation	Wool Flora and Fauna Group
Address	14 Cologne Road Bovington Wareham BH20 6NR
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Wool Flora and Fauna Group (- 1187112)
Comment ID	PLPP322
Response Date	03/12/18 12:38
Consultation Point	Policy H5: Wool (View)
Status	Processed
Submission Type	Web
Version	0.3
Files	wool-flora-and-fauna-additional-info.pdf Illustrations for Wool Flora and Fauna Group (1) Illustrations for Wool Flora and Fauna Group
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	10
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	H5
Do you consider that the Local Plan is legally compliant?	No
Do you consider that the Local Plan is sound?	No

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

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Policy H5

Although this submission is about Policy H5 it also relates to Policies E7, E9, E10 and Policy 13 (1.3).

SUBMISSION FOR THE INSPECTOR OF PURBECK LOCAL PLAN 2018

COMMITTEE MEMBERS OF WOOL FLORA AND FAUNA GROUP

Rachel Palmer BSc (Hons) Botany Leicester.- Chair

Botanist specialising in Woodland Flora including Lichens. Environmental Education Wool Resident

Dr A C Warne BSc. PhD. Notts. FRES

Entomologist. Retired ex Nature Conservancy Council & JNCC. Independent Consultant Ecologist

Mr A Brown

Local author and lifelong resident of Wool Parish. Hurdle maker.

Mr I Duckworth BSc CBIol London.

Specialist in Dragon Flies. Environmental Education

Mr A Branston BSc Environmental Science Plymouth

Professional Ornithologist. Wool Resident

Emma Branston BSc

Advisor for Farming Wildlife

Ms M Mahler MSc Imperial College, London

Professional Ecologist Landscape Design and Management

Mr B Shephard BSc(Hons) Zoology Cardiff

Fellow of the Linnaean Society. BTO Bird Ringer and Scheme Trainer

Mrs W Shephard BSc(Hons) Microbiology MSc Health Education Royal Society of Biologists

Childrens Outdoor Education specialist. Adult Environmentalist Chartered Biologist

INAUGURATION OF THE GROUP JANUARY 2017

REASONS FOR FORMATION:

Concerns for the loss of Wool's rich heritage of Biodiversity in the face of impending development. Backed by understanding of Wool's residents love of and concern for wildlife. The Parish Plan of 2011 had 80% of its respondents stating they wished areas rich in wildlife and designated sites to be protected and retained.

ACTIONS

- 1 Distribution of recording sheets across the village for residents to send in sightings of species they considered rare or unusual (see attachment)
- 2 Web site set up for records and on-rolling map of records to date.
- 3 Newsletter to Friends of Wool Flora and Fauna detailing records
- 4 Regular Committee Meetings
- 5 Exhibition on Wool Wildlife in March. Well attended by residents though sadly local District and County Councillors did not attend.

We consider the whole plan for the parish of Wool unsustainable and unsound as it falls down on the Environmental object C. The third requirement for sustainable development as stated in the National Planning Policy Framework (NPPF) guidelines 2018: Protecting our Natural , Built and Historic Environment.....Helping to improve Biodiversity.'

Purbeck District Council in Policy 13 speaks of enriching biodiversity habitats and that development can improve biodiversity. They provide no evidence for this and we refute this statement and in view of Wool already being a 'Biodiversity Hotspot' how this is possible set against the obvious losses we have addressed in this paper where even if it were possible, say in some parts of the country with low Biodiversity, here any gains would be far outstripped by losses.

Purbeck District Plan recognizes in its statement 'Purbeck contains some of the most specialised and heavily protected environments in the country. It has a wealth of Biodiversity and wildlife designated areas at International, national and county levels which should not be viewed in isolation. However, it fails to list them for Wool. They also state 'Maintaining a well connected and health network of biodiversity assets is an integral part of sustainable development. But in the face of seemingly not recognising what these are let alone where they are, we feel this is a hollow statement. Furthermore, the Purbeck Plan offers no evidence on how this can be achieved in the light of Wool's allocation of 470 houses and essential new infrastructure. (see map attachments).

In the parish there are:

1 SPA – International designation

2 SSSI – European designation

9 SNCI – County designation

1 LNR – Parish

13 Ancient Woodlands

The revised NPPF 2018 states in 'Achieving sustainable development p.171 plans should allocate land with least environmental value.

The Local Plan appears to have selected a parish of the highest environmental value for its second largest housing allocation. A SANG in Ancient Woodland, Coombe Wood (un-named in written documents within the plan) and builds entirely on organic farmland with ancient herborous forming a highly biodiverse ecosystem. Lists of its habitats include many priority habitats. They form a habitat mosaic possibly better than any other in Purbeck.

Variety of Habitats:

Woodlands: lowland mixed, deciduous and wet woodland

Water Meadows and River Frome

Streams including a chalk stream which runs through the centre of the village

Hedges (ancient and species rich)

Fen

Reed beds

Scrub ruderal habitats

Road verges

Organic farmland – rich arable land, new rev BAP habitat

Ponds

Heathland

Veteran Trees

Neutral grasslands

Gardens including 1 SNCI

HEDGEROWS

Hedgerows are a priority habitat when defined as any boundary line of trees and shrubs over 20m long and less than 5m wide, further defined as ancient or species rich.

Wool is outstanding as a parish in possessing miles of hedgerows perhaps only surpassed in the west of Dorset 20% of these are estimated as pre-enclosure e.g. before 1839, 30-40% enclosure hedges from 1839. These hedges are 200 years old and pre-enclosure hedges range from 300-400 years old some possibly dating to Anglo Saxon times.

Reduction of hedgerows means loss of valuable habitat and therefore loss of biodiversity. Removal and damage to hedges is likely to be widespread not only in delivering the present allocation of 470 houses but in improving transport links, creating cycle ways and footpaths and providing necessary infrastructure.

PARA 1. HABITAT CONTRIBUTION TO BIODIVERSITY

- 1 A place to feed. – Large numbers of woody plants of different species provide different leaf food sources for caterpillars and other insects and spiders using the woody framework for their webs. All these provide the bases of food chains giving food for many different species of bird which feed in and along them. These include three birds on the Red Data alert list for vulnerable and endangered species: Yellow hammer, Thrush and Corn bunting all recorded along hedges abutting developments. Numerous other birds: Hedge sparrow, Warblers, Wrens, Goldfinches, Goldcrests, Blackbirds provide a plentiful food source for raptors at the top of the food chain e.g. Sparrowhawks and Kestrels. With development Magpies could become more prevalent hunting along hedges for nests for eggs and fledglings. Bats hunt along hedges at night as the sheltered and damp atmosphere supports high numbers of mosquitoes and moths.
- 2 A place to breed – safe nesting sites with a woody framework.
- 3 'Hedges promote ecological networks, corridors and stepping stones important in protecting biodiversity'(NPPF 2018)
- 4
- 1 providing protection and assisting dispersal of species in an otherwise hostile and fragmented landscape. They are important for survival of certain species. Hedgehogs can travel 2 football pitches a night in search of food. In the face of National decline, Wool has a plentiful population.
- 2 Important in connecting the outstanding Habitat Mosaic of Wool. PARA 3 THREATS TO HEDGES WITH THE PROPOSED HOUSING ALLOCATIONb) Hedge cutting below 2m is not sanctioned by local authorities but with older hedges e.g. those around the development sites as higher cut than this can kill the hedge. There will be pressures for this where properties abut old hedges because of tidiness and shade. Cutting of the hedge in Autumn can remove important food sources of pre winter fruits and berries and spring cutting disturbs nesting birds – again illegal but this relies on the public to report it and then often it is too late. At present the hedges around the proposed development sites are cut at a suitable time.c)Disturbing the soil and lowering the water table in the root zone area which could be very wide for old hedges. This is particularly likely to be a threat with hot dry summers as a result of climate change.e)cutting roots of woody species in the building phase of development.g)tipping of garden household and building rubbish into the hedge (see photo above of footpath 10, Wool.) Footpath 10 the oldest way through the village where development either side at the Hillside area of the Parish has resulted in degrading of the ancient hedgerows either side of this way by loss of woodland flora, bioenrichment with dumping of garden rubbish -removal of woody species include some trees, general dumping and replacement of the hedge with a fence.h) replacement of garden hedges by fences which restrict movement of hedgehogs. Both the hedge to the west of Chalk Pit Lane/Oakdene road and the hedge running north from the Winfrith roundabout along Burton Road were part of a field system before 1845 being part of the hedge of the Great Field in the Middle Ages. These form part of the historic landscape of Wool.Wool has a huge compliment of hedges and it is in part due to these and the ecological network they provide so connecting Wool's impressive habitat mosaic that Wool is a 'biodiversity hotspot'.
- 3 Connecting together enriching biodiversity and wildlife habitats, improving connections, green corridors and links between the different components of green infrastructure' is admitted to in policy 13 'Infrastructure'. However there is no follow up of evidence of how this is to be achieved.
- 4 The proposed developments are bounded by pre and post enclosure hedges. The former qualify as important in the National Hedgerow regulations 9 criteria are listed for this qualification only

- one of which needs to apply but important hedges abutting the housing allocation qualify on three scores.
- 5 i)removal to provide road widening and all the infrastructure for development.
6
7 f)dust and debris especially during the building stage can cause reduced vigour of woody species particularly if these are of reduced vigour due to age.
8 d) spraying to suppress hedgerow growth
9 (Policy 13 does not seem complete)
10 a)removal for access to a building site and for penetration of utility services. This has to be applied for to the Local District Council but there is a 6 week comment period and developers may take the law into their own hands e.g. E.Burton Road, the Lawrence View development.
11

Historic Landscapes of Wool

Despite much unsympathetic development in Wool there is still a great deal of the ancient landscape to be found. There are a number of ancient trees, particularly oak.

An ancient withy bed remains and also a small amount of hazel remaining from the large hazel copses so necessary for the sheep so prolific in the area. Some pre Enclosure hedges remain but many were lost at the 1839 enclosure. Many of the enclosure hedges are still in existence. The Great Fields dating from the 13th century were reduced by the enclosures at the time of Enclosure Act but part of the original boundaries are still in existence.

Many of the Mediaeval roads passed through the parish and parts of them are still in existence. Perhaps the most notable is the Old Drove and Footpath No. 10 which ran from Purbeck in the south and northwards towards Briantspuddle. Another ran from the south across the heath through Hyford to Bovington Farm, part of which can still be seen today. Another ran through Woodmans Cross to Wood Street and Cole Wood and on to East Stoke. Bindon Lane served Bindon Abbey and Holme Priory. Originally it left Wool near the Church, passed the Abbey and on to Stoke Common. The main road through Wool can from Coombe Keynes about a quarter of a mile east of the existing road and running parallel to it into what is now Church Lane.

The water meadows between Wool and East Burton were an important part of farming life and in 1635 an agreement was made for "floating the common meadows". This was implemented in 1658. In Bovington the meadows were "floated" in 1645. This meant the meadows were flooded by means of hatches at each end and a controlled gentle flow of water covered the meadows to protect and bring on the young grasses for an "early bite".

Up until the Enclosure Act of 1839 part of the meadows were divided into narrow strips for the cottagers to have some for their own use.

If you look closely you can still find traces of the "drawns", "gattles", "carriers" and "panes" in the meadows. At Bindon the meadows were called Lammas Lands as the hay had to be made by Lammas Day.

Map Pre 1841 showing the common lands and the Great Field, Wool and East Burton

Organic farmland. H5

All of the area proposed for new housing in Wool is organic farmland. This is a valuable resource and is not the poorer quality farmland that should be preferred for development.

- 1 It takes many years to qualify as organic farmland.
- 2 It has had stewardship scheme money put into it under a 10 year management agreement ending in 2022.
- 3 It has not had artificial fertiliser applied to it and therefore is nitrate neutral so does not contribute to the River Frome and Poole Harbour nitrate pollution problems, housing might however increase nitrate levels on this type of land.
- 4 Organic farmland has on average 30% more species and species abundance than conventional farmland.
- 5 Organic farmland is antibiotic free and therefore can contribute to the health of people.
- 6 On the map showing the overall sensitivity of all Purbeck's asset's with partners including RSPB, Purbeck Heritage Committee, English Nature, DEFRA, RDS, FWAG, DWT, and NT the area where housing is proposed is shown as a hotspot for arable wildlife as part of one of the richest districts for wildlife in the country. The report by Land Use Consultants /Purbeck DC the largest area proposed for housing has 4 sub themes and is in the highest level of "moderate" sensitivity and it is also classified as Grade 3 (parts 2 rest 3a) good in the Agricultural Land Classification.

The wildlife importance of organic farmland.

There have been many studies comparing the effects of different farming regimes on the variety and abundance of wildlife and a review of these (a) has concluded that there is overall a 30% benefit on organic farmland this varies considerably for the type of wildlife and for various reasons. Herbicides while not directly targeting invertebrates have been found to suppress fecundity in some species, bat activity has been found to be 61% more and foraging activity in particular 84% higher over organic farmland than conventional and butterflies respond positively to organic farmland and this enriches the surrounding area.

(a), *Tuck S.L. et al. 2014 Land use intensity and the effects of organic farming on biodiversity, a hierarchical meta analysis. Journal of Applied Ecology 51 p.746*

Limited insect survey of field margins on the organic farmland in Wool showed higher diversity compared with field margins on nearby conventional farmland. Field margins around organic fields have higher numbers in part due to the presence of many more species that feed on clover that is sown as part of the organic crop rotation to provide nitrogen but other species feeding on a wide range of other plants are also more abundant in organic field margins. Around conventional farmland sorrels and other small plants may be swamped by the more vigorous growth of nettles and grasses that are stimulated by fertilisers. The survival of smaller plants round organic fields may account for the greater numbers phytophagous insects on organically managed land.

Clover that forms part of the organic crop rotation is also very important for bumblebees, honeybees and other pollinators that have declined nationally in recent years but are recognised as essential for the pollination of many commercial crops. The flora of the Wool organic fields have flowers characteristic of fields many years ago and now rare such as cornflowers, corn marigold and corn spurrey. Birds also in decline nationally such as corn bunting and yellowhammer and skylark are present and kestrels hunt the small mammals that live in the rich field margins. They are wintering areas for lapwings. The hedgerows have adders and Barn owls hunt along the hedges. Fields north of the A352 have records of several species of bats, all of which are protected, that feed across the fields and along the hedges. Arable land is recognised as valuable in Purbeck on a post card (attached) produced by Purbeck DC and others.

Should land that is already providing higher biodiversity as well as a cleaner environment be developed housing?

Organic Farmland – Cornflowers & Corn Marigolds

H5, E7, E9

Environmental Statement and Considerations regarding the proposed building of homes in the catchment of the River Frome.

River Frome below Dorchester is designated an SSSI.

The River flows into the Poole Harbour basin designated an SAC and Ramsar Site.

It is therefore essential that any development does not adversely effect the delicate habitat of the river and its flood plain.

The possible effect of development in the Purbeck District on the River can not be viewed in isolation. All the catchment developments will combine to effect the River. Increasing populations within the catchment inevitably will lead to increasing pollution and, unless some form of mitigation is built in, an increase risk of flash flooding.

Over time the river meanders across its flood plain with great force,(witness Wool Bridge collapse), additional house building can only increase the bankside damage.

It is vital that the chemical composition of the water is kept as pure and as clean as possible. In the past nitrogen, phosphate and other chemicals have polluted the river water, Leading to an overabundance of weed a major cause of flooding.

More insidious are the chemicals reaching the river via sewage, Many of the drugs taken by humans are now reaching the rivers. It has been demonstrated that the contraceptive pill is taken up by fish, who knows what other chemicals are affecting the natural balance of nature. We know from the River fly monitoring program that the in river invertebrates, so vital to all life, are diminishing. No longer do we have to wash the car windscreen after crossing a river bridge in summer to remove the dead flies.

Any increase in human population is inevitably going to adversely effect the existing populations of Water Voles and Otters. Sewage and other chemicals do escape and can have disastrous effects. (Paint stripper 1996 wiped out all fish below Bovington.)

The River is a vital resource, it not only carries our waste away but produces a wealth of environmental benefits.

The Water, the Silt, the Invertebrates, the Fish, the Bird and Mammalian Wildlife ,plus the natural vegetation, a complete eco system.

WE must look after it.

Policy E7 Impacts on Nationally and Internationally important sites.

Policy E9 Poole Harbour and Policy H5 Wool

(Video available supporting this)

The development of 470 extra homes in Wool is ambitiously projected to be nitrogen neutral. But the existing system is at maximum capacity from several aspects. The existing Wool sewage works treatment works is at full capacity processing sewage from Wool, Bovington, East Burton and Lulworth so that at times the smell is perceptible at the Seven Stars pub at West Burton. The feeder sewers are at full capacity especially where they pass under the railway and blockages occur causing flooding of sewage into the road and adjacent properties. When there are severe weather events there can be a backup of sewage. The drainage from the Purbeck Gate development has simply exacerbated the problems. There are already proposals in earlier plans that could result in another 350 houses contributing to Wool sewage works. In para 221 it states "as Purbeck continues to grow infrastructure will come under increased pressure" but it fails to acknowledge that the system is under excessive pressure now. The statement in the Environmental and Infrastructure Capacity Study that there is no problem with sewerage is untrue as the smell from Wool treatment works and backup and flooding from the sewers clearly demonstrates.

Nitrate levels in the Frome have steadily increased many years at a rate of about 1 mg per 10 years have be a data has measured at the Stoke. Much of this is attributed to agriculture and it is estimated that today's nitrate fertiliser application might take up to 30 years to reach Poole harbour this will mean

that over the 30 years the nitrate levels of Frome could increase 25 to 30% even if nothing is done. There is a problem now that needs to be sorted solved before additional homes are built but they already are throughout the friend catchment yet little appears to be happening to solve the problem. Wool will need a new sewage works and the feeder sewers will need replacement. Wool sewage works is present constrained by being adjacent to part of River Frome SSSI and there is little space for expansion which will need to have nitrate stripping to conform to nitrate neutrality policy. The replacement feeder sewers will cross least fit 1 km of land where biodiversity damage could occur.

The plans contain little but optimistic statements about nitrate neutrality and do not address the very considerable infrastructure ramifications of the new housing. There are other documents about nitrate problem in Poole harbour the mitigation options but there are these are needed now to solve the current problem yet there is little or no evidence of action. Policy 11 has no mention of the need for sewage treatment works upgrades unless b) includes this without any specific mention. Policy E9 is only about Poole Harbour but this also affects the River Frome SSSI and although the River Frome benefits from some of the Poole Harbour Policies these all need action now.

An Infrastructure Delivery Plan is referred to but does not seem to be available yet so a definitive assessment of this plan and its implications is not possible at present.

Policy H5 Wool and Policy E10 Protection of Biodiversity - Wool Watermeadows.

Watermeadows are a traditional landscape in lowland England but for many years have been more efficiently drained, pastures improved by fertilisers or even ploughed so that they are now becoming much less common and almost all water management has ceased.

Watermeadows are important for their flora, their mammals (notably water voles) and their nesting birds and for a vast range of invertebrates. In recent years many of the important nesting birds such as lapwing, snipe and redshank have deserted watermeadows and this is so for the Wool watermeadows. One important reason for their loss is the lowering of water levels but these can be restored to encourage these birds and others to return. We had hoped the Wild Purbeck Nature Improvement Area might have been applied to this.

The watermeadows do not exist in isolation but have the River Frome SSSI running through the middle and they abut a narrow band of Ancient Woodland on their north edge (all SNCI). The great diversity of wildlife on the watermeadows is enhanced by their relationship with contrasting habitats. Nitrate levels in the River Frome might affect some of the aquatic invertebrates that emerge and are fed on by waterside birds and there is evidence of a decline in numbers of mayflies and other "flies". If the watermeadows had their water level management restored it might have a beneficial role in reducing nitrate levels. The watermeadows are also important as feeding areas for Nightjar one of the species for which the heaths are designated as SPA, demonstrating another aspect of the linkages between habitats in Wool.

The Wool watermeadows are vulnerable to the proposed new housing because:

- 1 increased housing will bring an increase in dogs and therefore dog walking for which the riverbank is a popular area, this causes disturbance to wildlife particularly the otter and water voles that inhabit the area and will discourage the re-establishment of nesting waders should the right management regime be achieved.
- 1 although there is no proposal for a bypass at present the large increase in housing and therefore cars will lead to increased traffic problems at a level crossing and the need for a bypass. One proposal would be for this to be on a causeway along the south side of the watermeadows which would be a disaster for the fauna of the watermeadows and for flood management. Road drainage could also lead to pollution.

2

Policy H5 Wool, Policy E10 Biodiversity and Policy 13 Green Infrastructure

Road Verges

Verges are a very undervalued wildlife resource in Dorset (and nationally) those in Wool having 7.7% of the over 200 insects recorded being Nationally Notable or Rare and although a very small length has a modified mowing regime to support uncommon plants they are generally subject to not only mowing regimes that are dictated by economic pressures rather than enhancement but are compacted by vehicles, dug up for service installation, polluted by cars and many other things adverse to wildlife. Road verges adjacent to development sites are likely to be seriously harmed.

At Burton Cross roundabout the Nationally Scarce Corky-fruited Water Dropwort (*Oenanthe pimpinelloides*) occurs at the roundabout and the designated verge running south from the roundabout has Chicory, Scabious and Nettle Leaved Bellflower.

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

Policy H5 Wool – The SANG

COOMBE WOOD/WEST WOOD GRID REF: SY833846 is an approximately 100 acre area of Ancient Woodland in part: Plantation on an Ancient Woodland Site (PAWS) but with a high percentage of Ancient Semi-Natural Woodland (ASNW) with a composition of Oaks, Maple and Hazel Coppice last worked 50 years ago with 13 or more veteran Ash stools along the east edge and a few remaining veteran Oaks, including some beside the main path near the pond. Ancient semi-natural woodland and plantations on Ancient Woodland sites have equal protection under the NPPF (<http://planning.government.gov.uk> – achieving sustainable development pp.118 conserving and enhancing the natural environment.

It is a Priority Habitat containing Priority species. DERCS records include Doormice. Several interesting lichens are recorded, three of 4 old woodland species were found on the Oaks near the pond. Two lichens classified as Nationally scarce: *Eopyrenula grandicula* on old hazel stems and *Strigulataybrii* associated with wounds on cankered Ash are classified as Nationally scarce.

It is rich in bird populations including nesting Goldcrests and Siskins which are dependent on the conifers although a large area of these was cut down last May in the nesting season. There are two sites of nesting Cuckoos, Marsh Tits are recorded and Woodcock, all on the Red Data list. It has a complete representation of Ancient Woodland Flora including vast sweeps of Bluebells and Wood Sorrel. The grandiflora of this wood is very rich containing 19 Dorset notable species as recorded to date e.g. Wood Anemone, climbing corydalis, Nettle leaved Bell Flower, Butchers Broom and sweeps of bluebells. Increased visitor numbers would lead to increased trampling, nutrient enrichment through dog faeces.

Ancient Woodland is an irreplaceable habitat and cannot be recreated. It has provided a stable environment over a long period of time – 400 years and so they show ecological continuity and stability of conditions such as soil, light and humidity. They are often retreat areas for refugees which are woodland specialists and which would struggle to survive or colonise new areas.

The NPPF pp175 2018 states that when determining planning applications local Planning Authorities should apply principle C:

'Development resulting in loss or deterioration of irreplaceable habitats (Ancient Woodlands or Ancient or Veteran trees) should be refused unless there are wholly exceptional reasons of National significance.

Mitigation is not possible although gradual replacement by some more deciduous trees could help restore this habitat but careful attention would be needed to prevent abrupt changes which would damage lichens.

The Woodland with its present features perfectly suits one of its rare breeding birds (BTO records for Wool Parish), the Woodcock. I visited this wood in February 2017 with Ian Alexander of Natural England and we put up a Woodcock but he dismissed its importance as a ground dwelling and nesting bird

stating that it was probably a winter visitor passing through. However with such a close fit on habitat with BTOs breeding habitat description -undisturbed damp woodland with Oak, Birch and Coniferous trees and no other wood in the parish such a good fit why should there not be breeding birds? Overwintering sites could be as important in maintaining a viable population. Unfortunately our visit was not in the nesting season and constraints by the land owner (Mr James Weld) were put on further recording in the Wood including Bats and a request to do an Insect survey. The commissioned ecology report, the Weld Estate, have not put their results in the public domain as yet.

It is certain if any part of the wood is used as a SANG damaging effects are likely to spread through the whole wood. With my long years of experience as Chairman of Trees for Dorset and interacting with the public and children in Woodlands I would list the following threats from creating a SANG:

Evidence of Downgrading

- 1 Disturbance from widescale tree removal and noise
- 2 Widespread tree removal causes abrupt changes to humidity and shade. This is particularly concerning in Lichen rich areas. It is unclear whether Footprint Ecology carried out a lichen survey.
- 3 Footfall will increase potentially by 50% as new houses will increase Wool's population by half as much again. This with the increase in dog walkers (many households now have two or more dogs and there are also commercial dog walking ventures) will add to noise and particularly affects species like dormice and woodcock.
- 4 People using a SANG for general recreation are unlikely to be bird watchers, keen on the wildlife experience or enjoyment of a peaceful walk. I have noticed through my work with children that once out of the classroom they become noisy and are inclined to shout and scream in the open environment. Some parents alert to the natural environment will encourage their children to modify their behaviour but many others will not, seeing it as an opportunity for them to 'let off steam'.
- 5 Notices to 'Keep Dogs on Leads' on other sensitive areas such as Studland or Winfrith Heath are frequently ignored.
- 6 Youngsters view woods as exciting places out of view and will be tempted to light fires (serious destruction occurred in Bovington some years ago due to a fire getting out of control). Also den building resulting in destruction of trees (2 years ago several 20 year old oaks were cut down on MoD land). Also the woods are an ideal place for mountain biking and motor bike scrambling.
- 7 Woodland habitats due to their often remote nature are frequently used for fly tipping. 8 Acre Coppice in Bovington was covered in broken discarded strip lighting. Barriers and KEEP OUT notices are often seen as a challenge y people of malintent.

To seek to draw people from a sensitive habitat SPA, even if of the highest statutory designation, with the substitution of an equally fragile and arguably more biodiverse habitat is unsound.

NPPF 2018:

'Land for development should be allocated with the least environmental value.

Purbeck in its allocation both in choosing Wool with all its designated sites of nature conservation: 1SPA, 2SSSIs, 9 SNCIs, 2 LNR, 13 Ancient Woodlands has ignored this guidance.

Upton, an urban situation has been allocated only 90 houses. Wool which still retains features of Ancient Landscape as described in Oliver Rackham's 'Ancient Hedges and Trackways', the most biodiverse and sensitive sites have been selected for development – organic farmland surrounded by Medieval Hedges (in part) and Ancient Woodland.

Birds of Wool Parish – A short review of the birds of important local habitats

T Branston

November 2018

Good habitats for birds surround the village of Wool, many of which are nationally designated due to their importance for wildlife. Several of these habitats also have Biological Action Plans, the UK being the first country to produce a national BAP and UK BAP described the biological resources of the UK which provided detailed plans for conservation of these natural resources (JNCC, 1992). Locally we are lucky enough to have habitats such as; SSSI water meadows along the Frome (coastal and

floodplain grazing marsh), Native and mixed woodlands, Farmland with hedgerows inc. arable field margins, lowland heath and ponds. In addition to these roadside conservation verges provide for rare plants plus the many gardens and paddocks providing feeding areas for birds.

A quick search on the national wildlife recording database the NBN Atlas using a search area of 2km radius of Wool village centre (an approximation of parish size but excludes the heathland) gives 22,486 wildlife records from 1986 to 2017 of which 17,075 are birds. The vast majority of these records are recorded formally in BTO surveys from breeding bird surveys but also a few wintering bird surveys primarily (WeBs) along the Frome river. Therefore, the fact that birds are choosing to breed or overwinter shows the high quality of the local habitats.

The river **Frome SSSI**, an important chalk river with an important population of salmon is one of only 5 streams, out of 161 classified as chalk streams by the Environment Agency to have significant populations of salmon which now has recently been discovered to be a distinct sub-species from its cousins in non-chalk rivers (C. Ikediashi et al. 2018.) This new fact raises its level of importance and reinforces that more should be done to protect and enhance its ecological condition with efforts to reduce damaging nitrogen inputs. Unfortunately, birds using the water meadows along the Frome has declined sharply in recent years to the point where practically no wader species now breed according to Wetland Breeding Birds surveys (WeBs). This has been recognised to the extent that land was looking to be purchased by Natural England with the intent to manage it specifically for breeding waders but this optimistic project is unlikely to change the state of affairs. The decline of lapwing, redshank and snipe along the river valley is sadly common now as a similar situation has occurred along other rivers in the south of England including the Piddle and the Hampshire Avon. Changes in agricultural practices such as increases in fertiliser application and in stocking densities (S. Eglinton 1990) and increased recreational access especially for dog walking (D. Liley H. Fernley 2012; Banks & Bryant 2007) are known causes for these declines.

The importance of **local woodlands** for birds cannot be underestimated with many common and increasingly rare birds breeding or overwintering in the woods around the parish. Many woodland birds such as warblers and nightingales nest and forage for food at or just above ground level and are disturbed by people with dogs to the extent that they fail to breed and will abandon the site and fail to return if the pressures continue. In 2007 a study of woodland trails was undertaken by the University of New South Wales (Dr Peter Banks and Jessica Bryant), which showed that dog walking caused a 41% reduction in the numbers of individual birds detected and a 35% reduction in species richness compared with untreated controls – while disturbance from humans walking alone was typically less than half that of dogs however, still producing a significant reduction in birds. (Kate Priestman, 2017). Solutions are suggested in this well researched article and in the most sensitive areas, the presence of dogs should be eliminated entirely, by not allowing people to bring dogs to the site with them at all. Coombe / North Wood is such a local wood with good bird numbers ie warblers (inc. blackcap, chiff chaff and garden warbler) as well as nightingales and woodcock recorded, possibly helped by its restricted public access, although it is known to be used by a small number of dog walkers and permitted horse riders. Wholesale changes to levels of human recreational activity in this wood could have very damaging consequences for its bird (and other wildlife) populations.

Yellow hammers and corn buntings breed on the edges of **agricultural fields** and both of these species are on the red list due to population declines. The intensification of agriculture, over management of **hedgerows** and increased use of pesticides have been cited as contributing factors in their decline (PF Donald 1997). Wool has managed to hold onto a small population of yellow hammer and corn bunting (now very scarce suffering a 90% decline in last 25yrs, Eaton et al. 2015) possibly owing to good hedgerow management and organic farming practices which allows insects to survive and arable plants to produce enough seed to provide for their needs. Spring planted cereal is also preferable as autumn / winter wheat does not allow space for birds like the skylark to forage and nest. Recent changes in loss of set aside and overwinter stubbles has also prevented birds finding sufficient feeding areas and reduced the numbers of birds that farmland can support. Indeed, official figures revealed by DEFRA show a 9% *decline* in just 5 years between 2010-15 in overall *bird populations* living and breeding on the UK's *farmland*. (Press Association Nov 2017) Damaging changes in agricultural practices can be reversed in time with benefits of wildlife, and maybe Brexit might aid this, but building houses on farmland removes this habitat forever.

From the 2017 The state of the UK's birds published by the RSPB, BTO, WWT, DAERA, JNCC, NE and NRW it is very clear that some of our common and widespread birds are in real trouble for example it is quoted that "Farmland birds like corn buntings need help to survive alongside modern farming practices" (Hayhow et al. 2017) which confirms that we need to conserve and improve our agricultural land both to provide food for people and suitable habitat for wildlife.

Species

Long-term trend % (1970-2015)

BBS trend % (1995-2015)

BoCC4 Status

Chaffinch

21

-2

Greenfinch

-46

-46

Goldfinch

159

122

Siskin

na

61

Linnet

-55

-21

Redpoll

-87

27

Crossbill

na

-2

Bullfinch

-39

10

Yellowhammer

-56

-16

Reed bunting

-31

31

Corn bunting

-89

-34

Extract from Common and widespread birds table, The state of UK's birds 2017

It is well known that a healthy population of skylark, a red listed species was lost when the recent Purbeck Gate development of 150 houses was constructed. Indeed, some of these displaced birds (or their offspring now) may still hold on in the neighbouring organically managed fields which themselves are now part of the new proposed plan. Modernisation of farming and the direct conversion of their habitat to other uses such as housing are key contributory factors to the decline in skylark populations as recorded by the BTO breeding bird survey.

Figure source; <https://www.bto.org/volunteer-surveys/bbs/latest-results/trend-graphs#skyla>

Disturbance of **lowland heathland** birds by humans and dogs is now widely researched and accepted as a major cause for wildlife decline (Liley et al. 2006) and is legislated for in terms of a developer's levy for residential developments within 5km of designated heaths to provide for mitigation projects in attempts to reduce these effects. Nightjars, being ground nesting are particularly vulnerable to disturbance (Langston et al. 2005) and even direct predation of eggs or chicks by dogs (Nol and Brooks, 1982; Pienkowski, 1984). Nightjars nest within the parish (as well as Dartford warblers and woodlark, the other 2 major heathland birds of conservation concern) on the heaths of the Bovington training areas which, although heavily used by the army are protected from public access and are therefore extremely good for wildlife. The DWT heaths of Winfrith and Tadnoll area plus Coombe Heath and Higher Hyde Heath are all just outside the Wool parish boundary but within the 5km known disturbance distance (Liley et al. 2006) and therefore the ground nesting bird species nightjar and woodlark and even Dartford warblers, which nest in heather or gorse clumps would be adversely affected by dramatic increases in Wool's residential population caused by any new large scale housing development.

Barry Sheppard is a local bird ringer and a BTO qualified trainer who records birds in his and his partner Wendy Riddle's **garden** at 'Solitaire' in Frome Avenue, BH20 6ER / SY8365 8675 which directly backs onto one of the fields identified in the planning proposals. Barry has conducted Garden Birdwatch weekly surveys to BTO set protocol for the last 11 years recording 62 species including 15 red listed species and 12 amber listed ones. A highlight of this past summers records were the pleasing number of bullfinches including family groups with newly fledged young seen on numerous occasions. A summary table of Barry's record are shown below and arranged to indicate the species importance for nature conservation according to the list of Birds of Conservation Concern as denoted by a large group of conservation organisations including; RSPB, BTO, Game & Wildlife Conservancy, Natural

England, Natural Resources Wales, Scottish Natural Heritage, NIEA, WWT and JNCC and set out in the BoCC publications by Eaton MA, et al. 2015.

Common but particularly charismatic species such as house sparrow and starling breed within the village and still appear abundant as shown by their regular appearance in these records but surprisingly to some are red listed species due to long term population declines of 66% and 83% respectively over the past 25 years.

Species

Number of weeks observed

Reporting Rate

Species

Number of weeks observed

Reporting Rate

(of 560 weeks submitted)

(of 560 weeks submitted)

BoCC Red Listed Species

BoCC Amber Listed Species

Starling

419

0.75

Dunnock

537

0.96

House Sparrow

403

0.72

Reed Bunting

358

0.64

Song Thrush

175

0.31

Bullfinch

212

0.38

Herring Gull

36

0.06

House Martin

57

0.1

Fieldfare

7

0.01

Black-headed Gull

39

0.07

Redwing

5

0.009

Swift *

23

0.04

Firecrest

5

0.009

Kestrel

8

0.01

Grey Wagtail

4

0.007

Willow Warbler

5

0.009

Linnet

3

0.005

Stock Dove

2

0.004

Lesser Redpoll

2

0.004

Kingfisher

1

0.002

Mistle Thrush

1

0.002

Lesser Black-backed Gull

1

0.002

Lesser Redpoll

1

0.002

Snipe

1

0.002

Hawfinch

1

0.002

Marsh Tit

1

0.002

Swift* - overflying records only

Highlighted BoCC green status species (these are of 'least' but not no concern) include greenfinch which Barry has found a marked resurgence in the past year or 2 since their decline due to Trichomonosis which badly affected the population. Other regularly recorded species include; goldfinch, long-tailed tit, coal tit, chaffinch and blackcap plus great spotted woodpecker and sparrowhawk.

Regular bird ringing sessions at Solitaire catch a sample of the visiting birds which enables a close look at individual birds to assess health, age and allows a small numbered ring to be attached to a leg. This ring bears a unique number which is registered with the BTO so that if this bird is recaptured elsewhere then this gives some insight into its movements. Despite the advent of improved tracking technology ringing still gives by far the highest volume of bird movement data and is still widely practiced. Some recovery highlights from birds ringed at Solitaire are listed below;

- 1 Goldfinch: Birds ringed at Frome Avenue have been 'recovered' in Pembrokeshire and Co Cork.
- 2 Siskins have been 'recovered' in N Wales, East and West of Loch Ness, and one reached NE Finland where she was breeding (evidenced by brood patch).
- 3 Reed bunting: Birds ringed here have been 'recovered' both upstream and downstream along the Frome meadows.

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H5 Wool

SOME LOSSES AND DECLINES IN THE PARISH OVER THE LAST 10 YEARS

SPECIES	SIGHTINGS
REASON FOR DECLINE	
LAPWING -Red Data List	
	2 Wintering seen 2017/18 Still using proposed building land fields to the West of Chalk Pit Lane and Oakdene Road as feeding areas on passing through the village
	Main field with nesting now housing estate – Purbeck Gate
SKYLARK-Red Data List	
	Still feeding on proposed building land fields as above
	Purbeck Gate covers previous feeding site. Increase in dog walkers.
CORN BUNTING	
Red Data List	
	Just holding on
	Proposed loss of organic farmland therefore greater decline in future
Turtle Dove Red Data List	
	Lost from rough land in Cologne Road, holding on BTA. National 85% decline
	House building .
Yellowhammer Red List	
	Decline -Loss of hedgerows National decline
	Proposed lack of organic farmland
Marsh/Yellow Tit Red List	
	Coombe wood and Gardens in North of parish
	Nationally threatened
	National decline
	Dog walkers
Red Wing & Field Fare	
	Winter visitors – found in Meadows around access to Police HQ
	Loss of organic farmland
Cuckoo Red List	
	Holding on in Frome Valle
	Two sites in Coombe Wood could be lost if SANG goes ahead
Nightingale Red List	
	Possible Loss. 2 unsubstantiated sightings from proposed Sang
	Disturbance from woodland management
Less spotted Woodpecker	
	Declined/Lost
	Nests destroyed by vandals
	National Decline
	Cat Kill
Water Vole NERC	
	National Decline
	Dog Walkers on water meadows by the Frome, Mink

Hedgehog NERC

National Decline but doing well in areas of Wool with large gardens

Road Kill, Garden fencing, pesticides

Slow Worms

Doing Well

Loss of Hedgerows/garden fencing

Salmon NERC & DAT

Decline in Frome Protected under EU Habitat Directive

Pollution

Smooth Snake NERC

Local loss. OK on BTA

Cat Kill

Autumn Ladies Tresses Red List

Lost from Bovington Lane

Nationally Threatened

Wessex Pipe Works

Bog Gentian

Lost from Woolbridge

Illegal motorcycle activity

Barn Owl Amber List

National Decline

Road Kill

Moorhens

Frome and Tributaries

Dog walkers

Smooth Snake

National Decline

Cat Kill

Aspens

Saved

Re-siting of cycle path by DCC

Red List – Rare and endangered or vulnerable

NERC – Natural Environment and Rural Communities Act

WACA - Wildlife and Countryside Act

Species most likely to be lost from Wool within 5-10 years from adoption and implementation of the Purbeck District Plan.

Status

Reason

Rare

Cornflower, *Centaurea cyanus*

On building site

Some rare Lichens

Changes in microclimate,

Inappropriate tree felling

NERC, WACA

Otter, *Lutra lutra*

Increased people pressure with dogs on Frome watermeadows

NERC, WACA

Water Vole, *Arvicola terrestris*

Increased people pressure with dogs on Frome watermeadows

Red List

Lapwing, *Vanellus vanellus*

Houses built on feeding site

Red List

Corn Bunting, *Emberiza calandra*

Loss of habitat- house building on feeding and nesting site Hedgerow damage

Red List

Yellowhammer, *Emberiza citrinella*

Loss of habitat- house building on feeding and nesting site Hedgerow damage

Species likely to decline in that period.

Red List

Cuckoo, *Cuculus cuculus*

Disturbance and decline in warblers in reed beds due to increased by people and dogs along the Frome watermeadows

Amber List

Kingfisher, *Alcedo attuis*

Disturbance due to increased by people and dogs along the Frome watermeadows

BAP NERC

Salmon, *Salmo salar*

Pollution of river by sewage etc.

BAP NERC

Lamprey, *Lampetra* spp.

Pollution of river by sewage etc.

WACA 85

Slowworm, *Anguis fragilis*

Increase cat kills and urbanisation of gardens

NERC

Adder *Vipera berus*

People fear and aversion

Hedgehog, *Erinaceus europaeus*

Road kills and urbanised gardens with hedges replaced by impenetrable fencing.

WACA

Bats All species

Loss of rich feeding grounds over organic farmland

Public Commitment.

Residents of Wool have contributed sightings of wildlife around Wool for inclusion on our website www.woolwildlife.org. The possibility of Wool becoming part of a new National Park offers a new vision of Wool recognising its exceptional biodiversity.

The national commitment for 2020 of an increase in Biodiversity is unlikely to be achieved if plans bereft of biodiversity sensitivity are passed.

Appendices for Wool Flora and Fauna handed to Frances Summers in a separate envelope

Illustrations for Wool Flora and Fauna group are attached as a separate document.

Policy 13 Green Infrastructure. Who will take responsibility for these and manage them.

Green Infrastructure? Rubbish dumped over a garden fence, Bovington

Hazel hedge of footpath 10 cut outside garden to encourage a Laurel hedge! Footpath 10 is the oldest way across the village and has been damaged all along its length, woodland plants almost disappeared and dumped garden plants have now taken over

Garden and household debris thrown over a garden fence onto a footpath 10

The Consequence for wildlife of rubbish dumping – the debris in the bottle is entirely the remains of Voles, Shrews and insects.

Policy H5 Wool SANG.

Damage and demand for safety can be harmful to biodiversity

Burnt Woodland – Rare but in hot dry summers this is possible.

Cleared understorey to make walkers feel safe

Policy 13 Green Infrastructure & Policy H5 Wool

Vandalism - Trees in Eight Acre Coppice LNR hacked felled and damaged by children.

Fire – Cranesmoor – coincided with the Easter Holidays 2007.

Policy E9 needs The River Frome SSSI to be included in this. An existing problem without additional houses.

The Algal mat on the intertidal mud in Poole Harbour. Showing the seriousness of the nitrate enrichment.

Landscape: Frome Watermeadows, Compare with the AONB. Which is the beautiful landscape.

Heath Landscape

Heath flora – Cross leaved heath, Heather, Dwarf Gorse and Purple Moorgrass

The Frome in flood

Landscape – Organic fields with Corn Marigolds

Participation, Education – Members of “Wool on the Wildside” not only learn about wildlife but pull brambles and pick litter.

Community involvement - The Friends of 8 Acre Coppice LNR hedge laying

Exhibit of the Biodiversity of Wool 2017

Landscape - Little Perry Coppice, Wool. Oak with Hazel Coppice, Bluebells and Greater Stitchwort.

One of the last hurdle makers in Dorset, Traditional Use - Wool

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

Remove all housing for Wool as it is environmentally unsound, See: Hedges, River Frome, SANG and Organic farmland sections of document.

See NPPF guidelines on sustainable development 8 B & C as it fails on these overarching tests.

Remove Wool from the plan for 470 houses as unsustainable, inadequate traffic infrastructure, sewage capacity at its limits so pollution threats to the River Frome SSSI and Poole Harbour SPA will increase, Building on organic farmland, SANG being located in Ancient Woodland all leading to loss of biodiversity all contrary to NPPF.

If you have any supporting documents please upload them here. [Illustrations for Wool Flora and Fauna Group \(1\)](#)

(Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the examination, although all members of the public may observe the proceedings)

Only those who have made representations to the Local Plan during the statutory six week pre-submission publication period will be allowed to participate in the public examination.

If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Yes

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

Evidence is increasing with time. To provide more evidence of peoples involvement in the natural environment of Wool and to put forward a new vision of Wool in the likelihood of this area being part of a National Park. Remove all H5 Wool. This will certainly improve the soundness of the plan. Nb. the 2012 plan had no allocation for Wool. There should have been a more diligent search for brownfield sites in the urban fringe of Purbeck, reducing traffic movements and putting people where there is work and facilities.

PRODUCED FOR WOOL
NEIGH BEARWOOD PLAN

ENVIRONMENTAL REPORT **SEPTEMBER 2018**

In the last 60 years Wool has grown from a small village to a large one, 19% of land is built upon. It is on the edge of becoming a town. At present Wool has retained an amazing Biodiversity, although many species are on the edge of viable populations.

Biodiversity due to:

Varied Topography and therefore Hydrology. This includes a flood plain, river, streams draining into these areas and an area of small hills to the south. Gently rising land to the north of the River Frome leads to flatter land to the North of this.

Varied Geology Bagshot Beds – a range of stony deposits sands and gravel and Oxford Clay. Flint, Chalk and Riverine deposits also occur. There are varied soils derived from these – some in the space of a single garden. Over this area derived soils such as Woodland Loam and wet soils – Peat and Dry soils.

Many different habitats All of the above leads to an impressive variety of habitats.

- Woodlands – some conifer but in all 3 Ancient Woodlands (SNCI)
- Water meadows
- River Frome (SSSI)
- Hedges
- Streams, including chalk stream running through the centre of the village.
- Fen
- Scrub – ruderal habitats
- Road Verges
- Organic Farmland
- New naturally occurring woodland
- Ponds
- Heathland – wet (bogs) and dry (SSSI, SPA, SAC, RAMSAR – internationally important)
- Neutral Grasslands
- Veteran Trees
- Gardens – Including an SNCI

Many species are dependent on a combination of habitats – **Habitat Mosaics**. These are particularly important in Wool with linkages right across the village and combine to make Wool a very rich area for Wildlife. Wool is indeed a fine example of a **Habitat Mosaic**.

The Group Lower Frome Valley Flora and Fauna, realising how these very precious links can be overlooked in the broad-brush categories of the planning system have encouraged the people of Wool to send in records of interesting or unusual sightings of wildlife. These have been scrutinized by a team of qualified experts and then recorded. So far since set up under a year ago we have 117 records.

Some of the habitats above will now be dealt with in some detail.

WOODLANDS

Ancient Woodlands occur in two main areas. Those on the south east include Cole Wood, Highwood, Dorset Wood are on sandstone and gravel and are oak/hazel woods with an acid flora. Whilst those, including Vicarage Coppice and the collection of small woods near Coombe Keynes are influenced by underlying chalk and have Maple as a significant component as does Combe Wood to the south east. There is limited public access here and also in Cole Wood and Higher Wood. A sweep of woodlands runs in a chain along the northern edge of the river Frome: Little Perry Coppice, Great Perry Coppice, Long Coppice and Furzey coppice. Menin Wood (a secondary woodland), leading up to Bovington followed by Higher Wood with 8 acre coppice running south-east followed by Blindman's coppice leading back to the Frome, makes a complete circle of Ancient Woods. There is public access in 8 Acre Coppice indeed it is an LNR (Local Nature Reserve). There is a management plan and public participation in managing the wood and it is used by Wool on the Wildside, a club run for local youngsters.

All these woods contain Bluebells, a feature of English Woods alone. Other indicators of ancient woodland include Wood Anemones, Wood Sorrel and Yellow Archangel. Because Ancient Woodlands have been existence for over 400 years the soil is undisturbed by ploughing so often more than one type is found in one wood. In damper woods, primroses and early purple orchids occur. Climbing corydalis occurs in patches in acid woods.

An important element of the flora of these woods are lichens, many of which are rare and being assigned to RIEC status. This means they are reliant on the ecologically stable continuity.

Some of our rarer birds occur in these woods. Woodcock, Marsh Tits, Goldcrests and even Nightingales. These in Coombe Wood along with rare dormice favour lots of scrub and shrub giving protection against disturbance.

WATER MEADOWS

These are examples of meadows that have existed for centuries, taking advantage of the plant nutrients brought by flooding and the high water table allowing lush grass for grazing. Flooding was managed by a series of sluices such as Stony Weir near the River Frome, with hatches to control the flow of water onto the meadows and channels and ditches for distribution. The Purbeck Keystone Project with money from the Heritage Lottery have aimed to integrate farming with wildlife encouragement and in some places re-introducing water level management.

Parts of the meadows are notified as SSSI. They are of historical and environmental importance. They were managed as water meadows and are crossed by drainage channels. On the North side in the Bovington MoD training area they only receive a little management, whilst those to the south have been cut and grazed and possibly even cultivated in the past.

These meadows are among the best sites in Dorset for water voles, reed sweet grass on the edges of the river and in the ditches is a favourite food of theirs. Voles have declined in the last 20 years and are registered. Otters are known to have visited the area. Waders such as snipe and also lapwing occur. Although waders and voles have declined in numbers in recent years, with careful management this could be reversed but an increase in population with more dog walkers could lead to total disappearance of some of these valuable species. The Burr Reed on the river margins is the food plant of the beautiful Golden Reed Beetle that has declined nationally by 90%. The Wool section of the Frome is one of its best remaining sites in Britain.

OTHER WATER ENVIRONMENTS

The name of Wool is derived from the Anglo Saxon Wyllon which means spring or well. The river Frome is an SSSI and is the most westerly chalk river in England which has the largest chalk river resource in Europe. Its character

changes from a recipient of Chalk streams in the west to more acid water from the heaths. There are also watercress beds off the Luiworth Road which only occur in chalk streams. Wool is the section in which these changes occur and also the junction where estuarine fish from Poole harbour are also found. Sea trout are found in the Frome as well as the Brown trout associated with River Frome. The river Frome and its associated water meadows bisect Wool and occupy between 18-20% of the Parish and is of prime importance to the Biodiversity of Wool. There is a wide range hydrologically from Bogland and Heathland runoff in the raised land north of the parish to streams such as the Bovington stream and small rivers such as the River Win flowing into the Frome.

The Bovington Stream has records of Stone loach, Minnows and Eels and in time past Kingfishers passing down it. Water voles have been recorded as they have in the

Wool Stream running through the village where even more rarities such as Water Rail have been recorded.

HEATHLAND

These are protected under the designation SPA, special protection under the Birds Directive and SACs under the Habitats Directive.

The Heathlands lie for the most part on the Bagshot Beds with its sands and gravels. These also underlie the New Forest and the Dorset Heaths might be said to be a westward extension in miniature with a similar range of adjoining habitats (number?) % of Wool covered by these Heathlands. There are two main areas one to the southwest in the area of the Atomic Research Station, Winfrith. The much larger area lies on the higher ground to the north of the Parish within the MoDs Bovington Training area.

Not only are the heaths of national importance for their birds but also for reptiles, including smooth snake and the sand lizard. The areas of bare ground provide for egg laying and sunbathing early in the day. Within the Heathlands are a variety of sub habitats such as the bogs, the ponds and pools (wet heath). These provide for the breeding of Newts and Toads on which reptiles feed. The Nightjar, a ground nesting bird and therefore extremely vulnerable to domestic predators is protected by the no-access situation on MoD land and has done extremely well. They also roost in trees scattered upon the heath

and surrounding areas and fly down to the river Frome in the evenings to feed on the plentiful moths and other insects here. Another rare bird, the Dartford Warbler, that unlike the Nightjar, overwinters here, was nearly wiped out by the cold winter of 1962-63. In 1963 Wool Heath alone had a population outnumbering anywhere else in England.

The gorse on Heathland is very important for their survival the Dwarf Gorse is at about its Western limit here on Dorset heaths. Some of the rarer plants and insects include Heath Club moss and Coral Necklace, Heath Tiger Beetle and the Silver Studded Blue Butterfly.

The Heathlands are the result of widespread forest clearance 7,000 years ago in Mesolithic times. Unsuitable to agriculture representing some of the poorest soils in England they have remained intact apart from some natural spreading of trees and woodland. Extreme conifer plantations exist but under the advice of Natural England the MoD aims to redress encroachment and have been active in clearing conifers. The Heath provides one of the most colourful and evocative landscapes of Dorset and yet Hardy's Heaths failed to make it into the Dorset Area of Outstanding Natural Beauty. Hopefully this grave omission will be redressed in future.

HEDGES

Wool is remarkable for its many miles of hedges. These act as reserves for wildlife from the surroundings due to building and modern agricultural practice. They are also extremely important in providing natural corridors for wildlife linking the various Habitat Mosaics. The older the hedge the more precious it is for wildlife. Many of our hedges are Enclosure Hedges. They were created to divide the Open Field System and change ownership to the wealthier few. In England enclosure was completed by 1839 but in Dorset and Wool in particular by 1771 enclosure had taken place. Enclosure hedges, certainly the later ones have a high proportion of Hawthorn in them. Such a hedge occurs on the east side of the Playing Fields and the remnant surrounding the station car park near the Black Bear shows woodland hedges still persisting. These hedges penetrate into the centre of the village.

Many of our hedges pre-date Enclosure. Hedges with Maple are often 400 years old as seen in the hedge leading up from Woolbridge towards the C6 to Bere Regis. Wool's earliest hedges date back to the 1500s, such as those either side of the road running from the Lulworth Road to New Buildings. The hedge

along the Parish Boundary from New Buildings is yet another very early hedge. Sadly this hedge has been breached at various intervals by the land owner. Others to mention are the hedge near the Watercress beds and certain field boundaries east of the Lulworth road and the area of Bindon Abbey and Bindon Farm. Most easily visible is the ancient hedge seen from the footpath north of Cowieaze running east from the Church. Here a feature of many ancient hedges can be seen; a considerable change in level between the 2 fields it separates.

The hedges of Wool are then an historical and archaeological heritage and should not be discounted when development threatens as happened, sadly, to a Medieval hedge removed in E.Burton road in 2007. Unfortunately this happened without notification to the Parish. Criterion No.7 in the government's list of determining important Hedges would have given protection to this hedge. Historical pedigree can be gauged by the number of woody species in 30metres. The Bindon hedge as previously mentioned has six species; Hazel, Hawthorn, Privet, Dogwood, Maple and Guelder Rose. Plants of value can be found in the Bindon Lane hedge and the hedge leading from the Dorchester road to New Buildings and include; Hart's Tongue Fern, Shield Fern, Bluebell, Primrose, Wood Anemone, Barren Strawberry and Black Bryony. Black Bryony with its heart shaped glossy leaves can be used to date a hedge by the size of its underground tuber. This can be determined by the extent of the plant above ground rather than digging it up. The chains of glossy red berries add colour to Autumn and Winter hedges.

Hedges are of paramount importance to nesting birds and with the disappearance of old fields are often the last reserve for species such as Yellow Hammers which can still be seen in the hedges leading up from Woolbridge to Bovington. Also bats frequently hunt along hedges.

WOOL ROAD VERGES -

Road verges in Wool vary in Biodiversity from 20% which are on nutrient poor sands, gravels and chalk to the 80% nutrient enriched soils which are less biodiverse. Because of being dry and nutrient poor the former verges have fewer large aggressive plants such as tussocky grasses and tall herbs so these are the reserves of more botanical biodiversity and support plants such as Knapweed, Yarrow, Wild Carrot, Square stemmed St John's Wort, Birds foot

trefoil and near the Winfrith roundabout, the rare Corky Fruited Water Dropwort.

Verges are subject to many pressures that discourage wildlife. They may be dug up to lay pipes and cables, compacted by parking of vehicles, re-seeded or mown to keep them tidy. Sometimes nutrient rich topsoil is put on them as happened at the junction of the C6 and Bovington Lane where a good population of Autumn Ladies Tresses Orchids (red listed) were lost to cycle path reconstruction and water network improvement. The last remnants of a wildflower verge created by the Parish Council 15 years ago has been lost to provide a cycle path for Purbeck Gate.

There are approximately 8 miles of verges along roads of all grades outside the built up area. If the average width along this 1.5 miles (approx.) stretch is 2.65 metres this makes 5 hectares (12 ¼) acres of grassland. Most verges outside the built up area are edged by hedges which makes them doubly valuable.

These are as vulnerable to development as are hedges. A diversity of wildlife from mammals such as shrews, moles, voles and a vast number of invertebrates can exist in quite small areas of grass. 6% of beetles found in Wool's road side verges are nationally notable. The attractive Common Red Soldier beetle is easily spotted on hogweed flowers. Chicory's bright blue flowers are attractive to bees and butterflies along with the good patches of attractive knapweed found beside the Lulworth road.

SOME GARDENS OF THE PARISH

A lot of people have chosen to live in Wool because it is a rural Parish. This means that gardens are often a reasonable size and about wider areas. This is particularly true of houses in Cologne road where one garden and privately owned meadow has been made an SNCI (Site of Nature Conservation interest). This garden produced up to 100 Southern Marsh orchids and hybrids every year and several Broad Bordered Heleborines. Two or three species of bat still to be identified and Rudd have colonised the pond. A garden with plenty of trees, a pond and not too manicured like this one, is a real nature reserve. Grass snakes, adders are frequently found and are protected under the Wildlife and Countryside Act. Crested newts are found in at least one pond. Birds recorded include Kingfisher, Grey Heron, Bullfinches (on the red alert list) and Goldfinches are widespread. Siskins, Goldcrests, Brambling and

Red Poll and a wryneck on migration in silver birch trees. Along with slow worms and hedgehogs are a frequent occurrence even in gardens in the middle of the village.

Tree rich gardens to the north of the parish boast Nuthatches, Long Tailed Tits and Tree Creepers and on summer evenings the call of the Nightjar on the heath is heard. This year it has sung from April through to mid August. A garden to the south of the Parish reports Greenwoodpecker, Fieldfare and Yellow Wagtails and several of the gardens south of the Frome have swallows and House Martins as visitors or residents.

90 moths have been recorded in one garden including the Broad Bordered Bee Hawk. Butterflies benefit from the garden flowers and plants e.g. Silver washed Fritillary, Red Admirals, Tortoise Shells, Gatekeepers and Peacock. The Orange Tip needs the wild flower Ladies Smock as a food plant for its caterpillars. Holly Blues benefit from abundant trees and ivy in hedge gardens and woods. The large bright yellow early flying Brimstone butterfly needs the Alder Buckthorn for its food, a much less common tree but which occurs in the northern part of the parish.

TREES list already typed to be inserted.

Rarer trees include Aspen, Box (possibly occurring naturally on the bed from Wool High Street and the Creeping Willow on the heathland which is never more than ½ metre high.

The oak is one of our commonest trees and is of great importance to wildlife. 4000 different species of plants and animals can be associated with one mature oak. Oak has also been important for construction – oak beams often found in old cottages and also hazel is occasionally used for roofing timbers. However it is more often found as thatching spars and hurdle fences. Several veteran (trees of great age) trees can be found in the parish. Many are boundary oaks such as the one at the corner of Cologne Road and the one further on in Bovington Lane with a circumference of 3.90m. Many were way-markers or marked ownership as those behind 21 Cologne Road which mark the boundary of Frampton estates. One very large oak occurs in Bindon Lane, near the farm probably marking the old track from the church. Up to 20 veteran trees are found in Coombe Wood including Ash and Maple as well as Oak. Veteran trees are protected by law. The huge oak at Woodstreet is only 250 years old and only in middle age!

OTHER IMPORTANT WILDLIFE SITES

ORGANIC FARMLAND

Much of the agriculture lands farmed organically by Robert Hyde, registered as part of the Countryside Stewardship Scheme. The land is kept free of pesticides and fertilizers and is therefore the kind of farmland habitat largely gone from England today. It supports a wealth of wild flowers; corn marigolds, Centaury, Poppies, Heartsease and even cornflowers in one area. The land benefits a wealth of small birds; corn buntings, yellow hammers and skylarks and goldfinches.

Snipe and partridge run along the ground and buzzards are frequently heard overhead. There is even a possible record of a nightingale.

There are annual sightings of boxing hares in the fields by New Buildings.

SCRUBLAND

Sadly underrated in our 'tidy-minded' society this is important for warblers e.g. white throats, Cettis warbler. In one area of scrub wasteland near the old MoD's Forester's shed to the east of Bovington farm has proved a veritable bird 'creche' with blackcaps, chiffchaffs, goldfinches and a gold crest family in the large pine. Wool is a good area for cuckoos because of the river margin habitats where warblers occur.

THE OLD WATERCRESS BEDS

Reed Buntings, bullfinches, goldfinches and lesser common whitethroat have been recorded here. Kestrels and buzzards and a sparrowhawk hunt here aware of a good feeding site.

THE WITBY BEDS

Out beyond Cowleaze to the east of the Parish is an area of Willows, in the past cut for making baskets, thriving on the seepages. This is also a remnant of old woodland with wood anemones and bluebells. Adders can also be found feeding on the numerous newts.

CHALK PIT

This area now covered in young woodland and scrub is again an excellent area for our spring nesting birds e.g. blackcaps and chiffchaffs and a good area for fox dens.

BOVINGTON MIDDLE SCHOOL

This area provides parkland not found elsewhere in the Parish. Thrushes and blackbirds benefit from the wide areas of cut grass to search for worms. The sandy soil also is ideal for ants including yellow meadow ants and small black ants. Green woodpeckers can be regularly seen probing the anthills for food. Rougher areas of grass are rich in voles so at night the quiet grounds provide rich hunting areas for the Tawny Owls from the adjoining 8 acre coppice. The lawns are very important for a wide variety of rare fungi including the death cap, fly agaric, the rare coconut scented milk cap, Russula soraria and many tongue fungi. The cut lawns around the MoD buildings have been surveyed for fungi and include the very rare Olive earth tongue.

CONCLUSION

From this account it is not surprising that Wool must rate as the top Parish in the whole of Purbeck for Biodiversity with the possible exception of Studland, which has marine habitat. Interconnections between the different habitats provide multiple breeding and feeding opportunities for different species. If any of these links to the amazing mix of habitat mosaics is severed it will result in decline of its extremely rich Biodiverse natural heritage. A natural heritage not unlike the New Forest with similar drainage and ancient woodland abutting heathlands north of the Frome and an area rich in ancient working landscapes to the south. It is a record of continued local sustainability. Our abundant natural heritage should be jealously guarded and handed on in as complete a way as possible to succeeding generations. That the people living in Wool appreciate this bonanza of wildlife shows from the many records people have sent to the website of Wool Flora and Fauna. This group of qualified wild-life specialists drawn mainly from the Parish was set up just under a year ago with concerns about the damage the proposed widescale housing could impose. The present proposition is to increase Wool from a village to a town by nearly doubling its population.

The previous Parish Plan came up with a response that 80% of people expressed a desire for wildlife areas in the Parish to be protected and

landscapes preserved. Wool must be the best parish Mosaic in Purbeck, if not Dorset.

Section 40 of the Natural Environment and Rural Communities Act 2006 requires that 'Local Authorities ensure that conserving Biodiversity is an integral part of policy decision making' and that Planning Authorities should adhere to Government's Biodiversity Strategy in halting overall biodiversity loss. Planning permission should be refused for development resulting in the loss of irreplaceable habitats including ancient woodland and loss of aged or veteran trees.

CONSERVATION STATUS OF BIRDS MENTIONED IN THIS REPORT WHICH ARE THREATENED AND DECLINING

NIGHTJAR	RED ALERT
KINGFISHER	AMBER ALERT
GREEN WOODPECKER	AMBER ALERT
SKYLARK	RED ALERT
SWALLOW	AMBER ALERT
FIELDFARE	RED ALERT
SONG THRUSH	RED ALERT
WILLOW WARBLER	AMBER ALERT
BULLFINCH	AMBER ALERT
CUCKOO	RED ALERT
KESTREL	AMBER ALERT
LAPWING	RED ALERT
SNIPE	AMBER ALERT
WRYNECK	(NO DESIGNATION GIVEN)

NB Nearly 50% of bird species on the red list have been recorded in Wool.
Complete lists for all species recorded available on request.

Fungi recorded Bryan Edwards 22nd October 2017
and Bryan Edwards & Sean Cooch 24th October 2017

Grassland Indicator species

Clubs & Corals

<i>Clavaria ocuta</i>	Painted Club	Rare	
<i>Clavaria tenuipes</i>		Rare	1 st Darset Record
<i>Clovulinopsis corniculato</i>	Meadaw Caral	Occasional	
<i>Clavulinopsis helvala</i>	Yellow Club	Occasional	
<i>Clavulinopsis luteaalba</i>	Apricat Club	Rare	

Waxcaps

<i>Hygracybe ocutacanica</i>	Persistent Waxcap	Occasional	
<i>Hygracybe cantharellus</i>	Gablet Waxcap	Rare	
<i>Hygracybe ceracea</i>	Butter Waxcap	Occasional	
<i>Hygracybe chlaraphana</i>	Galden Waxcap	Rare	
<i>Hygracybe canica</i>	Blackening Waxcap	Frequent	
<i>Hygracybe glutinosa</i>	Glutinaus Waxcap	Rare	
<i>Hygracybe insipida</i>	Spangle Waxcap	Rare	
<i>Hygracybe mucranella</i>	Bitter Waxcap	Rare	
<i>Hygracybe pratensis</i>	Meadaw Waxcap	Rare	
<i>Hygracybe psittacina</i>	Parrat Waxcap	Occasional	
<i>Hygracybe quieta</i>	Oily Waxcap	Rare	
<i>Hygracybe reidii</i>	Haney Waxcap	Occasional	
<i>Hygrocybe russacariacea</i>	Cedarwaad Waxcap	Rare	
<i>Hygracybe virginea</i>	Snawy Waxcap	Occasional-Lacally frequent	
<i>H. virgineo var. achraceopallida</i>		Rare	

Pinkgills

<i>Entaloma chalybaeum</i>	Indiga Pinkgill	Rare	
<i>Entaloma conferendum</i>	Star Pinkgill	Occasional	
<i>Entaloma incanum</i>	Mausepee Pinkgill	Rare	
<i>Entaloma papillatum</i>		Rare	
<i>Entaloma sericellum</i>	Cream Pinkgil	Rare	

Earthtongues

<i>Geoglossum umbratile</i>	Plain Earthtongue	Occasional	
<i>Microglossum olivoceum</i>	Ollve Earthtongue	Rare	BAP Priority Species
<i>Trichoglossum hirsutum</i>	Hairy Earthtangue	Occasional	

<i>Dermalamo cuneifolium</i>	Crazed Cap	Rare	
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14 species and 1 variety of waxcap = Regional Importance

28 indicator species in total

Other species

<i>Marasmius areades</i>	Fairy Ring Champignon	Occasional	
<i>Mycena aetites</i>	Drab Bannet	Occasional	
<i>Mycena luteaalba</i>	Ivory Bannet	Occasional	
<i>Rickenella fibula</i>	Orange Masscap	Occasional	
<i>Rickenella swortzii</i>	Callared Masscap	Rare	

NATIVE AND NATURALISED TREES OF WOOL

Of the 35 or so British native trees, 26 are found in Wool Parish. 80% of these occur naturally. This is a noteworthy variety, particularly as some British native trees do not occur anyway in Dorset. Below is a list of what occurs, but more may be found!

Ash	Widespread
Alder	Widespread along River Frome
Aspen	Four sites, notably along Bovington Lane
Birch, Silver & Downy	Widespread. Forms hybrids between Silver & Downy
Box	
Beech	Native?
Cherry (Gean)	Very occasional, usually planted
Elder	Widespread
Elm, English	Suckering in hedgerows
Elm, Wych	
Field Maple	Most frequently in hedges
Hawthorn, Quickthorn or May	Widespread, frequently planted as hedging
Poplar, Black	Planted on Wool watermeadows, corner of East Burton Lane
Poplar, Grey	Hybrid; possibly native in wet area just east of Parish boundary; other places planted
Guelder Rose	Wet areas; hedges
Hazel	Very common and widespread in hedges and woodland
Holly	Common on acid soils
Hornbeam	Isolated trees; mainly planted and as hedging
Lime	The Common Lime is a hybrid between Large and Small leaved limes, however there are plantings of large-leaved Limes.
Oak, Common	Widespread.
Oak, Sessile	?
Rowan (Mountain Ash)	Frequent in Bovington woodlands; regenerates well.
Scots Pine	Naturalised, but not native to Southern England
Spindle	Low tree/shrub; hedges
Whitebeam	Planted in caravan park
Willow, Grey	Common. Stretch by A35 near Woolbridge
Willow, Goat	Common in wet areas
Willow, Crack	Along River Frome
Willow, White	Belt of 20 trees north of A35 near Woolbridge
Willow, Creeping	On heathland never more than half a metre high. Is it a tree?
Yew	Occasionally planted, but occurs naturally in some woods

Other trees commonly occurring both naturally and planted are Sycamores and Sweet Chestnuts. Both of these occur planted and arising naturally. However, neither are native; they were introduced. Sweet Chestnut was probably introduced by the Romans who, it is understood, made porridge with it. Sycamore was introduced in the 13th Century. However, our oldest Oak could be 1000 years old!



Olive Earthtongue *Microglossum olivaceum*, a Priority Species under the UK Biodiversity Action, only currently known from one other site in Dorset



Mousepee Pinkgill *Entoloma incanum*, a local pinkgill with a distinctive green stipe.

We believe Purbeck District Council are unaware of the importance of Wool's natural environment. We hope to produce a report that will convince Purbeck DC of this importance and if necessary the inspector at a public enquiry. We also hope to produce a map with locations of wildlife which people have seen or heard showing Wool to be an biodiversity hotspot.

CAN YOU HELP?

There are 3 ways:

- 1) As a foot soldier distributing leaflets
- 2) By Recording
- 3) Joining the group to add your expertise

We need people who can add records of anything they have heard or seen over the coming months or have seen in the past two years that they feel is unusual or they have not encountered frequently, such as Hedgehogs or Cuckoos. Are you prepared to be a foot soldier and use and deliver completed record sheet to us giving the information on the facing page.

We would be happy to provide further guidance phone [REDACTED] if you want to know more, or e-mail your findings to: info@woolwildlife.org.uk. Or send to Mrs R. Palmer Clouds, 14 Cologne Rd., Bovington, Wool, Wareham, Dorset BH20 6NR. There is a News page on the website that will be updated at regular intervals to show records we have received.

There is a drop off points for records at The Community Room at 21 Cologne Rd.

We have a website giving more information about the natural history of Wool at woolwildlife.org.uk The News Page will be updated regularly with your records

Your name,

Address,

B Date of record,

A Species (one or several),
(including road kill eg Badgers)

C Area habitat:

Road verge,

Garden,

Grassland,

Field, arable or non-arable

Wood, Broadleaved or coniferous

River,,

Riverside or watermeadows

Stream,

Pond

C. Location - Grid reference (if possible) or any other means of accurately indicating the location, eg. Proximity to road, building or landmark.

You can send photos by email of anything you are unsure about.

WOOL FLORA AND FAUNA RESPONSEWOOL – A BIODIVERSITY HOT-SPOT

2016

EVIDENCE

Before putting this evidence forward there are certain statements to be made regarding the Environmental Infrastructure Capacity Statement.

1. The Maps. Parcels indicating degree of sensitivity and thereby potential environmental constraints state they are not to scale but, as they are on an OS base with 1K grid they are to scale so they cannot easily be compared.
2. Even so, Wool appears to have land of Level 3 – Moderate Sensitivity – where housing is proposed, plus areas of higher sensitivity including areas surrounding the River Frome SSSI. Contrast this with areas to the west of Wareham (Parcel No 10) where there are areas of lower sensitivity - Level 1 - and to the south and east of Bere Regis. These areas are not broken up, unlike the areas of Level 1 in Wool, and amount to larger areas in total.
3. Table 5.1 - Landscape and Sense of Place omits section of historic landscape of which Wool has many sites – Withy Beds near Cole Wood, old Chalk Pit, sheep dipping area and the water meadows with their ancient management systems, Bindon Abbey and the old railtrack used in the First World War running from Wool to REME Works 1916 in Bovington. To the north of one of the areas designated for housing there is an archaeological site. Wool's Hardy site of Tess of the D'Urbervilles renown – Woolbridge Manor House - runs down to the historic bridge with views over the River Frome and water meadows. Surely, this valued landscape feature is of greater scenic beauty than much of the AONB which arguably needs revising with its bleak large open fields to the west of the Parish.
4. Table 8.1 suggests Wool has no restraints as regards Local Nature Reserves (LNR) (statutory) or Sites of Nature Conservation Interest (SNCI) designated by Dorset Wildlife Trust, whereas Wool Parish has 13 SNCIs plus two in the making; grass lawns with rare fungi in Bovington and garden and meadow in Bovington with 100 hybrids and southern marsh orchids – 2017 – and broad-leaved helleborine. Bere Regis has two dots suggesting a high register of environmental sensitivity but has 15 SNCIs (only 2 more SNCIs and no LNRs). Two more SNCIs are likely to be created shortly anyway. Even if Wool and Bovington are united as one parish, they still only score one dot on the table. This table is misleading.
5. Dividing up the parish of Wool into two parcels has therefore obliterated the importance of Wool Parish, which is not only one statutory unit but also arguably one ecological unit comprising as a whole a rich habitat mosaic where there will be movements across the parish, eg the nightjar nests on Woolbridge Heath but its feeding area is much wider and recorded along the River Frome water meadows. In this report Bovington and Wool will be regarded as one Parish – the Parish of Wool.

EVIDENCE OF WOOL BEING A BIODIVERSITY HOT-SPOT

Natural England suggests environmental constraints against development should concentrate on rarity status. These lists are therefore not comprehensive but pick out a few of Wool's rarities – also see map.

Some high status records from the Parish. Of the 141 bird records from the Parish, 52 are resident, 78% are breeding records, 50% of all records are on the Red List.

21 mammals are recorded over the last 10 years including 2 new records – a ferret polecat and water shrew, a soprano pipistrelle (NERC), otter (NERC), water vole (NERC) and dormouse (NERC).

1,000 Insects - beetles have been recorded for the Parish including the false click beetle only recorded in 5 other sites in Britain and the burr reed leaf beetle, a Biodiversity Action Plan (BAP) species. 15% of all records are rare or nationally notable.

Fungi lists include 26 rare species out of the 84 records, including the BAP priority species – olive earth tongue - and the very rare satan boletus.

Reptiles – the sand lizard, smooth snake and water snake (NERC) occur in Wool Parish.

Amphibians – toads, frogs and great crested newt are recorded.

There are of course many other groups of plant and animal species not dealt with here including flowering plants – bee orchid, southern marsh orchid, autumn ladies tresses, coral necklace and corn marigold (Red Data) and lichens.

Trees – of the 35 or so native species, 26 are found in Wool, 80% occur naturally and include creeping willow. There are 18 or more veteran trees – oak, ash and maple – many of these occur just outside the Parish in Coombe Wood designated as a SANG for the proposed development.

For conservation status, see Map 10.

REASONS FOR BIODIVERSITY

A. Varied Topography. River Frome UK BAP Priority Habitat, Flood Plain UK BAP Habitat. There is an area of small hills to the south and gentle rising ground, flattening off to the north of the river. Natural springs occur in the village near the watercress beds (in close proximity with one of the development sites).

B. Therefore, Varied Hydrology.

C. Varied Geology derived from Bagshot Beds, varied in themselves with clay, sand and gravel. Riverine deposits – overburden of alluvial deposits, chalk which is underlying appears in some places.

D. Therefore, Varied Soil Types: sand, heavy clay, heathland, podsoils, woodland loam (ancient woodland not influenced by herbicides or fertilizers).

E. Therefore a Variety of Habitats:

River Frome SSSI – central parish

Water meadows – central parish

Chalk stream and spring – central south

Ancient woodlands – 13 across parish

Road verges – 3 special conservation verges – north, south and central

New natural deciduous woodland with scrub

Central – Pug Pit (old chalk pit)

Organic farmland

Hedges – miles of enclosure and some pre-enclosure

Semi-natural grassland

Veteran trees

Ponds – east, south, north and central

Ditches

This biodiversity is also recognised by the fact that nearly half of Wool Parish is covered by major habitats for wildlife – designated in some form for conservation.

1 SPA	-	European designation (Special Protection Area)
2 SSSIs	-	National designation (Site of Special Scientific Interest)
1 LNR	-	Statutory Dorset designation (Local Nature Reserve)
13 SNCIs	-	Dorset wildlife selected (Site of Nature Conservation
(+2 proposed)	-	Interest)
13 Ancient Woodlands	-	Irreplaceable habitat

All these help comprise habitat mosaics where there will be at present movements across the Parish as a whole, eg the nightjar nests on Woolbridge Heath but its feeding area is much bigger including the water meadows of the River Frome.

PUBLIC INVOLVEMENT IN WOOL'S ENVIRONMENT

1. Wool Flora and Fauna is a group of environmental specialists (see list of Committee) established to build on a booklet "The Natural Environment of Wool", formerly part of Alan Brown's "The Changing Face of Wool" in 1999. We released pamphlets to encourage people to send in records of anything they felt might be unusual, plus records of hedgehogs and slow worms around the Parish. This is ongoing. Records are carefully checked for authenticity. Today we have a record of a hawfinch and a goldcrest (NERC). Pamphlet enclosed.
2. Two records are from people encouraging and caring for hedgehogs in their garden - photos available. Although hedgehogs are in national decline, we have had many records from across the Parish – Wool is a stronghold.
3. We have a water vole recorded in the Parish.
4. We have a Water Bailiff in the Parish who reports decline in salmon in the River Frome.
5. The MOD operates a Conservation Committee and we have a report including one on our LNR in "Sanctuary" – their wildlife magazine.
6. We have a hands-on small group who carry out Woodland Management in 8 Acre Coppice LNR. Two have been involved for 2 years in the winter months pulling up excess brambles smothering bluebells, Internationally Rare (IR).
7. A "Wool on the Wildside" Club for children run 2 weekly from Cologne Road Community Room and using 8 Acre Coppice as their focus. They were challenged to find and identify 100 species within a year – 115 are on record, many of which have been drawn.
8. A Bioblitz was carried out in Wool churchyard in 2013 – lists available. Unfortunately, 3 years back when Wild Purbeck was established by Purbeck District Council, we were told on enquiry that Wool was not going to be included and we have had no contacts since.

ENVIRONMENTAL DAMAGE LIKELY TO BE CAUSED BY LARGE NUMBERS OF HOUSES WITH SOME EVIDENCE TO DATE

Sewage Pollution. Wool Sewage Treatment Works is close to capacity. Concerns about algal bloom prompted an investigation by the MOD in 2014. Nitrates were found to be close to limits required then. Two-thirds of the site is surrounded by the SSSI of the Frome so there is no available space for the extensive reed beds needed to denitrify the effluent. Pollution will be carried down to Poole Harbour already suffering from algal bloom.

Loss of Habitat. House building will replace wildlife-rich organic farmland where at present exist corn buntings, skylarks, yellow hammers and a rich ground flora of corn marigolds and cornflowers. Hedges important for nesting and wildlife corridors are likely to be damaged by essential infra-structure and get replaced with fences, eg footpath which is the oldest green lane in Wool was edged on both sides by large housing development. Ponds, ditches and wetland areas can be lost - all increasingly rare and valuable habitats.

Loss of Wildlife Corridors such as green lanes and hedges are essential for animals to move from one place to another so preventing isolation of populations. The recent "State of Nature" government report emphasised the importance of connecting up wild areas. Development easily blocks these essential corridors.

Increase in Vehicles. Cars and HGVs lead to more road kills – badgers, hedgehogs, birds and frogs. Additional pollution from exhaust fumes as well as road salting increase affects on road-side verges.

People Pressure. Additional residents can produce environmental disturbance. Cats will kill birds, small mammals, frogs, slow worms (smooth snake). Dog walking can disturb ground-nesting birds such as larks, pipits, lapwing and woodcock. Recreational activities in the wrong place will cause damage to local woods, eg tree felling to create a camp (8 Acre Coppice), fire lighting (8 Acre Coppice) and heaths, eg motorbike scrambling and fire on Woolbridge Heath. Many favourite walks rich in wildlife are already at carrying capacity, eg water meadows by the River Frome – recent decline in water voles.

Light Pollution. New lead street lamps no longer attract moths, reducing feeding sites for bats.

Vandalism. An increase in this urban phenomenon has already caused an incident in 8 Acre Coppice where polystyrene marbles were scattered over the wood. A kingfisher's nest was vandalized on the Bovington stream.

Litter. Additional litter and fly-tipping is inevitable. Glass bottles can cause death to small mammals and start fires. A huge amount of dead fish were half buried in 8 Acre Coppice some 15 years ago.

Air Pollution. Wool is a rich area for lichens which are extremely pollution sensitive. The 13 ancient woodlands have many records on the list of Revised Index of Ecological Continuity (RIEC). Surveys have been conducted showing fall-off of lichens from open country to urban fringes to city centres.

**COMMENTS ON CHAPTER 3 OF THE ENVIRONMENTAL
AND INFRA-STRUCTURE CAPACITY STUDY**

Backs the case for the unsuitability of Wool as a recipient of any more large-scale housing developments.

3.10 - Section 40 of the Natural Environment and Rural Communities Act 2006 requires local authorities to ensure conserving biodiversity as an integral part of policy and decision-making – Wool has that biodiversity.

3.11 – The Biodiversity 2020 Strategy calls a halt to overall biodiversity loss. Overall biodiversity loss and decline has been occurring already over Wool, especially in development areas, eg lapwing at Purbeck Gate and autumn ladies tresses orchids at the junction of the C6 and Bovington Lane, for infra-structure – Wessex Water and cycle path. The turtle dove at the top of Cologne Road was lost some years ago to housing development.

3.13 - The NPPF setting out principles as a basis of planning states reducing pollution and that development land allocations should prefer land of lesser environmental value. The Wool Sewage Works was already causing pollution of the River Frome in 2014 with consequent algal bloom. The organic farmland chosen for development has a rich ground flora of cornflowers and corn marigolds and supports corn buntings and yellow hammers in surrounding hedges.

3.16 - The NPPF states that planning for biodiversity should be at a landscape scale across local authority boundaries. These plans do not even allow for continuity across the whole Parish. It also states that maps should include the ecological networks of international, national and locally designated sites of biodiversity, so allowing wildlife corridors and stepping stones that connect them. This is essential to benefit from the habitat mosaics which Wool presents. The wide scale plans for houses in Wool village cover the available space in such concentration this is impossible for Wool.

As for Nature Improvement Areas in local plans, Wool does not have a local plan but habitat improvement is not the most pressing problem to address regarding biodiversity, but the limiting of further losses in this Parish. Purbeck is a very rich biodiversity area as a whole containing the most biodiverse K square in the whole of Britain in the Wareham area, but this does not allow for insect or bird records. In this rich area the Parish of Wool must arguably qualify for one, if not the most, biodiverse parish in Purbeck.

CONCLUSION

In 2012 Purbeck District Council thought fit to omit Wool from further housing development. It was requested by the Inspectorate to explore the potential for more housing. It was not instructed to find more space. Its response to suddenly allocate one of the highest numbers of houses to Wool was the easy option by using a willing land owner to load the village with houses. No amount of mitigation will stop the overall biodiversity loss with yet more housing unrelated to local need.

Instead of taking the line of least resistance PDC might have used the time to gather evidence as to why, having evaluated the situation, they were unable to put forward much more housing without damaging the natural environment. To date they have shown no real interest in the environment, despite this being the canvas on which all planning has to be drawn and the framework on which it is built.

Purbeck District Council used to boast thriving communities in balance with the environment; if these housing allocations go ahead neither of these ideals will be fulfilled.

[REDACTED]
1st February 2017

Mr I Alexander

Natural England

Dear Ian

Thank you for sparing time to visit North Coombe Wood and hear my concerns for its species richness being reduced by it being managed as a SANG. I still feel that management of a SANG could conflict with the aims for this.

On waiking into the wood you said it did not impress you as a quality woodland. I quite understand this as that was my first impression. Its not being very immediately attractive could be a stumbling block in its role as a SANG as it should have the role of drawing people off the more sensitive heathlands. The wood has been managed for timber production and signs of disturbance and the negative effect on the woodland vegetation is only too obvious along the rides and near the entrance, which accounts for the plant list received from DERC. However, at present enough remains to classify it as quality Ancient Woodland – veteran sweeps of bluebells on the western side, the largest amount of wood sorrel i have ever seen and ample Butcher's Broom on the eastern side. . As far as a possible huge increase of dog use I still find this very concerning. Dogs do not always keep to paths and dog owners do not always have them on leads and they do get lost. There is also the problem of an increase in feral cats.

The creation of a lake would be in line with making it a more attractive SANG but the disturbance of the wood during its construction would be considerable. Of course, it would create new habitat for species but I feel could cause damaged and loss to some other species.

You asked how I would manage the wood. First and foremost I said thorough surveys should be carried out so that measures would be targeted on what was there and what was most at risk. I believe lichens come into this category. My summary of what might minimise impact is:

- 1 Full thorough surveys at different times of the year by specialists in certain fields so that evidence based decisions can be made.
- 2 Management changes taking a 'suck it and see' approach not large scale all at one time but spread over a period of say, ten years.
- 3 CCTV cameras in place to discourage lighting of fires and dumping). Wardens cannot be expected to cover a 24 hour period. Damage to local woods often takes place at night.
- 4 No motorbikes
- 5 Limited hazel coppicing
- 6 Dogs to be kept on leads
- 7 No corporate games e.g. paintballing or 'war' games

However, I still maintain that to spare Coombe Wood from becoming a SANG would be the most appropriate way forward to seeing the wood improve rather than degrade. I shall live in hope (I'm not a pessimist) and look out for an alternative SANG.

Yours sincerely

Rachel Palmer



Dear Councillor

I believe that you have recently received a letter from the Lower Frome Valley Wildlife Group.

The list of Committee Members below may be of interest to you.

Chairman: Mrs R Palmer

Members of Committee:

Dr A C Warne – Has worked for Natural England head office

Mr A Branston- Ornithologist

Ms M Mahler – Naturalist

Mr A Brown – Author of books on Wool and hurdle maker

Mr I Duckworth – Natural Historian

Yours faithfully

Mrs R Palmer

WOOL FLORA FAUNA

2681

MARCH 2017

NON COOPERATIVE
NO ACKNOWLEDGE
MEET

LETTER TO:

Purbeck District Councillors; Mr G Suttle, Mr N Dragon, Mr W Trite, Mr M Barnes, Mrs B Ezzard,

FROM:

WOOL AND LOWER FROME VALLEY WILDLIFE GROUP

- The U.N. has declared 2011-2020 the decade of Biodiversity following failure to halt species loss. We need a major shift in how society both respects and utilises the natural environment.
- Purbeck District Council's own Biodiversity Statement: 'Purbeck is one of the richest districts for wildlife in the Country with over 30 habitats and 200 species of conservation concern.
- One third of Wool is covered by environmentally rich designated sites.

Dear Councillor,

The stop-gap in the Purbeck review could be put to advantage if a more holistic approach is applied. It would be good if instead of thinking where can we put the extra houses the idea of what would be good for the area in say 20-50 years was to be adopted.

The Wool and Frome Valley Committee would encourage you to take this approach. We consist of a small group of members all with strong environmental qualifications and hands on experience. We believe choosing Wool as a top recipient for increased housing was a big mistake – one which rightly was not considered in the original local plan of 2012.

We wish to demonstrate that Wool is a local Biodiversity Hot Spot. We have not only carried out surveys ourselves but we have engaged with the local community in gathering records of rare, special or interesting species. We have had a good response so far with records coming from all over the Parish. We scrutinise these for validity for example once record of a Nightingale singing in the area of Coombe Wood (the suggested SANG for the proposed Wool Development) has not been registered until we have further evidence. We shall put all the records on a map of the Parish which would be available as evidence to any inspector in the future.

We hope to have an open meeting with displays of our findings in early March 2018. We hope you will be able to attend. If you wish to know more we have a website and have recently had an article in the Autumn CPRE Review, a copy of which is enclosed.

There are plenty of reasons against large scale development in Wool.

- In spite of changes to the railway timetable by the new franchise, South Western Railways, Wool will still only have one direct train an hour to London Waterloo. Those wishing the smaller stations to/from Weymouth will have to change at



Southampton. This would seem to indicate that it is unlikely that they would entertain the idea of moving Wool Station.

- The claims by PDC and the LEP of large employment at the Dorset Innovation Park are not evidenced based. Numbers of 2000 jobs have merely been taken from the site capacity figures. There is no evidence as to how PDC or the LEP will deliver employment on the site.
- Should Wool become a town there will be further urbanisation spreading Westwards which eventually may lead to a conurbation the size of Poole and Bournemouth. Would this really be to the advantage of the idyll of the Jurassic Coast?

WILDLIFE FACTS

Wool's biodiversity is already on record:

ISPA (Special protection area under the European Birds Directive)

ISSSI (Site of Special Scientific Interest) The River Frome winds through the parish.

9 SNCIs (Site of Nature Conservation Interest)

1 LNR (Local Nature Reserve) Local Children's' Wildlife Club is centred around this.

13 Ancient Woodlands.

Organically farmed fields, most which have been put forward for development with huge loss of habitat for wildlife.

LOCAL PLAN FACTS

The Present Local Plan Review contravenes many Environmental Planning Policy Guidelines. The NPPF sets out clearly that objectively assessed needs should be met unless the adverse impacts of so doing would significantly and demonstrably outweigh the benefits for example policies relating to sites protected under the birds and habitats directive and or sites of special scientific interest.

The riches of Wool's Biodiversity are likely to be overlooked simply by travelling through the village on the A32 Dorchester Road. However the above facts we hope will encourage you to vote against further housing in Wool. We urge you to help conserve Wool's considerable Biodiversity for generations to come.

Copies to:

Mr G Suttle, [REDACTED]

Mr N Dragon, [REDACTED]

Mr M Barnes, [REDACTED]

Mrs B Ezzard, [REDACTED]

Mr W Trite, [REDACTED]

Reviewing the plan for Purbeck's Future.

Strategic Housing Land Availability Assessment (SHLAA) June 2016.

Wool

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

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

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

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

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

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

Status terms used in accounts of habitats and impacts

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

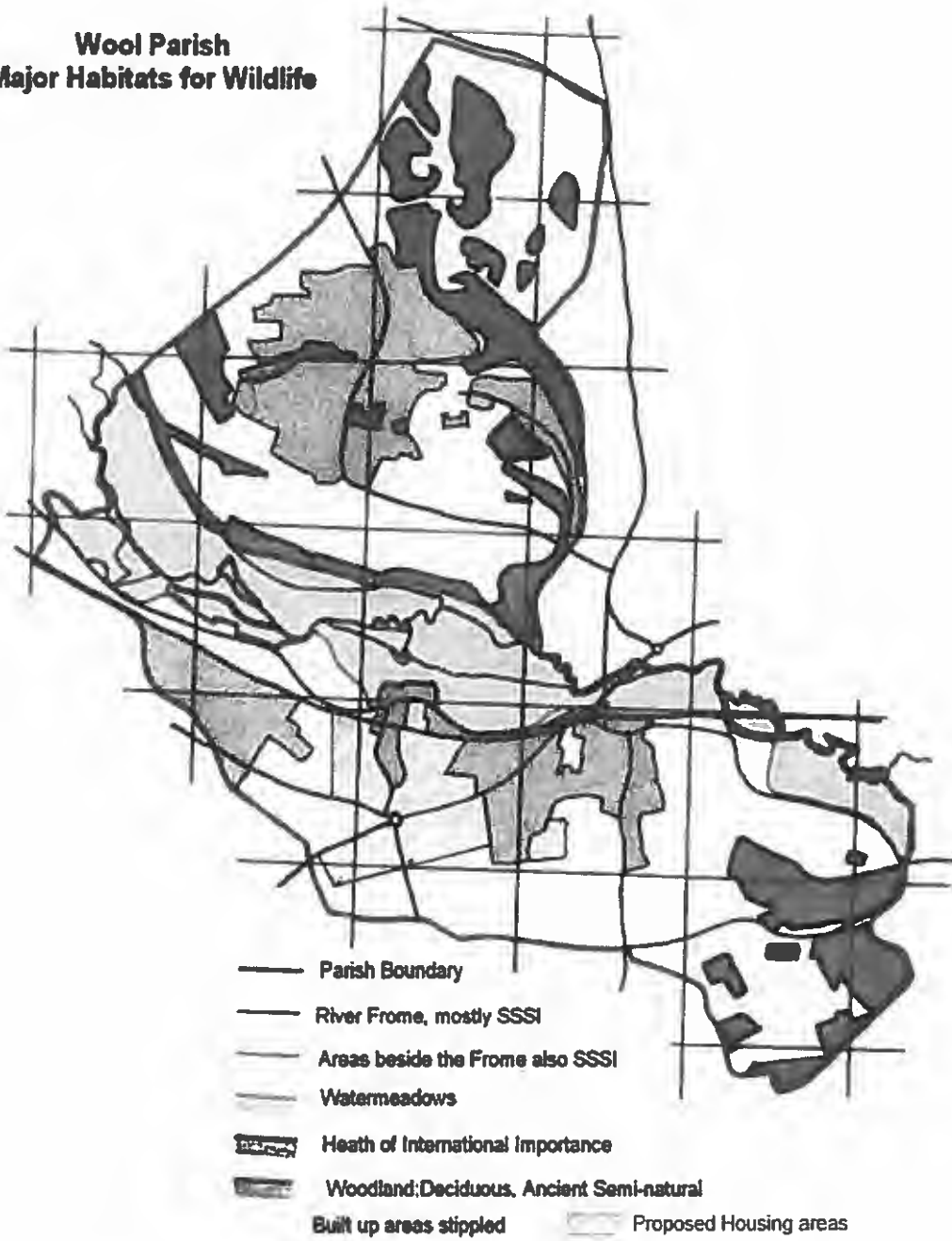
The Included Sites.

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

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

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

**Wool Parish
Major Habitats for Wildlife**



Habitats under Threat.

Heathland.

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

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

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

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

Water meadows.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Woodland.

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

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

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

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

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

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

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

Road Verges

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

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

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

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

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

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

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

Gardens

Location	Status	Harmful activity
Pollinators		Housing in large gardens

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

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

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

Conclusions.

There are two major aspects that need thorough consideration:

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

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

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

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

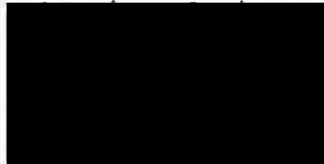
There should be an Environmental Impact Statement fully assessing this proposal on the grounds that there are changes to the degree of water pollution and changes to biodiversity.

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

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

More detail can be provided if required.

Dr.A.C.Warne,
Ecologist and Entomologist,



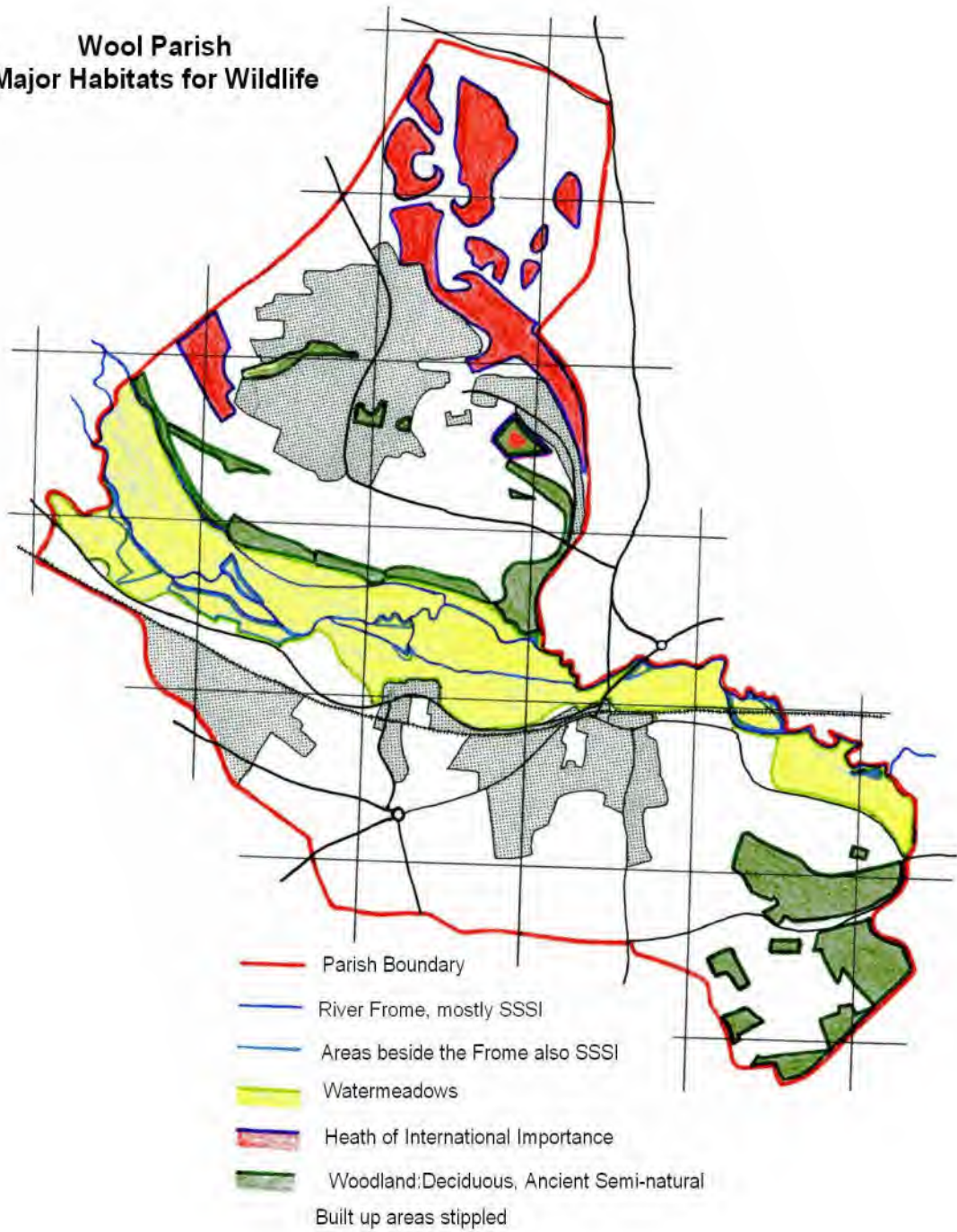
Appendix

Some Documents Consulted:

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

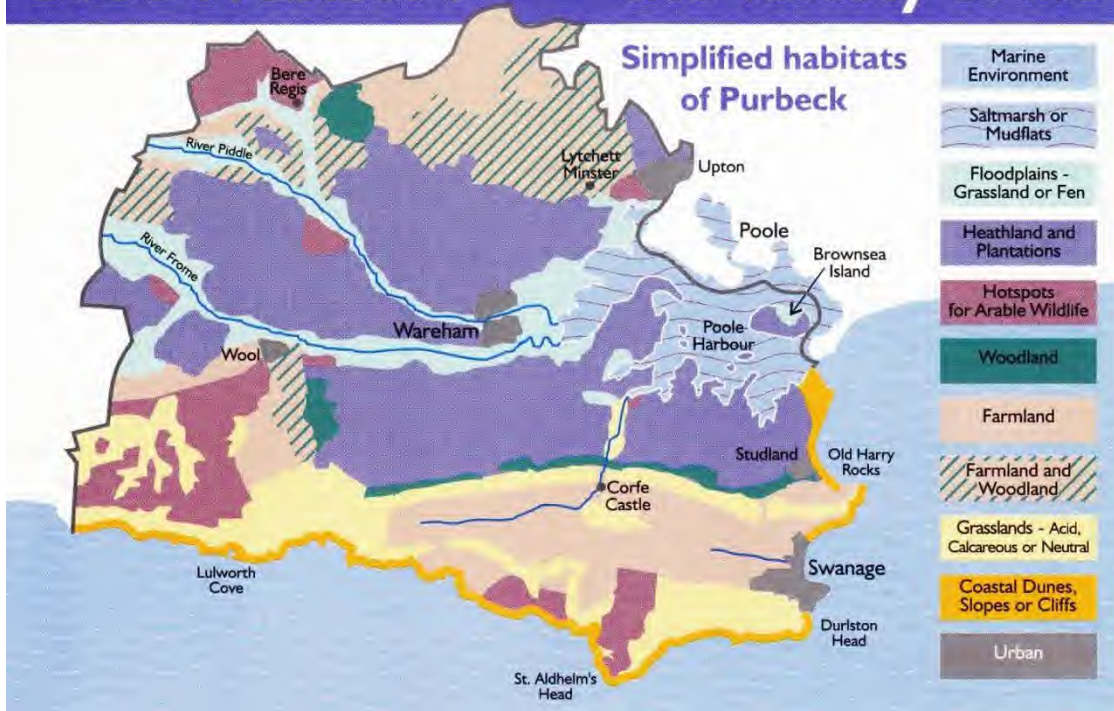
Pearman D. eds	The County Red Data Book Dorset Environmental Records Centre.
Dorset Biodiversity Partnership	Dorset Biodiversity Strategy

Wool Parish
Major Habitats for Wildlife





BIODIVERSITY . . . the variety of life



POST CARD



BIODIVERSITY . . . the variety of life

Purbeck is one of the richest districts for wildlife in the country with over 30 habitats and 200 species of conservation concern.

The Purbeck Biodiversity Project -

a partnership between the RSPB, Purbeck Heritage Committee, EN, DEFRA RDS, Dorset FWAG, DWT and NT.
Working with local people to protect and enhance Purbeck's wildlife.

Produced by Purbeck District Council, Community Planning and Design Section



Organic Farmland – Cornflowers & Corn Marigolds

Policy 13 Green Infrastructure. Who will take responsibility for these and manage them.



Green Infrastructure? Rubbish dumped over a garden fence, Bovington



Hazel hedge of footpath 10 cut outside garden to encourage a Laurel hedge!



Garden and household debris thrown over a garden fence onto a footpath 10



The
Consequence for wildlife of rubbish dumping – the debris in the bottle is entirely the remains of
Voles, Shrews and insects.

Policy H5 Wool SANG.

Damage and demand for safety can be harmful to biodiversity



Burnt Woodland – Rare but in hot dry summers this is possible.



Cleared understorey to make walkers feel safe

Policy 13 Green Infrastructure & Policy H5 Wool



Vandalism - Trees in Eight Acre Coppice LNR hacked felled and damaged by children.



Fire – Cranesmoor – coincided with the Easter Holidays 2007.

Policy E9 needs The River Frome SSSI to be included in this.

An existing problem without additional houses.



The Algal mat on the intertidal mud in Poole Harbour. Showing the seriousness of the nitrate enrichment.



Landscape: From Watermeadows, Compare with the AONB below.





Heath Landscape



Heath flora – Cross leaved heath, Heather, Dwarf Gorse and Purple Moorgrass



The Frome in flood



Landscape – Organic fields with Corn Marigolds



Participation, Education – Members of “Wool on the Wildside” not only learn about wildlife but pull brambles and pick litter.



Community involvement - The Friends of 8 Acre Coppice LNR hedge laying



Exhibit of the Biodiversity of Wool 2017

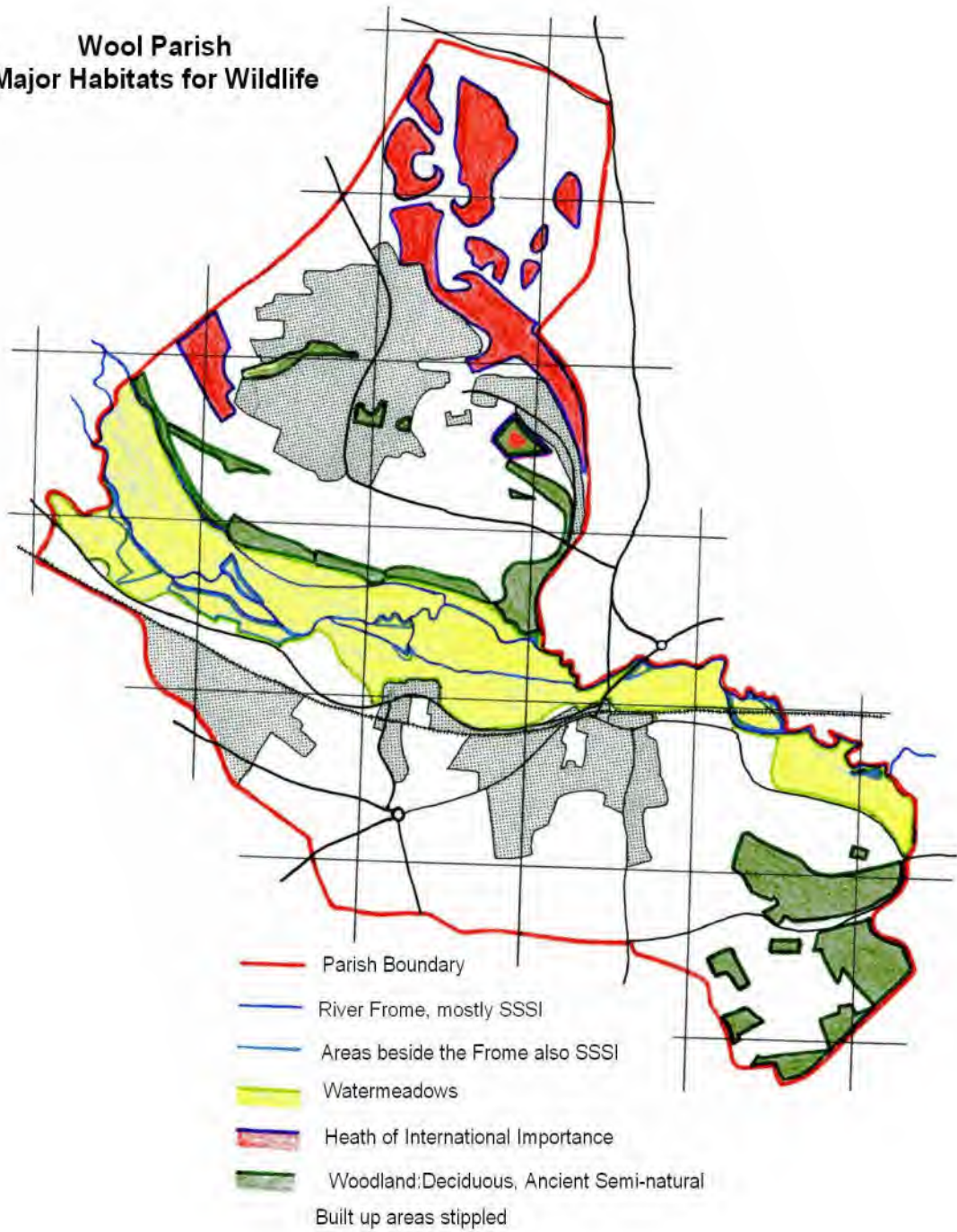


Landscape - Little Perry Coppice, Wool. Oak with Hazel Coppice, Bluebells and Greater Stitchwort.

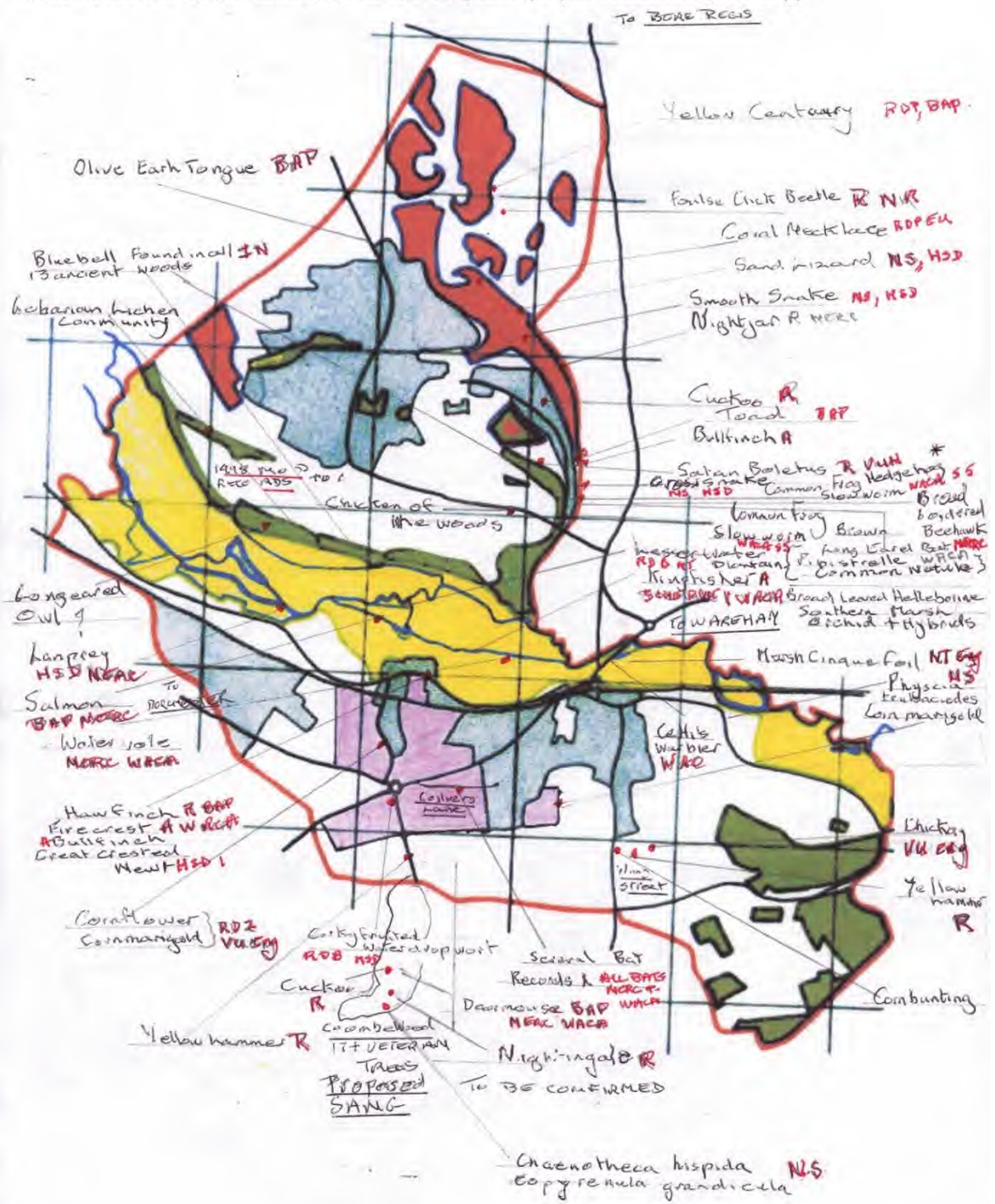


The last hurdle maker, Traditional Use - Wool

**Wool Parish
Major Habitats for Wildlife**



Other Rarities in Wool Parish over the last 20 years. (Key as Wildlife records map).



To BONE RECORDS

Yellow Centaury RDZ, BAP.

Olive Earth Tongue BAP

False Cuck Beele R N, N, R

Coral Necklace RDPEU

Sand lizard NS, HSD

Smooth Snake NS, HSD

Nightjar R, N, R, R

Bluebell Found. in all 13 Ancient Woods

Hebridean Lichen Community

Cuckoo R
Toad TAP

Bullfinch A

Satan Boleetus R, VUL, HSD
Great Snake R, HSD
Common Frog WACR, S, S
Sludgeworm WACR, S, S
Brown Bordered Beehawk WACR, S, S
Hedgehog WACR, S, S
Long Eared Bat WACR, S, S
Common Nettle WACR, S, S

Cuckoo of the woods

Longeared Owl

Kanprey HSD, N, R, A, C

Salmon BAP, N, R, A, C

Water vole N, R, A, C

WATER WACR, S, S
Diplazium WACR, S, S
Nightingale A
Broad Leaved Helleborine
Southern Marsh
Richard + Hybrids

Marsh Cinquefoil NT, S, S
Physcia tenuicruris WACR, S, S
Laminaria digitata

Haw Finch R, BAP
Firecrest A, W, S, S, S
Great Crested Newt HSD, I

Celtic Warbler WACR

Chickadee VUL, S, S

Yellowhammer R

Cornflower RDZ, VUL, S, S
Common Field VUL, S, S

Corky fruited Water dropwort RDZ, HSD

Cuckoo R

Yellowhammer R

Cornbellwood TIT, VETERAN

Trees PROPOSED SANG

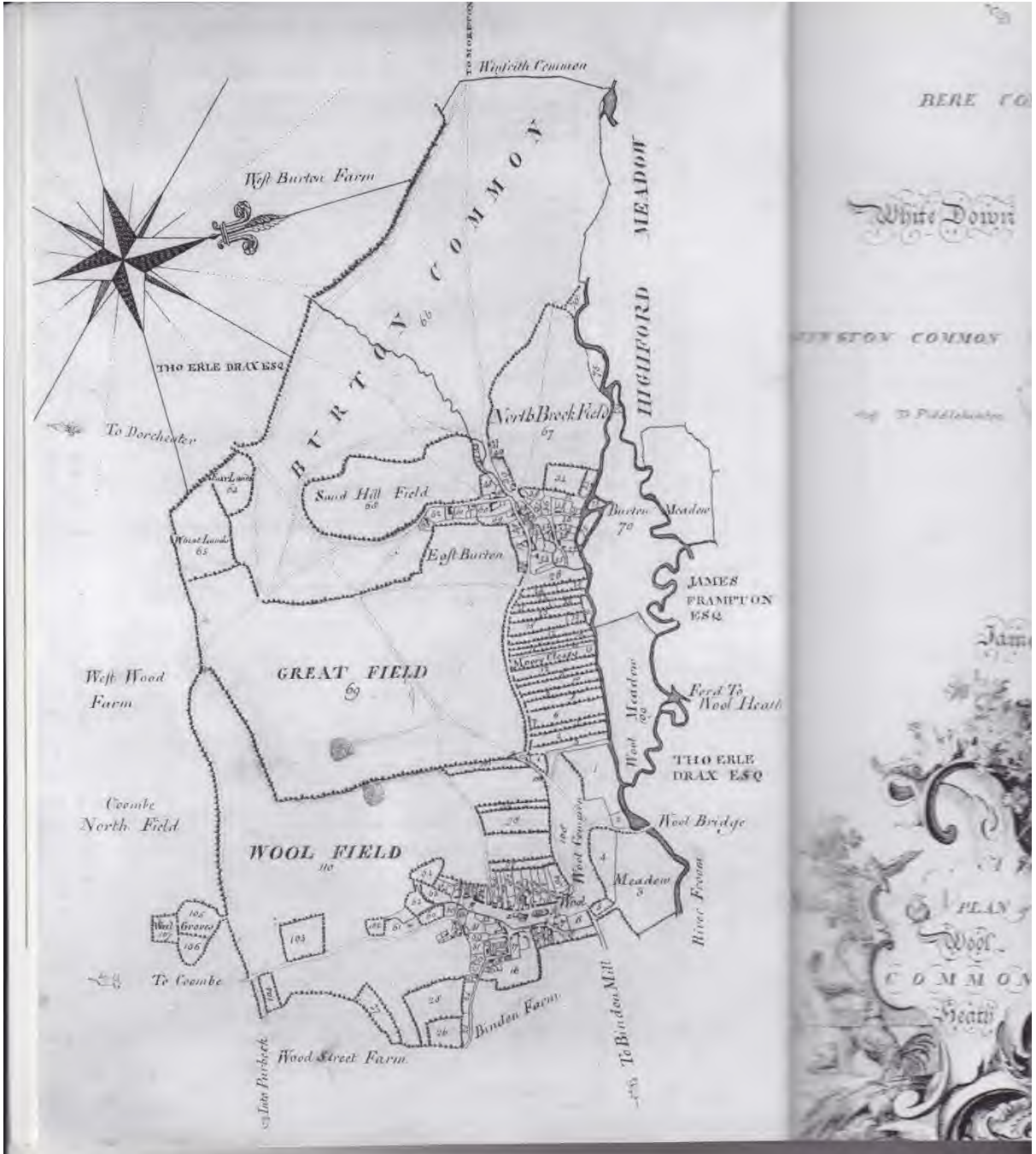
Several Bat Records & ALL BAP, N, R, A, C

Damouse BAP, N, R, A, C

Nightingale R

To BE CONFIRMED

Chaenotheca hispida NS
Copyprenula grandicula



BERE CO

White Down

WIMBORNE COMMON

By J. P. P. P.

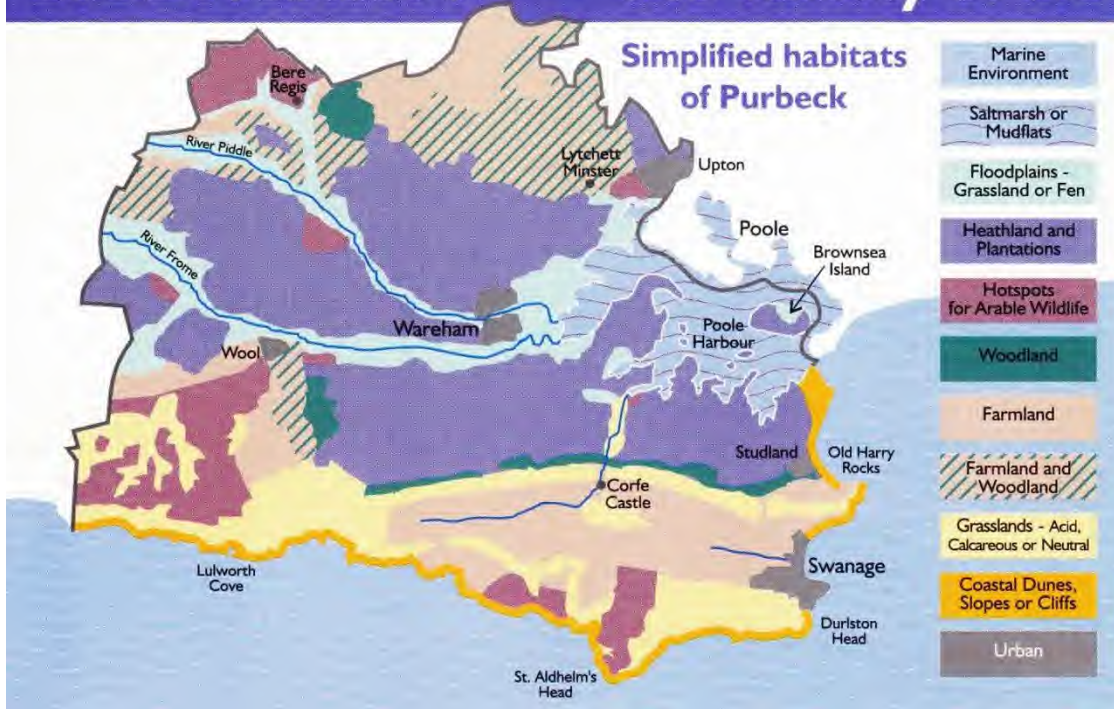
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PLAN

Wool COMMON

Heath

BIODIVERSITY . . . the variety of life



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Purbeck is one of the richest districts for wildlife in the country with over 30 habitats and 200 species of conservation concern.

The Purbeck Biodiversity Project -

a partnership between the RSPB, Purbeck Heritage Committee, EN, DEFRA RDS, Dorset FWAG, DWT and NT.
Working with local people to protect and enhance Purbeck's wildlife.

Produced by Purbeck District Council, Community Planning and Design Section



Organic Farmland – Cornflowers & Corn Marigolds

Policy 13 Green Infrastructure. Who will take responsibility for these and manage them.



Green Infrastructure? Rubbish dumped over a garden fence, Bovington



Hazel hedge of footpath 10 cut outside garden to encourage a Laurel hedge! Footpath 10 is the oldest way across the village, rubbish has been dumped all along its length and woodland plants have almost disappeared and garden plants have now taken over.



Garden and household debris thrown over a garden fence onto footpath 10



The
Consequence for wildlife of rubbish dumping – the debris in the bottle is entirely the remains of Voles, Shrews and insects.

Policy H5 Wool SANG.

Damage and demand for safety can be harmful to biodiversity



Burnt Woodland – Rare but in hot dry summers this is possible.



Cleared understorey to make walkers feel safe

Policy 13 Green Infrastructure & Policy H5 Wool



Vandalism - Trees in Eight Acre Coppice LNR hacked felled and damaged by children.



Fire – Cranesmoor – coincided with the Easter Holidays 2007.

Policy E9 needs The River Frome SSSI to be included in this.

An existing problem without additional houses.



The Algal mat on the intertidal mud in Poole Harbour. Showing the seriousness of the nitrate enrichment.



Landscape: From Watermeadows, Compare with the AONB below. Which landscape is visually more attractive.





Heath Landscape



Heath flora – Cross leaved heath, Heather, Dwarf Gorse and Purple Moorgrass



The Frome in flood



Landscape – Organic fields with Corn Marigolds



Participation, Education – Members of “Wool on the Wildside” not only learn about wildlife but pull brambles and pick litter.



Community involvement - The Friends of 8 Acre Coppice LNR hedge laying



Exhibit of the Biodiversity of Wool 2017



Landscape - Little Perry Coppice, Wool. Oak with Hazel Coppice, Bluebells and Greater Stitchwort.



Tone of the last hurdle makers in Dorset, Traditional Use - Wool

'CLOUDS, 14 COLOGNE ROAD, BOVINGTON, WAREHAM BH20 6NR 15th October 2018

Mr W Trite

Purbeck District Council

Westport House

Wareham

Dear Mr Trite

As requested, I submit my statement from the Public Participation time at the Purbeck District Council meeting on 9th October 2018.

'Purbeck contains the highest Biodiversity hotspot in the whole of England'

Wool must rate as one of the very topmost Biodiverse parishes in the District and the prime site for Habitat Mosaics. So what have Purbeck done to operate within the Natural Environment and Rural Communities Act 2006 thereby ensuring they conserve this Biodiversity?

Certain it is with Wool's present density the increase in the built environment already high at 18% to 23% - more with the Enterprise park and infrastructure, will make it one of the most densely built up areas in rural Dorset. How is the compatible with maintaining its Biodiversity?

With the housing need for Poole and Bournemouth being overestimated by 40% in each case surely Wool's allocation could be accommodated here where there is already proper infrastructure for an urban population and jobs. Also this would cut down on cross county travelling and subsequent pollution. Development in this area would free up Wool and save it from Biodiversity desecration.

I hear that Poole and Bournemouth have not the space to accommodate these extra numbers but there are pockets of derelict land and areas of houses and bungalows with large gardens not necessarily required by the occupants and this could be a source of building land. The finding of parcels of land in Poole and Bournemouth may prove a challenge to the planners, unlike Wool where housing land is handed out on a platter by a large landowner pressing to sell. However, good planning should not simply follow the line of least resistance.

I was disappointed that the plan in its incompleteness was presented to be voted on and passed by Councillors. Presumably the desperate rush through of the Purbeck Plan Document is to pre-empt the dissolution of PDC and the change to a unitary authority. The excuse that if Purbeck deid not have something ready in time, uncontrolled development would ensue is an exhausted and spurious argument. With Wool being allocated 470 houses in preference to less Biodiverse sites, a SANG earmarked for an Ancient Woodland, School and Surgery full to capacity, transport hub congestion and organic farmland earmarked for housing, we are already in the uneviable position of receiving developer driven expansion.

I would like to add my thanks to that of Malcolm Shakesby in your handling of the meeting and your seeming acceptance that the Jewel in the Crown, Purbeck, could be damaged irreparably by extreme housing.

Yours sincerely,

Rachel

P.S. I have put queries where I wish for a reply

Comment

Consultee	(1187112)
Email Address	████████████████████
Company / Organisation	Wool Flora and Fauna Group
Address	14 Cologne Road Bovington Wareham BH20 6NR
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Wool Flora and Fauna Group (- 1187112)
Comment ID	PLPP580
Response Date	29/11/18 16:55
Consultation Point	Policy E9: Poole Harbour (View)
Status	Processed
Submission Type	Web
Version	0.4
Are you responding on behalf of a group?	No
If yes, how many people do you represent?	1
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	E9
Do you consider that the Local Plan is legally compliant?	No
Do you consider that the Local Plan is sound?	No
Do you consider that the Local Plan complies with the duty to co-operate?	No

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

Policy E9 Poole Harbour

Nitrate levels in the Frome have steadily increased many years at a rate of about 1 mg per 10 years have be a data has measured at the Stoke. Much of this is attributed to agriculture and it is estimated that today's nitrate fertiliser application might take up to 30 years to reach Poole harbour this will mean that over the 30 years the nitrate levels of Frome could increase 25 to 30% even if nothing is done.

There is a problem now that needs to be sorted solved before additional homes are built but they already are throughout the friend catchment yet little appears to be happening to solve the problem. Wool will need a new sewage works and the feeder sewers will need replacement. Wool sewage works is present constrained by being adjacent to part of River Frome SSSI and there is little space for expansion which will need to have nitrate stripping to conform to nitrate neutrality policy. The replacement feeder sewers will cross least fit 1 km of land where biodiversity damage could occur.

The plans contain little but optimistic statements about nitrate neutrality and do not address the very considerable infrastructure ramifications of the new housing. There are other documents about nitrate problem in Poole harbour the mitigation options but there are these are needed now to solve the current problem yet there is little or no evidence of action. Policy 11 has no mention of the need for sewage treatment wirks upgrades unless b) includes this without any specific mention. Policy E9 is only about Poole Harbour but this also affects the River Frome SSSI and although the River Frome benefits from some of the Poole Harbour Policies these all need action now.

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

The plan is all about housing and does not get to grips with the infrastructure. Infrastructure proposals need to be judged with the housing proposals not come later when the potentially damaging issues have already been decided.

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I lack confidence in Purbeck District Council

Comment

Consultee	(1187112)
Email Address	████████████████████
Company / Organisation	Wool Flora and Fauna Group
Address	14 Cologne Road Bovington Wareham BH20 6NR
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Wool Flora and Fauna Group (- 1187112)
Comment ID	PLPP581
Response Date	03/12/18 12:39
Consultation Point	Policy H5: Wool (View)
Status	Processed
Submission Type	Web
Version	0.5
Files	wool-flora-and-fauna-additional-info.pdf
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	10
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	H5
Do you consider that the Local Plan is legally compliant?	No
Do you consider that the Local Plan is sound?	No
Do you consider that the Local Plan complies with the duty to co-operate?	No

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

Paragraph 2 Legal compliance – Lack of community involvement.

We, Wool Flora and Fauna wish to register that from the very outset, the Environmental case as put forward by PDC has been stone-walled and therefore this plan fails on Community Involvement and Co-operation. The community of Wool has been actively engaged in helping to build evidence of Wool being a Biodiversity Hotspot. We speak for the community.

REASONS AND HISTORICAL EVIDENCE

- 1 Wool is surrounded to the south and west by AONB. There is no AONB designation within the Parish. Wool lies in the 'Rain Shadow' area of the AONB and therefore dismissed as regards its landscape and natural environment. Actually the immediate AONB in area consists of large open fields with a scant number of trees or quality hedgerows and is widely cropped for Maize and Oil-Seed Rape.
- 2 Some years ago in setting up Wild Purbeck NIA, Rachel Palmer phoned PDC to compliment them on the scheme but also suggesting Wool Parish with its numerous habitats should be included and that evidence could be provided. The answer from Alison Turnock, the project leader was that Wool was not to be included. There was no request for evidence.
- 3 A response was sent to the 2016 Partial Review Group of the Purbeck Local Plan. None of the points raised seem to have been addressed. We seem not to have had any response. On 1st February 2017 Mrs Palmer as requested, visited Coombe Wood with Mr Ian Alexander (Natural England). He could see no reason why a SANG could lower the biodiversity. We stumbled across a Woodcock (red alert species) but it was dismissed as not necessarily breeding. In response to this unsatisfactory meeting Rachel Palmer wrote to Mr Alexander. (See attachment)
- 4 In March 2017 a meeting was held at Purbeck School regarding the Partial Review Consultation results. They admitted to having arrived at Housing allocations before assessing the infrastructure constraints (including the environment). We were assured there would be a new bottom upwards approach and SHLAAS would be assessed. We wrote a letter to various Councillors seeing this as a chance to put the environment as a solid base for a new plan. This did not happen. There were no replies from Councillors (see attachment)
- 5 In March 2017 Wool Flora and Fauna held an exhibition of Wool Wildlife in the D'Urberville Centre, Wool. It was well attended but unfortunately next door to Savills exhibition on their plans for the development of Wool and the Purbeck District Council local plan exhibition. The two elected District Councillors at that time: Laura Miller and Cherry Brooke were invited to drop in to see how the community valued their environment and to witness the biodiversity of the parish. They did not attend.
- 6 In May 2017 Dr Warne submitted a letter dealing with the Plan in view of his Environmental specialism (see attachment). He was invited to a discussion arranged by Mr S Tapscott of the Purbeck Environment Team but in the event the housing officer, Mrs Bellamy, was substituted. Also present at the meeting was Nick Squirrel of Natural England. There was little in the way of a positive outcome from this meeting. Dr Warne considered the meeting unsatisfactory.
- 7 Coombe Wood is not mentioned as the SANG for Wool in Policy 5 where as the SANG for the development at Morden has a whole policy (15). The SANG at Coombe Wood for Wool only appears in the Purbeck Local Policies Map where the site is allocated but it is not named. Is this obfuscation, and possibly the fact that Policy I3 is not placed under the Environment but under Infrastructure. This along with many other instances states progress to be reported in the Monitoring Report. Does this mean the public is no being given a complete picture to comment on and that the Plan is finally given to the Inspector may differ considerably from that presented to the public for consultation?
- 8 A visit to PDC on 28th November 2018 by one of our group seeking help on filling in the consultation. She had been asked by the group to obtain access to the Ecological Survey of Combe Wood commissioned by Mr J Weld (we had previously requested access to the wood to record insects and bats but this had been refused) Mrs Bellamy, now officer in charge of the plan, said it was proving difficult to locate. When queried whether it would in the public domain she suggested searching under Savills (Estate and Land Agent for Mr J Weld). A search as suggested was made by another member of the group but nothing was found. Our document is long as to date the natural environment of Wool has been disregarded except for the SPA where Purbeck DC have probably called on the expertise of Natural England.

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

Legal Compliance.

Policy numbering is confusing. Is Policy 13 or 1.3.

There is no policy for the SANG at Wool indeed it is only shown on the policies map and then not named.

Policy 13 or 1.3 incomplete. Duty to cooperate with Wool Flora and Fauna not followed through over the period 2017 – 2018. See end of our document.

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Evidence is increasing with time. To provide more evidence of peoples involvement in the natural environment of Wool and to put forward a new vision of Wool in the likelihood of this area being part of a National Park.

Comment

Consultee	(1187112)
Email Address	[REDACTED]
Company / Organisation	Wool Flora and Fauna Group
Address	14 Cologne Road Bovington Wareham BH20 6NR
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Wool Flora and Fauna Group (- 1187112)
Comment ID	PLPP582
Response Date	03/12/18 15:22
Consultation Point	Policy E10: Biodiversity and geodiversity (View)
Status	Processed
Submission Type	Web
Version	0.5
Files	wool-flora-and-fauna-additional-info.pdf
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	10
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	E10
Do you consider that the Local Plan is legally compliant?	No
Do you consider that the Local Plan is sound?	No
Do you consider that the Local Plan complies with the duty to co-operate?	No

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

Trees

Policy H5, E10, Policy13 (1.3)

Trees are important not only in the landscape but in providing biodiversity. Woodlands are the most biodiverse habitats in England. 2/3 of breeding birds, half moths and butterflies and 1/6 flowering plants depend on woodland as part or all of their habitat. Wool has 13 Ancient Woodlands and 2 or 3

Recent and semi-natural deciduous woodlands.

Trees reduce pollution and cases of bronchitis and respiratory disease have considerably lowered where trees separate houses from roads. They also lower stress by adding to the Green Environment.

Trees are one of the most frequent casualties of development, not only one of the first things to be cleared from building sites but also because of utility provision, eg 2017 removal of a fine mature oak at the junction of the C^ with the Turners Puddle road by Wessex Water when adding water infrastructure.

Developers should be required as part of a 106 agreement to plant at least 1 tree per house built especially along roads where there is traffic queuing next to housing, eg.the main Dorchester Road through Wool.

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

Need for some more information about the Green Environment and how it will apply to specific areas

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This aspect needs more thorough coverage in the plan

Comment

Consultee	(1187112)
Email Address	████████████████████
Company / Organisation	Wool Flora and Fauna Group
Address	14 Cologne Road Bovington Wareham BH20 6NR
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Wool Flora and Fauna Group (- 1187112)
Comment ID	PLPP583
Response Date	03/12/18 15:22
Consultation Point	Policy I3: Green infrastructure, trees and hedgerows (View)
Status	Processed
Submission Type	Web
Version	0.2
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	10
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	I3
Do you consider that the Local Plan is legally compliant?	No
Do you consider that the Local Plan is sound?	No
Do you consider that the Local Plan complies with the duty to co-operate?	No

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This aspect needs more thorough coverage in the plan

Comment

Consultee	Mrs Jacqui Hughes (1189783)
Email Address	██
Company / Organisation	Wool Parish Council
Address	D'Urberville Centre Colliers Lane Wool BH20 6DL
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Wool Parish Council (Mrs Jacqui Hughes - 1189783)
Comment ID	PLPP590
Response Date	03/12/18 11:57
Consultation Point	Policy V1: Spatial strategy for sustainable communities (View)
Status	Processed
Submission Type	Web
Version	0.2
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	15
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	Policy V1: Spatial strategy for sustainable communities
Do you consider that the Local Plan is legally compliant?	No
Do you consider that the Local Plan is sound?	No
Do you consider that the Local Plan complies with the duty to co-operate?	No

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V1

This latest round of the consultation process cannot be seen in isolation. It is arrived at and contextualised by three previous consultations – 2014/5, 2016 and 2018. In terms of challenging the PPS on the grounds of process, it should therefore be noted that at each stage of the historic process there have been significant flaws and problems, which although they have been challenged, have undoubtedly had a continuing impact on the process. An example: based on the 2014/15 consultation (which had a miniscule response), the 2016 consultation contained the statement that there was 'significant support' for 1000 houses in Wool. It was later admitted that there was no actual statistical basis for this statement, and the Chief Executive admitted in writing that whilst this statement was incorrect it would not be removed because it was too late to do so. The 2016 consultation referred to the possibility that a bypass for Wool 'could be considered' - this in spite of the decision by DCC (a decision known to PDC) a month or so before the publication of the consultation that all plans for a bypass had been scrapped. It would be my contention that the process is therefore potentially legally flawed because false perceptions and erroneous data might have influenced responses. The plan does not give adequate consideration of how all the sites, notably Wool, are essentially of a rural nature, and an extensive new housing will be used primarily for commuting to the large conurbations in Poole and Bournemouth. There has been inadequate consideration of the effect on the environment (traffic pollution and the loss of biodiverse farmland) and on local infrastructure (e.g. road particularly the A352 and the level crossing at Wool, but also the A351 at Sandford)

Whilst supporting the provision of a care home there has been no local consultation on this prior to the plan submission. The proposed location is at least a mile from the railway station and local road transport is inadequate.

The overall allocation to Purbeck neglects that it is primarily a rural area, augmented by tourism. Excessive housing has the potential to degrade the latter. The allocation has been skewed (although potentially within the NPPF) by linking Purbeck with East Dorset and the large conurbations to the East.

This Plan is unsound as it states that building 470 homes in Wool will provide houses that local people can afford. The January 2018 consultation said: "The average cost of a house in Purbeck is £250,000". That's seventeen times the average salary in Purbeck. To be genuinely affordable (for rent or purchase) a house needs to cost £150,000. The Plan presents no evidence that building 470 houses in Wool will cause house prices to drop by 40%.

Whilst the second full consultation was carried out on paper, PDC's insistence on using online methodologies has been severely criticised and there are grounds to suggest that not only has this policy been discriminatory, it is legally questionable, morally reprehensible, and cynically indicative of a desire by PDC to deliberately exclude wide swathes of the demographic that would be most critical of its proposals. The consultation of the Pre-Plan Submission is a classic example of this: it uses software which was declared not fit for purpose the first time it was used; it was initially impossible to gain access to the documents using the yellow 'Start Here' button – and whilst this has now been 'fixed'. The statement on the PPS Consultation instructions that '*Any representation made in alternative formats will not be considered*' is also discriminatory and seemingly deliberately designed to exclude responses from members of our community who lack the confidence, ability or equipment to respond online. This surely would allow for a legal challenge to the process.

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

All previous consultation content needs to be included in the review, taking into consideration all opinions. The Government guidelines states the Local people's views are vital to shaping a local plan. The views of local people must be respected.

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

Comment

Consultee	Mrs Jacqui Hughes (1189783)
Email Address	██
Company / Organisation	Wool Parish Council
Address	D'Urberville Centre Colliers Lane Wool BH20 6DL
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Wool Parish Council (Mrs Jacqui Hughes - 1189783)
Comment ID	PLPP592
Response Date	03/12/18 11:57
Consultation Point	Policy E1: Landscape (View)
Status	Processed
Submission Type	Web
Version	0.4
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	15
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	Policy E1: Landscape
Do you consider that the Local Plan is legally compliant?	No
Do you consider that the Local Plan is sound?	No
Do you consider that the Local Plan complies with the duty to co-operate?	No

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

E1

It is recognised that Wool and its environs are not designated as part of the AONB. Nevertheless the plan fails to take adequate regard of the rich biodiversity in the area, situated between the Frome water meadows and the Purbeck Hills and the low heathland to the North (Hardy's Egdon Heath). Other, expert groups will provide full detail of the biodiversity, and specialness of the area.

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

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Comment

Consultee	Mrs Jacqui Hughes (1189783)
Email Address	[REDACTED]
Company / Organisation	Wool Parish Council
Address	D'Urberville Centre Colliers Lane Wool BH20 6DL
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Wool Parish Council (Mrs Jacqui Hughes - 1189783)
Comment ID	PLPP594
Response Date	03/12/18 11:57
Consultation Point	Policy E3: Renewable energy (View)
Status	Processed
Submission Type	Web
Version	0.3
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	15
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	Policy E3: Renewable energy
Do you consider that the Local Plan is legally compliant?	No
Do you consider that the Local Plan is sound?	No
Do you consider that the Local Plan complies with the duty to co-operate?	No

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E3

The siting of a large number of houses used by commuters (see V1) would be prejudicial to energy conservation

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

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Email Address	██
Company / Organisation	Wool Parish Council
Address	D'Urberville Centre Colliers Lane Wool BH20 6DL
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Wool Parish Council (Mrs Jacqui Hughes - 1189783)
Comment ID	PLPP595
Response Date	03/12/18 11:57
Consultation Point	Policy E4: Assessing flood risk (View)
Status	Processed
Submission Type	Web
Version	0.2
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	15
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	Policy E4: Assessing flood risk
Do you consider that the Local Plan is legally compliant?	No
Do you consider that the Local Plan is sound?	No
Do you consider that the Local Plan complies with the duty to co-operate?	No

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

E4

Much, if not all, the development lies in a drainage area from the higher ground to the South, and into the water meadows of the Frome. The plan has failed to account for this. It is not for nothing that Wool's ancient name (Wyllon, Welle) meant a 'place of springs' The developers in other meetings seem to understand the issue that the railway does severe drainage as it falls naturally to the floodplain of the R Frome, as they have proposed a series of attenuation features as part of the green spaces being put forward also as an attempt to soften and enhance biodiversity. This must be addressed from the beginning.

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Comment

Consultee	Mrs Jacqui Hughes (1189783)
Email Address	██
Company / Organisation	Wool Parish Council
Address	D'Urberville Centre Colliers Lane Wool BH20 6DL
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Wool Parish Council (Mrs Jacqui Hughes - 1189783)
Comment ID	PLPP596
Response Date	03/12/18 11:57
Consultation Point	Policy E5: Sustainable drainage systems (SuDs) (View)
Status	Processed
Submission Type	Web
Version	0.2
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	15
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	Wool Insert Map
Do you consider that the Local Plan is legally compliant?	No
Do you consider that the Local Plan is sound?	No
Do you consider that the Local Plan complies with the duty to co-operate?	No

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V1

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Whilst supporting the provision of a care home there has been no local consultation on this prior to the plan submission. The proposed location is at least a mile from the railway station and local road transport is inadequate.

The overall allocation to Purbeck neglects that it is primarily a rural area, augmented by tourism. Excessive housing has the potential to degrade the latter. The allocation has been skewed (although potentially within the NPPF) by linking Purbeck with East Dorset and the large conurbations to the East.

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V2

No comment

E1

It is recognised that Wool and its environs are not designated as part of the AONB. Nevertheless the plan fails to take adequate regard of the rich biodiversity in the area, situated between the Frome water meadows and the Purbeck Hills and the low heathland to the North (Hardy's Egdon Heath). Other, expert groups will provide full detail of the biodiversity, and specialness of the area.

E2

No comment

E3

The siting of a large number of houses used by commuters (see V1) would be prejudicial to energy conservation

E4

Much, if not all, the development lies in a drainage area from the higher ground to the South, and into the water meadows of the Frome. The plan has failed to account for this. It is not for nothing that Wool's ancient name (Wyllon, Welle) meant a 'place of springs' The developers in other meetings seem to understand the issue that the railway does severe drainage as it falls naturally to the floodplain of the R Frome, as they have proposed a series of attenuation features as part of the green spaces being put forward also as an attempt to soften and enhance biodiversity. This must be addressed from the beginning.

E5

Given the comments in E4 above, a sustainable drainage system must include a scheme to identify and improve inadequate drainage paths currently managed by Network Rail and other landowners. Any measures taken to minimise flood risk or permit attenuation upstream of such channels and especially railway culverts, are designed with sufficient capacity to take account of flood risk to all adjacent or developed properties including allowances to account for climate change therein.

E6

N/A

E7

N/A

E8

Much of the proposed development would be within 5km of the heathland. There is a lack of satisfactory evidence of how this would be mitigated.

E9

N/A

E10

The policy fails to recognise the biodiversity of the area, much of which (and promoting biodiversity) is organically farmed, and which is subject to development. A fuller report by Wool Flora and Fauna Group gives details

E11

N/A

E12

No comment

H1

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H2

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H3

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H4

No comment

H5

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H6

No comment

H7

No comment

H8

No comment

H9

Although the mix is reasonable, the plan should give more prominence to social housing

H10

No comment

H11

The proposed affordable housing development on the Winfrith Site needs to be taken into consideration and the total housing figure should include the site.

H12

No comment

H13

No comment

H14

Although not strictly applicable to areas outside the AONB, the policy should extend to the whole of Purbeck. Otherwise it is just shifting the problem.

H15

No comment

EE1

No comment – except to reiterate that DIP's predecessors over the last 25 years have tried and failed to develop the site, and that the current major employers are the privatised companies of the MoD establishment formerly on site.

EE2

No comment

EE3

Fails to recognise the extent of vacant retail space in Wool and in the wider Purbeck area. The need has not been established.

EE4

No comment

I1

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I3

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I4, I5, I6, I7,

IM1

No comment

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Email Address	██
Company / Organisation	Wool Parish Council
Address	D'Urberville Centre Colliers Lane Wool BH20 6DL
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Wool Parish Council (Mrs Jacqui Hughes - 1189783)
Comment ID	PLPP597
Response Date	03/12/18 11:57
Consultation Point	Policy E8: Dorset heathlands (View)
Status	Processed
Submission Type	Web
Version	0.2
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	15
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	Wool Insert Map
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V2

No comment

E1

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E2

No comment

E3

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E6

N/A

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E11

N/A

E12

No comment

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H6

No comment

H7

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Although the mix is reasonable, the plan should give more prominence to social housing

H10

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H11

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H12

No comment

H13

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H14

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H15

No comment

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EE2

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Comment

Consultee	Mrs Jacqui Hughes (1189783)
Email Address	██
Company / Organisation	Wool Parish Council
Address	D'Urberville Centre Colliers Lane Wool BH20 6DL
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Wool Parish Council (Mrs Jacqui Hughes - 1189783)
Comment ID	PLPP598
Response Date	03/12/18 11:57
Consultation Point	Policy E10: Biodiversity and geodiversity (View)
Status	Processed
Submission Type	Web
Version	0.4
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	15
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	Policy E10: Biodiversity and geodiversity
Do you consider that the Local Plan is legally compliant?	No
Do you consider that the Local Plan is sound?	No
Do you consider that the Local Plan complies with the duty to co-operate?	No

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E10

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Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Wool Parish Council (Mrs Jacqui Hughes - 1189783)
Comment ID	PLPP599
Response Date	03/12/18 11:57
Consultation Point	Policy H1: Local housing requirement (View)
Status	Processed
Submission Type	Web
Version	0.2
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	15
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V2

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E1

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E3

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No comment – except to reiterate that DIP's predecessors over the last 25 years have tried and failed to develop the site, and that the current major employers are the privatised companies of the MoD establishment formerly on site.

EE2

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EE3

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I4, I5, I6, I7,

IM1

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Consultee	Mrs Jacqui Hughes (1189783)
Email Address	██
Company / Organisation	Wool Parish Council
Address	D'Urberville Centre Colliers Lane Wool BH20 6DL
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Wool Parish Council (Mrs Jacqui Hughes - 1189783)
Comment ID	PLPP600
Response Date	03/12/18 11:57
Consultation Point	Policy H2: The housing land supply (View)
Status	Processed
Submission Type	Web
Version	0.2
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	15
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Which policy / paragraph number / policies map does your comment relate to?	Wool Insert Map
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No comment

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E11

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E12

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Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Wool Parish Council (Mrs Jacqui Hughes - 1189783)
Comment ID	PLPP601
Response Date	03/12/18 11:57
Consultation Point	Policy H3: New housing development requirements (View)
Status	Processed
Submission Type	Web
Version	0.2
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Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Wool Parish Council (Mrs Jacqui Hughes - 1189783)
Comment ID	PLPP602
Response Date	03/12/18 11:57
Consultation Point	Policy H5: Wool (View)
Status	Processed
Submission Type	Web
Version	0.2
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Comment ID	PLPP603
Response Date	03/12/18 11:57
Consultation Point	Policy H9: Housing mix (View)
Status	Processed
Submission Type	Web
Version	0.2
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	15
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	Wool Insert Map
Do you consider that the Local Plan is legally compliant?	No
Do you consider that the Local Plan is sound?	No
Do you consider that the Local Plan complies with the duty to co-operate?	No

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

V1

This latest round of the consultation process cannot be seen in isolation. It is arrived at and contextualised by three previous consultations – 2014/5, 2016 and 2018. In terms of challenging the PPS on the grounds of process, it should therefore be noted that at each stage of the historic process there have been significant flaws and problems, which although they have been challenged, have undoubtedly had a continuing impact on the process. An example: based on the 2014/15 consultation (which had a miniscule response), the 2016 consultation contained the statement that there was 'significant support' for 1000 houses in Wool. It was later admitted that there was no actual statistical basis for this statement, and the Chief Executive admitted in writing that whilst this statement was incorrect it would not be removed because it was too late to do so. The 2016 consultation referred to the possibility that a bypass for Wool 'could be considered' - this in spite of the decision by DCC (a decision known to PDC) a month or so before the publication of the consultation that all plans for a bypass had been scrapped. It would be my contention that the process is therefore potentially legally flawed because false perceptions and erroneous data might have influenced responses. The plan does not give adequate consideration of how all the sites, notably Wool, are essentially of a rural nature, and an extensive new housing will be used primarily for commuting to the large conurbations in Poole and Bournemouth. There has been inadequate consideration of the effect on the environment (traffic pollution and the loss of biodiverse farmland) and on local infrastructure (e.g. road particularly the A352 and the level crossing at Wool, but also the A351 at Sandford)

Whilst supporting the provision of a care home there has been no local consultation on this prior to the plan submission. The proposed location is at least a mile from the railway station and local road transport is inadequate.

The overall allocation to Purbeck neglects that it is primarily a rural area, augmented by tourism. Excessive housing has the potential to degrade the latter. The allocation has been skewed (although potentially within the NPPF) by linking Purbeck with East Dorset and the large conurbations to the East.

This Plan is unsound as it states that building 470 homes in Wool will provide houses that local people can afford. The January 2018 consultation said: "The average cost of a house in Purbeck is £250,000". That's seventeen times the average salary in Purbeck. To be genuinely affordable (for rent or purchase) a house needs to cost £150,000. The Plan presents no evidence that building 470 houses in Wool will cause house prices to drop by 40%.

Whilst the second full consultation was carried out on paper, PDC's insistence on using online methodologies has been severely criticised and there are grounds to suggest that not only has this policy been discriminatory, it is legally questionable, morally reprehensible, and cynically indicative of a desire by PDC to deliberately exclude wide swathes of the demographic that would be most critical of its proposals. The consultation of the Pre-Plan Submission is a classic example of this: it uses software which was declared not fit for purpose the first time it was used; it was initially impossible to gain access to the documents using the yellow 'Start Here' button – and whilst this has now been 'fixed'. The statement on the PPS Consultation instructions that '*Any representation made in alternative formats will not be considered*' is also discriminatory and seemingly deliberately designed to exclude responses from members of our community who lack the confidence, ability or equipment to respond online. This surely would allow for a legal challenge to the process.

V2

No comment

E1

It is recognised that Wool and its environs are not designated as part of the AONB. Nevertheless the plan fails to take adequate regard of the rich biodiversity in the area, situated between the Frome water meadows and the Purbeck Hills and the low heathland to the North (Hardy's Egdon Heath). Other, expert groups will provide full detail of the biodiversity, and specialness of the area.

E2

No comment

E3

The siting of a large number of houses used by commuters (see V1) would be prejudicial to energy conservation

E4

Much, if not all, the development lies in a drainage area from the higher ground to the South, and into the water meadows of the Frome. The plan has failed to account for this. It is not for nothing that Wool's ancient name (Wyllon, Welle) meant a 'place of springs' The developers in other meetings seem to understand the issue that the railway does severe drainage as it falls naturally to the floodplain of the R Frome, as they have proposed a series of attenuation features as part of the green spaces being put forward also as an attempt to soften and enhance biodiversity. This must be addressed from the beginning.

E5

Given the comments in E4 above, a sustainable drainage system must include a scheme to identify and improve inadequate drainage paths currently managed by Network Rail and other landowners. Any measures taken to minimise flood risk or permit attenuation upstream of such channels and especially railway culverts, are designed with sufficient capacity to take account of flood risk to all adjacent or developed properties including allowances to account for climate change therein.

E6

N/A

E7

N/A

E8

Much of the proposed development would be within 5km of the heathland. There is a lack of satisfactory evidence of how this would be mitigated.

E9

N/A

E10

The policy fails to recognise the biodiversity of the area, much of which (and promoting biodiversity) is organically farmed, and which is subject to development. A fuller report by Wool Flora and Fauna Group gives details

E11

N/A

E12

No comment

H1

The extent of the need is not from Purbeck, as local statements of PDC have made clear (ref Wareham and Swanage Advertiser Nov 22nd 2018), but is from a wider area, again making Wool and similar dormitory villages.

H2

The allocation has been made on the basis of what can be 'shoehorned in', rather than a rational assessment of local need.

H3

In terms of the proposed development at Wool, insufficient consideration has been given to the nature of any proposed SANG to ameliorate the development. Proposed areas include, almost exclusively, areas of rich biodiversity and ancient woodland.

H4

No comment

H5

The assessment of the constraints for development at Wool have been at best superficial. The impact on drainage to the river Frome, the congestion at the level crossing and the impact on the rich biodiverse environment have been inadequately addressed. Sewage treatment, flowing into the Frome and hence Poole Harbour (Nitrogenous) has been glossed over. As most of the proposed development is on organic farmland, it is not a case of simply trading agricultural effluent for a more personal one.

H6

No comment

H7

No comment

H8

No comment

H9

Although the mix is reasonable, the plan should give more prominence to social housing

H10

No comment

H11

The proposed affordable housing development on the Winfrith Site needs to be taken into consideration and the total housing figure should include the site.

H12

No comment

H13

No comment

H14

Although not strictly applicable to areas outside the AONB, the policy should extend to the whole of Purbeck. Otherwise it is just shifting the problem.

H15

No comment

EE1

No comment – except to reiterate that DIP's predecessors over the last 25 years have tried and failed to develop the site, and that the current major employers are the privatised companies of the MoD establishment formerly on site.

EE2

No comment

EE3

Fails to recognise the extent of vacant retail space in Wool and in the wider Purbeck area. The need has not been established.

EE4

No comment

I1

The plan does not give robust assurance that such infrastructure will be delivered. Wool has experience of recent development, which after 8 years the roads have not been finished to a state that they can be adopted. The plan needs to ensure that developer led infrastructure will actually be delivered.

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I3

This policy only gives lip service to the preservation of natural flora and fauna in a semi-rural area such as Wool. Other expert groups will give more detail, but the policy is weak and ill thought out.

I4, I5, I6, I7,

IM1

No comment

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Comment

Consultee	Mrs Jacqui Hughes (1189783)
Email Address	██
Company / Organisation	Wool Parish Council
Address	D'Urberville Centre Colliers Lane Wool BH20 6DL
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Wool Parish Council (Mrs Jacqui Hughes - 1189783)
Comment ID	PLPP605
Response Date	03/12/18 11:57
Consultation Point	Policy H11: Affordable housing (View)
Status	Processed
Submission Type	Web
Version	0.2
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	15
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V2

No comment

E1

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E2

No comment

E3

The siting of a large number of houses used by commuters (see V1) would be prejudicial to energy conservation

E4

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E6

N/A

E7

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E10

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E11

N/A

E12

No comment

H1

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H4

No comment

H5

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H6

No comment

H7

No comment

H8

No comment

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H10

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H11

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H12

No comment

H13

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H14

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H15

No comment

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Comment

Consultee	Mrs Jacqui Hughes (1189783)
Email Address	██
Company / Organisation	Wool Parish Council
Address	D'Urberville Centre Colliers Lane Wool BH20 6DL
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Wool Parish Council (Mrs Jacqui Hughes - 1189783)
Comment ID	PLPP606
Response Date	03/12/18 11:57
Consultation Point	Policy H14: Second homes (View)
Status	Processed
Submission Type	Web
Version	0.2
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	15
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
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Email Address	██
Company / Organisation	Wool Parish Council
Address	D'Urberville Centre Colliers Lane Wool BH20 6DL
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Wool Parish Council (Mrs Jacqui Hughes - 1189783)
Comment ID	PLPP607
Response Date	03/12/18 11:57
Consultation Point	Policy EE1: Employment land supply (View)
Status	Processed
Submission Type	Web
Version	0.2
Are you responding on behalf of a group?	Yes
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Comment ID	PLPP608
Response Date	03/12/18 11:57
Consultation Point	Policy EE3:Vibrant town and local centres (View)
Status	Processed
Submission Type	Web
Version	0.2
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	15
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	Wool Insert Map
Do you consider that the Local Plan is legally compliant?	No
Do you consider that the Local Plan is sound?	No
Do you consider that the Local Plan complies with the duty to co-operate?	No

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

V1

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Whilst supporting the provision of a care home there has been no local consultation on this prior to the plan submission. The proposed location is at least a mile from the railway station and local road transport is inadequate.

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This Plan is unsound as it states that building 470 homes in Wool will provide houses that local people can afford. The January 2018 consultation said: "The average cost of a house in Purbeck is £250,000". That's seventeen times the average salary in Purbeck. To be genuinely affordable (for rent or purchase) a house needs to cost £150,000. The Plan presents no evidence that building 470 houses in Wool will cause house prices to drop by 40%.

Whilst the second full consultation was carried out on paper, PDC's insistence on using online methodologies has been severely criticised and there are grounds to suggest that not only has this policy been discriminatory, it is legally questionable, morally reprehensible, and cynically indicative of a desire by PDC to deliberately exclude wide swathes of the demographic that would be most critical of its proposals. The consultation of the Pre-Plan Submission is a classic example of this: it uses software which was declared not fit for purpose the first time it was used; it was initially impossible to gain access to the documents using the yellow 'Start Here' button – and whilst this has now been 'fixed'. The statement on the PPS Consultation instructions that '*Any representation made in alternative formats will not be considered*' is also discriminatory and seemingly deliberately designed to exclude responses from members of our community who lack the confidence, ability or equipment to respond online. This surely would allow for a legal challenge to the process.

V2

No comment

E1

It is recognised that Wool and its environs are not designated as part of the AONB. Nevertheless the plan fails to take adequate regard of the rich biodiversity in the area, situated between the Frome water meadows and the Purbeck Hills and the low heathland to the North (Hardy's Egdon Heath). Other, expert groups will provide full detail of the biodiversity, and specialness of the area.

E2

No comment

E3

The siting of a large number of houses used by commuters (see V1) would be prejudicial to energy conservation

E4

Much, if not all, the development lies in a drainage area from the higher ground to the South, and into the water meadows of the Frome. The plan has failed to account for this. It is not for nothing that Wool's ancient name (Wyllon, Welle) meant a 'place of springs' The developers in other meetings seem to understand the issue that the railway does severe drainage as it falls naturally to the floodplain of the R Frome, as they have proposed a series of attenuation features as part of the green spaces being put forward also as an attempt to soften and enhance biodiversity. This must be addressed from the beginning.

E5

Given the comments in E4 above, a sustainable drainage system must include a scheme to identify and improve inadequate drainage paths currently managed by Network Rail and other landowners. Any measures taken to minimise flood risk or permit attenuation upstream of such channels and especially railway culverts, are designed with sufficient capacity to take account of flood risk to all adjacent or developed properties including allowances to account for climate change therein.

E6

N/A

E7

N/A

E8

Much of the proposed development would be within 5km of the heathland. There is a lack of satisfactory evidence of how this would be mitigated.

E9

N/A

E10

The policy fails to recognise the biodiversity of the area, much of which (and promoting biodiversity) is organically farmed, and which is subject to development. A fuller report by Wool Flora and Fauna Group gives details

E11

N/A

E12

No comment

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H3

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H4

No comment

H5

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H6

No comment

H7

No comment

H8

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H9

Although the mix is reasonable, the plan should give more prominence to social housing

H10

No comment

H11

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H12

No comment

H13

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H14

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H15

No comment

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No comment – except to reiterate that DIP's predecessors over the last 25 years have tried and failed to develop the site, and that the current major employers are the privatised companies of the MoD establishment formerly on site.

EE2

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No comment

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I4, I5, I6, I7,

IM1

No comment

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Email Address	██
Company / Organisation	Wool Parish Council
Address	D'Urberville Centre Colliers Lane Wool BH20 6DL
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Wool Parish Council (Mrs Jacqui Hughes - 1189783)
Comment ID	PLPP609
Response Date	03/12/18 11:57
Consultation Point	Policy I1: Developer contributions to deliver Purbeck's infrastructure (View)
Status	Processed
Submission Type	Web
Version	0.2
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E11

N/A

E12

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Comment

Consultee	Mrs Jacqui Hughes (1189783)
Email Address	[REDACTED]
Company / Organisation	Wool Parish Council
Address	D'Urberville Centre Colliers Lane Wool BH20 6DL
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Wool Parish Council (Mrs Jacqui Hughes - 1189783)
Comment ID	PLPP610
Response Date	03/12/18 11:57
Consultation Point	Policy I2: Improving accessibility and transport (View)
Status	Processed
Submission Type	Web
Version	0.2
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	15
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
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Comment by	Wool Parish Council (Mrs Jacqui Hughes - 1189783)
Comment ID	PLPP611
Response Date	03/12/18 11:57
Consultation Point	Policy I3: Green infrastructure, trees and hedgerows (View)
Status	Processed
Submission Type	Web
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This latest round of the consultation process cannot be seen in isolation. It is arrived at and contextualised by three previous consultations – 2014/5, 2016 and 2018. In terms of challenging the PPS on the grounds of process, it should therefore be noted that at each stage of the historic process there have been significant flaws and problems, which although they have been challenged, have undoubtedly had a continuing impact on the process. An example: based on the 2014/15 consultation (which had a miniscule response), the 2016 consultation contained the statement that there was 'significant support' for 1000 houses in Wool. It was later admitted that there was no actual statistical basis for this statement, and the Chief Executive admitted in writing that whilst this statement was incorrect it would not be removed because it was too late to do so. The 2016 consultation referred to the possibility that a bypass for Wool 'could be considered' - this in spite of the decision by DCC (a decision known to PDC) a month or so before the publication of the consultation that all plans for a bypass had been scrapped. It would be my contention that the process is therefore potentially legally flawed because false perceptions and erroneous data might have influenced responses. The plan does not give adequate consideration of how all the sites, notably Wool, are essentially of a rural nature, and an extensive new housing will be used primarily for commuting to the large conurbations in Poole and Bournemouth. There has been inadequate consideration of the effect on the environment (traffic pollution and the loss of biodiverse farmland) and on local infrastructure (e.g. road particularly the A352 and the level crossing at Wool, but also the A351 at Sandford)

Whilst supporting the provision of a care home there has been no local consultation on this prior to the plan submission. The proposed location is at least a mile from the railway station and local road transport is inadequate.

The overall allocation to Purbeck neglects that it is primarily a rural area, augmented by tourism. Excessive housing has the potential to degrade the latter. The allocation has been skewed (although potentially within the NPPF) by linking Purbeck with East Dorset and the large conurbations to the East.

This Plan is unsound as it states that building 470 homes in Wool will provide houses that local people can afford. The January 2018 consultation said: "The average cost of a house in Purbeck is £250,000". That's seventeen times the average salary in Purbeck. To be genuinely affordable (for rent or purchase) a house needs to cost £150,000. The Plan presents no evidence that building 470 houses in Wool will cause house prices to drop by 40%.

Whilst the second full consultation was carried out on paper, PDC's insistence on using online methodologies has been severely criticised and there are grounds to suggest that not only has this policy been discriminatory, it is legally questionable, morally reprehensible, and cynically indicative of a desire by PDC to deliberately exclude wide swathes of the demographic that would be most critical of its proposals. The consultation of the Pre-Plan Submission is a classic example of this: it uses software which was declared not fit for purpose the first time it was used; it was initially impossible to gain access to the documents using the yellow 'Start Here' button – and whilst this has now been 'fixed'. The statement on the PPS Consultation instructions that '*Any representation made in alternative formats will not be considered*' is also discriminatory and seemingly deliberately designed to exclude responses from members of our community who lack the confidence, ability or equipment to respond online. This surely would allow for a legal challenge to the process.

V2

No comment

E1

It is recognised that Wool and its environs are not designated as part of the AONB. Nevertheless the plan fails to take adequate regard of the rich biodiversity in the area, situated between the Frome water meadows and the Purbeck Hills and the low heathland to the North (Hardy's Egdon Heath). Other, expert groups will provide full detail of the biodiversity, and specialness of the area.

E2

No comment

E3

The siting of a large number of houses used by commuters (see V1) would be prejudicial to energy conservation

E4

Much, if not all, the development lies in a drainage area from the higher ground to the South, and into the water meadows of the Frome. The plan has failed to account for this. It is not for nothing that Wool's ancient name (Wyllon, Welle) meant a 'place of springs' The developers in other meetings seem to understand the issue that the railway does severe drainage as it falls naturally to the floodplain of the R Frome, as they have proposed a series of attenuation features as part of the green spaces being put forward also as an attempt to soften and enhance biodiversity. This must be addressed from the beginning.

E5

Given the comments in E4 above, a sustainable drainage system must include a scheme to identify and improve inadequate drainage paths currently managed by Network Rail and other landowners. Any measures taken to minimise flood risk or permit attenuation upstream of such channels and especially railway culverts, are designed with sufficient capacity to take account of flood risk to all adjacent or developed properties including allowances to account for climate change therein.

E6

N/A

E7

N/A

E8

Much of the proposed development would be within 5km of the heathland. There is a lack of satisfactory evidence of how this would be mitigated.

E9

N/A

E10

The policy fails to recognise the biodiversity of the area, much of which (and promoting biodiversity) is organically farmed, and which is subject to development. A fuller report by Wool Flora and Fauna Group gives details

E11

N/A

E12

No comment

H1

The extent of the need is not from Purbeck, as local statements of PDC have made clear (ref Wareham and Swanage Advertiser Nov 22nd 2018), but is from a wider area, again making Wool and similar dormitory villages.

H2

The allocation has been made on the basis of what can be 'shoehorned in', rather than a rational assessment of local need.

H3

In terms of the proposed development at Wool, insufficient consideration has been given to the nature of any proposed SANG to ameliorate the development. Proposed areas include, almost exclusively, areas of rich biodiversity and ancient woodland.

H4

No comment

H5

The assessment of the constraints for development at Wool have been at best superficial. The impact on drainage to the river Frome, the congestion at the level crossing and the impact on the rich biodiverse environment have been inadequately addressed. Sewage treatment, flowing into the Frome and hence Poole Harbour (Nitrogenous) has been glossed over. As most of the proposed development is on organic farmland, it is not a case of simply trading agricultural effluent for a more personal one.

H6

No comment

H7

No comment

H8

No comment

H9

Although the mix is reasonable, the plan should give more prominence to social housing

H10

No comment

H11

The proposed affordable housing development on the Winfrith Site needs to be taken into consideration and the total housing figure should include the site.

H12

No comment

H13

No comment

H14

Although not strictly applicable to areas outside the AONB, the policy should extend to the whole of Purbeck. Otherwise it is just shifting the problem.

H15

No comment

EE1

No comment – except to reiterate that DIP's predecessors over the last 25 years have tried and failed to develop the site, and that the current major employers are the privatised companies of the MoD establishment formerly on site.

EE2

No comment

EE3

Fails to recognise the extent of vacant retail space in Wool and in the wider Purbeck area. The need has not been established.

EE4

No comment

I1

The plan does not give robust assurance that such infrastructure will be delivered. Wool has experience of recent development, which after 8 years the roads have not been finished to a state that they can be adopted. The plan needs to ensure that developer led infrastructure will actually be delivered.

I2

The transport plan for the A352 at Wool (and the A351 at Sandford) is superficial. In particular the current occurrence of accidents is above what would be normally be expected, and the effect of increased traffic at Wool level crossing (and the subsequent pollution from waiting cars) has not been adequately addressed.

I3

This policy only gives lip service to the preservation of natural flora and fauna in a semi-rural area such as Wool. Other expert groups will give more detail, but the policy is weak and ill thought out.

I4, I5, I6, I7,

IM1

No comment

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

All previous consultation content needs to be included in the review, taking into consideration all opinions. The Government guidelines states the Local people's views are vital to shaping a local plan. The views of local people must be respected.

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

Comment

Consultee	Mr Roger Khanna (1012997)
Email Address	[REDACTED]
Company / Organisation	Worth Matravers Parish Council
Address	Highlands Haycrafts Lane Swanage BH19 3EE
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Worth Matravers Parish Council (Mr Roger Khanna - 1012997)
Comment ID	PLPP347
Response Date	03/12/18 13:43
Consultation Point	Chapter 4: Housing (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	Yes
If yes, how many people do you represent?	600
Please tick the box(es) if you would like to be notified at an address/email address of the following:	
Which policy / paragraph number / policies map does your comment relate to?	H8
Do you consider that the Local Plan is legally compliant?	Yes
Do you consider that the Local Plan is sound?	No
Do you consider that the Local Plan complies with the duty to co-operate?	Yes

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

The Parish Council objects to the housing development policies and proposals in the Local Plan Review. It considers the Plan to be **Unsound** as proposals affecting the parish have been developed which are unjustified, serve no useful function, are socially and environmentally unsustainable, and create unwarranted development pressure in this Area of Outstanding Natural Beauty

PURBECK LOCAL PLAN REVIEW

WMPC RESPONSE TO THE LOCAL PLAN INSPECTOR

Summary. The Parish Council objects to the housing development policies and proposals in the Local Plan Review. It considers the Plan to be **Unsound** as proposals affecting the parish have been developed which are unjustified, serve no useful function, are socially and environmentally unsustainable, and create unwarranted development pressure in this Area of Outstanding Natural Beauty.

Numbers. The Plan lacks clarity. A third of the proposed houses (933 of 2,688) are on unspecified 'Small Sites' which could be anywhere in Purbeck around the areas mentioned in text and in a remote addendum. This is not sustainable 'Planning'. It is demand-led private development mostly in the Area of Outstanding Natural Beauty which formerly, with the Green Belt, had the highest level of protection from such speculative development.

Small Sites. The Small Sites criteria for development next to existing settlements (Policy H8) would permit applications for small sites adjacent to existing homes in the parish with the scale of proposed development up to a maximum of 30 homes. The villages in the parish to which this policy applies are Harmans Cross, and Worth Matravers both of which both have an existing 'Settlement Boundary'.

In the context of the Worth Matravers Settlement this Policy H8 is totally unsound and environmentally unsustainable. It has no objectively assessed needs nor any communication with the Parish Council in determining and agreeing such especially as past and disputed 'Need' figures as were supplied by PDC as the Planning / Housing enabling Authority available have been constantly changed and finally lowered to nothing over recent years.. Its justification appears to be a means to increase total Purbeck future housing numbers and would give rise to purely speculative private development of considerable environmental impact in this outstanding Heritage Coast part of the AONB. It has evolved without justification using a remote addendum to the Plan (as defined in the settlement hierarchy in the glossary), This Plan proposal could allow, with very few restrictions or limitations, for a number of small sites each of up to 30 units adjacent to any of the Parish Settlements.

Sustainability The Worth Matravers village lacks any essential local infrastructure to support additional housing development. There are no continuous footways, no street lighting, no retail shop, no Health Centre or doctors or dental surgery, no school or pre-school, no library service or any form of public transport service. Existing residents without access to a car currently have to walk for 20 minutes to the Kingston to Langton road to pick up an hourly 40 service to Swanage or Corfe Castle or incur a substantial taxi fare each way to either destination. This has resulted in residents being forced to move out of the village especially as they get older. Communication especially in an emergency has proved difficult as there is no Mobile telephone signal in the Worth Matravers village area.

In the case of Harmans Cross which is also in the Parish of Worth Matravers residents who have no access to a vehicle also have to move away as there are no alternative public transport facilities.

The District Council have recently agreed that the affordable housing development currently in progress will more than cater for housing need for Worth Matravers village. Any further development allowed by this 'Small Sites' policy would be heavily weighted towards much high market value property which would otherwise be unjustifiable in the AONB.

Affordability. This Plan is unsound as it pursues the policy that building thousands of houses in new development will address the serious shortage of affordable homes for sale or rent for local people. The declared household income by Dorset County Council is £24,000 for Purbeck residents. Even the PDC consultation statement confirms: "The average cost of a house in Purbeck is £250,000 a unit ten times the household income. The average house price in Worth Matravers is considerably higher.

The Plan presents no evidence that building houses will satisfy existing requirements or would cause house prices to drop by up to 40%.

The Plan contains no policies for providing and ensuring an adequate supply of affordable social rental housing.

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

The Small Sites Policy needs to remove the inclusion of the Worth Matravers Parish Settlements (WM & HX) in the settlement hierarchy in the glossary

As a housing development policy Affordability and Sustainability of local communities is needed to be more clearly reflective of Purbeck's low household income .

Social facilities ,Environmental (AONB and Heritage Coast) and and Infrastructure constraints to future housing development must be more clearly recognised

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If your representation is seeking a change to the Local Plan, do you consider it necessary to participate in the oral part of the examination? Yes

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

Experience of previous and recent Public Inquiries

Comment

Consultee	Dr Diana Wright (1186868)
Email Address	[REDACTED]
Address	Unknown Unknown Unknown
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dr Diana Wright (1186868)
Comment ID	PLPP228
Response Date	02/12/18 13:55
Consultation Point	Policy E3: Renewable energy (View)
Status	Processed
Submission Type	Web
Version	0.1

Are you responding on behalf of a group? No

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

Which policy / paragraph number / policies map does your comment relate to? E3

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

Do you consider that the Local Plan is sound? Yes

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

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

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Comment

Consultee	Dr Diana Wright (1186868)
Email Address	[REDACTED]
Address	Unknown Unknown Unknown
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dr Diana Wright (1186868)
Comment ID	PLPP229
Response Date	02/12/18 13:56
Consultation Point	Policy V2: Green belt (View)
Status	Processed
Submission Type	Web
Version	0.1

Are you responding on behalf of a group? No

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

Which policy / paragraph number / policies map does your comment relate to? V2

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

Do you consider that the Local Plan is sound? Yes

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

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

I believe that the Policy regarding Green Belt boundaries is sound as it is based on and extensive and thorough review of all Green Belt Land in Purbeck.

The PDC January Strategic Green Belt Review considered the NPPF Essential Characteristics of Openness and Permanence and the NPPF Purposes of Checking unrestricted sprawl of large built-up

areas, Preventing neighbouring towns merging, Safeguarding the countryside from encroachment and Preserving the setting of historic towns.

PDC discussed issues with local residents. The review was examined and revised by an independent body. The documents supporting the Green Belt Policy are sound.

The Draft Plan has taken account of the importance of the Green Belt in the east of Purbeck around the village of Lytchett Minster in preventing the urban sprawl of the Christchurch/ Bournemouth conurbation, the nearest part of which is within 750metres of the village.

The Policy supporting document clearly explains why there are no exceptional circumstance for changing Green Belt boundaries at Lytchett Minster.

Whilst it may not be desirable to build on Green Field sites, such as those in the West of Purbeck, it is important to conserve the Green Belt land in the East of Purbeck as a resource for the population of the conurbation and for tourists who visit the local campsite.

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

None

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

Comment

Consultee	Dr Diana Wright (1186868)
Email Address	██
Address	Unknown Unknown Unknown
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dr Diana Wright (1186868)
Comment ID	PLPP230
Response Date	02/12/18 13:56
Consultation Point	Policy E4: Assessing flood risk (View)
Status	Processed
Submission Type	Web
Version	0.1

Are you responding on behalf of a group? No

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

Which policy / paragraph number / policies map does your comment relate to? E4

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

Do you consider that the Local Plan is sound? Yes

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

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

I support this policy because the Flood Risk Assessment process used to create the Draft Plan has identified the flood risks relevant to my village of Lytchett Minster.

I feel that the policy could be strengthened by ensuring that developers must assess the flood risk to existing homes that are within the catchment area of a proposed development before planning consent is granted.

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

Comment

Consultee	Dr Diana Wright (1186868)
Email Address	[REDACTED]
Address	Unknown Unknown Unknown
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dr Diana Wright (1186868)
Comment ID	PLPP231
Response Date	02/12/18 13:56
Consultation Point	Policy H1: Local housing requirement (View)
Status	Processed
Submission Type	Web
Version	0.1

Are you responding on behalf of a group? No

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

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

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

Do you consider that the Local Plan is sound? Yes

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

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

I support this policy because housing numbers have been calculated using the Government Formula.

The number published in 2017 is the same as that given in the Draft Plan for 2018. The estimate has not gone down, unlike Poole, where a 40% reduction in demand was forecast using the 2018 formula.

Whilst I do not agree with the Government Policy of forcing councils to provide more homes than are needed to meet local needs, I accept the Draft Plan because it will save Purbeck from the threat of Developer-led development.

The policy of building in the West of Purbeck will provide homes for local people in this rural area where incomes are low. They will be able to live close to families and support groups.

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

None

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

Comment

Consultee	Dr Diana Wright (1186868)
Email Address	██
Address	Unknown Unknown Unknown
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dr Diana Wright (1186868)
Comment ID	PLPP233
Response Date	02/12/18 13:57
Consultation Point	Policy H3: New housing development requirements (View)
Status	Processed
Submission Type	Web
Version	0.1
Are you responding on behalf of a group?	No

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

Which policy / paragraph number / policies map does your comment relate to? H3

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

Do you consider that the Local Plan is sound? Yes

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

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

I support this policy as it clearly states the numerous responsibilities of developers when submitting planning applications for developments.

The policy details what facilities residents are entitled to expect from a new site.

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Comment

Consultee	Dr Diana Wright (1186868)
Email Address	[REDACTED]
Address	Unknown Unknown Unknown
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dr Diana Wright (1186868)
Comment ID	PLPP234
Response Date	02/12/18 13:57
Consultation Point	Policy E7: Conservation of protected sites (View)
Status	Processed
Submission Type	Web
Version	0.1

Are you responding on behalf of a group? No

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

Which policy / paragraph number / policies map does your comment relate to? E7

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

Do you consider that the Local Plan is sound? Yes

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

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

I support this policy because I believe that it is very important to preserve the unique environment of Purbeck.

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

Comment

Consultee	Dr Diana Wright (1186868)
Email Address	[REDACTED]
Address	Unknown Unknown Unknown
Event Name	Purbeck Local Plan Pre-submission Draft
Comment by	Dr Diana Wright (1186868)
Comment ID	PLPP235
Response Date	02/12/18 13:58
Consultation Point	Policy E9: Poole Harbour (View)
Status	Processed
Submission Type	Web
Version	0.1

Are you responding on behalf of a group? No

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

Which policy / paragraph number / policies map does your comment relate to? E9

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

Do you consider that the Local Plan is sound? Yes

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

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

I support his policy because it protects the Poole Harbour SPA and internationally recognised RAMSAR site.

The policy will control the scale of development in the East of Purbeck in order to restrict nitrogen flow into Poole Harbour from sewage.

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