

Core Strategy Pre-Submission – Chapter 17 Omission to the Plan and comments on Assessments

Contact Person ID	Contact Full Name	Contact Company / Organisation	ID	Number	Question 1 - Legally compliant	Question 2 - Sound	Question 3 - Positively Prepared	Question 3 - Justified	Question 3 - Effective	Question 3 - Consistent with national policy	Question 4	Question 5	Question 6	Question 7	Order	Filename					
653852	Mrs Susan Newman-Crane		CSPS586	17.1	Yes	No	Yes				This document incorporates the previous Local Plan for Christchurch, deleting or continuing its policies individually. Any final planning document which all must abide by must therefore include exactly word by word all the previous policies which have been retained, because apart from in Appendix 4, these are not mentioned. They should have been mentioned and included at this stage.	Incorporate all the policies carried forward from the Borough-Wide Local Plan.	No, I do not wish to participate at the oral examination		757						
359277	Mr Jamie Sullivan	Tetlow King	CSPS2727	17.2							The Council's evidence base also appears to be incomplete. We are only able to locate a viability study for East Dorset on the Planning Policy pages of the Dorset for You website. If there is a viability study for Christchurch then the policy can be considered sound. It must be based on a robust evidence base, and whilst there are similarities between the two districts, sites within the Borough of Christchurch must be tested to ensure the affordable housing targets are viable for both local authority areas. The East Dorset viability assessment was carried out in 2010 for East Dorset and needs updating to reflect various policy changes and ensure it is considered to be a robust evidence base for the plan policy. It assumes a grant level of £50,000 per dwelling. This is no longer accurate and is standard across the region for viability assessments to assume nil grant. No consideration of the role of affordable rent is provided as the study pre-dates its introduction. The assessment also only assumes new development will meet Level 3 of the Code for Sustainable Homes. However, by the time this policy is adopted it will be mandatory for new development to meet the energy requirements of Level 4 through building regulations. Finally with regard to the viability assessment, it only assumes £5,000 per dwelling on planning contributions. However, the CIL proposed in nearby Poole is between £75m2 and £150m2. If this was repeated in East Dorset and Christchurch, then using HQI standards this would lead to a 4 bedroom property paying between £5,325 (at £75m2) and £10,650 (at £150m2). This is before any site specific Section 106 contributions of around £1,000 per unit (on average on larger schemes) are added. We strongly recommend that the study is updated to take into account the changing policy landscape and ensure that the policy is considered sound. Currently it would not be considered by an Inspector to be "justified" as per the tests of soundness in the NPPF as the evidence base upon which this policy is based is not robust.										
498034	Mr Richard Cutler		CSPS3174	17.2		No	No	No	No	No	Our representation on the Core Strategy Options, submitted on 11 January 2011, together with Stourbank Park, Wimborne: A Compelling Case – Part 1 (May 2010), resubmitted with our January 2011 representations, set out a detailed case for the allocation of Stourbank Park for employment purposes (with some residential, given the adjoining properties). This can be developed in conjunction with the adjoining Wessex Water Depot. We fundamentally disagree with the strategy of allocating one very	The Core Strategy should include a new Policy FWP9, identifying 5 hectares of employment land for release at Stourbank Park in the period 2011-21 (possibly to include the Wessex Water Depot in addition). This would leave 25 hectares at Blunt's Farm which, with the existing,	Yes, I wish to participate at the oral examination	East Dorset has failed to engage with us on our representations so a third party hearing is essential in	758	2254009_0_1.pdf					

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											<p>large site, and two small sites in the East Dorset area (as shown on Map 4.3). Wimborne, an important service centre, is not provided for and we feel, with the recent improvements to the Canford Bottom Roundabout, the area around Ham Lane and the Stourbank Nursery offers good potential. In addition:</p> <ol style="list-style-type: none"> 1. The previously developed land at Stourbank Park is no more remote than the proposed Green Belt, greenfield release at the very attractive Holmwood Park (Policy FWP3) adjoining the small business centre there. 2. The proposed Green Belt, greenfield release East of New Road (Policy FWP6) looks difficult to contain and could signal an eastwards migration of urbanization. 3. The proposed Green Belt, greenfield release West of New Road (Policy FWP7) is founded on a relief road that looks difficult to fund with just 200 dwellings and, in addition, is likely to impact adversely in landscape and visual terms, to the south generally and with regard to the nearby Dudsbury Hillfort (a Scheduled Ancient Monument). <p>We find it hard to understand why the case for Stourbank Park has been overlooked. The site is previously developed, in need of a positively planned future, and far less constrained than the three proposed Green Belt releases above. The draft Core Strategy is therefore unsound on the basis of this omission, as further argued elsewhere in our representations.</p>	<p>consented 9 hectares, is still a substantial and purposeful allocation. New Policy FWP9 could read as follows: “Stourbank Park Employment Allocation, Wimborne Land at Stourbank Nurseries, Ham Lane, is removed from the Green Belt and allocated for employment development. This should involve: • The provision of 5 hectares of B1 employment uses. • Ancillary support services, such as a café • Open space to act as a buffer to the existing dwellings on site. • Up to 1 hectare of residential. Prerequisites for development include: • Agreement to a master plan that keeps new development within the existing parameters. • A management strategy for removing the glasshouses and dealing with any land contamination. • Agreement of a comprehensive travel plan. • A landscaping scheme, including for the southern boundary.” Our Compelling Case document provides the evidence base and all the necessary plans and diagrams.</p>		<p>order to mediate our case. As a former Director of Arlington Securities Plc (now Goodman), the company that originated the business park concept in the UK, we have substantial experience in the delivery of employment and economic strategies, which ought to be of assistance to the examination.</p>		
521499	Mr Colin York		CSPS3165	17.2	Yes	No	Yes	Yes	No	No	<p>We believe small areas of possible development such as land adjoining Greenacre, Firs Glen Road BH31 6JB(item 2.121 Formation of Pre-Submission Options) and that at the corner intersection of St Michaels Road and Howe Lane (item 2.125) should be looked at individually and not under the broad umbrella of VWM4. The decision not to proceed with option VWM4 as the developer has not secured a Suitable Alternative Natural Greenspace to support the development should not apply to such a small area.</p>	<p>These areas are green belt anomalies in that the lands adjacent have been added to the urban development. This would follow the principle set out in item 2.93. This states "the principle of allowing development in the Green Belt is accepted because affordable housing needs cannot be met by building on the urban areas. The removal of this land from the Green Belt would cause minimal harm as it would cause coalescence and a new strong boundary can be identified".</p>	<p>Yes, I wish to participate at the oral examination</p>	<p>Participation at the oral part of the examination with the Government Inspectors is necessary to promote the opportunity to develop smaller plots of land in the Verwood area to ease current housing problems.</p>	758	<p>2254373_0_1.pdf 2254374_0_1.pdf</p>
52353	Mr	Savills	CSPS31	17.2		No	No	No	No	No	<p>It is important for the Core Strategy to be sound. In order to do so it</p>	<p>Land at Wimborne Road Colehill</p>	<p>Yes, I wish to participate</p>	<p>Savills are</p>	758	<p>2293500_0_1</p>

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1	Tim Hoskinson		96								<p>should be positively prepared, justified, effective and take account of and reflect Central Government policy and guidance, including the recently produced National Planning Policy Framework (NPPF). To be positively prepared the Core Strategy should take account of the Government’s Localism agenda, which encourages the consideration of locally generated initiatives which deliver development to meet local needs and provide local facilities. Land at Wimborne Rd Colehill has been discussed between the landowner and Colehill Parish Council for a small area of housing development which will deliver a significant area of land for much needed allotments. This initiative is supported by the Parish Council and by the newly formed Colehill Allotments Group. The land is in the green belt and is not one of the District Council’s strategic housing site allocations. It has not therefore been the subject of a specific consultation in the current or previous consultation rounds. The Core Strategy should allow for such initiatives to be fully and appropriately considered. Locally generated initiatives such as this should be given due consideration. We understand that omission sites are to be consulted upon separately in September 2012. This site should be included in that consultation.</p>	<p>should be included as an omissions site in the next round of consultation on sites that have not been included as proposals within Section WMC.</p>	<p>at the oral examination</p>	<p>acting on behalf of the Canford Estate and Harry J Palmer Ltd in relation to their landholdings on the edge of Corfe Mullen that form part of the CM1 allocation in the Pre-submission Draft Core Strategy. We are seeking participation at the oral part of the examination in order to help ensure that the plan is sound and deliverable.</p>		<p>pdf 2293501_0_1.pdf pdf 2293502_0_1.pdf</p>
654876	Mr Frank Phillips	Eaglebeam Ltd & Matchams Leisure Ltd	CSPS3200	17.2							<p>I am writing in connection with the published core strategy document and would like to submit the following comments. In doing so we have also requested our Planning Consultants , who are locally based to submit a request on our behalf. I am directly involved with Eaglebeam Ltd who are the owners of Matchams Stadium Site located at Hurn Road , St Leonard's, Ringwood, BH24 2BT Over the past two years we have made a concerted effort to gain a detailed understanding of the region , the demographics , economics and a review of regional and local needs. We have acquainted ourselves with the local business community, key influencers both legislative and private sector and of principal importance the Local Planning Authority . We recognize that it view of the sites location and size that we have ability to bring a development of substantial value and importance to the area - Job creation , construction opportunities for local firms, commissioning of consultants and advisors — all of which we propose to focus on the local market to satisfy our supply chain requirements. In brief a development that benefits the region in every conceivable way. We recognize too, in collaboration and consultation with your authority, the need to be creative in terms of the potential options and alternative uses of this land – entirely or in part - that are available to us. In view of this we would like to see the Core Strategy contain a policy that incorporates alternative land uses that would be</p>				758	

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											appropriate at the site and a criteria for making this ambition attainable.					
657138	Mr Mike Hirsh	Intelligent Land	CSPS3212	17.2	Yes	No	Yes	Yes	Yes	Yes	<p>The Core Strategy does not provide for: a policy to positively resolve the future of Stapehill Abbey and its grounds in accordance with the general advice of the National Planning Policy Framework. A full range of housing and in sufficient number of proposed units at variance with National Planning Policy Framework advice.</p>	<p>Policy: Stapehill Abbey Ferndown A New Neighbourhood is located at Stapehill Abbey west of Ferndown to provide a site for new homes, including those arising from the conversion of the Abbey complex. The total development will comprise approximately fifty-five residential units. To enable this development the Green Belt will be amended to exclude the site for new housing. Use of the existing "listed" Abbey complex, layout and design. The use of the existing listed building complex will be determined by the best solution for the long term future of the historic fabric, in the main providing a residential conversion for dwelling units. Suitable additional uses for parts of the building may included offices (B1), educational or leisure. A development brief detailing the uses for the listed building and the implementation of a package to ensure its early restoration shall be agreed by the Council. The brief will set out the financial arrangements and the phasing of associated enabling development to ensure that any "conservation Deficit" is satisfactorily resolved. Once the development identified above has come forward and the historic fabric has been restored accordingly, a second phase of development will be permitted for a scheme where prime housing at a net density of no more than three dwelling per hectare shall be provided. In addition a scheme for a minimum of ten affordable housing units, an on-site SANG and up to two hectares of land for allotments shall be developed. Delivery and monitoring Process: The development management process. The Architect's Panel will be used to</p>	Yes, I wish to participate at the oral examination	<p>It will inform the Inspector about housing land supply generally and "prime housing" in particular. (In relation to housing land supply Intelligent Land is willing to try to agree with the council common ground to minimise the time before the Inspector)</p>	758	2253838_0_1.pdf 2253841_0_1.pdf 2253842_0_1.pdf 2253853_0_1.pdf 2253854_0_1.pdf 2253857_0_1.pdf

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												<p>inform decision making Close working with local community, the existing landowner, the Town Council in relation to the allotment provision and other authorities and service providers. The Policy will be monitored: Regular visits from the Design and Conservation Officer during the restoration. Building for life assessments. The annual completion survey.</p>				
523319	Mr Ryan Johnson	Turley Associates	CSPS3296	17.2	No	Yes	Yes	Yes	Yes	Yes	<p>The reasoned justification and evidence base for this policy has not indicated what the objectively assessed need for housing is in Corfe Mullen. This has been expressed as a need for 700 homes in previous iterations of the plans supporting evidence base. However, no further evidence has been produced to demonstrate what the need is, having regard to the SHMA and the employment growth implications of accommodating such needs.</p> <p>The Council's site based approach gives no indication of what proportion of the housing need directed to Corfe Mullen Policy CM1 would meet. Nor is there justification for the extent of release from the Green Belt as a consequence of housing need and available urban supply. This omission is contrary to NPPF paragraphs 14, 47 and 182 (Positively Prepared, Justified and Consistent with National Policy) in our view. A site based approach has been proposed, which has not been informed by evidence of objectively assessed need and supply. Those reading the plan have no justification before them on the need for such releases, the extent and composition of them, or why this option alone has been chosen from all others. The omission of such evidence needs to be addressed prior to submission of the Core Strategy DPD if the Council are to satisfy the tests of soundness in paragraph 182 of the NPPF. We have previously expressed concern over the deliverability of the CM1 proposals, particularly in respect of the availability of the school site for development (which at the time of writing this letter has still not be confirmed by the education authority), options to relocate allotments, sports pitches and provide SANG. These uncertainties need to be addressed prior to submission of the plan in our view to satisfy the tests of soundness in NPPF, particularly 'Justified'.</p> <p>In addition, we have previously expressed concern that the Council have not reviewed and consulted on alternatives to enable them to 'justify' the CM1 policy site is the most appropriate. Whilst the Council indicate they are to undertake such an exercise over the autumn, we are not clear how the Council propose to respond to this given the relatively fixed stage the Core Strategy DPD is now at. We contend the alternative sites consultation will need to inform the plan if it is to satisfy the 'justified' test of soundness in NPPF. The alternative sites consultation should include the final update on the form of the current policy site CM1, having regard to the</p>	<p>The objectively assessed housing needs of Corfe Mullen should be defined (inc. implications for employment growth, need for affordable housing, duty to cooperate provisions etc) and urban sources of supply to meet this set out. Options to accommodate this objectively assessed need should be assessed and consulted upon to 'justify' the final option included in the Submission Core Strategy DPD. We contend land east and west of Haywards Lane represents a suitable alternative or addition to the policy CM1 site option depending on the scale of the objectively assessed housing needs for the area. A report in support of the sites credentials is appended to these representations</p>	Yes, I wish to participate at the oral examination	<p>We would wish to participate at the Examination in Public to elaborate on these comments, particularly in the context of the lands controlled by our client.</p>	758	<p>2255452_0_1.pdf 2255451_0_1.pdf</p>

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											<p>availability of the school and land for open space, SANG and allotments. This will allow those commenting on the alternative sites consultation to make informed comparisons and decisions on the deliverable options available.</p> <p>We enclose a report for an alternative site option east and west of Haywards Lane, which includes an illustrative masterplan. We are happy to supplement this as necessary to assist the Council in consulting on alternative sites. In summary the attached report confirms the site is available, suitable and achievable for residential development and would accord with NPPF in all other respects.</p> <p>We have specifically addressed within the report concerns raised by the Parish Council and District Council regarding topography and highway safety for avoidance of doubt. The development would integrate well with existing urban area and takes advantage of the sites topography to create a varied and high quality development that positively contributes to the areas character. Accessibility from the site to the existing urban areas facilities and the proposed country park and vice versa is capable of being delivered in an acceptable and safe manner. The site provides an opportunity to deliver a sustainable and high quality extension to Corfe Mullen, providing much needed market and affordable homes, public open space and a country park for the benefit of existing and future residents. This offers a suitable, deliverable and sustainable alternative to the Council's proposed option for CM1.</p>						
359264	Mr Peter Atfield	Goadsby Ltd	CSPS3535	17.2	Yes	No	No	No	No	No	<p>Policy KS 5 of the Core Strategy (CS) sets out the approach to the provision of employment land at the strategic level in Christchurch and East Dorset. It is based on the Bournemouth, Dorset & Poole Workspace Study 2012 (BDP). In turn, the BDP Study uses forecasts of the demand for employment land provided by Experian and the South West Observatory. The baseline demand for the Bournemouth and Poole conurbation is set out in Tables 18 and 19 of the study, with the latter containing a prediction of industrial demand in two phases: Industrial Baseline 2011-2021 2021-2031 2011-2031 B'mouth & Poole SSCT* 51.4 ha 2.4 ha 53.8 ha (*Strategically Significant City or Town) Paragraph 2.16 of the BDP Study urges caution in the use of projections. Here, we would fully concur. The 2021 – 2031 projection for industrial demand is dramatically below the earlier phase from 2021 onwards. It means that only 0.24 hectares will be required across the conurbation on an annual basis in the second of these phases, which includes the last seven years of the CS. It is our submission that industrial demand will be higher than this. We do not see it falling to such low levels. As such the overall target for the provision of employment land to 2028 should be increased. In support of this submission we refer to Policies BA 1 – BA 3 of the CS, where 60 hectares of land is available for development at Bournemouth International Airport (BIA), with 30 hectares to be developed within the lifetime of the CS. However, the CS acknowledges that there are major infrastructure issues associated with the development at BIA, including road improvements to the</p>	<p>Allocate land east of the Ferndown Industrial Estate for employment development – as shown on Plan 4.3.</p>	<p>Yes, I wish to participate at the oral examination</p>	<p>To critically analyse the timing of the likely delivery of land for employment development within the plan period.</p>	758	2260024_0_1.pdf	

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											<p>B3073, the A338 and associated junctions. Major scheme funding that has not yet been secured will be required. Without it, the delivery of the employment land at BIA cannot be guaranteed. Taking into account these matters, it is submitted that greater flexibility and choice should be introduced into the CS by allocating additional land for employment development to the east of the Ferndown Industrial Estate, as shown on the plan that accompanies this form of representation. The site is already well related to the strategic highway network, with direct access to the A31. It can incorporate a landscaped buffer to the residential properties to the east so as to maintain the amenity.</p> <p>The allocation of additional land for employment development within the CS will help to build a strong, competitive economy, as set out in Paragraphs 18 – 21 of the National Planning Policy Framework (NPPF). In particular, flexibility can be introduced so as to accommodate needs not currently anticipated in the CS. The land east of the Ferndown Industrial Estate is very well located to attract both inward investment and the expansion of existing local businesses without requiring the prior implementation of major infrastructure. The relative lack of constraints means that employment development on the site could be delivered early, in accordance with Objective 4 and Policy KS 5 of the CS.</p>						
656684	Mr Ed Denham	Dorset County Council	CSPS3619	17.2							<p>Note on the possible movement of the Greenbelt for Basic Educational Need</p> <p>St. Michael's Middle School is a 140 PAN school with a current enrolment of 504 students as of January 2012. St. Michael's is one of two Middle Schools serving the Wimborne/Colehill areas. The Allenbourn Middle School is a 152 PAN school with 599 children on role and thus is working at 98.5% of capacity.</p> <p>The current Core Strategy for Wimborne identifies upwards of 1300 house for the area, with the children generated by these developments needing to access Middle School education in either St. Michael's or Allenbourn.</p> <p>Allenbourn from an enrolment point of view is already full. Its current site provides approximately 30,000m2 of outdoor learning and sports area. The required space for a school this size is 39,000m2. Given Allenbourn's location, surrounded by housing and with a water way restricting development to the East and North – it is unlikely that the school would able to expand and thus to increase enrolment on such a restricted site would compromise educational delivery.</p> <p>The number of houses being proposed could potentially require an additional 200 places in the middle school sector and these will have to be provided at St. Michael's in the first instance. If St. Michael's were to rise from 140 PAN (a planned admission capacity of 560) to a PAN 180(a planned admission capacity of 720) then there would need to be a significant amount of new infrastructure required on the St. Michael's site.</p> <p>The overall external play area is approximately 53,000m2. A 180 PAN Middle School would require 47,000m2 of space. Based on DFE Building Bulletin 98 the school rising from 140 PAN to 180</p>					758	2260744_0_1.pdf

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656684	Mr Ed Denham	Dorset County Council	CSPS3620	17.2							<p>Note on the possible movement of the Greenbelt for Exceptional Need</p> <p>The Beaucroft Foundation School is a Nursery to KS4 special school. The children have arrange of need from Autistic Spectrum Disorders, Moderate Learning Difficulties and Complex Learning Difficulties.</p> <p>As of January 2012 there are 141 pupils on role at Beaucroft Special School. Included in this number are the 6 students who are currently part of the Post 16 pilot programme.</p> <p>This pilot is a result of DCC's Children Services agreeing that there is a need to increase capacity across Dorset for Post 16 provision for these children. This will allow students to remain at the same institution from nursery through to 6th Form which will provide far better continuity of care and will further ensure the quality provision for their particular needs.</p> <p>In October 2010 the school was assessed for overall suitability. Based on the current intake across all age groups Beaucroft should have a total of 20 basic teaching areas as well as the other specialist and support areas. The school currently has 17 such teaching spaces.</p> <p>Given the current make up of year groups and based on January 2012 figure of 141 students, the school is overcapacity at 103.7%.</p>					758	2260760_0_1.pdf

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											<p>The school has a published capacity of 151, and when the numbers reflect this then the school will be over capacity by 111.1% As part of a formal statutory notice published in 2012, Beaucroft will now be developing a Post 16 provision. This is to move the pilot programme into a formal permanent provision on the Beaucroft site. The additional 1, 2 or 3 years in the Post 16 department will help the young people to develop their skills so that they are able to transfer to a local college of further education at a later stage. It is anticipated that the numbers of students requiring Post 16 provision at Beaucroft could rise to 19 in 2013/2014 and then to 24 by 2016/2017. Part of this is as a result of a need to retain children in Dorset to decrease the level of out of county placements that can be disruptive to the students who have progressed smoothly from Nursery to KS3 on one site. Projections are also showing that the needs of children at all stages attending Beaucroft into the future will become ever more complex and the school will need sufficient flexibility to allow some development to reflect these changing needs. Re-alignment of the Greenbelt will also allow the development of the former caretakers bungalow to accommodate the increasing numbers of Post 16 children. This minor change of the Greenbelt within the areas of the existing Beaucroft School will allow these changes to take place but will not significantly change the nature of the site. In addition this provision has been identified by OFSTED as being necessary for the quality delivery of Post 16 education at Beaucroft. They currently hold an 'OUTSTANDING' OFSTED Rating though Post 16 provision was only rated 'GOOD' due to the "the lack of appropriate accommodation for this group of students particularly for leisure and cooking, which limits their independence because they have to use the schools facilities" – OFSTED Nov 2009. The attached map proposes, marked with the red line, an alternate Greenbelt. This will allow the school to be more flexible when it comes to replacing the existing mobiles with permanent buildings which are more suitable for children with a diverse range of needs as well as allowing modest redevelopment of the caretakers bungalow for the Post 16 provision.</p>					
359264	Mr Peter Atfield	Goadsby Ltd	CSPS3565	17.2	Yes	No	No	No	No	Yes	<p>Paragraph 11.44 introduces a policy that allows for development (at West Moors) to take place on land that is situated within 400 metres of protected heathland, albeit not for general needs housing. The principle of this approach can be applied elsewhere. Land to the south east of Noon Hill Road, Verwood, is owned by Seward Properties. The site can also be accessed from a track that extends eastward from Southernhay Road. It is shown edged red on the attached plan, included as Appendix 1 to these representations. Although the site falls within 400 metres of protected dry heathland, it is submitted that it has potential to provide a range of community facilities to support the growth of the settlement of Verwood, as proposed by the Core Strategy. In particular, some feedback from the Verwood Focus Group meeting that took place on the 15th June 2012 identified the need for additional community and medical facilities in the town. There was also a concern that with the ageing</p>	<p>Omit land at Noon Hill Road from the green belt. Designate the site as being suitable for a range of community uses, including doctor's surgery, dental practice, pharmacy, care home and allotments.</p>	<p>No, I do not wish to participate at the oral examination</p>		758	2260383_0_1.pdf

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											<p>population profile, more care home facilities may be needed. In this respect the site is well placed to accommodate a range of uses such as a doctor's practice, dental surgery, pharmacy and care home. These facilities are generally lacking in the eastern part of the settlement of Verwood. However, as the site extends to in excess of 2 hectares it is comfortably big enough to accommodate all of these uses, which are acceptable in terms of the relationship to the heath land. A new centre for the community can be established in a location that has a good catchment and excellent access via Ringwood Road.</p> <p>The size of the site means that it is also capable of accommodating allotments, for which we believe there is a need in the settlement.</p>					
359264	Mr Peter Atfield	Goadsby Ltd	CSPS355	17.2	Yes	No	No	No	No	No	<p>Site VTSW 4 is situated to the west of Eastworth Road and north of Edmonsham Road. The area is rural in character, accommodating good quality farmland. The existing adopted East Dorset Local Plan (EDLP) identifies the site as falling within an Area of Great Landscape Value (AGLV).</p> <p>The site is the subject of Policy LSCON 2 of the EDLP. This seeks to prohibit development that would harm the landscape quality and character of the area. It is submitted that this policy should continue to be applied to the site.</p> <p>The purpose of the AGLV is to protect areas of local landscape importance that have a high value as unspoilt countryside. It has a strong historical dimension, containing traditional cottages and farm buildings, forming varied human and natural landscapes. Site VTSW 4 forms an important part of the AGLV in this part of East Dorset District. It gives north west Verwood an established, rural setting. Eastworth and Edmonsham Roads provide a natural transition between the settlement of Verwood, to the south east, and open countryside to the north west. Eastworth Road itself has a semi rural character, with mature hedges and trees providing a natural boundary between the village and the countryside. Edmonsham Road is essentially rural in character. The proposed creation of the points of vehicular access will substantially harm the character of the area, given the need to create junctions of sufficient dimensions and forward visibility.</p> <p>The majority of the allocation comprises Grade 3 agricultural land, as is some of the associated SANGS. This good quality agricultural land would be lost in perpetuity if the site was developed. Although the site has woodland to the south west and the former railway line to the north west, it is very prominent in the landscape, particularly when viewed from the former railway bridge at Edmonsham Road. The prominence of the site is reflected by the need to plant substantial additional landscaping on the south east, south west and north west boundaries. This demonstrates that substantial mitigation measures would be required in order to reduce the adverse visual impact of the potential development.</p> <p>As an alternative, land at Manor Road should be allocated for development. This was previously identified for the construction of 165 dwellings in the Core Strategy Options for Consideration 2010. Since that time land has been identified for the delivery of a</p>	<p>Delete Policy VTSW 4. Add a new policy allocating land for development at Manor Road, in association with a SANGS to the south. Add map based on Appendix 1.</p>	<p>Yes, I wish to participate at the oral examination</p>	<p>To critically examine site constraints, development opportunities and SANGS delivery.</p>	758	<p>2260384_0_1.pdf 2260382_0_1.pdf</p>

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											<p>Sustainable Alternative Natural Green Space (SANGS). The drawing (Appendix 1) that accompanies these representations comprises an outline masterplan indicating how the site could be developed. Access is from Manor Road leading to a series of development 'cells'. These reduce in density towards the southern boundary of the site. A SANGS extends from manor Road in the east to a point south of Verwood C of E School to the west. It allows for circular walks to be created in this southern part of Verwood, linking from the existing Potterne Park with a potential link to Margards lane. Its provision has been agreed with Natural England and a Statement of Common Ground (Appendix 2) is also submitted as further evidence.</p> <p>Seaward Properties own and control all land required to deliver a comprehensive development on land that is relatively unconstrained. Unlike Site VTSW 4, it is naturally contained. To the south is the Crane River Valley. This provides a logical boundary to round off development at this part of Verwood. Additionally, development of the site can bring forward the following benefits:</p> <ul style="list-style-type: none"> • The site is not prominent in the landscape and will have little visual impact when viewed from public land to the south. Tree belts and mature hedges run laterally alongside the River Crane, obscuring views into the site from the south. The site is not easily visible from the B3072. • The agricultural land quality is low; being Grade IV. The site is not intensively farmed. In the main it comprises land used for horse grazing. It has a low grade recreational use and character. • There is no landscape or other significant environmental designation; i.e. the site is not within an Area of Great Landscape Value. It is therefore free from major statutory constraints. • Vehicular access to the site can be obtained direct from Manor Road, where there is good forward visibility. • The site is in a sustainable location. It is situated less than 1 kilometre from the supermarket, shops and leisure centre at Pennine Way, and 1.5 kilometres from Verwood town centre. Residential development of the scale proposed would increase the number of people shopping in Verwood town centre. This would assist in boosting trade and help the town centre to expand; as proposed Policy VTSW 1. • The site is also well situated in terms of accessibility to community services in Verwood town centre as well as work opportunities at the Ebblake Industrial Estate. This is located 1.5 kilometres to the east. Both Verwood C of E First School and Emmanuel Middle C of E Voluntary Aided School are situated 700 metres to the west, in Howe Lane. Given Seaward Properties ownership, there is potential to improve east – west links from Manor Road to Howe Lane for the benefit of pedestrians and cyclists. • Importantly, the site has the potential to provide SANGS that will be available for use by new residents and provide a recreation facility that will be attractive for use by existing residents. This will reduce the pressure on nearby protected heathlands. <p>Given Seaward Properties contractual and freehold land ownership in this location, the company is in a position to deliver the housing</p>					

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											<p>early in the plan period, thus meeting the needs of Verwood and this part of East Dorset district, where additional dwellings are required. Existing properties in the locality can be retained within their current curtilage, although provision can be made for their future development if they become available for that purpose.</p> <p>Land south of Manor Road contains a number of existing properties and important tree belts. There is also the River Crane as well as some large ponds. The landscape therefore has a pleasant, varied character. Development here will result in houses built within an established and mature environment. It avoids the more monotonous appearance that would otherwise be created on, for example, the open farmland to the north west of the town.</p> <p>Development of the site has the potential to provide a mixture of house types and densities, with a good quality of design. A flexible approach is required to the ultimate number of dwellings to be constructed, taking into account the need to undertake a topographic survey, identify all features to be retained (including individual trees, tree belts and woodland areas) and establish future pedestrian and cycle linkages across the site. There is considerable potential to provide a network of footpaths through the site, leading from Manor Road to Howe Lane and St. Michael's Road.</p>						
359264	Mr Peter Atfield	Goadsby Ltd	CSPS3526	17.2	Yes	No	No	No	No	No	<p>J. Havelock and A. Lloyd are the owners of approximately 1 hectare of land to the south west of Blandford Road at Corfe Mullen. This is identified on the plan reproduced at the end of this form of representation. The site is just to the north of a petrol filling station (Windgreen Garage) with an ancillary shop. Beyond this are sports facilities, including a hall, and a library. Some of these areas are already the subject of Policy CM3 of the adopted East Dorset Local Plan. This policy states that:</p> <p>“Developments falling within Use Classes A1, A2, A3, B1 and community uses will be permitted in accordance with Policy SHDEV1 para 6.236 along Wareham Road at Hill View Post Office, around the junction with Albert Road, the library and Windgreen garage in areas shown on the Proposals Map. Any such development or redevelopment will be subject to the provision of off-street car parking and/or rear service areas and must not prejudice the amenities of residential properties. Residential development at first floor level will also be permitted in association with such development.”</p> <p>The intention of this policy was to consolidate and strengthen the two principal centres at Corfe Mullen, including the area around the Windgreen Garage site. Given that the Core Strategy (CS) now allocates 250 new dwellings to the northern part of the settlement, there is an even greater need to strengthen the existing commercial and community centre. The land south west of Blandford Road is ideal to accommodate these additional uses.</p> <p>This should be considered as an alternative to the creation of a new local centre adjoining the junction of Blandford Road and Wimborne Road. In this location, new shops and facilities will compete with the existing shops and services in the area around the Windgreen Garage. The existing facilities are established and more central to</p>	Amend Policy CM 1, Plan 9.1, and the green belt boundary to exclude land at Blandford Road as identified on the attached plan.	Yes, I wish to participate at the oral examination	To critically examine the revised position of the green belt boundary.	758	2259992_0_1.pdf	

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											<p>the settlement of Corfe Mullen. As shown on Map 9.1, the proposed local centre is in a peripheral location, with the illustrative master plan indicating that there will be no main road frontage – landscaping surrounds the site.</p> <p>Our previous representations referred to a historic parish plan and focus group meetings that identified a need for the following services:</p> <ul style="list-style-type: none"> • A new dental practice. • There may be a further need for a doctor’s surgery if more housing is constructed at Corfe Mullen – some respondents stated that they currently travel outside of the area to get to a doctor or dentist. • A cyber café is required. • A focal point will help bring the village together. <p>The Core Strategy, at Paragraph 9.20, identifies the potential to develop new retail facilities, but makes the assumption that these should be in association with the development of a new neighbourhood. This does not need to be the case. It is more appropriate to develop new services alongside existing facilities, in commercially advantageous locations.</p> <p>It is therefore submitted that land to the south west of Blandford Road is suitable to accommodate a range of uses to compliment the residential development of 250 dwellings at Lockyer’s School, east of Violet Farm Close and at the eastern end of the recreation ground. The range of uses could include:</p> <ul style="list-style-type: none"> • Retail • Medical surgery / health care facility, with pharmacy • Care Home • Residential (where in excess of 400 metres from Dorset heathland) <p>The allocation of land for additional residential development would also meet the guidance set out in the National Planning Policy Framework (NPPF). In particular, Paragraph 47 states that local plans should meet the full, objectively assessed needs for market and affordable housing. In Corfe Mullen, these are immediate needs. The CS approach will not deliver housing in the short term. Policy CM 1 requires the re-location of Lockyers School, based on a pre-agreed active sports strategy. Also, the establishment of allotments is a development pre-requisite. Our clients’ land at Blandford Road provides a more immediate development opportunity in the early years of the plan period, hence meeting current market and affordable housing needs.</p> <p>An amendment to the boundary of the green belt is required at Corfe Mullen. It is submitted that a new boundary can also exclude land south west of Blandford Road from the green belt so as to permit the development of the site with the range of uses set out earlier.</p>					
359585	Mr Robert Finn		CSPS3902	17.2	Yes	No	Yes	Yes	No	Yes	<p>Alderholt, being a Local Centre and the largest village in East Dorset, has potential for being more than a Rural Service Centre. Alderholt compares with Burton, in the southern area, which under policy CN2 has an allocation of a site for approx. 45 houses. Alderholt, in the northern area, should become the candidate for</p>	<p>Policy. Land off Blackwater Close rising to the south of the village is allocated for residential development for approx. 75 bungalows. A minimum of 42% of all the bungalows</p>	<p>Yes, I wish to participate at the oral examination</p>	<p>Wide range of issues raised.</p>	758	<p>2254465_0_1.pdf 2254468_0_1.pdf 2254469_0_1.pdf 2254466_0_1.pdf 2254467_0_1.pdf</p>

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											<p>expansion in the form of residential development targeted at the older generation, my generation.</p> <p>The Core Strategy concentrates new development around the existing conurbation in order that services will be close at hand and journey times diminished. My generation, the 65 to 80 year olds have different needs though. We are not ready for sheltered accommodation inside a conurbation, indeed we are the new active 65's rather than the old "Active 55's" and we wish to remain independent, both physically and economically, for as long as possible.</p> <p>My generation, according to LPA statistics, is the fastest growing age group in the district and by 2020 there will be four retirees for every three of working age living here. The Core Strategy seems not to take account of this, quoting historical numbers with little provision for housing this expanding sector of the population.</p> <p>The local housing market is in need of a boost on the supply of new bungalows which would meet a demand of retirees trading down, thus freeing up family homes for those who could afford them, demand coming from, in my experience, one third local, one third London and the remaining third the rest of the country. I am advised by RSL providers that there is a shortage of 2B3P bungalows available on a shared equity basis generally. So the affordable element of these proposals could release 3B5P affordable or market housing elsewhere. I have an actual case study to support these claims.</p> <p>And so, I am proposing a residential development allocation on a site in Alderholt to be a good solution in the rejuvenation of the village, for part of my generation looking to trade down to an active retirement, release of some family homes to the market and in providing an affordable solution in active retirement, release of some family homes to the market and in providing an affordable solution in active retirement for locals or nearby neighbourhoods.</p> <p>The proposed site is entered through Blackwater Close and rises towards the south to a plateau. The development would not be seen by the majority of the village. The site borders two sides of the village envelope, is outside the green belt, has no heathland constraints, requires little off-site infrastructure and has all services, including gas, available nearby.</p> <p>Notes on my plan and drawings herewith:</p> <p>I have looked at the Three Dragons proposals for affordable housing but they assume the lowest density of 30dph which was a planning policy but is no longer viable. Their residual value assessment for this site @20dph would be interesting but, I fear inaccurate without their market value assumptions being reduced in the new economic world in which we live.</p> <p>Positively prepared - there appears to be no strategy of objectively assessed development too meet the needs of my generation,</p> <p>Justified - the plan cannot be justified as it fails to meet the needs of the fastest growing generation to which it purports to serve.</p> <p>Effective - in as much as my proposed change is deliverable the document would remain effective.</p> <p>Consistent with National Policy - in as much as the plan</p>	<p>will be affordable. The development will contribute towards improved community facilities in Alderholt. The development will make appropriate contributions towards transport and heathlands.</p>				<p>pdf 2254472 0 1.pdf pdf 2254470 0 1.pdf pdf 2254471 0 1.pdf</p>

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											discriminates against the one market sector able to generate momentum in the housing market it probably is against national policy.					
521508	Ms Lisa Jackson	Jackson Planning Ltd	CSPS3808	17.2	Yes	No	Yes	Yes	Yes	Yes	<p>NO POLICY on Strategic Allotment Sites MEM believes there should be a separate policy that deals with the strategic provision of allotments. It is the policy of the Council to relocate the allotments at Roeshot to facilitate the best planning of the area. Allotments by their very nature are flexible in scale and layout and can be located to suit what otherwise might be difficult development conditions. The current Roeshot allotment site is required for comprehensive development of the urban extension to facilitate the most appropriate form of development, given its size it is strategic in nature and to be a sound allocation in the plan it must be shown to be available and deliverable. Part of deliverability is to identify a new strategic sites(s) for the statutory allotments. Please note this representation is substantiated by additional evidence in a supporting statement submitted with the representations by MEM Ltd.</p>	<p>The Core Strategy needs a new policy to set out the site or sites that the new allotments will occupy to accommodate the development of the existing allotment site. It is inappropriate to include the alternative locations within policy CN1. This policy is particularly important given that one alternative site is outside the Borough within New Forest District Council. This is a strategic need within the Borough that must be addressed by the Core Strategy. The suggested policy wording: Strategic Allotment Provision The Council has agreed a new strategy for allotment provision which seeks to locate allotments in strategic hub sites. In addition as part of the policy CN1 for the Christchurch urban extension the Council has resolved to relocate the existing allotments at Roeshot Hill to a more suitable site so that best use can be made of land within the urban extension. Where statutory allotments are relocated the new site or sites they must be located within reasonable travelling time from the existing site. This limits the extent to which relocation can be considered, however, it does include land outside the Borough boundary where it meets the location and physical criteria set out in the Council's allotment strategy. Potential strategic locations for the new hub sites are shown on the key diagram.</p>	Yes, I wish to participate at the oral examination	MEM represent the landowner who owns potential alternative sites for allotment provision in the Borough (including land located within NFDC)	758	2267120_0_1.pdf
359291	Mr Jeremy Woolf	Woolf Bond Planning	CSPS3811	17.2	Yes	No	Yes	Yes	Yes	Yes	<p>The core strategy pre-submission draft is not sound as it needs to be revised to reflect the requirements in the NPPF. It is recommended that a localised version the PINS model policy is used to reflect the National Planning Policy Framework Presumption in favour of sustainable development.</p>	<p>Additional Policy recommended: Presumption in favour of sustainable development When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable</p>	No, I do not wish to participate at the oral examination		758	

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												<p>development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions, which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area. Development within Christchurch and East Dorset will seek to provide the most sustainable location, forms and practices consistent with national policy. The economic and social role that a proposal plays must be considered as part of the assessment of sustainability. The developments must consider impact from climate change and the unique biodiversity of the Dorset Heathlands, the River Valleys, Christchurch Harbour and the coast.</p> <p>Planning applications that accord with the policies in this Core Strategy (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.</p> <p>Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:</p> <p>Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or</p> <p>Specific policies in that Framework indicate that development should be restricted.</p>				
359291	Mr Jeremy Woolf	Woolf Bond Planning	CSPS3813	17.2	Yes	No	Yes		Yes	Yes	The core strategy pre-submission draft is not sound as it needs to be revised to reflect the requirements in the NPPF. It is recommended that a localised version the PINS model policy is used to reflect the National Planning Policy Framework Presumption in favour of sustainable development.	Additional Policy recommended: Presumption in favour of sustainable development When considering development proposals the Council will take a positive approach that reflects the	No, I do not wish to participate at the oral examination		758	

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											(See also same comment from Taylor Wimpey and Bodorgan Properties)	presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions, which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area. Development within Christchurch and East Dorset will seek to provide the most sustainable location, forms and practices consistent with national policy. The economic and social role that a proposal plays must be considered as part of the assessment of sustainability. The developments must consider impact from climate change and the unique biodiversity of the Dorset Heathlands, the River Valleys, Christchurch Harbour and the coast. Planning applications that accord with the policies in this Core Strategy (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise. Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether: Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or Specific policies in that Framework indicate that development should be restricted.				
360320	Mrs J Tripp	Friends Of Victoria Hospital Wimborne	CSPS3923	17.2	Yes	No	Yes	Yes	No	No	The Trustees support the proposed expansion of Wimborne Hospital (VHW) but believe that the 0.4 hectares allotted will be insufficient for the future health needs of the local population. The Hospital is built to the boundary already, leaving no room for expansion within the existing footprint.	A larger supply of land than that proposed in the document should be made available for future expansion of the hospital that may be required with the proposed population	Yes, I wish to participate at the oral examination	To contribute to any public debate there may be surrounding	758	

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											<p>The justification for our view is as follows:</p> <ul style="list-style-type: none"> • The proposed building of 1300 new dwellings in Wimborne/Colehill alone will put pressure on local health services. Patients outside of this area where further population growth is expected, will also need to access VHW facilities • The demography will change, with an increase in the numbers of elderly needing help with independence made difficult through physical and mental health challenges. More young families moving into the area will require intervention for the outcomes of unhealthy lifestyles in younger people • The demand for out-patient treatment of all types will grow as the cost of in-patient care increases and VHW is well established, with the infrastructure in place to meet this need • The pressure on health agencies to offer low cost, local care, such as that provided at VHW is likely to continue and the drive to keep patients out of high cost acute care will remain a priority • The move of health commissioning to general practitioners will increase demand, as these groups are committed to using the services at VHW from 2013/14 • We believe that an amalgamation of GP practices to the area identified in WMC3 is unlikely and would be better sited elsewhere. This land should be used for the expansion of the hospital • Sufficient land for car parking would be a requirement as a result of the expected growth in services • We know that local people would prefer to be treated at VHW. Evidence of their support for VHW is overwhelming, Since 2000, £6.5 million has been donated and £5million has been spent on improving current and funding new services • Although it is not possible at this early stage to estimate accurately the area of land required, we suggest 0.8 hectares would be sufficient 	increases and for reasons as detailed above.		this particular element of the strategy.		
557299	Mr Peter Weatherhead	DTZ Planning	CSPS3899	17.2	No	Yes	Yes	Yes	Yes	Yes	<p>The Malmesbury Estate objects to Policies BA1 and BA2 Vision and Strategy for the Operational Airport and Northern Business Parks. The policies takes a short term view based on the views of MAG rather than a proper assessment and fails to include the undeveloped Estate land although it proposes the removal of the existing Estate owned medium/long term car park from the Green Belt even though it is outside the ownership of Manchester Airports. A similar logic would suggest that the remaining land identified in DTZ1 should be removed from the Green Belt to meet employment needs, airport related development needs and park and ride needs for the Plan period. See the written representations in the letter dated 22 June 2012.</p>	<p>The adjustment of the boundary between the airport and the Green Belt designation. See the written representations in the letter dated 22 June 2012, together with the formal responses made on the Estate's behalf and included in the background documents.</p>	Yes, I wish to participate at the oral examination	To explain our representations in full and to have the opportunity to comment on relevant topics and debates carried out during that part of the examination that deals with the airport and related policies.	758	2254182_0_1.pdf 2254183_0_1.pdf
521508	Ms Lisa Jackson	Jackson Planning Ltd	CSPS3992	17.2	Yes	No	Yes	Yes	Yes	Yes	<p>Although the allocation is supported by MEM Ltd the policy as currently drafted in relation to Burton is not sound as it is not justified by evidence. The current allocation of 45 units does not reflect the housing need within the Borough and in particular does not reflect available housing land supply to meet the Borough need</p>	<p>The policy should be altered on the second bullet point to say: 'Approximately 90 dwellings will be delivered on the allocated site in accordance with a site specific flood</p>	Yes, I wish to participate at the oral examination	MEM Ltd believe they can demonstrate to the Inspector	758	2267120_0_1.pdf 2261608_0_1.pdf 2261606_0_1.pdf 2261607_0_1.pdf

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											<p>within the first five years of the plan. MEM Ltd believes the capacity of land south of Burton is greater than indicated in the pre-submission draft, and will make a positive contribution to the land supply from 2013/14.</p> <p>At 50% affordable housing requirement the scheme is not viable to make a competitive return for a willing developer as required by NPPF paragraph 173 . There is no justification or evidence for a 50% requirement based on the SHMA. The SHMA (paragraph 6.13) is clear that a 50% affordable requirement may not be supported by the current market. The SHMA refers to viability tested scenarios at 40% affordable housing across sites in Dorset and indicates in some cases up to 50% (greenfield sites). This evidence is not provided in the SHMA and is not be relevant to the new neighbourhood sites in Christchurch.</p> <p>The scheme at Burton has been tested for viability and deliverability by experts. The results of this testing show that the site can provide a maximum of 40% rather than 50% affordable housing. Fixed costs for infrastructure, utilities, flood mitigatin, SANG & CIL/s106 in combination with the low revenues from affordable housing units only allow an acceptable developer profit margin at 40% affordable. Criteria used to develop this viability are standard industry costs and margins. This confidential and commercially sensitive information but this can be provided to the Council on request.</p> <p>Please note this representation is substantiated by additional evidence in a supporting statement submitted with the representations by MEM Ltd.</p>	<p>risk assessment. Development will be phased over 4 years with commencement in 2013/14. A maximum of 40% of all housing will affordable consistent with policy LN3.'</p> <p>The fifth bullet point should be altered to read : 'The development will provide suitable SANG to meet the requirements of Policy ME3 A full suite of technical reports on the site at Burton including: community consultation, flooding, green belt, transport, landscape and visual impact assessment, phase 1 ecology, heritage impacts, SANG/ heathland mitigation has been submitted in support of the site. The technical evidence provided with this submission shows that the site is avaiable and deliverable within the first five years of the plan.</p>		<p>why the allocation at Burton should reflect the greater potential this site can deliver, and why the form of development should change to support local objections and technical evidence on visual impact. The position is supported by extensive evidencesubmitted in support of this representation that the Inspector may wish to examine including a report of comprehensive community engagement undertaken to date.</p>		<p>2261605_0_1.pdf 2261602_0_1.pdf 2261603_0_1.pdf 2261601_0_1.pdf</p>
360692	Mrs Wendy Britton		CSPS3920	17.2	Yes	No	Yes	Yes	Yes	Yes	<p>This objection relates to the Pre-Submission Core Strategy (PSCS) and the 'soundness' of the policies regarding the potential development of land at Arch Ground, Station Road, Sturminster Marshall as a New Neighbourhood and Area of Public Open Space with recreational and community facilities. References are made (but not exclusively) to the PSCS and the following policies:-</p> <ol style="list-style-type: none"> 1. KS1 (settlement hierarchy) 2. KS4 (housing provision and provision of land) 3. HE4 (open space provision) 4. Chapter 4 (the broad location and scale of housing) 5. Chapter 12 (strategic allocations) 6. Chapter 14 (creating high quality and distinctive environments) 7. Chapter 15 (meeting local needs) 8. RA1 (Baillie Gate) <p>BACKGROUND This objection is in respect of policies and the text of the PSCS</p>	<p>The following alterations are required to be made:-</p> <ol style="list-style-type: none"> 1. Generally – Amend the Pre-Submission Core Strategy to include a Strategic Policy regarding, The development of a 'New Neighbourhood' and area of Public Open Space etc. at Station Road Sturminster Marshall. This policy should be drawn for the sake of clarity in a similar form as to Policy RA1. 2. Pol.HE4 - amend table to incorporate the above. 3. Pol.KS1. - amend to incorporate 1 above. 4. Pol. KS4. - Ditto 	Yes, I wish to participate at the oral examination	To support my proposal	758	2252889_0_1.pdf

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											<p>which would if implemented deny the development of about 7.2 hectares (ha.) of land known as Arch Ground (as shown edged red on the map attached to the hard copy submission). The promotion of the land for development has a long planning history which is available from the files held by East Dorset District Council and the owners. However, to date planning permission has not been secured due to policy restrictions resulting from the site being within the Green Belt.</p> <p>The current use of the land is agricultural. It is enclosed by Station Road and by the housing opposite fronting that road. It is also enclosed by the hedge-row, trees and the industrial buildings situated on or near the adjacent boundary of the Bailie Gate industrial estate. The other two boundaries are bounded by natural high hedge-rows etc. The south-east boundary is also clearly defined by an existing access track. The land is not within the conservation area, nor is it subject to flooding. Access to the site is from Station Road. The land is in private ownership and does not provide any public amenity. Views to the distant open countryside are restricted by the boundaries as previously described. The land is flat and constrained and is visually uninspiring. The site is situated on the main road through the existing built-up area. It is close to existing local amenities, facilities and services including public service vehicle routes to nearby Wimbourne Minster (5m), Poole(7m) and Blandford(7m). It is also close to the shops, post-office, school, 3 pubs, church, pharmacy, garage, hairdresser, community hall, golf course and is immediately proximate to the site of a large industrial employment estate.</p> <p>THE PROPOSAL</p> <p>It is clear from the above information that the land meets all the requirements necessary (see Note.1) for the development of a New Neighbourhood as defined in policy KS4 and referred to in Chapter 4.21. The area proposed for residential development would require the redefinition of the Green Belt boundaries to allow the removal of about 3.7ha. from the total site area of 7.2ha. currently in the Green Belt.</p> <p>Economically viable and highly sustainable low density residential development of the site would be phased in line with demand and the need to make good, the substantial housing short-fall which has accrued over the last decade or so.</p> <p>In addition the Proposal incorporates the provision of the 3.5 ha. of retained Green Belt land as Public Open Space with recreational and community facilities, similar to that described in the 'saved policy SM2 and SM3' of the 2002 local plan.</p> <p>It is to be noted that the removal of above 3.7ha. of land from the from Green Belt replicates the similar removal of 3.3he. from the Green Belt in order for the highly successful and adjacent Bailie Gate industrial estate to be expanded as set out in Policy RA1.</p> <p>It is also to be noted that as an indirect result of the expansion of the Bailie Gate industrial estate the New Neighbourhood would meet the potential need for additional housing in the Sturminster Marshall area, over and above that required to meet future household growth and the making good of the current substantial</p>	<p>5. Chapter 4 – Ditto 6. Chapter12 – Ditto 7. Chapter 14 – Ditto 8. Chapter 15 – Ditto</p>				

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											<p>short-fall.</p> <p>The Proposal would also provide additional support and enable the growth of existing services etc. currently available in Sturminster Marshall area of East Dorset.</p> <p>Note1.</p> <p>'New Neighbourhoods' are residential led schemes around settlements with good access to key services, facilities and employment. They are designed to produce high quality sustainable developments, that are able to be integrated into the local character of the area without having a detrimental impact on the surrounding countryside They will require the re-drawing of the Green Belt boundaries to accommodate them. The difficulty in meeting housing need, will provide the exceptional circumstances to enable the provision of New Neighbourhoods.</p>					
656643	Mr Tom Whild	Terence O'Rourke Ltd	CSPS3901	17.2	No	No	Yes	Yes	Yes	Yes	<p>The identification and allocation of sites within the key settlements of East Dorset has been based primarily upon a master planning exercise, which sought to determine the capacity of a number of areas of search to accommodate development. The individual sites which have become proposed allocation under this policy were presented for consultation at a time when the strategic housing requirement for the district had not been defined.</p> <p>Therefore it would be reasonable to interpret the allocation as one that seeks to achieve a position of minimal development in the area rather than meet the objectively assessed housing needs of either the district or of Corfe Mullen itself.</p> <p>We consider that the master plan approach, while worthwhile in selecting suitable sites and setting development parameters, does not constitute positive planning if it is not combined with a suitably nuanced understanding of the actual housing requirements for a given community.</p> <p>In addition to the approach to the apportionment of development, the consultation process for the identification of sites within Corfe Mullen is inconsistent with the principle that the plan should be Positively Prepared. The Options For Growth consultation, which was published in December 2010 presented three potential sites for delivering growth in Corfe Mullen. These were Lockyer's School, the Allotments and waste land to the north of Wimborne Road and the recreation ground. The submission Core Strategy has sought to allocate part or all of every site for development with the main concession that a smaller part of the recreation ground is identified and would not be developed for housing but a replacement school. In this context it would appear that the earlier Options For Growth consultation did not present sufficient options for the delivery of housing in Corfe Mullen. Had a wider range of sites been identified at that earlier stage, there is the possibility that others could have emerged as being more appropriate to deliver growth in the village. It is likely that a suitable alternative site would not face the same level of constraint in terms of its delivery that the proposed allocation will have, as set out below. However the earlier consultation did not provide that opportunity, instead presenting a smaller range of sites, which appear to have been selected to fit</p>	<p>In order to ensure that the housing needs of Corfe Mullen can be met, and in light of the significant difficulties surrounding the delivery of the allocation the council should allocate one or more 'reserve sites' within the original area of search. The Perry Family Trust's land between Blandford Road and Pardy's Hill would be well placed for inclusion as a reserve site in this respect. It is able to provide a substantial proportion of the housing requirements for Corfe Mullen, without facing the same delivery difficulties as the allocation site. The site is well located for the existing facilities in the village, contains previously developed land and is well served by electricity, gas and water infrastructure. It is also able to offer benefits to the safe operation of the local road network.</p>	<p>Yes, I wish to participate at the oral examination</p>	<p>The Perry Family trust holds land which may be made available in order to meet the need for a reserve housing site in the event that the allocation cannot be delivered.</p>	758	2253414_0_1.pdf

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											<p>with an emerging master plan.</p> <p>In light of the above, we consider that the Core Strategy has not been positively prepared and is not therefore sound.</p> <p>Justified</p> <p>In order to meet the test of being Justified the NPPF states that the plan should be: "the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence".</p> <p>In developing the master plan and allocation the council's consultants considered a range of sites within an area of search around Corfe Mullen. That area of search included those sites proposed to be allocated under this policy and a range of other sites, including our client's site between Blandford Road and Pardy's Hill. Our clients site was eliminated on the basis of its landscape sensitivity. However, in our view that assessment fails to take adequate account of either the benefits which our clients site is able to offer, or the difficulties presented by the proposed allocation. Although the development of the site will inevitably have some impacts including on landscape, it could deliver substantial benefits in other areas, which we do not consider have been given appropriate weight in assessing the site. Notably, the development of the site has potential to deliver significant access improvements allowing the closure of the junctions of Pardy's Hill and Sleigh Lane with Blandford Road to vehicular traffic. Both junctions have poor visibility and their closure and replacement with a new junction would deliver a significant improvement in road safety. As part of the promotion of its site, the Perry Family Trust has, in conjunction with Dorset County Council, prepared an access solution which provides the aforementioned benefits.</p> <p>At the same time there are substantial negatives associated with the development of the allocated site. These are related to the fact that the sites allocated are not readily available as there are existing established uses which will need to be relocated before any housing can be delivered. This will therefore affect the deliverability of the site. By contrast, our client's site is not subject to the same constraints and is available for development.</p> <p>In light of the above we consider that the site policy is not justified and cannot therefore be considered sound.</p> <p>Effective</p> <p>In order to be considered effective, the NPPF states that a plan should be "deliverable over its period wand based on effective joint working on cross-boundary and strategic priorities". The proposals for Corfe Mullen, as set out in policy CM1 fail this test in our view. There are a substantial number of key issues which affect the deliverability of the allocation. In summary, they key issues are:</p> <ul style="list-style-type: none"> • Re-provision of Lockyers School • Loss of and need to re-provide allotments • Re-provision of part of recreation ground to be lost <p>Each of these issues should also be considered in the context of the NPPF. Paragraph 70 of the NPPF establishes the key principles for the protection of community facilities. One of the key principles is that planning policies should "guard against the unnecessary loss of</p>					

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											<p>valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs". In this context, the development proposal may be seen as causing unnecessary loss of facilities.</p> <p>Re-provision of Lockyers School</p> <p>The allocation is predicated on the premise that the majority of housing will be delivered on the current site of Lockyers School, with the school being replaced on part of the recreation ground to the north. During previous consultations on the Core Strategy, the County Council has indicated that the replacement of the school is not a strategic objective and that it would be dependent upon factors such as a potential shift to a two-tier system, upon which a decision had not yet been made. In this context, the strength of the County Council's commitment to the replacement of the school should be questioned. There are also concerns in respect of the timescale for the delivery of development as the county council has indicated that if it were to replace the school it would not be for 10-15 years. This could therefore cause significant delay to the delivery of housing in Corfe Mullen and would exacerbate a situation where no affordable housing has been delivered in the village for 16 years. While the site has been identified and can be made available, no details are provided in respect of how the new school might be funded. Paragraph 173 of the NPPF highlights that in order for development to meet the test of being deliverable, development allocations should not be subject to obligations or other burdens that would threaten their viability. We consider it extremely unlikely that a development of just 250 dwellings would generate sufficient value to fund the construction of a new school without placing an unreasonable financial burden upon the development.</p> <p>Furthermore, the master plan does not recognize the fact that the school's board of governors has recently applied for academy status. Attaining this status would mean that the school would have a great deal more autonomy including over its site. The ownership of the school grounds would pass from Dorset County Council to the school. If the school is successful in its application this would mean that there would be a great deal more complexity in terms of the land ownership and it is not certain that an independent academy would agree to the development. This would therefore have a knock-on effect on the deliverability of the allocation.</p> <p>Loss of and need to re-provide allotments</p> <p>In addition to the school site, the majority of the remainder of the housing to be provided is on existing allotments to the south of the recreation ground. As with the school, the allotments will need to be re-provided elsewhere within Corfe Mullen. The policy requires that replacement allotments are suitably located and established before development can commence on the existing allotment site. However, no suitable replacement site or even list of suggested sites has been formally or publicly identified. We understand that an initial site of potential sites have been presented to the parish council, but none were considered suitable. The existing allotments are long established and have developed a high quality of soil with good growing conditions. It is questionable whether any</p>					

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											<p>replacement site would be able to provide similar conditions. In this context it is impossible to be sure that suitable sites which are locally accessible for the replacement of the allotments exist, can be made available or can be delivered. This therefore impacts upon the ability to deliver the required housing and adds to uncertainty over whether the proposed allocation is a realistic proposition for delivering the village's required housing. Re-provision of part of the recreation ground to be lost The relocation of Lockyers School onto part of the existing recreation ground means that it will be necessary to provide replacement sports pitches elsewhere in Corfe Mullen. While the policy broadly identifies that the additional sports pitches should be provided to the west of the village, neither the policy or supporting text offer any further detail. The re-provision of the sports pitches is key to the whole development. Lockyers school cannot move until replacement provision is identified and provided. As the existing school site is so central to the master plan proposals, the delivery of the whole allocation is therefore reliant upon the re-provision of the sports pitches. The existing playing fields are some of the only open areas of level ground in the village and also benefit from good drainage. While a broad area for the replacement pitches has been identified, there is no confirmation that sufficient suitable sites are or can be made available. The landscape around Corfe Mullen is broadly characterized by steeply sloping ground, particularly to the north and west of the existing built up limits of the village. Land to the east of the village lies within the Borough of Poole and cannot therefore be safeguarded through the Core Strategy. Land to the south, while more level, is heathland, subject to international ecological conservation designations. Therefore it would not be an appropriate location for the reprovision of the pitches. In this context we consider that there is unlikely to be a great deal of flexibility in terms of the sites available, putting pressure on whichever site is identified. In addition to the difficulty in identifying and securing suitable replacement pitch provision this approach will create operational difficulties and lead to the unnecessary duplication of facilities. Any new pitches to be provided will naturally require suitable changing facilities storage for sports equipment and parking. This provision already exists in association with the northern playing fields. The splitting of provision and facilities will also cause unnecessary difficulties for the various sports clubs that utilise the playing fields. The likely location of any new fields, to the west of the village will mean that leveling works would be required, which will have implications in terms of both cost and landscape impact. The NPPF, at paragraph 154 states that Local Plans should be aspirational but realistic. Policy CM1 is clearly aspirational. However it cannot be said to be realistic due to the multiple factors which impact upon the deliverability of the allocation. As such, the policy fails to meet the test of being effective and cannot be considered sound.</p>					

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498554	Mr Paul Davenport	Stour Valley Properties Ltd	CSPS3913	17.2	No	No	No	No	No	No	<p>EDDC need to find appropriate sites for new housing. EDDC have stick with Areas of Search that originate over 12 years ago with work done on the Structure Plan Review and PRG10 and which they then justified by the Broadway Malyan 2010 Report. There are sites out there that can contribute to the total housing numbers required for the new Local Plan. The schemes promoted by Stour Valley Properties (Dorset) Ltd (appendix B) and Moondale Developments Ltd (appendix C) can contribute over 450 homes to the housing requirement of East Dorset. Broadway Malyan dismissed the appropriateness of the Stour Valley site by stating it was 'not considered as a good location for development due to noise and access issues. Furthermore the area comprises an awkward linear shape and lies close to residential properties to the north and is not therefore considered suitable for the location of the football and rugby clubs.'</p> <p>I believe that the depth of assessment of this site was 5min looking at the O.S map!</p> <p>The access to the site is exceptionally good directly off Wimborne road West.</p> <p>Noise issues from the A31 can easily be dealt with (acoustic report to follow for EiP) and would improve the amenity value to the existing properties to the north.</p> <p>The shape of the site does not preclude development of the highest standard of design – the recent approved scheme of 186 homes at Brook Road in Wimborne fits easily into this site.</p> <p>The Stour Valley proposals also allow for a Stour Valley Country park and the relocation of Wimborne Rugby Club.</p> <p>The Moondale scheme was not even considered as it did not fit into the outdated 'Ares of Search'.</p> <p>The aspect of this site in particular (sloping down from east to west) means that it does not impinge on the green belt gap between Wimborne and Ferndown.</p> <p>Both these sites are a more appropriate strategy, when considered against the Cranborne Road site, based on proportionate evidence.</p>	<p>Both the Stour Valley & Moondale proposals for New Neighbourhoods are a more appropriate strategy, when based on proportionate evidence than the Cranborne Road site.</p> <p>Policy WMC5 is unsound as written and should either be removed completely from the Core Strategy/Local Plan or reworded as follows:-</p> <p>South & East Colehill New Neighbourhoods</p> <p>Approximately 12.5 hectares are allocated to provide New Neighbourhoods to the south of Wimborne Road West and to east of Middlehill Road. These will include about 450 homes, local community facilities, parish allotments along with significant areas of green space. To enable this the Green Belt boundary will be amended to exclude the land identified for new housing and community facilities.</p> <p>Layout and Design</p> <ul style="list-style-type: none"> • The New Neighbourhoods will be set out according to Masterplans drawn up with the Local Authority. • A design code will be agreed by the Council setting out the required standards. • The built form of the New Neighbourhoods will be contained by a planted bund along the A31 and the ridge line to the east of Colehill. • The Neighbourhood to the east of Colehill will have a clear gap containing allotments between it and housing in Bridle Way. <p>Green Infrastructure</p> <ul style="list-style-type: none"> • The implementation of a generous green infrastructure strategy, along with a SANGS strategy is a fundamental requirement • Approximately 54 hectares of SANGS along both banks of the River Stour, with the possibility of creating a 'hub' with visitor amenities and education centre. • Approximately 9ha of sports pitches and appropriate facilities to 	Yes, I wish to participate at the oral examination	By the time of the EiP more detailed work will have been done to help the Inspector to balance the appropriateness of Policy WMC5 against reasonable alternatives, and I would hope to add to his understanding of a complex matter should this written representation not be adequate.	758	2251286_0_1.pdf 2251282_0_1.pdf 2251283_0_1.pdf 2251280_0_1.pdf 2251281_0_1.pdf 2251278_0_1.pdf 2251279_0_1.pdf

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												accommodate Wimborne Rugby Club • Approximately 9ha of woodland suitable for environmental enhancement and controlled public access. • Provision of allotments Transport and Access • Vehicular access is to be provided primarily from Wimborne Road West and Willow Drive. • There will be pedestrian and cycle access from a number of points to link the New Neighbourhoods with local facilities and also to the existing employment sites at Ferndown and Uddens and to the new site at Blunts Farm. • Contributions will be made to facilitate the proposed DCC Infrastructure Improvements (appendix D)				
498554	Mr Paul Davenport	Stour Valley Properties Ltd	CSPS3914	17.2	Yes	No	Yes	No	No	No	<p>Policy WMC6 is not justified or consistent with the NPPF therefore it is Unsound.</p> <p>It is not the most appropriate strategy, when considered against a reasonable alternative, to place 350 homes adjacent to new facilities for Wimborne Town Football club and Wimborne rugby club, therefore it is not justified.</p> <p>The reasoning behind re locating these clubs was twofold. One was that they had both outgrown their current grounds and more pertinently that there was a conflict between the amenity value of local residents by the intrusion of floodlights, spectator nose and car use and parking.</p> <p>Wimborne Town Football club will require much larger facilities, including a new stand in order to fulfill their expectations of advancement up the leagues and provide more space for youth development.</p> <p>Wimborne Rugby Club have a very large youth section with corresponding pressure on their current ground and need to double their field capacity to 4 pitches and increase changing room space. By placing them next to new residential areas will only move the problems not solve them.</p> <p>Broadway Malyan in their 2010 report state that the housing proposed in Policy WMC6 is 'enabling' development in order to pay for the clubs relocation.</p> <p>So with this in mind, South West Properties (Dorset) Ltd is to offer a more reasonable alternative to Policy WMC6 in which the Rugby Clubs new facilities will be at a remove from any enabling residential development .</p> <p>This will enable the Club to achieve their ambitions and run a sustainable operation for the foreseeable future. Wimborne Rugby Ltd will submit a detailed planning application in July 2012 for new</p>	<p>It would also be more appropriate if the new football club was adjacent to employment uses as opposed to residential.</p> <p>A more logical layout on Map 8.6 would be to have more land zoned for employment adjacent to the existing Brook road units and the sewage farm. This area was originally identified in the South East Dorset Strategy (SED4-Development Options) as suitable for 16ha of employment land.</p> <p>If some enabling housing was allowed, as shown, immediately south of Parmiter Drive, employment land where the Football pitch is shown and the football pitch on the rugby pitch, then a more reasonable and balanced scheme could be achieved (appendix A).</p>	Yes, I wish to participate at the oral examination	To ensure my ideas are clear to the Inspector and contribute to any discussions.	758	2250319_0_1.pdf

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											sports pitches and appropriate facilities at Manor Farm, Little Canford.					
498554	Mr Paul Davenport	Stour Valley Properties Ltd	CSPS3915	17.2	No	No	No	No	No	No	<p>Policy WMC3 is not justified as it is not the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence. It is not 'consistent with national policy' as it does not take into account the NPPF. Therefore Policy WMC3 is Unsound. Cuthbury Allotments were first identified as a potential urban extension in the South East Dorset Strategy (SED 04 Development Options) November 2005. The methodology used (para 3.1-3.48) consisted of 9 steps and while the Cuthbury site was not considered under steps 1-6 as part of the Structure Plan Review it was considered in Step 7- Overlooked Potential. (appendix A) This is where the evidence trail appears to break down. As it appears that the methodology that was applied to other sites was never used on Cuthbury, or if it was never published? Rigorous Test Results For Broad Areas of Search (appendix B) and Broad Areas of Search-Summary of Main Constraints (appendix C), both cover north and south Wimborne but do not consider Cuthbury allotments. The assumption that the Cuthbury site is appropriate for removal from the Green belt gained momentum at local government level through numerous P & R Committee meetings since 2005. It was therefore supported by EDDC consultants Broadway Malyan in their Housing Options Masterplan Report 2012, which appears to assume that the testing and evidence gathered by previous reports in respect of Areas of Search were both accurate and still relevant. The soundness of the evidence base that supports the building of up to 260 homes at Cuthbury and ST Margarets can be questioned on a number of accounts.</p> <p>1) Landscape and Character (assessed and illustrated on pages 58 & 59 of the Broadway Malyan Report.) I believe there are a number of views into the site from the surrounding countryside that show the proposed level of development at Cuthbury is excessive and potentially damaging to:-</p> <p>a) The setting of the Listed building Stone Park and its grounds, particularly as viewed across the Area of Great Landscape Value from the Scheduled Ancient Monument of Julians bridge (photo 1694 – training pitch mid centre) (all photos appendix D).</p> <p>b) Important views from the Pamphill Conservation area of the Minster, (Photo 1711 – training pitch mid centre). Pamphill is an Area of Great Landscape Value. 'There is a fine view of the Minster from Little Pamphill. The vantage point offers a panoramic view of the valley and the landscape beyond, and to the west, a dramatic glimpse of the Stour.' (EDDC supplementary Planning Guidance No.19, June 1997)</p> <p>c) Important views from Cowgrove Road (Sustrans route 25) across the Area of Great Landscape Value to the scheduled ancient monument of Julians Bridge and the listed building of Merley House</p>	<p>The opportunity to support the aspirations of Wimborne Football Club to move to a new location to the east of Wimborne is to be supported, together with the chance to allow some land for any future expansion of Wimborne Hospital. To achieve these aims Policy WMC3 is not the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence. It would be more appropriate to reduce the number of homes at Cuthbury and St Margarets to a level which enables the re location of the football club, but does not have a detrimental effect on the landscape and character value of the area and means the allotments can remain in basically the same location. To accommodate any shortfall in housing numbers It would be more appropriate to allocate land to the east of Wimborne and Colehill, nearer to the existing employment opportunities at Ferndown Industrial Estate and the proposed Blunts Farm Employment Allocation. Alternative schemes (appendix K) promoted by Stour Valley Properties (Dorset) Ltd (appendix H), Moondale Development Ltd (appendix I) and Barthelemy & Co (appendix J) all appear to have merit when compared with the overdevelopment proposed in WMC3. The revised Policy WMC3 should read as:- Cuthbury Allotments and St Margarets Close New Neighbourhoods, Wimborne The Green Belt boundary will be amended to exclude areas to the northwest & southeast of Julians Road, the main pitch of Wimborne Town football Club, part of Cuthbury allotments adjacent to Cuthbury Gardens and land to the east of St</p>	Yes, I wish to participate at the oral examination	<p>1) There are 2 surveys I am commissioning regarding existing residents travel patterns and school postcode data. These are not yet complete but will be available to inform the Inspector at EiP.</p> <p>2) I have lived and worked in the district for 59 yrs. I started at Queen Elizabeths Grammar School in 1965, my 15, 17 and 18yr old daughters have all been educated at local schools and believe I can provide an insight into how the town operates on a personal level as opposed to how professional consultants believe it operates.</p>	758	2251457 0 1.pdf 2251473 0 1.pdf 2251476 0 1.pdf 2251471 0 1.pdf 2251472 0 1.pdf 2251469 0 1.pdf 2251470 0 1.pdf 2251467 0 1.pdf 2251468 0 1.pdf 2251465 0 1.pdf 2251466 0 1.pdf 2251463 0 1.pdf 2251464 0 1.pdf 2251460 0 1.pdf 2251462 0 1.pdf 2251458 0 1.pdf 2251459 0 1.pdf 2251518 0 1.pdf 2251519 0 1.pdf 2251516 0 1.pdf 2251517 0 1.pdf 2251514 0 1.pdf 2251515 0 1.pdf 2251477 0 1.pdf 2251513 0 1.pdf 2251522 0 1.pdf 2251520 0 1.pdf 2251521 0 1.pdf

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											<p>(photo 1698, 1700, 1703 all would be blocked by building on the training pitch)</p> <p>d) Views from Eye Bridge (Area of Great Landscape Value) downstream – (photo 1705 – currently no built environment – field at far end of river is training pitch)</p> <p>On simply landscape and character terms the current training pitch of the football club should not be removed from the Green belt and should not be built on therefore Policy WMC3 is Unsound.</p> <p>2) Transport and Access</p> <p>The proposed development at Cuthbury and SST Margarets of 260 homes may initially appear to be a sustainable option in terms of transport and access due to its proximity to Wimborne Town centre. Access by foot to town centre services and public transport (bus stops) in the Square are obviously good (but only 2.9% of workers use the bus).</p> <p>Trips to the dentist, hospital, cinema/theatre, restaurants, and other community facilities are not taken on a daily or weekly basis. The most regular trips that people take are either for employment or education daily or a food shop at a supermarket weekly.</p> <p>a) Employment.</p> <p>In employment terms placing housing to the west (WMC3) and northwest (WMC5) of Wimborne makes little sense and is an inappropriate strategy and is therefore unsound. Evidence shows that the majority of the residents of Wimborne either work to the south in the Bournemouth/Poole conurbation, to the southeast at the airport, to the east, locally at Ferndown industrial estate, or even further afield along the A31 corridor to Hampshire and London.</p> <p>Paragraph 2.52 of the Core Strategy states that East Dorset has the highest level of car ownership in the COUNTRY.</p> <p>Analysis of the 2001 census by DCC show that in Wimborne only 21.2% of people travel <2km to work. 16.3% 2km - <5km; 29.1% 5km-<10km; 26.7% 10km-<40km; 6.7%- 40km+</p> <p>Only 15.4% walk to work but it should be noted that the employment figures include any 16+ who are in education, so a reasonable percentage of this figure will be children walking to the upper school at Pamphill.</p> <p>The profile for Wimborne on the Dorsetforyou website dated 7/02/2012 gives more up to date data but in terms of employment evidence is very misleading.</p> <p>There is a general inconsistency regarding whether we are referring to Wimborne or Wimborne and Colehill.</p> <p>It lists 5600 people working in the town, but then qualifies this as Wimborne/Colehill. (2001 census shows 2839 in employment in Wimborne, including 16+ in education)</p> <p>It lists 16 major employers in Wimborne but in fact this is inaccurate.</p> <p>4 are on the Ferndown industrial estate (9.7km from Cuthbury)</p> <p>2 are on the Woolsbridge industrial estate (16.6km from Cuthbury)</p> <p>1 is in Bournemouth airport (703 employees) (15.7km from Cuthbury)</p> <p>1 is in Holt (7km from Cuthbury)</p> <p>1 is in Merley (Poole) (4.2km from Cuthbury)</p>	<p>Margarets Hill (Plan - appendix G). This will allow a new neighbourhood of 140 homes and 0.4ha of land for a future extension of Victoria Hospital.</p> <p>Layout and Design</p> <p>As Core Strategy.</p> <p>Green Infrastructure</p> <p>Land running alongside the river can contribute to the overall requirement of SANGS (minimum circular walk of 2.6km) that any development at Cuthbury would require.</p> <p>Replacement allotments can be provided on Green Belt land that currently is occupied by the football clubs training pitch. A small car park to service the allotments can be provided near the existing vehicular entrance to the football club.</p> <p>Transport and Access</p> <p>The main access for the homes on the football pitch and along the southwest edge of the existing built up area can be provided form Cuthbury Gardens.</p> <p>Access to development to the south east of Cuthbury Close can be from Julians Road.</p> <p>A new foot/cycle bridge across the River Stour will be constructed some 100m upstream form Julians Bridge to give unrestricted views of the Scheduled Ancient Monument and link the Stour Valley Way with the wider countryside and settlements to the south.</p> <p>Phasing</p> <p>Prior to the development of land occupied by the Football club a new ground must be made available to the east of the town.</p>				

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											<p>1 is in Furzehill (446 employees at EDDC but only 7.2% live in Wimborne) (appendix E) (3km from Cuthbury) Of the remainder, 3 are in Public administration, education and health – basically DCC and NHS. This leaves 3 'major employers' in Wimborne. A supermarket, an estate agents (Savills) and Cobham (480 employees) 2km from Cuthbury. Core Strategy Employment Policies BM1 & BM2 (Bournemouth Airport) and FWP8 (Blunts Farm, Ferndown) provide for up to 60ha of new industrial land to the East and South East of Wimborne and appear robust and sound. But Policy WMC4 (Stone Lane) even proposes replacing the only small employment estate to the west of Wimborne with housing. The justification (para 8.34 Core Strategy) for placing up to 260 homes at Cuthbury and St Margarets in terms of work opportunities is not supported by the evidence base and is therefore unsound.</p> <p>b) Education In theory the upper school at Pamphill (1.2km), the first schools at Wimborne (350m) and Pamphill (1.3km) and the middle school at Wimborne (800m) are all within reasonable walking distance. In practice the high incidence of car ownership (88% 1 car or more), relative wealth of the district and a good choice of quality first schools and private schools in the surrounding villages means that the majority of children in East Dorset are taken to school by car. Perversely this means that a parent will drive their car from Holt to Pamphill first School and will pass someone from Pamphill driving their child to Holt. Four times a day this makes 28km a day. This is not unusual – mothers quite happily drive their children from the Bournemouth/Poole conurbation to Pamphill first school. (before the EiP I will have data to support this).</p> <p>c) Access to Site Policy WMC3 states that 'the main access for the Cuthbury site is to be delivered from Julians Road...' and that 'the Cuthbury development must contribute to delivering a traffic light controlled system to improve safety at Julians Bridge.' To have the only vehicular access for around 200 homes through Cuthbury Gardens would be detrimental to the amenity value of existing residents. Vehicular access onto Cowgrove Road would be unacceptable on safety grounds. Therefore a spurious or contrived reason for a new access onto Julians Road has been promoted for 'safety reasons'. On 'safety' grounds there is no evidence to support this assumption. Since the 1st January 1998 there have been 5 accidents to the south west of Julians Bridge (appendix F) None actually on the bridge. The only accident involving pedestrians was approx 32m south of the bridge and involved 1 of 4 pedestrians affected by alcohol walking in the road at 2355hrs and was hit by a vehicle, lifting him onto the bonnet – this was not fatal. Anecdotal evidence (survey data before EiP), from when traffic lights were used on Julians Bridge during restoration work a few years ago, suggest that traffic backs up along Julians Road to the</p>					

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											<p>junction at Pye corner and restrict the flow of traffic up Victoria road towards the hospital and the upper school. Evidence suggests that a traffic light controlled junction on Julians Road is not the most appropriate strategy so Policy WMC3 is unsound. Policy WMC3 is unsound unless a specific SANGS strategy is in place for a specific development. Unless a SANGS site is identified and deliverable – not identified as a ‘potential’ SANGS then the policy is unsound. Finally Policy WMC3 is not consistent with national policy as it was conceived and based on planning guidance that has been superceded by the National Planning Policy Framework and is therefore unsound.</p>					
498554	Mr Paul Davenport	Stour Valley Properties Ltd	CSPS3916	17.2	Yes		No		No	No	<p>I support the inclusion of Policy FWP8 in the Core Strategy but feel an opportunity has been missed to link this employment land with associated housing to create a more sustainable whole. As with my comments on WMC6 I think a mix of employment and housing makes better sense. Moondale Developments are proposing around 100 homes only 1300m from Blunts Farm (see attached drawings). Should EDDC or the Inspector need more information on these proposals for the Alternative Site consultation later this year we would be most happy to oblige.</p>		Yes, I wish to participate at the oral examination	To ensure our case is presented to the Inspector in full as the promoter of a number of alternative strategic housing sites.	758	2257828_0_1.pdf 2257830_0_1.pdf
656678	Mr James Cleary	Pro Vision Planning and Design	CSPS3918	17.2	Yes	No	Yes	Yes	Yes	Yes	Please see enclosed representations.	Please see enclosed representations.	Yes, I wish to participate at the oral examination	<p>1) Because of the high level of public interest in reducing greenfield land take in East Dorset in favour of optimizing previously developed land. 2) To enable the Inspector to test the evidence demonstrating that the Core Strategy is unsound without the allocation of Little Canford Depot for a mixed use residential and employment</p>	758	2258053_0_1.pdf

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														development.								
524088	Mr Ken Parke	Ken Parke Planning Consultants	CSPS3894	17.2	No	No	Yes	Yes	Yes	Yes	Please see attached representations document and appendices	Please see attached representations document and appendices	Yes, I wish to participate at the oral examination	The representation has a significant bearing on the distribution of housing within the district and will require detailed oral examination.	758	2260318_0_1.pdf 2269251_0_1.pdf						
515406	Mr Christopher Undery	Christopher Undery	CSPS3912	17.2							It is disappointing that the potential that land at Leigh Farm, Wimborne (see attached plan and representations) continues to be overlooked, apparently for reasons of Green Belt strategy, when other more environmentally sensitive and economically valuable farmland within the Green Belt (such as that to the north of Wimborne on either side of the B3078 Cranborne Road) is sacrificed.	I ask that the land at Leigh Farm is reconsidered to contribute to the required housing provision for Wimborne, especially since in approving the land to the immediate west off Cranfield Avenue (formerly known as Highland Park) your Council accepted road provision (Birchdale Road and Hornbeam Way) to allow for later development of Leigh Farm.	Yes, I wish to participate at the oral examination	Because the planned housing allocations into existing Green Belt fail to take into account the merits and opportunities at Leigh Farm.	758	2166689_0_1.pdf 2166690_0_1.pdf						
646370	Mr Craig Baker	Dorset Fire & Rescue Service	CSPS3995	17.2							Dorset FRS believe that it is essential that the new housing stock is provided with domestic sprinkler systems and that East Dorset and Christchurch implement a new local planning rule to ensure that these new buildings are safe and sustainable from the design stage. In 2011, the Welsh Assembly voted to require sprinklers in all new housing. The law will apply to new houses, flats and care homes built in Wales. Dorset FRS fully support the Welsh Assembly legislation for the wider use of sprinklers in all types of buildings. We endorse the correct installation and use of sprinklers as a means of securing life, property and firefighter safety. Sprinkler systems in dwellings are not a requirement under current planning or building regulations. However, with community safety a key issue at all levels of society and government we want to ensure that community safety is prioritised as a crucial aspect of achieving sustainable communities. When considering the growth of the area and the potential reduction in Fire and Rescue Service funding, sprinklers are an ideal way of achieving a safe and sustainable community. The Case for Sprinkler Systems Even when people are not injured, a small fire can have a catastrophic effect on businesses or households. The physical damage can result in significant downtime whilst recovering from the fire and sometimes irretrievable loss of business, customers, personal and sentimental possessions. The Arson Prevention Bureau in their statistics state that 'Many businesses never entirely recover - losing orders, contracts, key employees or may go out of business resulting in lost jobs and services to the community'.											

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											<p>The direct economic implications, financial losses, temporary and permanent job losses, evacuation of businesses, schools and homes are devastating. In these harsh financial times, it is simply more than most businesses can bear.</p> <p>Sprinkler systems possess many benefits, including supporting the environment, and if more widely used, will potentially save millions of pounds for our economy. We believe more can be done to promote the wider use of sprinkler systems in domestic, commercial and residential premises and are actively working towards supporting this aim.</p> <p>Dorset FRS is committed to reducing the impact of fire on people, property and the environment. There is clear evidence that sprinklers and other forms of automatic fire suppression systems can be effective in the rapid suppression of fires and therefore play an important role in achieving a range of benefits for both individuals and the community in general. The speed of reaction to a fire by a sprinkler is much faster than the response of a local fire crew, however near they may be. Sprinklers may not always extinguish a fire, but they will hold it in check.</p> <p>This is because sprinklers can significantly help to:</p> <ul style="list-style-type: none"> • Improve the time available to escape from a fire • Reduce death and injury from fire • Reduce the risks to firefighters who we ask to fight the fires • Protect property and heritage • Reduce the effects of arson • Reduce the environmental impact of fire • Reduce fire costs and the disruption to the community and business • Permit design freedoms and encourage innovative, inclusive and sustainable architecture 					
646370	Mr Craig Baker	Dorset Fire & Rescue Service	CSPS3996	17.2							<p>The core strategy identifies land for community use in West Parley. Considering the issue of community safety, Dorset FRS will consider whether the planned growth of East Dorset, Christchurch and Bournemouth requires a new model of Fire and Rescue Service infrastructure in the period up to 2028. this may incorporate a new Fire and Rescue Service station at this location but would involve adjustments to the existing Fire and Rescue Service resources in the surrounding area.</p>				758	
653402	Mr Anthony Sherman	Wimborne Cemetery	CSPS3929	17.2	Yes	No	Yes	Yes	Yes	No	<p>No 8 Land at St Margaret's Hill. It makes no sense to put houses on this land as it is unsuitable. With an extra 1500 houses in the area it will put additional need for space on Wimborne Cemetery, and this piece of land being adjacent to the cemetery would be better used for burials. Poole and Bournemouth are both running out of burial land and Wimborne Cemetery is accommodating many of their deceased residents. It would make no economic sense for the Cemetery to have a split site requiring extra staff and equipment when there is ideally suitable land available at St Margaret's Hill. In the short term, the land could be used for allotments, thus relieving the necessity of finding additional space to replace Cuthbury allotments.</p>	<p>Wimborne Cemetery needs the land at St Margaret's Hill in order to cater for the needs of Wimborne and surrounding areas.</p>	<p>Yes, I wish to participate at the oral examination</p>	<p>To re-inforce the need of extra land for Wimborne Cemetery</p>	758	

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654688	Mr Paul Newman	Paul Newman Property Consultants Limited	CSPS39 28	17.2	No	No	Yes	Yes	Yes	Yes	I do not feel that the LPA has taken into account when assessing housing demand and need in the district the actual true level of development that is required to meet the identified housing need. Further allocation of land is required which will involve the need to roll back the green belt further to ensure that a sufficient supply of housing land is to be provided. The evidence base is not sound nor is it robust in this respect. A continued reliance of a policy of urban area regeneration will not deliver the affordable housing the district requires.	The additional allocation of land is required to meet the identified housing need and this should be done by allowing the extension of the current proposed housing allocations, in particular those at Wimborne and Ferndown have and hold potential for a natural expansion and continuation of the development which will bring additional housing to the district. The land at Holmwood House should also be included as part of the overall development proposals for the allocation at FWP3, as this represents a natural extension which due to its size would contribute to the overall site and increase the level of affordable housing by virtue of its development. Access should also be taken from Christchurch Road as a regular user of Ringwood Road any further traffic generation on to this will only further increase the existing highways issues going through Longham.	Yes, I wish to participate at the oral examination	I would like to make the Inspector fully aware of the Council's appalling record in the delivery of affordable housing and to point out how a continued reliance on a policy of urban regeneration will not work and will produce any affordable housing, and how a policy of increasing the size of the allocation at FWP will help meet the affordable housing needs without having any detrimental impact on either the green belt or the separation of the site and Longham.	758	2274440_0_1.pdf
654871	Mr Martin Miller	Terence O'Rourke Ltd	CSPS39 22	17.2	Yes	No	Yes	No	Yes	No	Stone Park House is a grade II listed building set in extensive grounds located to the north west of the town. Stone Park house directly overlooks Julian's Bridge, Wimborne Town Football Club and the Cuthbury allotments, with views to the Minster, all of which form part of the building's setting. We are aware that the council's evidence base includes the Cuthbury Allotments, Stone Park & Julians Road Landscape Character Assessment (May 2009). We note from the landscape appraisal contained within the district council's Housing Options Masterplan 06 Constraints and Opportunities background paper that Stone Park is considered to have a substantial landscape sensitivity. However, we also note that it is considered to have only a moderate landscape value (rather than substantial value), perhaps underpinned by the appraisal recording Stone Park as having little conservation interest, despite being a Grade II listed	As part of its evidence base, the council needs to formally define the setting of Stone Park in line with English Heritage guidance published in October 2011. It should also identify within Policy WMC3 the measures that will ensure that this setting is preserved and/or enhanced as part of the proposed development.	Yes, I wish to participate at the oral examination	The owners of Stone Park will be directly affected by the proposed development and wish to participate in any discussion at the examination concerning the impacts on the setting of Stone Park House. To	758	2252791_0_1.pdf

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											<p>building.</p> <p>Apart from the landscape character assessment, we can find nothing within the council's evidence base that indicates that the local planning authority has assessed and defined the setting of Stone Park in accordance with English Heritage guidance published in October 2011. This, we believe, is a deficiency with the council's evidence base.</p> <p>Historically, the site owners have objected to the development of the Cuthbury Allotments on the basis that it would adversely affect the setting of Stone Park. By way of an alternative that would not adversely affect its setting, the site owners advocated a small parcel of land at the entrance to the Stone Park estate be developed for around 70 dwellings. Although this parcel of land fell within the Council's Area of Search for new housing sites (as shown on Map 4.1 within chapter 4 of the pre-submission Core Strategy), the site was discounted from further consideration because it was considered by the council to have "low landscape capacity for development and is part of the historic landscape". Whilst we accept that parts of the estate are indeed sensitive in both landscape and heritage terms, the parcel of land identified within the estate for potential development adjoins the existing urban area of Wimborne and could be developed with minimal landscape or heritage impacts. To reject all of the site's development potential on the basis of simply being part of the Stone Park historic landscape seems non-sensical and illogical given that the council has identified the Cuthbury allotments and Wimborne Town Football Club as suitable for development, both of which also form part of the historic landscape.</p> <p>During winter months, Stone Park endures significant light pollution emanating from the floodlights at Wimborne Town Football Club. Although a historic planning permission exists for the floodlight pylons, there are no planning conditions that restrict the angle of the lights or the light intensity of the bulbs used within them. The council has confirmed that the Football Club is immune from planning enforcement action and that the owners of Stone Park must use statutory nuisance legislation to address the impacts that the pollution is having on their residential amenity.</p> <p>In these circumstances, the possibility of redeveloping the Football Club in a manner that respects and delivers improvements to the residential amenity of the Stone Park Estate and the overall setting of the estate is of interest to the owners. In January 2011, they reluctantly supported the council's suggested allocation of land south of Cowgrove Road, subject to measures that would deliver improvements to the residential amenity and heritage setting of the Stone Park estate being specified. The estate owners also objected to the possibility of a green link between the proposed development site and the Stone Park estate, in the absence of residential development at the latter.</p> <p>Although Policy WMC3 and Map 8.3 confirm the allocation of land to the south of Cowgrove Road for future development without a green link to Stone Park (which is supported), Policy WMC3 fails to identify how the layout and design of the site will preserve or</p>				date, the absence of an evidence base dealing with this issue has prevented such discussions from taking place.		

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											<p>enhance the setting of Stone Park, which is a significant heritage asset. Consequently, the plan is not sound because it is not consistent with paragraphs 129, 132, 154 and 169 of the National Planning Policy Framework which require:</p> <ul style="list-style-type: none"> • local planning authorities to identify and assess the particular significance of any heritage asset affected by a proposal, including its setting • great weight to be given to the impact of a proposed development on the significance of a designated asset when considering the impact of a proposed development, given that substantial harm or loss to a grade II listed building, park or garden should be exceptional • local planning authorities to set out clear policies that provide a clear indication of how a decision maker should react to a development proposal • local planning authorities to have up-to-date evidence about the historic environment in their area and use it to assess the significance of the heritage assets and the contribution they make to their environment. 						
656249	Ms Gemma Care	Barton Willmore LLP	CSPS3917	17.2	Yes	No	Yes	No	No	No	<p>Thank you for the opportunity to provide comments on the Christchurch and East Dorset Core Strategy (JCS) Pre-Submission document. On behalf of our client, Stour Valley Properties (Dorset) Ltd., we are pleased to provide the following response, which should be read in conjunction with the accompanying Consultation Response Forms.</p> <p>Background Barton Willmore LLP has been instructed to make representations to this document, on behalf of Stour Valley Properties (Dorset) Ltd. ('SVP')</p> <p>SVP have land interests within East Dorset and welcome the opportunity to contribute to the emerging Core Strategy (JCS). SVP are currently promoting the release of their land to the south of Wimborne for housing.</p> <p>Fundamentally, SVP have serious concerns over the level of overall housing provision identified within the draft JCS and the degree to which that which is proposed is sufficient to meet identified needs within the East Dorset and Christchurch locality. We submit, having regard to the evidence base material available that the level of housing proposed for East Dorset within the draft JCS is inappropriate and inconsistent with national planning policy, which states that each local planning authority should ensure that the Local Plan is based on adequate up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local planning authorities are expected to ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals.</p> <p>Consideration is given within the submitted representations to the strategic site allocations for Wimborne and Colehill identified within the JCS and the extent to which the proposed allocations fulfil the overall objectives and spatial vision for East Dorset and</p>		Yes, I wish to participate at the oral examination	To ensure our case is presented in full and to be party to discussions.	758	2257927 0 1.pdf 2257928 0 1.pdf 2257925 0 1.pdf 2257926 0 1.pdf 2257923 0 1.pdf 2257924 0 1.pdf	

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											<p>Christchurch. On the premise that insufficient housing requirements are identified in the Pre-Submission JCS we submit that additional strategic allocations or an increase in the specified number of required new dwellings are required in order to plan positively for the further housing growth we consider necessary in light of our appraisal of the Council's published JCS evidence base.</p> <p>In accordance with section 20 of the Planning and Compulsory Purchase Act 2004 (as amended) local plans must be 'sound': i.e. they must be positively prepared, justified, effective and consistent with national policy. We suggest that the housing strategy adopted within the JCS as it stands is (a) not the most appropriate (on the basis that it is not considered fully justified) and (b) it is not 'positively prepared' – i.e. it is not based on a strategy which in our view genuinely seeks to meet objectively assessed needs.</p> <p>Within these representations we do not comment on every aspect of the JCS; our intention is to comment on those sections where we non-compliance with tests of soundness is apparent, or where we are particularly supportive. To be clear, our primary concern in this instance is the content and justification of Policy KS4 and the proposed housing allocations for Wimborne and Colehill – specifically Policy WMC6.</p> <p>An alternative proposal for housing to the south of Wimborne is considered with specific reference to the SVP land shown on the concept plan attached at Appendix 1 to these submissions. Comments are also provided on a number of other policies within the JCS, on individual response forms, as requested. The full list of policies to which these representations respond are: Policy KS1, KS4, KS5, KS10 Policy WMC3, WMC6 Policy FWP3, FWP4, FWP6, FWP7, FWP8 Policy ME3 Policy HE4</p> <p>Copies of all Core Strategy Response Forms relating to each policy addressed within these representations are contained at Appendix 4.</p> <p>Appendices 1 – 3 to this cover letter are those referred to in the various consultation forms.</p> <p>I trust that all of the enclosed is clear and in order and we look forward to engaging with you further in the consultation process.</p> <p>THE STRATEGIC ALLOCATIONS FOR WIMBORNE AND COLEHILL</p> <p>The JCS states at paragraph 4.19 that: In Christchurch there is capacity to build approximately 2,140 new homes in the urban areas and 2,800 in East Dorset over a 15 year period. This does not meet the needs identified in the Housing Market Assessment, so it has been necessary to identify sites in the Green Belt.</p> <p>It continues at paragraph 4.21 to advise that: The difficulty in meeting housing needs provides the exceptional circumstances required to amend Green Belt boundaries, where appropriate. The greenfield areas allocated in the Core Strategy have been identified through a rigorous process, as set out within</p>					

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											<p>the Key Strategy Background Paper and Masterplan Reports....Christchurch, Wimborne and Colehill, Verwood, Corfe Mullen, Ferndown and West Parley [are] suitable settlements for growth...A sieve map exercise has been undertaken to identify which areas on the edge of these settlements are not subject to the absolute constraints of proximity to protected heathlands and floodplains. This identifies six areas of search where these absolute constraints do not exist, which have been subject to the detailed masterplanning exercises. These have analysed the suitability of the areas to deliver new homes.</p> <p>We recognise that the allocations proposed within the JCS are based upon the masterplanning exercises that have been carried out to support the document and that the proposed sites have been put forward following a logical weighing up of the various opportunities and constraints that have been identified. We have concerns however – for the detailed reasons below – that Policy WMC6 (South of Leigh Road New Neighbourhood and Sports Village, Wimborne) – does not represent the most appropriate and justified strategy for this particular part of the Eastern Area of Search and set out below our proposed alternative approach to development of this area along with the benefits our client's proposals have the potential to bring to Wimborne.</p> <p>Given the apparent shortfall in the identified housing figure for East Dorset and the indication from our initial research that the housing requirement ought to be pitched higher than is currently the case, there is clearly potential for further allocations to be made as part of the JCS process or for existing allocations boundaries to be extended in order to accommodate additional growth.</p> <p>Currently, the JCS proposes, via policy WMC6, 320-350 homes and sports village on land to the south of Leigh Road and Parmiter Drive (which also forms part of the southern sub area). The explanatory text states that this area offers the opportunity to provide high quality sporting, recreation and open space facilities along much needed housing and states that it can also help to maintain the long term integrity of the Green Belt gap between Colehill and Wimborne, by keeping development no further east than the existing housing on Leigh Road and protecting the gap as public open space.</p> <p>It is not the most appropriate strategy, when considered against a reasonable alternative, to place 350 homes adjacent to new facilities for Wimborne Town Football club and Wimborne rugby Club, therefore it is not justified.</p> <p>The reasoning behind re locating these clubs was twofold. One was that they had both outgrown their current grounds and more pertinently that there was a conflict between the amenity value of local residents by the intrusion of floodlights, spectator noise and car use and parking.</p> <p>Wimborne Town Football Club will require much larger facilities, including a new stand in order to fulfill their expectations of advancement up the leagues and provide more space for youth development.</p> <p>Wimborne Rugby Club have a very large youth section with</p>					

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											<p>corresponding pressure on their current ground and need to double their field capacity to 4 pitches and increase changing room space. By placing them next to new residential areas will only move the problems not solve them.</p> <p>Broadway Malyan in their 2010 report state that the housing proposed in Policy WMC6 is 'enabling' development in order to pay for the clubs relocation.</p> <p>So with this in mind, Stour Valley Properties (Dorset) Ltd is to offer a more reasonable alternative to Policy WMC6 in which the Rugby Club's new facilities will be at a distance from any enabling residential development.</p> <p>This will enable the Club to achieve their ambitions and run a sustainable operation for the foreseeable future. Wimborne Rugby Ltd will submit a detailed planning application in July 2012 for new sports pitches and appropriate facilities at Manor Farm, Little Canford.</p> <p>Alternative to Policy WMC6 SVP are proposing an alternative to the current option set out within current policy WMC6. The concept plan at Appendix 1 refers. SVP propose the relocation of the rugby club on the land known as The Manor Farm site at Canford Bottom. A detailed planning application for the scheme is proposed for submission in July 2012. Copies of the current plans are provided at Appendix 2. The site is in single ownership and is fully deliverable. Detailed specifications for the development have been agreed in consultation with Wimborne Rugby Club and indicative proposals suggest that 6 x 20 player changing rooms would be provided along with 4 dedicated full size grass rugby pitches and car parking for up to 170 cars. We consider that our client's proposals for the development of the the Manor Farm site, developed as part of a comprehensive scheme with strong pedestrian and cycle links, including a 55ha new Country Park and approximately 350 new dwelling on either side of the A31 represents a sustainable and logical alternative to Policy WMC6.</p> <p>It is understood that land covered by Policy WMC6 is in multiple ownership. Furthermore, it is clear from the evidence base produced by the Council, namely the master planning reports, that the site is subject to a number of constraints, including:</p> <ul style="list-style-type: none"> - Access; - Existing sewage treatment works – no residential development is permitted within the 145m buffer of the sewage works; - 33kv power cable runs diagonally across the site from the north west to the south east – this will need to be incorporated or buried/diverted – it is not known whether or not this will incur an abnormal cost; - Twin rising mains will require 4m buffer either side; - The PROW may require a minor diversion to ensure the land to south of the A31 is accessible – particularly if this is to become a new Country Park/SANG; - Any development should have consideration of the noise impact on the A31. <p>In contrast the SVP site is considered by the Council to be</p>					

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											<p>constrained only by 'noise and access issues' - both of which are resolvable. The site is said to comprise an 'awkward linear shape', however as the plan at Appendix 2 illustrates, an appropriate layout is considered achievable. Concern is raised over the proximity to existing residential properties and on this basis the site is not considered suitable for the location of the football and rugby clubs, however our client is proposing relocation of the rugby club away from any existing residential development but which would be interlinked with the proposed new housing and Country Park to form a coherent and sustainable wider development scheme, capable of making a significant contribution to the Council's overall strategic objectives in relation to housing, recreation and leisure.</p> <p>It is clear that the site would represent the logical extension of existing residential development on a sustainable and deliverable site in close proximity to Wimborne centre. The site benefits from good accessibility, is in sole ownership and is capable of delivery as soon as planning permission is granted. Development of the site for housing should be considered in conjunction with development of the land between the A31 and River Stour for a Country Park and the development of the site at Canford Bottom for the relocation of the rugby club. Applications for the latter are due for submission imminently and all three aspects should be viewed holistically in terms of the overall benefits they could bring to the area.</p> <p>We submit that Policy WMC6 should be reconsidered and our clients proposals carefully considered as a viable alternative to the option currently proposed.</p>					
656562	Mr Andrew Robinson	Symonds & Sampson	CSPS3911	17.2	No				Yes		<p>The additional 9.7ha of employment land to be provided by the Core Strategy is welcomed because it adjoins the Woolsbridge Industrial Estate, which has close links to the A31 and the highway network. It would also help to meet the needs for additional employment opportunities within the district.</p> <p>In our opinion however, the Policy VTWS6 is not effective because:</p> <p>a) Deliverability</p> <p>It is quite clear that the proposed policy site lies directly adjacent to the Holt & West Moors Heath SSSI Area of Nature Conservation and to the Moors River SSSI. Policy is clear in stating a package of mitigation measures to ensure that the development does not have an adverse impact on the Moors River SSSI will be required and it is equally clear that landscape buffers alongside the countryside edge of the site will also be required. Over and above this, thought will also have to be given to flood protection.</p> <p>9.7ha of additional employment land will not, therefore, be delivered because areas will be lost from the site to meet these mitigation measures.</p> <p>Over and above this, the additional employment land will be entirely dependent upon Old Barn Farm Road to provide access and question marks must exist over the adequacy of the road and the adequacy of the access on to Ringwood Road. The land opposite Old Barn Road is undoubtedly in third party ownership and relevant control may not exist in relation to the land to the east and west of the access with the Ringwood Road. Highway problems may,</p>	<p>By the inclusion of the land shown edged red on the attached plan, the deliverability and flexibility of the proposed policy VTSW6 is greatly improved. The land in question is within the ownership of one family. As the land in question has a long frontage to Ringwood Road, Three Legged Cross, a new or secondary access to the Woolsbridge Industrial Estate could be created without need for dialogue or agreement with third parties. That can ensure that, whatever the limitations and failings of Old Barn Farm Road, Policy VTSW6 can be implemented and additional employment land delivered.</p> <p>It also means, by including the land shown edged red on the attached plan, mitigation measures and landscape buffers can be considered and implemented, whilst maintaining the developable area of the additional employment land, thereby</p>	Yes, I wish to participate at the oral examination	<p>It is important the Government Inspector fully understands the problems that Policy VTSW6 and its additional land designation will create as currently drawn.</p> <p>9.2 As the policy stands and as the land allocation stands, the Woolsbridge Industrial Estate may not be able to:</p> <p>a) provide suitable access to and from the</p>	758	2272189_0_1.pdf

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											<p>therefore, render this policy undeliverable as requirements for an improved and appropriate access to the Woolsbridge Industrial Estate in its increased size cannot be met.</p> <p>b) Flexible Both environmental and highway constraints make this policy inflexible, with Natural England, the Highway Authority and numerous third parties able to render this policy unworkable and unimplementable.</p> <p>c) Able to be monitored Whilst an annual monitoring report can be implemented with regard to the land included within Policy VTSW6, that annual monitoring report may, as boundaries are drawn, merely have to comment upon the issues which are preventing the development proceeding. That, in our view, is not an effective policy.</p> <p>d) For the avoidance of doubt, contact has been made with the owners of the "additional employment land" currently promoted by Policy BTSW6. Informally, it has been agreed that the inclusion of the land coloured red on the attached plan will improve the deliverability of the overall package of "additional employment land" adjacent to Woolsbridge Industrial Estate and, therefore, cooperation between the relevant land owning parties will occur to ensure that the policy can be fully and properly implemented in the short term.</p>	<p>providing greater employment in the area. Policy VTSW6 merely needs to be changed by including within the red line on the policy documentation the land which we have highlighted and by amending Policy VTSW6 by wording it "12.2ha of land at Woolsbridge Industrial Estate is removed from the Green Belt and developed for new employment".</p>		<p>increased employment site, as the current site owners have little or no control over the land that fronts Ringwood Road, Three Legged Cross and may not, therefore, be able to offer appropriate splays, right hand turning lanes, etc. as the additional land is developed and the junction becomes busier;</p> <p>b) provide 9.7ha of additional employment land as parts of the area must, by the nature of policy VTSW6 be lost to:</p> <p>i) mitigation measures to meet an overall Wildlife Strategy ii) flood protection iii) landscape buffers.</p> <p>9.3 The inclusion of the land shown edged red on the attached plan can overcome these difficulties by providing:</p>		

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														<p>a) either a completely new access to the Woolsbridge Industrial Estate, resulting in the closure of Old Barn Farm Road; or a second access/egress to and from the Woolsbridge Industrial Estate, allowing for either a one way only system to be adopted, thereby overcoming certain of the difficulties created by the junction of Old Barn Farm Road with Ringwood Road, and by reducing pressure on that access.</p> <p>b) addition potential employment land, allowing land to be taken for mitigation measures, flood protection and landscape buffers, whilst maintaining a deliverable area of employment land.</p>		

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657462	Ms Carla Fulgoni	The Planning Bureau Limited	CSPS4003	17.2							<p>I set out below the comments on behalf of our clients McCarthy & Stone Retirement Lifestyles Ltd in respect of the Core Strategy. McCarthy & Stone is the UK's leading provider of specialist Retirement and Extra Care Housing for older owner-occupiers and are members of the Housing and Ageing Alliance. Having developed over 800 developments throughout the UK the company is in a very strong position to comment upon the impact of emerging Development Plan policies, in particular in relation to private retirement and extra care developments. This is a specialised form of development that has its unique development and selling constraints that make it very different to open market housing. The principle ongoing objection that McCarthy and Stone have to the emerging Core Strategy policies of the Council stems from the need to ensure that greater weight and emphasis be placed upon the ageing population and their associated housing needs and options. It should not be underestimated that unless it is properly planned for over the next 20 years there is likely to be a serious short fall in specialist accommodation for the older population, which will have a knock on effect in meeting housing needs of the whole area and wider policy objectives. McCarthy and Stone therefore raise objection to the absence of policy consideration.</p> <p>Core Strategy</p> <p>The Core Strategy rightly draws out that the Districts will experience a "significant ageing of the population" during the plan period. Strategic Objective 5 of the Core Strategy states the need to deliver a suitable, affordable and sustainable range of housing to provide for local needs. In broad overall terms McCarthy and Stone set out that as part of the Core Strategy's priorities and objectives more specific reference should be made to the needs of the ageing population and particular emphasis made to the housing of this proportionately rising section of society. The Core Strategy identifies the quantities of residential dwellings required in each of the District's settlements, in policies. However a specific policy or reference to the needs of the ageing population should be included to identify the wide ranging issues that will be associated with a larger proportion of people in need of accommodation, care and other facilities which cannot be addressed under the wider "residential" heading. While saved policy HODEV3 sets out the criteria for the Development Of Older Person's Accommodation this needs to be updated, whether it is incorporated into the settlement housing allocations or as a standalone policy. It is clear that the opportunity exists to provide a dedicated policy or acknowledgment within policies KS3 and KS4 to outline the benefits of older person's accommodation including owner occupier retirement and extra care housing. This is evident in the document as it states that some areas, for example West Moors, have an older population profile with 40% of its population over retirement age and others have a considerably younger population profile, such as Corfe Mullen. The complex needs, expectations, provision of care and support will vary considerably within this age group and there will be a need to provide a holistic approach to different types of housing and care provision from the public and private sector, and across all types of</p>						

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											<p>tenure. The Core Strategy itself fails to fully explore the implications and lacks policy promotion and as such the strategy should pick up this more detailed issue.</p> <p>By actively supporting such accommodation at policy level whether through proactive policies or specific land allocation the supply of retirement housing will increase and help release larger properties back into the housing market for more efficient use of the housing stock. This will help achieve the Core Strategy's objective 5 to create a sustainable range of housing to meet local needs and demands.</p> <p>Specialist Accommodation for the Older Population - NPPF The National Planning Policy Framework sets out the strategic case to assess the housing need for the older population. Para 50 of the NPPF states that ... To deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should: ".....plan for a mix of housing based upon current and future demographic trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities" and".....identify the size, type, tenure and range of housing that is required in particular locations reflecting local demand..." and "where they have identified that affordable housing is needed, set policies for meeting this need on site, unless off site provision or financial contribution of broadly equivalent value can be robustly justified (for example to improve or make more effective use of the existing housing stock) and the agreed approach contributes to the objective of creating mixed and balanced communities. Such policies should be sufficiently flexible to take account of changing market conditions over time.</p> <p>By 2026 older people will account for almost half (48 per cent) of the increase in the total number of households, resulting in 2.4 million more older households than there are today . The number of people aged 85 or over will increase by 2.3 million by 2036 – 184 per cent increase . The ageing of society poses one of our greatest housing challenges. The Government has recognised this and has set out its aims and objectives of providing more specialised housing for older people in 'A National Strategy for Housing in an Ageing Society – Lifetime Homes, Lifetime Neighbourhoods'. The National Strategy identifies the important role the planning system has in delivering housing choice for older people, stating;</p> <p>'Spatial planning offers a new and real opportunity to provide more and better quality housing – across the necessary range – for an ageing population in a way that we've not done before.'</p> <p>In respect to future planning policy the Strategy is clear as to the level of importance to be given to an ageing society, stating;</p> <p>'Recent reforms to the planning system require regional and local plans to take proper account of ageing and the needs of older people. Future planning policy reform will reflect the high priority we are giving to the challenge of ageing.'</p> <p>It is considered that in light of the Government Strategy guidance that it is appropriate for the Core Strategy to have greater regard to this objective. My Client's response is based on meeting the</p>					

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											<p>Government’s objective, set out in the National Strategy, to ensure that sufficient specialist housing is delivered to meet the growing needs of an ageing population. This is reinforced in recent publications, please refer to the attached appendix to this letter. The ageing population has increasingly been seen as a potential issue that needs to be positively planned for in all new Local Development Frameworks and particularly at the Core Strategy level. The Department of Health and Communities and Local Government document ‘Lifetime Homes, Lifetime Neighbourhoods – A National Strategy for Housing in an Ageing Society’ dated February 2008 takes this further in looking at the wide range of options that policy makers need to include in formulating future plans. The Strategy identified providing a positive vision for specialised housing and providing more homes and more choice through public funding and encouraging private sector provision through planning system reforms(para 27). The strategy also noted that the vast majority of older householders (68%) owned their own home in 2001, and the figure was projected to rise to 75% by 2026. As such, these people are expected to wish to maintain their own independence by continuing to own their own homes. Chapter 11 of the Lifetimes Homes strategy specifically deals with specialised housing identifying that there is a continuing need for specialised housing and that such accommodation will continue to offer a certain advantage over private housing, particularly to those who need a physical environment designed for those with impairments, better access to help and care, company and a sense of safety. In the provision of appropriate accommodation for the elderly it is also recognised that the private sector has a major strategic role in this.</p> <p>Specialist Retirement Housing Needs Specialist retirement housing meets a number of Core Strategy aims and yet is given little weight in the overall document.</p> <p>Retirement Housing and Assisted Living Extra Care:</p> <ol style="list-style-type: none"> 1. brings older people closer to transport links, local shops and services reducing car dependency, 2. enables older people to release equity, 3. frees up the housing chain, 4. reduces under occupation and meets the wider Core Strategy aims of retaining and enhancing much needed housing stock to families (85% of McCarthy and Stone customers downsize from houses to move to retirement housing), 5. creates opportunities for more efficient provision of local care services eg GP services, reduces the need for respite care after hospital stays, offers a supportive setting with close family, neighbours and house manager, reduces pressure on working families to provide informal care, and 6. it makes optimum use of centrally located brownfield sites. <p>Well located and designed specialist housing for older home owners is a highly sustainable form of housing. There should be a presumption in favour of sustainable housing and in particular specialist housing which is being proposed on suitable sites.</p> <p>Mix of Housing – A retirement and care development such as that</p>					

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											<p>developed by McCarthy and Stone is an important contributor to the housing mix in a particular area. By its very nature it is a single entity with communal space and facilities and could not provide a mix of house types and tenure within the same block.</p> <p>Summary</p> <p>It is clear from local and national statistical data that the demographics of Christchurch and East Dorset and the UK as a whole is ageing. The Council recognise the current and future increase in the older people in the district and in older person households which will have significant implications on the overall housing market in a district with many physical constraints on residential development. The evidence suggests that there is a current and growing need for specialised forms of private sector accommodation for older persons such as retirement housing (cat II type sheltered housing) and assisted living extra care.</p> <p>The Core Strategy fails to draw out sufficient policy weight on this issue. I have appended to this letter recent assessments and reports that reinforce the need for LPAs to give more appropriate weight to such specialist housing and extra care. I trust that due weight will be given to these reports and the requirements of the NPPF to provide policy support for this highly sustainable form of development.</p>							
656692	Mr Robin Henderson	Ken Parke Planning Consultants	CSPS3919	17.2	Yes	No	Yes	Yes	Yes	Yes	The document fails to make positive provision for residential development necessary to secure the future of community services in Longham or the provision of housing to meet local needs during the life of the plan- please see attached statement.	The Core Strategy should be modified to include the expansion of the settlement boundary of Longham around the identified parcel of land to the rear of 122 Ringwood Road. This should feature as a district policy and map in chapter 10- please see the attached statement.	Yes, I wish to participate at the oral examination	The Oral Examination will facilitate discussion of the proposed change.	758	2260313_0_1.pdf		
669847	Mrs Christine McNulty	Ken Parke Planning Consultants	CSPS3993	17.2	No	No	Yes	Yes	Yes	Yes	Please see attached representations document.	Please see attached representations document.	Yes, I wish to participate at the oral examination	To facilitate discussion of the proposed change.	758	2285406_0_1.pdf		
646370	Mr Craig Baker	Dorset Fire & Rescue Service	CSPS2794	17.3							<p>This document sets out the response from Dorset Fire & Rescue Service (Dorset FRS) on the impact on the Service from the proposed growth of East Dorset and Christchurch and how this will affect our current infrastructure.</p> <p>This document has regard to and responds to the following emerging planning documents:</p> <ul style="list-style-type: none"> • East Dorset and Christchurch Core Strategy • Draft Infrastructure Delivery Plan to support the Core Strategy <p>It is noted that the Draft Infrastructure Delivery Plan include a reference to Dorset FRS's infrastructure requirements in paragraphs 2.51 -2.53. This document is intended to provide East Dorset and Christchurch with sufficient information and evidence to enable it to include Dorset FRS's additional requirements in these emerging planning documents.</p> <p>This document is intended for use by East Dorset and Christchurch as an evidence base document in support of the emerging Core</p>						759	2268868_0_1.pdf

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											<p>Strategy. It evidences the need for including identified items of Fire and Rescue Service Infrastructure within the Infrastructure Delivery Plan for future funding through Community Infrastructure Levy (CIL). The relationship between new development and the need for Fire & Rescue Services is explained in this document. It also sets out the justification of the need for developer contributions towards Fire and Rescue Service infrastructure having regard to Fire and Rescue policy, planning policy and current funding.</p> <p>Included in the document is a review of existing Fire and Rescue Service Infrastructure in the core strategy area, the extent of growth that is planned and how growth will change requirements for Fire and Rescue Service infrastructure. Dorset Fire & Rescue Service contacts and relevant references are also included.</p> <p>This document therefore provides the legal and policy basis for Dorset FRS seeking future contributions from development proposals towards its infrastructure, identifies the nature of infrastructure that is anticipated will be required to meet the demands of planned growth and outlines the magnitude of contribution that is likely to be sought.</p> <p>The nature and cost of Fire and Rescue Service infrastructure required to meet growth may change with time and therefore Dorset FRS reserves the right to amend the contents of this document in the future.</p> <p>2. Relationship between growth and Fire and Rescue Service infrastructure New residential and commercial developments, with its associated infrastructure in an area attract people to live and work in it and lead to an increase in traffic movements and volumes. This inevitably results in an increase of fire and non-fire and rescue incidents. Consequently, it places additional demands on Fire and Rescue Service resources to ensure safe places are maintained, consistent with national Government expectations and guidance. Residential properties pose the highest risk to life from fire related incidents. For residential development a clear link can be established between the number of households and the expenditure of Fire and Rescue Service resources. Much proactive work has been carried out by Dorset FRS in recent years to drive down the number of fires and emergencies attended through community engagement. These initiatives have had a significant impact to reduce the number of fatalities and injuries from fire. In addition to preventative work through community safety initiatives, there will remain a need to protect vulnerable communities from fire and other emergencies, to enforce fire safety legislation so that persons responsible for properties maintain and manage them safely and to ensure that suitable personnel and equipment are provided and located to respond quickly in case of fire. We have developed a long term vision for Dorset to 2020, reflecting what is important to us and our communities. This is supported by the following three</p>					

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											<p>strategic aims:</p> <ul style="list-style-type: none"> • Prevention – reducing risk by educating our communities to prevent fires and other incidents occurring. • Protection – ensuring that buildings are well regulated and can offer a safe means of escape in the case of fire. • Response – ensuring that our response delivers a swift and professional service in an emergency. <p>The current standard of service provision in Dorset provides for: 2 fire appliances, with a minimum of 9 firefighters for a domestic house fire; 3 fire appliances and a high rise appliance for blocks of flats of four floors or greater and; 2 fire appliances and 9 firefighters for all road traffic collisions. The number of firefighters is crucial for the service to implement safe systems at work for fire personnel, other emergency services and the general public, whilst ensuring employers and employees comply with the Health & Safety at Work Act.</p> <p>Dorset FRS has historically attended incidents in urban areas within 10 minutes. This is a more challenging target in rural areas served by retained on-call firefighters as found in the East Dorset and Christchurch area. One measurement of our success is the proportion of fires we attend that are confined to the room of origin. This is a useful measure as it includes elements of our preventative, protective and response services. It is therefore vital to consider the future needs for the delivery of this service to ensure that the communities expectations and requirements continue to be delivered both to the existing properties in East Dorset and Christchurch and to those that will be occupied when the developments take place.</p> <p>Dorset FRS will continually review the availability of funding sources to assist in the delivery of its strategy (see section 3 below). Currently there are no capital funding sources available to Dorset FRS for investments to meet the future demands that the growth of East Dorset and Christchurch will place upon its service delivery. For this reason, future contributions from development will play a crucial role in supporting improved and enhanced service delivery, with a view to continuing to meet the current service level following growth. Whilst the mechanism for securing such investment in fire service infrastructure is changing, both the traditional section 106 planning obligations approach and the Community Infrastructure Levy or a local tariff will have a part to play in the provision of infrastructure in the future.</p> <p>It is essential to ensure that new development delivers the necessary requirements to compliment the strategic aims of the Service. Dorset FRS is seeking support for this growth through emerging planning policy to recognise these needs and to source appropriate funding mechanisms. In order to provide future appropriate levels of fire and rescue service cover to the East Dorset and Christchurch area, then it will be necessary for additional funding towards infrastructure to be secured by Dorset FRS.</p> <p>The provision of the current level of prevention, protection and response services using existing resources will not be sustainable</p>					

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											<p>given the forecast rate of expansion and development of the East Dorset and Christchurch area to 2028. We can expect to see an increase in the number of incidents, including fires, rescues and road traffic collisions (RTCs) due to population growth during both the construction and completion phases of the proposed developments as envisaged in the proposed Core Strategy to 2028. In addition, the emergency response times can be expected to be adversely affected due to increased congestion on the road network (Communities and Local Government, "Review of Fire & Rescue Response Times"; Fire Research Series 1/2009).</p> <p>Any delay in the attendance of appropriate resources will be a major contributory factor in the increased risk of additional fatalities, injuries and property damage from fire and other emergency related incidents. This is also true of emergency special services such as RTCs and flooding.</p> <p>The Fire and Rescue Service attends a significant number of incidents other than fire. The other most significant area of activity is the extrication of persons/casualties from road traffic collisions (RTCs). Attendance to RTCs currently accounts for approximately 5.1% of all Dorset FRS incidents. Whilst it is more difficult to align this activity with specific areas of growth, the impact on the Fire and Rescue Service cannot be ignored.</p> <p>The impacts of growth on Fire and Rescue Service resources manifest themselves in a variety of forms both on and off development sites, dependent on the scale and nature of the proposed development, including the need to:</p> <ul style="list-style-type: none"> • acquire land and the capital costs of Fire and Rescue Service buildings and associated facilities for the provision of new fire stations; • extend existing fire stations; • replace temporary with permanent accommodation; • provide additional vehicles and other resources; • extend communication infrastructures; • increase levels of Fire Safety workloads; • reduce risk and demand through advice, enforcement and the provision of equipment. For example, improve fire suppression (sprinklers etc) systems in existing and/or new premises; • provide additional water supplies and hydrants; and • increase staffing levels. <p>Fire and Rescue Service policy background Dorset FRS has a statutory duty under the Fire and Rescue Services Act 2004, via the Fire and Rescue Services' National Framework to prepare an Integrated Risk Management Plan (IRMP). Dorset Fire and Rescue Service's Community Safety Plan 2011 – 2016 is the current IRMP covering East Dorset and Christchurch. The IRMP sets out Dorset FRS's strategy, in collaboration with other agencies, for:</p> <ul style="list-style-type: none"> • reducing the number and severity of fires, road traffic collisions and other emergency incidents occurring; • reducing deaths and the number & severity of injuries in fires, road 					

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											<p>traffic collisions and other emergency incidents;</p> <ul style="list-style-type: none"> • reducing the commercial, economic and social impact of fires and other emergency incidents; • safeguarding the environment and heritage (both built and natural); • contributing to the development of stronger, more self-sufficient and cohesive communities; and • providing value for money. <p>Dorset FRS's growth planning will be subject to continuous review through the Integrated Risk Management process.</p> <p>Community safety is a key issue at all levels of society and government. Ensuring community safety, whether from crime or in its widest sense, is seen as a crucial aspect of achieving sustainable communities.</p> <p>Community safety is high on the list of local quality of life indicators as identified in Supporting Local Communities to Become Sustainable, (Public Sector National Report, AC August 2005) for use in monitoring local Sustainable Community Strategies (SCS's), Local Development Frameworks (LDF's) and Local Area Agreements (LAA's).</p> <p>Community Safety is also recognised in the Department for Government and Local Communities (DCLG's) white paper: Strong & Prosperous Communities (Oct 2006) Vol 2 para A1, where Government's stated ambition is to put community safety "at the heart of the place shaping the role of local authorities"- reflecting the high priority (often the highest) that local communities place on it.</p> <p>The critical role that the Fire and Rescue Service plays in delivering safe and sustainable communities was reinforced in a ministerial speech to the Local Government Association (LGA) conference by the Fire Minister, Bob Neil, in March 2011. Underpinned by statutory obligations within the Fire and Rescue Services Act 2004, the Fire and Rescue National Framework document sets out the Government's expectations on Fire Authorities for reducing and managing community risk through proactive prevention and protection activity and through providing an efficient and effective emergency response.</p> <p>Recognising that Local Authorities will have a greater leadership role in delivering growth, it is relevant to highlight that Local Authorities are legally required under Section 17 Crime & Disorder Act 1998 to ensure they consider crime and disorder reductions and community safety in the exercise of all their duties and activities; this includes spatial planning. Planning authorities should therefore facilitate the objectives of other legislation where land use considerations arise. Any omission or under-emphasis of community safety throughout LDF documents would clearly be contrary to this legal duty.</p> <p>The above legislation imposes a requirement on Fire and Rescue Authorities and Local Authorities to ensure efficient and effective fire and rescue provision and that the Service contributes effectively to the wider community safety agenda.</p> <p>New development schemes place additional demand for Fire and</p>					

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											<p>Rescue Service resources, both in terms of the need for additional capital investment in new facilities and funding for additional firefighters, officers and support staff. It is therefore reasonable for Fire and Rescue Service needs to be taken into account by Local Authorities when determining planning applications relating to the provision of new development.</p> <p>There should be no assumption that Fire and Rescue Services infrastructure can be provided by funding generated outside the planning framework. Dorset FRS has no access to sources of capital funding that could contribute towards new infrastructure arising from growth, although it will continue to seek to identify potential funding sources through other mechanisms in support of the delivery of its strategy. In view of the funding position of Fire & Rescue Services, reliance on developer contributions is therefore paramount to ensuring provision of effective Fire and Rescue Services as growth takes place.</p> <p>If growth takes place, or is at risk of taking place, without fully taking account of community safety issues and requirements, and unless the appropriate policy statements are in LDFs to try and prevent this, Local Authorities are putting at risk Government objectives of creating sustainable and safe communities. Inevitably, as growth generates additional pressure on the Fire and Rescue Service, unless funds are secured to provide a level of infrastructure commensurate with that growth, the service provided will suffer and key planning objectives at the national and local levels will not be met.</p> <p>3. Planning policy context</p> <p>Policy support for securing effective and efficient Fire and Rescue Services in order to create safe places is provided by national guidance and Central Government publications.</p> <p>The provision of adequate Fire and Rescue Service resources is essential in the delivery of a safe, healthy and attractive place to live - a key policy requirement of national planning guidance in Planning Policy Statement 1 (PPS1). Paragraph 5 of PPS1 states that planning should facilitate and promote sustainable and inclusive patterns of development by ensuring development supports existing communities and creates safe, sustainable, liveable and mixed communities.</p> <p>Paragraph 14 states that the Government is committed to developing strong, vibrant and sustainable communities by promoting personal well-being and social cohesion and inclusion. Paragraph 16 states development plans should promote development that creates social cohesion and inclusion, through delivering safe, healthy and attractive places to live.</p> <p>PPS12 (2008) Local Spatial Planning makes it clear that in order to deliver new homes, to foster sustainable economic growth and regenerate our towns and cities, the provision of social, physical and green infrastructure is vital. The Government is committed to ensuring that the necessary funding is in place to support housing and economic development through the allocation of central resources and the introduction of the CIL.</p> <p>"Safer Places - The Planning System and Crime Prevention",</p>					

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											<p>published by the Office of the Deputy Prime Minister (ODPM) in February 2004, states that the prevention of crime and the enhancement of community safety are matters that a Local Planning Authority should consider when exercising its functions under the Town and Country Planning legislation.</p> <p>The existing framework for negotiating development contributions towards infrastructure and services is set out under Section 106 (S106) of the Town and Country Planning Act 1990 (as amended). "Planning Obligations" (ODPM Circular 05/2005) provides Central Government advice on planning obligations under Section 106 of the Town and Country Planning Act as substituted by the Planning and Compensation Act 1991. The guidance states the aim of planning obligations is to make acceptable development which would otherwise be unacceptable in planning terms. It states planning obligations can be used to mitigate a development's impact, for example through the need for increased public transport provision. It follows that, when development gives rise to increased demand for Fire and Rescue Services, it is reasonable to seek contributions from developers to mitigate that impact. Circular 05/2005 also makes provision for the pooling of contributions to mitigate the cumulative impact of development.</p> <p>To enable Local Planning Authorities to seek contributions under the Circular a planning obligation must be:</p> <ul style="list-style-type: none"> • relevant to planning; • necessary to make the proposed development acceptable in planning terms; • directly related to the proposed development; • fairly and reasonably related in scale and kind to the proposed development; and • reasonable in all other respects <p>Paragraph B5 of ODPM Circular 05/2005 states that contributions under Section 106 should be directly related to the development proposal and fairly and reasonably related in scale and kind. The existing policy and legislative context is changing as a consequence of the Planning Bill and the emergence of CIL. Government has committed to the use of a CIL albeit in an amended form that set out under the original November 2010 Regulations. The impact of this is that, in time, it may no longer be possible to secure developer contributions towards aspects of community safety infrastructure under S106 agreements.</p> <p>The Community Infrastructure Levy Regulations (CIL) 2010, and its subsequent amendments, sets the foundation for an emerging approach to securing support from development in the delivery of infrastructure required as a consequence of growth, where that infrastructure is considered to be CIL chargeable. The CIL Regulations create a complimentary mechanism scaling back the use of S106, and setting the framework under which Local Planning Authorities that can become a CIL Charging Authority providing the mechanism, through which a local tariff can be set, payable by the appropriate development within its area. When in place, CIL payments received can be used to deliver infrastructure in accordance with the legal and regulatory framework.</p>					

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											<p>Paragraph 12 of the May 2011 DCLG overview guidance document on CIL states: “The Planning Act 2008 provides a wide definition of the infrastructure which can be funded by the levy, including transport, flood defences, schools, hospitals, and other health and social care facilities. This definition allows the levy to be used to fund a very broad range of facilities such as play areas, parks and green spaces, cultural and sports facilities, district heating schemes and police stations and other community safety facilities. This gives local communities flexibility to choose what infrastructure they need to deliver their development plan.” As fire and rescue services are an essential part of community safety, there is no question that fire and rescue infrastructure falls within the definition of infrastructure for the purposes of CIL. 4. Current Fire and rescue Service Funding Current funding for Dorset Fire & Rescue Service is provided from the following sources: Revenue Support Grant;♣ National Non-Domestic Business Rate Grant;♣ Council Tax Precepts.♣ Like all Local Authorities, Dorset FRS faces a very difficult financial period and Central Government has now announced a very challenging settlement for the next four years. Government announced in 2010 that for the period 2011-14 the grant allocation to fire and rescue services would be reduced by 25%, with the majority of the reductions in 2013 and 2014. In recent years, some additional funding, by way of specific grants, has been provided by Central Government to support particular initiatives, for example, arson reduction, home fire safety checks and national projects such as “New Dimensions”, but such additional funding has to a large extent ceased. The above funding streams provide capital and revenue financial resources to meet existing Fire and Rescue Service needs, thus in order to maintain strategic provision at an adequate level to accommodate growth in new communities, further investment will be required to accommodate the additional demand that will inevitably be placed upon the service by growth. 5. Planned growth in East Dorset and Christchurch to 2028 The East Dorset and Christchurch core strategy forecasts there will be a net increase of 8,270 dwellings within the area by 2028, significantly increasing the resident population. By 2028, East Dorset and Christchurch is projected to experience a 20% increase in population of 156,700 people. The resulting increase in population and commensurate growth in employment, retail, leisure and other facilities will significantly increase the demands on Dorset FRS infrastructure and resources. In response Dorset Fire and Rescue Service will focus on the following two objectives detailed within the core strategy. Employment - Objective 4 East Dorset and Christchurch propose a growth in the employment land available to enable the mixed economy of Christchurch and East Dorset to grow and develop new employment sectors. This will</p>					

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											<p>include significant new zones of employment development located at Bournemouth Airport (15-30ha) and on key sites in East Dorset to serve the local and sub-regional economy.</p> <p>Response We support this proposal but the growth in employment land will have an effect on Dorset FRS resources at a time when they are likely to be reducing due to tightened capital and revenue financial resources to meet existing Fire and Rescue Service needs.</p> <p>Housing - Objective 5 East Dorset and Christchurch propose a growth in housing across the areas with the view to deliver a suitable, affordable and sustainable range of housing to provide for local needs. Sufficient housing will be provided in Christchurch and East Dorset to address local needs and include well planned sustainable new communities in appropriate locations.</p> <p>About 5,250 new homes will be provided in East Dorset between the years 2013 and 2028. The housing provision in Christchurch is proposed to deliver approximately 3,020 new homes between the years 2013 and 2028.</p> <p>Response We support this proposal but the growth in housing will have an effect on Dorset FRS resources at a time when they are likely to be reducing due to tightened capital and revenue financial resources to meet existing Fire and Rescue Service needs.</p> <p>Dorset FRS believe that it is essential that the new housing stock is provided with domestic sprinkler systems and that East Dorset and Christchurch implement a new local planning rule to ensure that these new buildings are safe and sustainable from the design stage. In 2011, the Welsh Assembly voted to require sprinklers in all new housing. The law will apply to new houses, flats and care homes built in Wales. Dorset FRS fully support the Welsh Assembly legislation for the wider use of sprinklers in all types of buildings. We endorse the correct installation and use of sprinklers as a means of securing life, property and firefighter safety.</p> <p>Sprinkler systems in dwellings are not a requirement under current planning or building regulations. However, with community safety a key issue at all levels of society and government we want to ensure that community safety is prioritised as a crucial aspect of achieving sustainable communities. When considering the growth of the area and the potential reduction in Fire and Rescue Service funding, sprinklers are an ideal way of achieving a safe and sustainable community.</p> <p>The Case for Sprinkler Systems Even when people are not injured, a small fire can have a catastrophic effect on businesses or households. The physical damage can result in significant downtime whilst recovering from the fire and sometimes irretrievable loss of business, customers, personal and sentimental possessions. The Arson Prevention Bureau in their statistics state that 'Many businesses never entirely recover - losing orders, contracts, key employees or may go out of business resulting in lost jobs and services to the community'. The direct economic implications, financial losses, temporary and</p>					

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											<p>permanent job losses, evacuation of businesses, schools and homes are devastating. In these harsh financial times, it is simply more than most businesses can bear.</p> <p>Sprinkler systems possess many benefits, including supporting the environment, and if more widely used, will potentially save millions of pounds for our economy. We believe more can be done to promote the wider use of sprinkler systems in domestic, commercial and residential premises and are actively working towards supporting this aim.</p> <p>Dorset FRS is committed to reducing the impact of fire on people, property and the environment. There is clear evidence that sprinklers and other forms of automatic fire suppression systems can be effective in the rapid suppression of fires and therefore play an important role in achieving a range of benefits for both individuals and the community in general. The speed of reaction to a fire by a sprinkler is much faster than the response of a local fire crew, however near they may be. Sprinklers may not always extinguish a fire, but they will hold it in check.</p> <p>This is because sprinklers can significantly help to:</p> <ul style="list-style-type: none"> • Improve the time available to escape from a fire • Reduce death and injury from fire • Reduce the risks to firefighters who we ask to fight the fires • Protect property and heritage • Reduce the effects of arson • Reduce the environmental impact of fire • Reduce fire costs and the disruption to the community and business • Permit design freedoms and encourage innovative, inclusive and sustainable architecture <p>6. Existing Fire and Rescue Service Infrastructure in East Dorset and Christchurch</p> <p>Fire and Rescue cover for East Dorset and Christchurch is currently provided at five fire stations. Within East Dorset three fire stations at Wimborne, Verwood and Cranborne are crewed by on-call (retained) fire fighters. Ferndown has fulltime firefighters in the day time and on-call firefighters at night. Christchurch is crewed by both fulltime and on call crews. All these appliances provide a fire and rescue capability for fire and road traffic collision incident types. In addition to these fire appliances several specialist appliances are stationed at both Ferndown and Christchurch which provide specialist capability for incidents across Dorset.</p> <p>Dorset FRS operates across the county and whilst this submission is concerned with development within East Dorset and Christchurch, the cumulative effect of development within neighbouring Authorities of Bournemouth, Poole, North Dorset and Purbeck will have implications on the total infrastructure provided by Dorset FRS. The implications of the total development, in terms of the demand created for the associated capital requirements, means that when locally based resources are committed to an incident, alternative resources remain available to maintain the Fire and Rescue Service's operational response standards within the local area.</p> <p>7. Additional Fire & Rescue Service Infrastructure requirements</p>					

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											<p>The fire and operational risk model used to predict the future requirements of Fire Service provision in East Dorset and Christchurch for the next fifteen years takes into account the following points:</p> <ul style="list-style-type: none"> • Predicted housing and employment development within Poole, Bournemouth and Dorset. Predicted population growth, based on East Dorset and Christchurch estimates. • Population density increase due to brown field development. • Increase in non-resident population with enhanced economic and social activity following town centre development. • Increased traffic flows due to population and economic growth. • Increase in Service response times due to increase in traffic density. • Maintenance of an operational response that has provision for incident command and a safe system of work for firefighters. • Community liaison infrastructure provision. • Technical fire safety provision. • Administration and support staff. • Retained Duty System (RDS) <p>Response Infrastructure The potential impact of the response infrastructure will need Dorset FRS to consider an alternative approach to providing fire cover within East Dorset and Christchurch and the wider areas that appliances from the stations in the Borough of Poole attend. Dorset FRS, based on the growth forecast, is likely to see an increase in the number of incidents attended that will include fires in domestic dwellings, commercial properties, small fires and road traffic collisions. This submission has depicted the normal FRS attendance for many incidents and we will need to ensure that fully equipped fire appliances are available for attending incidents in homes, commercial premises and on the roads.</p> <p>The core strategy identifies land for community use in West Parley. Considering the key issue of community safety, Dorset FRS will consider whether the planned growth of East Dorset, Christchurch and Bournemouth requires a new model of Fire and Rescue Service infrastructure in the period up to 2028. This may incorporate a new Fire and Rescue Service station at this location but would involve adjustments to the existing Fire and Rescue Service resources in the surrounding area.</p> <p>Should the forecast growth realise, much will occur outside of a 10 minute response time that may change the infrastructure Dorset FRS requires to attend and deal with an incident safely and effectively. Map 1 and Map 2 indicate areas currently outside of Dorset Fire and Rescue Service's response times. Map 1 Christchurch Borough Council Map 2 East Dorset District Council Protection (Fire Safety) Workload The Core Strategy identifies an additional 80 hectares of employment land within the East Dorset and Christchurch area. These jobs will be accommodated within an, as yet, unknown number of commercial units. However, there is sufficient information available to indicate there will be a significant impact on the</p>					

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											<p>workload of the Fire Safety department.</p> <p>The impact on Fire Safety considers a number of factors that determine the length of time spent on Building Regulation submission / consultation and subsequent risk based fire safety audits:</p> <ul style="list-style-type: none"> • The size of the premises. • The complexity of layout. • Is there a fire engineered solution. • The request for pre consultation meetings. • Subsequent amended plans inspections. • Subsequent design meetings. • New commercial premises will be added to the Risk Based Inspection Programme. It is impossible to assess at this stage the impact on the audit workload. A conservative estimate is that if we inspect 5% of these premises per annum then an additional 120 hours of work per year will be created. • Provision of advice. An increased population will automatically lead to an increase in requests for Fire Safety advice. • Administration. Consideration will also need to be given to an increase in the administration staff in the Poole office to cope with the workload. <p>Prevention (Community Safety) Workloads</p> <p>With the estimated increase in homes and the estimated increase in population Dorset FRS will target its prevention resources to those most vulnerable within the East Dorset and Christchurch. The impact on prevention teams, those staff who visit people within their homes to reduce the risk of fire, will be significant.</p> <p>Dorset FRS is aware that the provision of additional Fire and Rescue Service facilities represents only one of a range of community facilities and infrastructure that may be required to serve a new development. The Fire and Rescue Service will, therefore, liaise with other core partners (e.g. Police and Ambulance Services) to ensure a coordinated approach to investment in, and the delivery of, new and/or improved emergency services infrastructure.</p> <p>The measures detailed above must be viewed as a package that as a whole gives the most flexible and resilient solution to the prevention, protection and response requirements for East Dorset and Christchurch. It should be noted that all FRS resources work cohesively as part of an integrated response and this includes work across local authority and FRS boundaries. The Dorset FRS infrastructure proposed above has been identified based on both the information currently available and the professional judgement of Dorset FRS officers. Should part of this package become unattainable, then all the other aspects would require re-assessment.</p> <p>Firefighting Water Supplies – Fire Mains and Fire Hydrants</p> <p>The increased residential and commercial developments will require additional hydrants to be installed and appropriately sized water mains to be provided for fire-fighting purposes. This additional infrastructure is required as a direct result of the developments and so the costs will need to be borne by developers either through them financing the cost of fitting suitable mains and fire hydrants or</p>					

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											<p>through developer contributions. Importantly, these fire-fighting water supplies must be installed at the same time as each phase of development is built so that they are immediately available should an incident occur and the Fire & Rescue Service be called. Experience has shown that developers may intend to install smaller diameter water mains in new developments than would traditionally have been used. Water mains used for fire-fighting purposes must be of adequate diameter in order to provide sufficient pressure and flow rates. A minimum diameter of water main is specified for each of domestic and commercial uses. It does not make good sense environmentally or economically for two mains to be laid in parallel – one for domestic or commercial use and one for fire-fighting use. Therefore, it is requested that a standard planning condition be put in place requiring all new developments to be provided with water mains and fire hydrants suitable for fire-fighting, both according to specifications as detailed by Dorset FRS. These should be installed as part of an agreed delivery plan at the same time as each phase of a development is delivered and at the cost of the developer. Dorset FRS Specifications for Fire Hydrants and Water Mains to be used for Firefighting Purposes.</p> <p>If it is decided not to put in place such a planning condition, then a suitable alternative means would still need to be provided to ensure that the appropriate size of mains will be installed, at the appropriate time, and that hydrants will also be installed at the right time, in the right places, and all at the cost of the developer.</p> <p>Dorset Fire and Rescue Service reserves the right to update and amend this initial statement and looks forward to working with East Dorset and Christchurch authorities.</p> <p>See attachment for maps</p>					
359437	Ms Gill Smith	Dorset County Council	CSPS2848	17.3							<p>In general the Draft IDP is supported although it is considered that it lacks proposals for cultural facilities.</p>	<p>The table under para 1.10 should be amended as follows: 1) Include as a separate category "Cultural facilities" including within the description, arts facilities, theatres, museums, galleries and concert halls. Delivery agencies being, community groups, private companies and local authorities. No particular infrastructure project is submitted but it is suggested that the evidence base should be expanded to investigate cultural needs in more detail. 2) make reference to Dorset County Council as the Lead Local Flood Authority and future SDS Approving Body (SAB). The latter is likely to be commenced April 2013. Para 2.50 should be updated to read "The extension of the library in Christchurch is underway with a</p>			759	

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												completion date of spring 2013.” Waste is identified in the table under para 1.10, but no proposals are included in the Schedule. This should be updated to reflect the position that Dorset Waste Partnership is currently investigating options and the business case for a single depot within the Christchurch /East Dorset area to replace the existing depots at Grange Road Christchurch and Haviland Road, Ferndown.				
656686	Mr Jay Coleman	Intelligent Land	CSPS2784	17.3							<p>This Policing Plan has been prepared by Dorset Police with planning consultancy advice from Intelligent Land; all of the technical information within the Plan has been provided by Dorset Police and the Local Area Commander for the district.</p> <p>Dorset Police has a statutory responsibility to ensure that the district is a safe place to live and work; where crime and fear of crime is reduced.</p> <p>The purpose of this plan is to provide information on an objective assessment, based on the local planning authority’s proposals for future growth, of the level and types of police infrastructure necessary to maintain an adequate level of police service. The Policing Plan confirms the total and individual costs associated with delivery of the identified infrastructure requirements to inform Section 106 negotiations on developer obligations and the local authority’s preparation of a Charging Schedule to introduce the Community Infrastructure Levy.</p> <p>We will in due course present an assessment of the financial impact of units of development by Use on appropriate and qualifying infrastructure items which will be required to adequately police growth. Therefore our objective assessment will comprise the Divisional Commander’s assessment of infrastructure requirements, as well as a formulaic ‘empirical’ assessment which has been approved by the Association of Chief Police Officer’s (ACPO) and scrutinised and approved by a leading QC.</p> <p>The plan does not discuss ‘Secure by Design’ principles as these are set out in ‘The Compendium of Crime Prevention & Reduction in the Planning System’ (2010) and will be pursued by the Police Crime Prevention Design Advisors.</p> <p>Whilst local authorities have a greater leadership role in delivering growth, the Crime and Disorder Act 1998 introduced a wide range of measures for preventing crime and disorder. Section 17 (as amended by Schedule 9 of the Police and Justice Act 2006), imposes an obligation on every local authority (which includes Planning Authorities) to consider crime and disorder reduction in the exercise of all of their duties. This duty extends to spatial planning and by clear association the infrastructure planning required to facilitate growth in a sustainable way.</p> <p>As described in the previously submitted documentation, a significant gap exists between the existing sources of funding</p>				759	2253066_0_1.pdf 2253069_0_1.pdf

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											<p>available to Dorset Police, to deal with planned local population growth, and the scale and objectively assessed impact of that growth.</p> <p>Without significant and sufficient top-up funding to mitigate the impact of local growth, crime levels could be expected to rise, community safety and the fear of crime, and therefore quality of life, could also be expected to suffer in the district. The sole purpose of this Policing Plan is to facilitate Dorset Police's involvement in the planning process and inform the LPA of the Force's infrastructure requirements via CIL / S.106 and the Infrastructure Delivery Plan.</p> <p>CONTENTS</p> <p>1 DORSET POLICE STRATEGIC OVERVIEW 3</p> <p>2 PLANNING POLICY JUSTIFICATION 5</p> <p>3 BASELINE POLICING MODEL 6</p> <p>4 INFRASTRUCTURE REQUIREMENTS.....5</p> <p>5 FUNDING.....7</p> <p>APPENDICES.....11</p> <p>Note: Content of LPA Policing Plans are subject to change depending on feedback from LPA Commanders.</p> <p>1 DORSET POLICE STRATEGIC OVERVIEW</p> <p>1.1 East Dorset falls within the operational area of Dorset Police which is responsible for delivering services to address community safety; to tackle the fear of crime and to seek to achieve a reduction in crime.</p> <p>1.2 The delivery of growth and new development within the East Dorset imposes additional pressure on Dorset Police's infrastructure base which is critical to the delivery of effective policing and to securing safe and sustainable communities. The Police Service does not receive any dedicated funding for capital projects. While revenue funding is provided by the Home Office and the Council Tax precept, capital spending is predominantly financed by prudential borrowing. Borrowing to provide infrastructure necessarily has an impact on the delivery of safe and sustainable communities because loans ultimately have to be repaid from revenue budgets, the corollary of which is a reduction in the funding available to deliver operational policing.</p> <p>1.3 As part of the Government's Comprehensive Spending Review (CSR) announced in November 2010, Dorset Police has been forced to rationalise its estate and plan for future financial cuts in order to achieve its CSR requirements. This has included the consolidation of policing services at some police stations and the closure of other police stations. Any receipts generated from the disposal of existing facilities cannot be 'ring-fenced' or dedicated to new capital spending projects; instead the funds are required by statute to be reinvested into the running of the police estate as a whole. Income is therefore ploughed back into areas such as building maintenance; replacement of operational equipment and</p>					

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											<p>operational funding. As a consequence in practical terms there is no 'pot' of money available to provide new facilities, where expansion, replacement or upgrading is required. Capital receipts from the sale of stations are committed to supplementing other funding streams within Dorset Police (to minimise potential impacts on frontline services). Post-CSR, through its Estate Plan, the Force has sought to streamline its infrastructure base to reduce operational costs whilst maintaining frontline presence to match the existing population and maintain delivery of an efficient and effective police service.</p> <p>1.4 To this end, the baseline position for this LPA Policing Plan reflects the post-CSR spending cuts. Therefore, any net additional growth within the Local Police Area will place additional pressures on policing infrastructure.</p> <p>1.5 Accordingly this Plan assesses potential impacts arising from planned growth and identifies mitigation measures in the form of new infrastructure.</p> <p>Growth Related Impacts</p> <p>1.6 The growth related impacts on effective and efficient policing are twofold:</p> <p>(1) Population growth Policing is essentially a population driven service; with any increase in population there is a concomitant increase in the pressure on the ability of the Police to fulfil their obligation under the Police Act 1996 to deliver an efficient and effective Police service. The causal relationship between population size and levels of crime is supported by academic research. Put simply, if a population increases there is a proportionate increase in the level of crime. Therefore a need then exists to either increase the number of officers to address the rising incidence of crime associated with a growing population, or to make the existing quotient of officers more efficient in dealing with the rising number of incidents to ensure the level of service is maintained or improved.</p> <p>(2) Dispersal or concentration of property While population is a key influence on the effectiveness of delivery of the police service; property, and in particular residential property, exerts a strong influence over how policing is delivered. Population growth, greater longevity and decreasing household size combine to create a need to deliver growth in the stock of housing provided nationally. In addition it is Government policy to increase access to home ownership and to enhance economic prosperity through an increase in the delivery of housing. New housing is delivered (broadly) either through redevelopment and intensification of existing urban areas, or through the development of new peripheral green field sites. Each will impact on delivery of policing; either through a concentration of population within an existing urban area, which places greater demand on existing facilities/staff; or by spreading the growing population more widely within an area, thereby facilitating a need for additional facilities located more closely to new centres of population.</p> <p>Economic growth is also a key Government policy objective. Economic growth creates a greater stock of premises to be policed,</p>					

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											<p>which impact for similar reasons (to residential growth) on the delivery of policing. Maintenance of a visible police presence is a key deterrent to crime, and therefore an increase in the amount and dispersal of all types of property necessarily increases demands on policing infrastructure.</p> <p>Neighbourhood Policing</p> <p>1.7 Dorset Police Local Police Areas are split into neighbourhoods to facilitate effective and efficient delivery of policing. Each neighbourhood has a dedicated neighbourhood policing team (most teams have their own policing facility, although some are shared across boundaries) with some specialist services centralised in larger stations. Growth will increase the population of a neighbourhood and may physically expand the area to be policed or concentrate development within neighbourhoods. This increases the pressure on delivery of the police service; without targeted mitigation to improve service delivery the effectiveness and efficiency of policing will be reduced.</p> <p>2 PLANNING POLICY JUSTIFICATION</p> <p>National Planning Policy Framework (2012)</p> <p>2.1 The National Planning Policy Framework (NPPF) introduces a presumption in favour of sustainable development; which comprises three component dimensions; economy, society and environment. The Planning System is charged with identifying and co-ordinating development requirements including the provision of infrastructure as part of its economic role. It is also tasked as part of its social role with creating a high quality built environment with accessible local services that meet the community's needs and support its health, social and cultural well-being.</p> <p>2.2 One of the objectives of the NPPF is to the promotion of healthy communities, to which end it requires that planning policies and decisions should aim to create places that promote "safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion" (Paragraph 69, NPPF). This is further emphasised at Paragraph 156 which states that Local Planning Authorities should include strategic priorities to deliver "... health, security, community and cultural infrastructure and other local facilities" (Paragraph 156) when preparing their Local Plans.</p> <p>2.3 Accordingly policing plays a major role in achieving these NPPF objectives and it is crucial that additional policing infrastructure is delivered in tandem with development growth.</p> <p>Community Infrastructure Levy Regulations 2010 (as amended)</p> <p>2.4 The Regulations implement the detail of the Community Infrastructure Levy; a mechanism for raising finance from new development to fund the retention/improvement/expansion of infrastructure to support new development. Paragraph 12 of the DCLG guidance document "The Community Infrastructure Levy: An Overview" (May 2011) emphasises that police stations and other community safety facilities can be funded by the CIL.</p> <p>Town and Country Planning (Local Planning) Regulations (2012)</p> <p>2.5 Policing Authorities are identified as a 'relevant authority' (Regulation 2). Regulation 19 requires Local Authorities to consult</p>					

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											<p>with 'specific consultation bodies' which includes 'relevant authorities' when preparing Development Plan Documents.</p> <p>3 BASELINE POLICING MODEL</p> <p>3.1 The baseline infrastructure position in respect of policing infrastructure in East Dorset reflects the changes incurred as a result of the Comprehensive Spending Review (November 2010). Accordingly, Police Authorities will be expected to grow inline with population and economic growth.</p> <p>3.2 There are approximately (as at 22nd June 2012)</p> <ul style="list-style-type: none"> • 1 x Police Officer to every 306 persons in East Dorset calculated as a proportionate average. • 1 x PCSO to every 2,794 persons in East Dorset calculated as a proportionate average. <p>4 INFRASTRUCTURE REQUIREMENTS</p> <p>4.1 Having regard to the preceding chapters of this plan Dorset Police has determined that the proposed level of growth in East Dorset will significantly increase demand for policing services and place increased pressure on Dorset Police infrastructure base. To ensure maintenance of the existing level of service delivery the impacts of planned growth should be mitigated through provision of additional police infrastructure. Dorset Police have identified only the minimum level of infrastructure necessary to cater for the increased demands on policing generated by the planned level of growth. Accordingly, this chapter sets out priority infrastructure that is required to maintain an adequate level of service delivery.</p> <p>4.2 For the purposes of these Policing Plans infrastructure is defined as property and non-property infrastructure necessary to maintain an adequate police service. Non-property includes but is not limited to, staff set up costs and staff revenue funding, capital and revenue costs of vehicles and the capital costs of equipment and IT necessary to enable remote staff working or to provide remote monitoring of areas e.g. CCTV and Automatic Number Plate Recognition (ANPR). Property infrastructure costs include the capital cost of construction, including fit-out costs to the Force's specifications, adaptation costs to internal building layout.</p> <p>4.3 The impact of proposed growth within East Dorset has been assessed across each of Dorset Police Neighbourhood Policing Areas, however only those areas where additional infrastructure is required to cater for new development are set out below. In light of strategic service rationalisation we have only sought moneys for front-line officer's, including PCSO's for visible neighbourhood policing, as well as vehicles. This compliment is sought kitted out, trained and funded for the first three years, as this is the objectively assessed impact of growth.</p> <p>Justification:</p> <p>4.4 Based on an interview with the Divisional Commander Paul Kessell, and Head of Estates Michael Moysey, the implications of growth have been objectively assessed and it has been determined that the service will be unable to support new development proposals without the suitable mitigation of the impact of growth. The Force has no extra capacity to serve an expanded service and the level of infrastructure sought is therefore the minimum level of</p>					

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											<p>infrastructure required to enable the provision of a continued standard of service to ensure community safety and quality of life.</p> <p>4.5 Do Nothing Scenario: (Impact if the additional infrastructure is not delivered) If these financial contributions are not made then we advise that that crime and the fear of crime are likely to rise.</p> <p>4.6 A full schedule of additional (priority) infrastructure required by Dorset Police to address the impacts of growth in East Dorset is attached as Appendix 1.</p> <p>4.7 Because all persons, and all units, regardless of tenure, will have an equal impact on crime and therefore on policing, and ergo, on infrastructure needs, we require the total sum quoted to be provided from all housing types, including affordable housing, or alternatively uplifted on the FMV element to reflect the true impact of growth.</p> <p>4.8 In terms of timescales, all infrastructure items are to be funded upon the commencement of development or in accordance with phased payments as negotiated by the planning authority, in time for the procurement and training (where necessary) of additional resources in time to police new growth areas as soon as the impact is presented. I.e. upon occupation.</p> <p>5.0 Funding</p> <p>5.1 The principal sources of funding are the Home Office grant and the Council Tax precept.</p> <p>5.2 The funding is in turn divided into two broad streams, revenue and capital funding. The revenue funding stream relates broadly to the day to day running costs of maintaining the existing Force, that being the payment and management of staff, the ongoing costs relating to running and maintaining buildings and equipment and repaying of any loans. The capital projects element relates to the provision of additional buildings, equipment and other infrastructure items required to both sustain existing policing services and address increased pressures and requirements placed on the Force as a consequence of growth in demand for services.</p> <p>5.3 Funding allocated to Police Authorities via Home Office grants and other specific limited grant is insufficient to fund requests for capital expenditure. Capital programmes are funded generally from a mixture of asset disposal (a finite option); re-direction of revenue funding (with implications for operational policing) and prudential borrowing. Prudential borrowing is not a nil cost option, with any borrowing required to be repaid from revenue/income; repayments from this source have implications for delivery of operational policing in a similar vein to the re-direction of revenue funding.</p> <p>5.4 Funding received by the Police via the Council Tax precept is used entirely for revenue costs and is not available for capital projects on the basis that this diminishes the resource available for operational delivery.</p> <p>5.5 Detailed information regarding Government and Council Tax funding for the Police and Dorset Police's response to the CSR is set out below: - Home Office/Central Government Funding</p> <p>5.6 Police Authorities are funded by similar methods used to fund all</p>					

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											<p>other Local Authorities and/or other public services. The funding allocated to Police Authorities via Home Office grants, the Council Tax precept and other specific limited grants is insufficient to fund requests for capital infrastructure.</p> <p>5.7 Following the CSR, the Home Office grant which over recent years led to Forces receiving a percentage increase year on year based on the previous year's grant, has from 2011/2012 lead to Forces receiving a percentage reduction year on year. In effect, this means that the Home Office grant is entirely unresponsive to new needs for policing which arise from an increase in population and development stock. Therefore the only option is to supplement it with alternative local funding sources such as prudential borrowing, reinvestment of capital receipts (increasingly unfeasible) and/or the one-off use of reserves or balance surpluses (also limited in scope). Many of these funding options have negative repercussions as discussed briefly below.</p> <p>5.8 Prudential borrowing is not a nil cost option, with any borrowing required to be repaid from revenue/income; repayments from this source have implications for delivery of operational policing in a similar vein to revenue contributions to capital expenditure.</p> <p>5.9 Three-year funding settlements for the Police are determined in accordance with the Comprehensive Spending Review (CSR), which utilises population forecasts that are historic. Funding is based on population figures that are three years in arrears, on which basis the Police Grant received in the current financial year is based on population figures from three years earlier; accordingly there is a consistent lag between the level of revenue funding available and the population to be policed. It is on this basis that three year revenue funding for the infrastructure sought, in line with CIL Regs, is justified. I.e. the impact is solely due to new development and without it the Police cannot support proposals for new housing on the grounds of an unacceptable impact on community safety.</p> <p>5.10 Although PFI is an option, it is a diminishing resource with serious shortcomings. These can be summarised as follows: -</p> <p>5.11 It is considered unwise for Police Authorities to enter into the long term contracts associated with PFI. Indeed HM Treasury is actively reviewing all PFI arrangements and suggesting options of contract review. Changes in demand and unforeseen events in the future may mean severe restrictions in resources if Police Authorities are tied into PFI contracts. For example, if due to a change in circumstances it is decided that a Police Facility is no longer needed, a termination of the contract would require the Police Authority to pay all outstanding debt, interest and foregone profits of the consortium.</p> <p>5.12 PFI facilities are usually very expensive. There are examples of Police Authorities being forced to cut services so as to stay within their budgets i.e. the PFI unitary payment consumes a greater proportion of diminishing revenue budgets.</p> <p>5.13 Schemes built under PFI do not generally provide value for money when comparing the savings on policing infrastructure built under the Public Sector Comparator (PSC) i.e. estimated cost if the</p>					

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											<p>project had been undertaken by the Police Force itself.</p> <p>5.14 It has been found that public services planned by private companies are generally done with a 'commercial ethos' in mind i.e. most PFI consortiums would much rather build larger projects than smaller locally-accessible community facilities, as they generate larger profits for the consortium.</p> <p>5.15 The rate of interest at which a company may borrow reflects the level of risk associated with that loan. Therefore, with the negligible amounts of risk associated with building policing infrastructure a private company can obtain debt finance at a low level of interest. There is therefore no real risk that can be saved by transferring from the public to the private sector.</p> <p>5.16 The PFI system is also widely criticised for the commercial confidentiality that is commanded by private companies, as this obscures accountability. To expand on the points made above, although some Forces do use PFI and have operated it successfully, others have had negative experiences of PFI.</p> <p>5.17 As a form of borrowing requiring repayment, use of this funding mechanism inevitably impacts on a Force's revenue stream and subsequently delivery of the Police service within that area. The corollary is that, in simple terms, there is less funding for officers and support staff and consequently a less visible profile for the police within communities, undermining the neighbourhood policing objective of reducing both the incidence and fear of crime and disorder.</p> <p>5.18 Alternatively, new capital projects can be funded through efficiency savings generated from the existing police estate. This is an option we have been examining closely. However, this is necessarily a finite resource, which cannot be relied upon to deliver considered and planned infrastructure improvements needed to respond to the levels of growth planned over the medium to long term.</p> <p>5.19 Notwithstanding all of the above, the pressure on revenue funding is such that it is extremely unlikely it could be made available to finance the capital or three-year revenue funding gaps identified.</p> <p>Council Tax Precept</p> <p>5.20 Funding received by Dorset Police via the Council Tax precept is used exclusively for revenue purposes and the income contributes towards the running of the existing Force. It does not include any surplus that could be directed towards capital projects/programmes on the basis that directing funds towards such projects would diminish that available for delivery of the policing service.</p> <p>5.21 It should also be noted that even with revenue raised from Council Tax precept there has been a recognised funding gap created by inflation and a continuing expansion of the role of the Police service and the demands placed upon it. Indeed, in relation to Dorset, there is no increase in the Council Tax precept in the current financial year.</p> <p>Comprehensive Spending Review</p> <p>5.22 As a result of the CSR, Dorset Police will need to save</p>					

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											<p>approximately 17-20% reduction in real terms. At the same time, the Government advised police authorities nationally not to increase the policing element of Council Tax. The CSR settlement came into effect from April 2011 onwards.</p> <p>5.23 Dorset Police will not use CIL monies as total funding, and appreciate that it is gap funding only. There are significant additional costs related to the provision of those infrastructure items requested, not least related to land, property, fuel, wages and ongoing revenues, and CIL funds will only be used where the infrastructure will be expanded in line with the overarching strategy, and where the Police have other funding to support the investment, from one or more of the sources identified above. It should be appreciated however that CIL is wholly necessary to mitigate the impact of the proposed growth.</p> <p>5.24 Our calculation of the financial contributions which will be required from CIL before we can support growth proposals, to facilitate new infrastructure provisions, when combined with other funding sources, follows.</p>					
524606	Ms Gill Sanders	Wessex Water	CSPS3209	17.3							<p>During the workshop it was advised that Wimborne STW was currently being improved suggesting that foul drainage as a whole was not an issue for Wimborne. In previous communications I have outlined the likely requirement for capacity improvements of receiving networks for the larger greenfield sites (27th January re IDP) Your accompanying notes advise:</p> <p>Any other improvements to services which are required as a result of development will be discussed by the service providers with the developers who will be required to pay for any work needed.</p> <p>Please also note we expect the developer to contribute towards the cost of capacity improvements. (These comments apply to Wimborne and in general terms)</p>				759	
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS3427	17.4	No	No	No	No	No	<p>Sustainability Appraisal SA Objective 1 Protect, enhance and expand habitats and protected species New extensions to employment sites being created on Greenfield land in East Dorset will be at the expense of significant loss of biodiversity and habitat restoration potential, particularly heathland. Air pollution and light pollution will increase and there is a significant risk of direct and diffuse pollution of watercourses, notably the Moors River system, SSSI. Scoring negative SA Objective 3 Minimise pollution If employment site extensions are taken forward to the Local Plan, meeting this objective will require detailed examination of the entire drainage from the existing and expanded industrial estates to ensure that all surface water passes through carefully designed and maintained pollution control/balancing ponds/features. Responsibility for maintenance and monitoring must be assured.in policy Unless recommendations are adopted scoring is negative</p>	<p>If employment site extensions are taken forward there should be a commitment to detailed examination of the entire drainage from the existing and expanded industrial estates to ensure that all surface water passes through carefully designed and maintained pollution control/balancing ponds/features. Responsibility for maintenance and monitoring must be assured.in policy</p>	<p>No, I do not wish to participate at the oral examination</p>		760		
360302	Mrs Hilary	Environment TAG	CSPS3435	17.4	No				No	<p>By seeking to simplify the policy through combining those in the</p>	<p>Ensure compliance with NPPF</p>	<p>Yes, I wish to participate at the oral examination</p>		760		

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	Chittenden	(East Dorset)									<p>Core Strategy Options document the Policy ME1 is in fact less clear and less effective. Development should add to biodiversity not simply minimise impact: opportunities for increasing biodiversity should be realised. The Policy is not compliant with the overall thrust of NPPF in terms of biodiversity gain. In particular, the following points should be addressed within the policy:</p> <ul style="list-style-type: none"> • The first sentence should include reference to NPPF para 109 – establishing coherent ecological networks • NPPF (para 113) requires criteria based policies and a distinction between the hierarchy of sites so that appropriate weight is given to their importance and the contribution they make to wider ecological networks. The policy appears to give equal weight to all sites • The requirements of NPPF para 114 are not entirely satisfied by inclusion of Nature Map: in the absence of ecological survey potential linkages that could be achieved eg by SANGs or viewed from long term perspective cannot be identified. • In the absence of survey, detailed identification and mapping of local ecological networks (including BAP habitats and species) has not informed site selection adequately eg native woodland and lowland meadow so the policy does not comply with NPPF para 117. <p>Criteria (bullet point 1) should seek to avoid loss or damage to habitats and species. Criteria (bullet point 3) should be amended: it is a requirement of NPPF to improve biodiversity. The words where possible should be deleted. Adequate funding and clear responsibility for monitoring should be put in place. This should either be covered in Policy or under para 13.12. Sustainability Appraisal SA Objective 1 Protect, enhance and expand habitats and protected species The emphasis has been on protecting habitats and protected species rather than enhancing and expanding biodiversity. Score negative</p>	<p>particularly paras 109, 113, 114, 117. Amend Criteria (bullet point 1) so that it seeks to avoid loss or damage to habitats and species. Amend Criteria (bullet point 3) Delete the words where possible. Put in place a mechanism for both adequate funding and clear responsibility for monitoring (either in Policy or under para 13.12.) ETAG supports changes recommended by DWT</p>				
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS3436	17.4	No					No	<p>The site has not been the subject of biological survey. Development will need to take account of the fact that it has been mapped by the RSPB as having heathland restoration potential. Being contiguous with N2K heathland in the West Moors Petroleum Depot, it could make a useful contribution to delivering coherent ecological networks (NPPF para 109). The larger area has remained undisturbed for many years. There is known biodiversity interest in the publicly accessible area alongside the Castleman Trailway. Gas and water mains would preclude that area from development. Sustainability Appraisal SA Objective 1 Protect, enhance and expand habitats and protected species Scoring should be negative not neutral/unknown. The land is adjacent to N2K heathland and presents opportunities</p>				760	

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											for heathland restoration and expansion. The extent of that opportunity should be informed by survey.					
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS34 37	17.4	No	No	No	No	No	No	<p>We recommend that the proposal should acknowledge in the text the significant biodiversity constraints. These include substantial SNCI areas within the site (encompassing important neutral grassland with Green Winged Orchids and heathland) and the adjoining Moors River SSSI system, valley bogs and more N2K heathland. The extensive potential for heathland restoration and habitat linkages from this site have been mapped by the RSPB. More detailed mapping and biological survey together with FRA is required and should be taken into account in considering potential ecological links and buffering to ensure net biodiversity gain and contribute to coherent and resilient ecological networks (NPPF para 109). We consider that normal residential development would be extremely damaging.</p> <p>The policy has not identified criteria such as Layout and Design, Green Infrastructure, Transport and Access, Phasing or, most critically for this site, Drainage.</p> <p>Sustainability Appraisal SA Objective 1 Protect, enhance and expand habitats and protected species</p> <p>Despite claim that residential housing cannot take place here it is understood that proposals for 180 houses are being considered. . There is high risk to the SNCI. This area of important neutral grassland (together with Corfe Mullen Meadows and Alderney) was described by the leading authority on Dorset orchids (Martin Jenkinson) as being the finest site in the country for GreenWinged Orchids. Autumn Ladies Tresses is equally abundant on this site later in the year. Any loss of SNCI should be compensated to provide net biodiversity gain.</p> <p>SA Objective 3 Minimise pollution There is high risk of damaging light pollution to heathland and aquatic ecosystems.</p> <p>Habitats Regulations Assessment More explicit guidance on mitigation of light pollution is required than is covered by Policy HE3 The implications of new road access to the site have not been addressed.</p>	<p>Add new para to follow 11.43 The allocation should be informed by biological survey. The SNCI will be protected and buffered from the development and a Management Plan for the SNCI will be agreed with Dorset Wildlife Trust and arrangements put in place for its long term application. Include design criteria including a specific commitment that the Moors River SSSI will be protected from pollution.</p>	No, I do not wish to participate at the oral examination		760	
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS34 38	17.4	No	No	No	No	No	No	<p>This site drains into the Moors River SSSI, a riverine system which supports an exceptional range of biodiversity including rare Odonata and the Otter. There have been serious pollution incidents in the past from employment estates which drain into the Moors River which have proved highly damaging to its biodiversity. We are therefore deeply concerned about the pollution threat from this proposal, both from acute accidental pollution and ongoing diffuse pollution via ongoing surface water pollution. Both sections of the allocation lies within Flood Zones 2 & 3 and partially within areas that are susceptible to surface flooding (which is likely to increase in the longer term due to climate change NPPF para 99), so the issue of surface water pollution when this flooding inevitably occurs is especially worrying. Without absolute certainty that no damage will</p>	<p>The allocation should be informed by full biological survey. All designated habitats and flood risk zones should be shown on proposals maps – in this case Map 11.7. Include reference to the adjacent SNCI and N2K heathlands in para 11.37 and add a prerequisite for the wildlife strategy to consider the SNCI and N2K heathland.. The policy should explicitly refer to the risk of light pollution and the need to comply with Lighting SPG.</p>	Yes, I wish to participate at the oral examination	As part of the East Dorset Community Partnership, ETAG's remit on biological sciences and sustainability is wider than that of Natural England or Dorset Wildlife Trust.	760	

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											<p>result to the Moors River system, the policy fails to comply with NPPF para 120.</p> <p>The Environment Agency's GP3 (2011), Groundwater Protection, Policy and Practice explains the need for the precautionary approach and the very real problems that pollution can cause, sometimes taking decades to resolve. Of particular relevance is Part 2, the Technical Framework and the section on pollutants. (http://www.environment-agency.gov.uk/research/library/publications/40741.aspx)</p> <p>In our response to the Options consultation, we advised, Of the several employment estates in the catchment of the Moors River, the Woolsbridge Estate is arguably one of the most threatening due to</p> <ul style="list-style-type: none"> • its extreme proximity to the river so that any contaminated surface water runoff can reach the river very quickly, lessening the opportunity for detection and containment; and • its susceptibility to flood (as witnessed by the constraints map and the transecting public footpath being flooded/waterlogged for 6 months of the year) allowing pollutants to be washed into the nearby river. <p>Further Para 11.37 refers only to Moors River SSSI and thus fails to take into account the adjacent N2K heathland and the Woolsbridge Farm Carr SNCI, neither of which are marked on the proposals map.</p> <p>We advise that all SSSIs and SNCIs that are close to proposed development sites should be shown on proposals maps to demonstrate that these are planning constraints that need to be taken on board by developers.</p> <p>There has been no biological survey of the actual allocations, the eastern of which at least would appear to be an undisturbed grassland habitat.</p> <p>The potential for damaging light pollution, to both heathland and aquatic ecosystems, is high.</p> <p>Please see ETAG's detailed supplementary advice to the Options consultation (Light Pollution – Issues for consideration in developing the Core Strategy submitted to EDDC, 5.6.11) which includes details of why light pollution is harmful and what particular developments (roads and buildings, as well as lighting) can have devastating effects.</p> <p>We consider that deliverability of this policy is in doubt. The proposal lacks flexibility to deliver objectives if part or all of the potential allocation fails. It should be noted that the bus service to the site has been terminated recently (May 2012) so sustainable travel to work plans are less likely to be achieved. The present site is significantly under occupied, calling into question the need for such an extensive extension.</p> <p>Notwithstanding our view that the site should not be taken forward for development, we support the prerequisites but recommend that they are strengthened to take better account of the Moors River SSSI and the nearby SNCI and N2K heathland</p> <p>Sustainability Appraisal SA Objective 1 Protect, enhance and expand habitats and protected</p>	<p>Add a prerequisite to direct all surface water from the new and existing estate through a pollution control balancing feature for which a detailed management plan must be agreed by the Council, Environment Agency and Natural England.</p>		<p>Membership includes highly qualified natural scientists and town & parish representatives</p>		

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											<p>species</p> <p>There is no evidence that the policy will meet the objective. High risk of damaging water borne pollution and light pollution affecting Moors River SSSI, SNCI and N2K heathland. Aquatic and terrestrial protected and priority species will be at risk.</p> <p>Negative score not neutral</p> <p>SA Objective 3 Minimise pollution</p> <p>Travel to work plans may limit GHG emissions but the high risk of polluting ecosystems remains.</p> <p>Scoring possibly negative</p> <p>SA Objective 4 Minimise factors contributing to climate change</p> <p>Travel to work plans may limit GHG emissions but bus service has been withdrawn. Service industries (such as boiler maintenance companies etc as on the present site) depend on using fleets of vehicles. Such additional vehicle movements can only be controlled by defining carefully the type of business use that is acceptable.</p> <p>SA Objective 5 Provide access to meet people's needs</p> <p>Travel to work plans may limit GHG emissions but the bus service has been withdrawn. A meaningful travel to work plan may not be achievable. Current plans for improving cycleways will contribute to meeting the objective.</p> <p>Habitats Regulations Assessment</p> <p>More explicit guidance on mitigation is required than is covered by Policy HE3</p>					
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS3439	17.4	No	No	No	No	No	No	<p>Policy VTSW6-The policy does not recognise adequately the importance of the sub-region's environmental assets. Sustainable development must include all three strands of Sustainability - social, economic and environmental. (NPPF para 7)</p> <p>The wording "significant landscape buffers" is open to interpretation. Proposals should reflect the fact that the whole site has been identified by the RSPB in their Heathland Extent and Potential Mapping. There is known important biodiversity on the site including nightjar, smooth snake, sand lizard and dormouse, not just within the SNCI but within the heathy habitat between and beneath the conifers (and possibly beyond). It is imperative that site design is informed by biological survey and seeks to enhance, expand and buffer the SNCI through recreating areas of priority habitat (NPPF para 117). At the very least the NE section of the site should be protected from development and provision made for its long term management.</p> <p>This site drains into the Uddens Water which feeds into the Moors River SSSI only slightly downstream of the site, and is itself part of the SSSI. This riverine system supports an exceptional range of biodiversity including rare Odonata and otters. There have been serious pollution issues in the past from employment estates which drain into the Uddens/Moors River system which have proved highly damaging to its biodiversity</p> <p>We are therefore deeply concerned about the pollution threat from this proposal – both acute pollution from accidental spillage and diffuse pollution via ongoing surface water drainage.</p> <p>The site is included within areas which the EA has warned may be</p>	<p>The allocation should be informed by full biological survey</p> <p>The SNCI should be expanded and buffered substantially, recreating areas of priority habitat: provision should be made for its long term management.</p> <p>Other screening of the industrial area should reflect and enhance existing natural habitat.</p> <p>The policy should include a prerequisite for all surface water from the new and existing estate to pass through a balancing/pollution control feature for which a detailed management plan must be agreed by the Council, Environment Agency and Natural England.</p>	Yes, I wish to participate at the oral examination	<p>As part of the East Dorset Community Partnership, ETAG's remit on biological sciences and sustainability is wider than that of Natural England or Dorset Wildlife Trust. Membership includes highly qualified natural scientists and town & parish representatives</p>	760	

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											<p>prone to surface water flooding and which is likely to increase in the longer term due to climate change (NPPF para 99). Thus the issue of pollution through surface water drainage, as and when this flooding inevitably occurs, is especially worrying.</p> <p>The Environment Agency's GP3 (2011), Groundwater Protection, Policy and Practice explains the need for the precautionary approach and the very real problems that pollution can cause, sometimes taking decades to resolve. Of particular relevance is Part 2, the Technical Framework and the section on pollutants. (http://www.environment-agency.gov.uk/research/library/publications/40741.aspx)</p> <p>Without absolute certainty that there will be no damage to the Moors River system the policy fails to comply with NPPF para 120.</p> <p>Sustainability Appraisal SA Objective 1 Protect, enhance and expand habitats and protected species</p> <p>Although welcome, simply protecting designated sites does not meet this objective. As identified in comments on the proposal the whole area presents opportunities for significant habitat enhancement of heathland and the two areas of wet woodland . These would be lost to development.</p> <p>Negative score not neutral.</p> <p>SA Objective 3 Minimise pollution Pollution risk is a threat to biodiversity of the site and Uddens Water.</p> <p>SA Objective 5 Provide access to meet people's needs Travel to work plans may limit GHG emission. Current plans for improving cycleways will contribute to meeting the objective.</p> <p>Cumulative effects and summary The policy does not score positively on objectives 1 and 3</p>					
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS3440	17.4	No	No	No	No	No	No	<p>Policy FWP7-The policy does not recognise adequately the importance of the sub-region's environmental assets. Sustainable development must include all three strands of Sustainability - social, economic and environmental. (NPPF para 7)</p> <p>In the absence of biological survey at appropriate times of year and in the absence of inappropriate land management (in this case very heavy horse grazing) there is no evidence on which to base unequivocal assessment of the damage/loss that would be caused by development. Based on ETAG members' expertise and experience it is believed that this site in particular could well be a significant area of BAP acid grassland much of which would be lost to development. Further, it is inappropriate to pre-empt survey and recommend that the potential SANG should be set out as parkland. It is essential to look at the wider picture and ensure that the SANG reflects and enhances the existing habitat and contributes to wider and more resilient ecological networks (NPPF para 109).</p> <p>The topography of the site raises concern about the acceptability of the steepest areas for housing. Similar gradients are one of the criteria that have ruled out land at Corfe Mullen. The original BroadwayMalyan Masterplan identified a required surface run-off attenuation storage capacity of 10,668 cu.m. It is assumed that this</p>	<p>The housing allocation should be informed by biological survey (to ensure that high value BAP grassland, if identified, is not lost) and by flood risk assessment (to ensure that longer term climate change impacts are taken into account. Flood risk assessment should include consideration of the ecosystem services provided by the land and the impact on the SANGs areas that are prone to flood. Additional suitable dry areas should be identified.</p> <p>Because of the open aspect of the site, the policy should include a requirement for avoidance or mitigation of light pollution impacts on the R. Stour.</p> <p>Layout and design of the land between the Hillfort and the</p>	Yes, I wish to participate at the oral examination	As part of the East Dorset Community Partnership, ETAG's remit on biological sciences and sustainability is wider than that of Natural England or Dorset Wildlife Trust. Membership includes highly qualified natural scientists and town & parish representatives .	760	

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											<p>would have to be tanked to ensure it did not become a magnet for waterfowl and hence risk air strike. No reference has been made to the ecosystem services afforded by the land (NPPF para 109), the “future proofing” of the proposal with regard to climate change issues in the longer term (NPPF para 99) or the provision of SUDs for the development. We are concerned that leaving FRA to the planning application stage is inappropriate for a site that may prove undeliverable, at least in part.</p> <p>The topography also raises concerns about the suitability of the SANG for the elderly, for young children and for parents with buggies. Much of the SANG should be DDA compliant. It is understood from local residents and councillors that the lower (SW) part of the SANG is flooded or at best waterlogged following heavy rain. There should be links for both people and wildlife across New Road to the smaller area of SANG shown for FWP6. This should be made an attractive option so that people do not simply drive round to Parley Common. It is essential that this SANG works so that there is no adverse impact on the N2K heathland at Parley Common.</p> <p>There is no reference to the problem of light pollution here (particularly from the new link road and other street lights) nor any proposal for its avoidance or mitigation particularly in relation to the damaging impact on the R Stour. (NPPF para 125). The SANG car park should be located away from the river to minimise polarised light.</p> <p>Deliverability is in doubt: i) Flood Risk Assessment and biological surveys should inform the selection of sites that are short listed; ii) the proposal lacks flexibility to deliver objectives if major parts of the site fail.</p> <p>Sustainability Appraisal SA Objective 1 Protect, enhance and expand habitats and protected species ETAG believes that the site may well be a significant area of BAP acid grassland that properly managed could make a substantial contribution to habitat enhancement and connectivity. Much would be lost beneath built development. SA Objective 3 Minimise pollution Policy and SA should address light pollution. Comparative data on air pollution of other options for the road system would be valuable to inform the eventual decision: this is important for local residents, pedestrians and impact on Parley Common.</p>	<p>development should be informed by existing nature conservation interest of the land The SANG design should be informed by biological survey to create coherent ecological networks more resilient to current and future pressures. The majority of the SANG should be DDA compliant and accessible from new development on the site. A safe road crossing should be provided at the junction of the new link road and New Road with ecological links to the smaller area of FWP6 SANG.</p>				
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS3441	17.4	No	No	Yes	Yes	No		<p>Policy FWP3 and Map 10.4 The biodiversity interest of this site is uncertain because of close cropping by horses but it has been relatively well managed so potentially there is good biodiversity interest: there is evidence of a good range of species and numbers of birds. In the absence of biological survey there is no evidence on which to base assessment of the damage/loss that would be caused by development or the location of SANG and its management to mitigate that loss or damage. It is unclear from the proposals map what land is currently publicly accessible or where there are existing public rights of way. Given</p>	<p>We recommend that existing Rights of Way and public access land should be shown on the proposals map. The potential for enhancing ecological networks should be identified following biological survey. Some of the SANG may not be deliverable if surface water is a problem: additional land should be</p>	No, I do not wish to participate at the oral examination		760	

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											<p>the extent of the native woodland across the area there may be opportunities to enhance that which exists, possibly including the area to the SE of the proposed SANG (NPPF para 109). The original BroadwayMalyan report identified drainage as a major consideration for this site and recommended the provision of 2000cu metres of surface water attenuation storage. Assuming that the site design is as shown in Map 10.4, surface flooding could preclude use of some areas of SANG in which case additional area should be provided. At the southern entrance to the area, deep ditches have been culverted under the existing driveway indicating at least seasonally large volumes of surface water drainage which would be exacerbated by building. No proposals for SUDs have been included.</p> <p>It would be helpful if existing RoW and public access land were shown on all proposals maps. The people and wildlife links to FWP 4 should be clarified.</p> <p>Sustainability Appraisal SA Objective 1 Protect, enhance and expand habitats and protected species In the absence of survey, impact is unknown. Policy should identify possible linkages to meet objective.</p>	identified to compensate.				
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS3442	17.4	No	No	No	No			<p>Policy WMC5-The proposal does not recognise adequately the importance of the sub-region's environmental assets. Sustainable development must include all three strands of Sustainability - social, economic and environmental. (NPPF para 7) Deliverability is in doubt: i) Flood Risk Assessment and biological surveys should inform the selection of sites that are short listed; ii) the proposal lacks flexibility to deliver objectives if major parts of the site fail.</p> <p>Layout and design As previously advised in ETAG's supplementary advice to the Options consultation ("Light Pollution – Issues for consideration in developing the Core Strategy" submitted to EDDC, 5.6.11) , With any development in this location, it is essential to bear in mind that the West Wilts and Cranborne Chase AONB is the darkest place in Southern Central England. There is potential for development to have a serious impact on this unique area: it has been mapped by CPRE as tranquillity but includes light pollution. The nearest other dark area is Exmoor. There is potential for damaging impact from the proposed new neighbourhood. This document which includes details of why light pollution is harmful and where and why particular developments (roads, car parks and buildings, as well as lighting) can have devastating effects.has neither been put into the public domain nor acknowledged in the background documents to the current consultation. It is appended for ease of reference. To comply with NPPF (para 125) and limit the impact on the intrinsically dark landscape of the AONB and the biodiversity of the River Allen corridor, non-polarising hard landscaping surfaces, locating car parks away from the river, careful direction of suitable street lighting, and suitable restrictions on security lighting will be essential. The UK Institution of Lighting Professionals, the lighting</p>	<p>We recommend that biological survey and flood risk assessment should inform site layout, scale of development, SANG design and location and the location of allotments and take full account of the implications of climate change in the longer term. To ensure compliance with those NPPF requirements cited, these surveys should precede adoption of the Core Strategy. The light pollution requirements of NPPF should be assured in this particularly sensitive location. Policy on the drainage and protection of the R Allen should be strengthened and consideration given to surface water attenuation measures as outlined above.</p>	Yes, I wish to participate at the oral examination	As part of the East Dorset Community Partnership, ETAG's remit on biological sciences and sustainability is wider than that of Natural England or Dorset Wildlife Trust. Membership includes highly qualified natural scientists and town & parish representatives	760	

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											<p>industry's guideline body, states in its Guidance Notes on the Reduction of Obtrusive Light (revised 2011) that, in intrinsically dark rural landscapes, zero upward light should be the aim. The ILP further states: "Use specifically designed lighting equipment that minimises the upward spread of light near to, and above, the horizontal. Care should be taken when selecting luminaires to ensure that appropriate units are chosen and that their location will reduce spill light and glare to a minimum". The ILP, the Campaign to Protect Rural England (CPRE) and the British Astronomical Association's Campaign for Dark Skies (CfDS) all have detailed information on their websites on best lighting practice. While this should all be considered at the planning application stage, the additional requirement should be taken into consideration when assessing the viability of the proposed development.</p> <p>It is unclear how this substantial new neighbourhood will relate to the local area generally, integrate into the natural, built and historic environment of the approach to Wimborne from the north, or meet the Green Belt purpose of preserving the setting and special character of historic towns of this approach to Wimborne (NPPF paras 59, 61, 80). We recommend that subject to biodiversity and flood risk concerns being addressed in full, this should be clarified in policy and not left to the Planning Application stage. This is of great importance to the local community many of whom regard the scale as overwhelming.</p> <p>The European Landscape Convention (ELC) sets out a broad definition of landscape: Landscape means an area, as perceived by people, whose character is the result of the action and interaction of natural and /or human factors.</p> <p>Each of these words is carefully measured. As identified in the LUC report for Natural England (2009) on implementing the ELC, landscape links culture with nature, and past and present. Not all values of landscape are tangible: it matters to and is valued by people and provides a context for people's lives.</p> <p>Green Infrastructure and SANGs The site has been proposed in the absence of any habitat or protected species survey so lacks any plan to establish coherent ecological networks (NPPF para 109). The land to the east of Cranborne Road is uncultivated grassland but in the absence of access it is not possible to reach even preliminary conclusions on its biodiversity value. It is known that the fields that border Dogdean have high biodiversity interest as does the road verge along the Cranborne Road. The possible existence of substantial BAP lowland meadow habitat within the land to be developed should not be ruled out.</p> <p>The proposed SANGs, particularly to the north and east of the development, are fragmented in nature and will not offer the experience of wide open heathland. Rather they will allow a short dog walk or play area and cannot be considered as being more than public open space.</p> <p>Their location should be informed by full biological survey to ensure a net gain in biodiversity (NPPF para 109). This should also inform</p>					

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											<p>the location of allotments. The opportunity should be taken to enhance the River Allen (BAP chalk stream) and create further habitat linkages recognising the importance of existing woodland at, for example, Catley Copse and the Row and adjacent to the Sembcorp (Water Company) buildings (NPPF para 114). We recommend the inclusion of some woodland into the SANG. There should be a safe road crossing at the northern end of the development.</p> <p>The important verges along the Cranborne Road should be protected. Hedgerows that border this road should be retained and managed so that they screen the development and reduce its visual impact on the setting of the historic town. There should be additional linkages of both grassland and hedgerows to the new GI for the development.</p> <p>The total area of SANG should allow for the maximum occupancy rate that can be achieved given the number of bedrooms per dwelling. If there is potential for this number to be increased in time, additional land should be safeguarded to allow extension of the SANGs to mitigate that increase.</p> <p>Surface water flooding may preclude the use of some areas of SANG: additional land should be made available to offset this.</p> <p>Transport and access</p> <p>The need to cross the Cranborne Road to access the larger SANGs will necessitate safe road crossings at the northern and southern ends of the development. Given the volume of traffic (including HGVs) using this road, a bridge over the road should be considered for the benefit of people and wildlife. It would be preferable to traffic calming measures and further reduction of the speed limit to less than the proposed 30mph.</p> <p>Drainage</p> <p>We welcome proposals for SUDs to be informed by a Flood Risk Assessment but are concerned that the need to “future-proof” flood risk and the potential impact on the River Allen and its ecology have not been considered fully (NPPF para 99). Even relatively low levels of pollution including added silt could have devastating consequences. Throughout most of its length the river corridor borders or runs through the AONB: conservation of its wildlife should be given appropriate high priority (NPPF para 115). There should be no increased risk of flood to the existing urban area of Wimborne (NPPF para 99 and 103).</p> <p>The BroadwayMalyan report identified the whole site area as 26.01 ha of which 15.61ha would be impermeable but just 12.48ha would require water attenuation. The calculated total volume of attenuation requirement was 5113 cu. m. of which 2596cu.m.would require treatment. There was no consideration of the impact of climate change particularly the intensity and change of rainfall patterns that we are experiencing even now.</p> <p>The present development pattern for North Wimborne has been to cover the slopes of the Allen Valley with built development right down to the edge of the floodplain. In effect this proposal extends that pattern upstream. At the very least we need to ensure that this urban extension is done differently with the utmost care being taken</p>					

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											<p>during the construction phase (potentially the most damaging). While grey water from roof drainage is likely to be taken to soakaways, run-off from roads and driveways must not reach the River Allen directly.</p> <p>Keeping the floodplain green and functional is essential and welcome (and contrasts to the situation downstream where the floodplain was converted to car park) but there appears to be no recognition that a pollution/balancing control pond actually in the Allen flood plain may be required. This would be similar to a “mini Moors Valley lakes” which were constructed as balancing ponds/pollution control ponds for Verwood.</p> <p>Sustainability Appraisal SA Objective 1 Protect, enhance and expand habitats and protected species Until surveys have been carried out, biodiversity losses to development cannot be assessed. Similarly, potential for habitat linkages and enhancement may exist but are unknown. The impact on the River Allen corridor is also unknown.</p> <p>SA Objective 3 Minimise pollution Such extensive built development on a steep slope above the Allen is fundamentally at odds with minimising pollution – which includes heavy siltation.. While water run-off may be “minimised” it is essential that pollutants, including suspended solids, do not reach the R Allen: this will be particularly challenging during construction.</p> <p>SA Objective 4 Minimise factors contributing to climate change Score unknown (0) not positive Loss of permanent grassland to the E of the Cranborne Road will contribute to GHG emissions. Loss of ecosystem function will reduce the water holding capacity of the land Appendix to ETAG response to WMC5 Light Pollution – Issues for consideration in developing the Core Strategy 1. Introduction 1.1 While exterior lighting brings many benefits and personal convenience, there is increasing recognition that excessive, poorly designed and badly aimed lighting has adverse effects. DCLG (2007) highlighted the subtle, cumulative effect of excessive lighting on the character of rural landscapes and the tendency for the distinction between urban and rural areas to be blurred. 1.2 In its report on Artificial Light in the Environment, The Royal Commission on Environmental Pollution (2009) describes the night sky as the most culturally universal and historically pristine of natural vistas that is being obscured by light. This loss of vista has been well documented by organisations such as the British Astronomical Association’s Campaign for Dark Skies and CPRE and many international symposia. Of particular concern is the damaging impact of artificial light on biological systems and organisms, including man, that have evolved to respond to natural light and its periodicity. The report draws attention to the need to protect existing low night light areas in both rural and suburban locations: it specifically identifies darkness as an amenity. 1.3 It is essential that the Core Strategy takes into account the</p>					

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											<p>potential damage that may arise from recommendations for development and ensures that artificial night lighting is not allowed to extend out into those areas of open countryside where light levels are currently low and where significant ecological damage could result or into the night sky.</p> <p>1.4 This technical note discusses how organisms respond to light and the damaging impact of light in the wrong place or at the wrong time (light pollution). It concludes with recommendations for consideration in the next stage of developing the Core Strategy.</p> <p>1.5 Appendix 1 C (p10-12) summarises the advice given by the Campaign for Dark Skies, British Astronomical Association and their assessment of the light pollution potential at proposed development sites in the Core Strategy. (This advice has also been included in ETAG’s response to Core Strategy Options).</p> <p>2. Guidance and Legislative framework</p> <p>2.1 Government has recognised that light is a potential source of nuisance in common law and is also a statutory nuisance on which local authorities have powers to act.</p> <p>2.2 Lighting in the countryside – Towards Good Practice (DCLG, 1997) provides a detailed analysis of the severity of light pollution and impacts on man and wildlife as known at that time. Our knowledge and understanding have moved on considerably since then but many of the principles discussed in the Guidance are still very relevant. New issues have arisen with changes in lighting technology and the wavelengths emitted. Changes to countryside character are discussed and the Guidance recommends environmental assessment for lighting installations should include:</p> <ul style="list-style-type: none"> • the effects of night lighting on dark landscapes; • the appearance of lighting structures in daytime; • the potential impacts on the visual amenity of residents and special interest groups such as astronomers; and • the effects on the safety of transport users. <p>It also recommends that Countryside Character Assessment should encompass the sensitivity of a given area to the introduction of exterior lighting. Those areas which retain a dark sky should be recognised: AONBs and areas of wildlife importance are specifically mentioned. Some types of landscape are more vulnerable to the impact of lighting than others: factors that have a strong influence include the overall visual scale of the landscape, the degree of enclosure provided by vegetation cover (though this may not be permanent) and topography.</p> <p>2.3 The NERC Act (2006) Section 40 requires all public bodies to have regard to biodiversity conservation when carrying out their functions (the “biodiversity duties”). Many invertebrates are listed as national priority species for conservation under UKBAP. Loss of invertebrate pollinators, predators and prey due to the impact of light pollution will have adverse consequences for other BAP species and habitats.</p> <p>2.4 Due to the decline in bat numbers, all species of bat are protected by the Wildlife & Countryside Act (1981) (as amended) and the Conservation (Natural Habitats, &c.) Regulations 1994 (as amended). This makes it illegal to: kill, injure, capture or disturb</p>					

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											<p>bats, obstruct access to bat roosts or damage/destroy bat roosts. Lighting in the vicinity of a bat roost causing disturbance could constitute an offence.</p> <p>2.5 PPS1 Delivering Sustainable Development para 20 requires Development Plan policies to take account of environmental issues such as mitigation of the effects of, and adaptation to, climate change through the reduction of greenhouse gas emissions and the use of renewable energy: air quality and pollution: land contamination: the protection of groundwater from contamination; and noise and light pollution.</p> <p>2.6 Annex A, PPS23 Planning and Pollution Control: The following matters (not in any order of importance) should be considered in the preparation of development plan documents and may also be material in the consideration of individual planning applications where pollution considerations arise: ...the need to limit and, where possible, reduce the adverse impact of light pollution eg on local amenity, rural tranquillity and nature conservation.</p> <p>2.7 The ILE (now Institution of Lighting Professionals or ILP) recommend that Local Planning Authorities specify the following environmental zones for exterior lighting control within their Development Plans. (ILE, 2005) Category Examples E1 Intrinsically dark landscapes (National Parks, Areas of Outstanding Natural Beauty) E2 Low district brightness areas (Rural, small villages or relatively dark urban locations) E3 Medium district brightness areas (Small town centres or urban locations) E4 High district brightness areas (Town/city centres with high levels of night time activity) They advise, Where an area to be lit lies on the boundary of two zones, the obtrusive light limitation values used should be those applicable to the strictest zone. Although these guidance notes are generally useful, they are now somewhat dated. The ratios of upward light they allow in their zoning system (up to 15% in urban areas) are unacceptable to the Campaign for Dark Skies. There is NO reason to allow light above the horizontal anywhere, at any time.</p> <p>3. Light and how organisms respond 3.1 "Light" is normally used to describe that part of the electromagnetic radiation spectrum that is visible to man. Light varies in its intensity (the number of photons per unit area) and in its spectral content (wavelength). Other species have different sensitivities eg many insects are able to detect UV light (electromagnetic radiation of a wavelength too short for the human eye to perceive). Natural light intensity varies during the day-night cycle, the lunar cycle and the seasonal cycle: examples are shown in Table 1. Table 1 Illumination from common sources</p> <hr/> <p>Source Illumination</p>					

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											<p>(lux)</p> <p>Full sunlight 103,000 Partly sunny 50,000 Cloudy day 18,000 Bright office 400-600 Most homes 100-300 Full moon under clear conditions 0.1 – 0.3 Quarter moon 0.01 – 0.03 Clear starry sky 0.001 Overcast night sky 0.00003 - 0.0001</p> <hr/> <p>(Rich & Longcore, 2006)</p> <p>3.2 While the “lux” unit of light measurement is that used by designers and engineers it emphasises those wavelengths that are most visible to the human eye. It largely ignores those wavelengths which we cannot detect but are visible to other species. [Please see Bruce-White & Shardlow, 2011 pp 18 -21 for detailed discussion of types of lamp, their uses, spectral range and advantages and disadvantages.]</p> <p>3.3 Organisms have evolved to respond to periodic changes in light levels in ways that control or modulate movement, feeding, mating, emergence, seasonal breeding, migration, hibernation and dormancy, and in plants, flowering and vegetative growth, and the direction of growth.</p> <p>3.4 Light sensitive chemicals in plants provide the basis for photosynthesis and light also modulates growth rates and growth patterns. Red light induces most of the key stages in the life cycle of flowering plants from germination through to flowering and to the onset of dormancy. Positive phototropism (growth towards light) is induced by blue light. Day length regulates flowering in some of our temperate species and is a critical factor in determining the onset of dormant phases in trees.</p> <p>3.5 Invertebrates comprise more than 95 percent of animal species. Their photoreceptors are highly diverse. Insects have compound eyes that detect light and form images and most insects are able to perceive the spectral region of ultraviolet (short wavelength and high frequency) to red (long wavelength and low frequency).</p> <p>3.6 Vertebrates have two types of light sensitive cells in their eyes: - rods which work in dim light but with low acuity: most are sensitive to blue/green light; and - various types of cones which are generally well supplied with nerve connections so deliver sharp colour vision across the visual spectrum.</p> <p>The proportions of rods and cones correlate broadly with the lifestyle of animals. While nocturnal mammals have more rods than cones and diurnal mammals are rich in cones, the differences in species are more subtle than this suggesting that there has been strong evolutionary pressure for adaptation to particular light regimes.</p> <p>3.7 There are four main behavioural responses to light: • Attraction to light – Many species of invertebrates and vertebrates will move towards a light source. This can affect foraging behaviour.</p>					

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											<p>• Avoidance of light – Many species show the opposite behaviour. For example in bright moonlight, small nocturnal mammals move about less, restrict their foraging range and feed for a shorter time than when the sky is overcast. It is thought that this behaviour avoids predation.</p> <p>• Photoperiodism – Many aspects of physiology and behaviour are influenced by day-night (circadian) rhythms. Where species show seasonality in their behaviour, eg annual migrations or periods of dormancy, day length is a mediating factor. These changes enable the individual to avoid unfavourable circumstances.</p> <p>• Spectral quality – Species have evolved to function under particular light regimes. Both their ability to receive light stimuli and respond to them are finely tuned to particular qualities of the visual spectrum. This is particularly apparent in plants, where different photoreceptors are stimulated by different wavelengths of light. Potentially light pollution could impact on each of these with consequences that might be significant for the spatial and temporal distributions of populations (Royal Commission, 2009).</p> <p>Invertebrates</p> <p>3.9 As noted above, invertebrates make up the majority of biodiversity on earth: they are vital to ecosystems. Many are also listed as national priority species for conservation under the UKBAP.</p> <p>3.10 Artificial light has the potential to significantly disrupt ecosystems. It is widely observed that some invertebrates, such as moths, are attracted to artificial lights at night. In addition the polarisation of light by shiny surfaces is a significant problem as it attracts aquatic insects, particularly egg laying females, away from water and reflected light has the potential to attract pollinators and impact on their populations, predators and pollination rates.</p> <p>Species attracted to light</p> <p>3.11 Insects attracted to light include moths, beetles, lacewings, aphids, caddis flies, crane flies, midges, hoverflies, true flies, scorpion flies, damselflies, dragonflies, butterflies, some diurnal jumping spiders, bush crickets, and wasps. Moths are known to fly 3 to 130 m (depending on the species) but distances up to 500m have been observed (Frank, 2006)</p> <p>3.12 An estimated one third of flying insects that are attracted to street light will die as a result (Eisenbeis, 2006). While the heat of the lamps can kill directly, most succumb as a result of increased predation either due to bats (Noctule and Common Pipistrelle) or through falling to the ground having become disoriented and exhausted. Mercury vapour streetlights increase bat predation because the light interferes with the moths' ability to detect ultrasonic sound bursts used by bats to locate prey. Windows and lights become festooned with spiders' webs taking advantage of the artificially high abundance of prey.</p> <p>3.13 Other predators, including lizards, hedgehogs, shrews and the Common Toad can also be attracted to the food source associated with artificial lights. Moths and other invertebrates attracted to light often rest on surfaces close to the light source by day, frequently on an unsuitable background making them clearly visible to predators.</p>					

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											<p>Birds soon learn to hunt for invertebrates resting on surfaces close to artificial light sources (Parsons et al, 2011).</p> <p>3.14 Moths are important pollinators. Most are attracted to white flowers that have low UV reflectivity. Moths have colour vision and require both a visual image and floral scent to locate flowers. Light pollution has many spectral peaks of colour and hence will affect the apparent colour and contrast of flowers at dusk and night so reducing the ability of moths to detect flowers and hence reducing pollination rates. Artificial light has been shown to suppress mating in some species. It can also lead to a shift in egg-laying sites, the female moth laying eggs nearer the light source. This can lead to increased larval density locally (and corresponding decrease elsewhere) and an increased risk of starvation, disease and predation (Parsons et al, 2011).</p> <p>3.15 A report on the larger moths of Britain (Fox et al 2006) identified light pollution as a potential contributory factor to the declines in moth populations, through the disruptive effects of lighting on their behaviour, inhibiting moths from flying and mating and increasing their exposure to predators. High pressure sodium lights attract moths because they emit UV wavelengths: low pressure sodium lights of the same intensity but which do not emit UV are far less likely to attract moths.</p> <p>3.16 Stoneflies, caddisflies, mayflies and other aquatic invertebrates are a vital part of freshwater ecosystems and an important food source for birds, fish and other animals. Increasing intensity and distribution of lights across Britain is affecting riverfly breeding and survival (Fox et al, 2006). The larvae are repelled by light but adults are attracted to artificial night light and appear to be disoriented around them. Flying adults are attracted away from water by lights and shiny surfaces that create polarised light which mimics the surface of a waterbody. High rates of mortality have been recorded around light sources close to river banks. Polarised light pollution sources are also attractive to beetles and dragonflies.</p> <p>3.17 Artificial sources of polarised light such as smooth dark building, cars, road surfaces and solar panels simulate a water surface on which adult mayflies can breed and lay eggs. Laid on these surfaces the eggs will not develop. (Brahic, 2009). Eight of our riverfly species are UK BAP priority species for conservation action. All but the most polluted rivers in Britain support mayfly populations so artificial lighting and sources of polarised light pollution around all rivers should be minimised. (Bruce-White & Shardlow, 2011).</p> <p>Light avoidance</p> <p>3.18 Invertebrates repelled by light include earwigs, cockroaches, woodlice, and earthworms.</p> <p>3.19 Zooplankton, such as Daphnia, normally migrate upwards to the water surface at night to feed on algae. Their failure to do so in light polluted waters can lead to algal bloom so reducing water quality. (Bruce-White & Shardlow, 2011). Aquatic midge larvae and shrimps exhibit pronounced avoidance of even low light levels: artificial light confines them to cold deep water where food is less abundant (Moore, 2006).</p>					

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											<p>3.20 The female Glow-worm does not normally “light up” until light levels have dropped below a certain point. Artificial lighting may impact on this behaviour thereby affecting mating success. (Parsons, 2011)</p> <p>3.21 Other adverse impacts on invertebrates include:</p> <ul style="list-style-type: none"> • inhibition of diapause (a form of dormancy) which would prevent some species from surviving the winter; • changes in levels of activity; • changes in growth rate and natural predator-prey balance; • changes in feeding behaviour of Lepidoptera larvae: many feed at night so avoiding predation; • inhibition of stream drift by aquatic invertebrates leading to increased competition, and serious implications for stream ecosystems (Moore, 2006); • interference with invertebrate migration and dispersal at local and continental scale; • increased activity of necrophilous flies, including egg laying which normally only occurs in daylight. <p>Vertebrates</p> <p>3.22 Fish In addition to disruption of aquatic ecosystems, lights may reduce recreational fishing opportunities. Lights from an adjacent tennis court eliminated the seatrout fishing opportunity in the River Cowie in Stonehaven, Scotland. This nocturnal forager only becomes active when natural light falls to 0.2 - 0.5lux. Angling for this species is never attempted during a full moon. Local anglers successfully won a court case to restrict the use of the tennis court lights during the fishing season (SANA, 2007).</p> <p>3.23 Amphibians and reptiles are also affected by light pollution. Light sources introduced during normally dark periods can disrupt the production of melatonin (a hormone that regulates photoperiodic physiology and behaviour) and developmental irregularities such as retinal damage, reduced sperm production and genetic mutation.</p> <p>3.24 Birds Light polluted sites induces birds to sing during the night, so disrupting normal sleep and rest patterns. Many of our songbirds are primarily insectivorous: thus loss of invertebrates reduces their food source. Light pollution reduces the suitable area of feeding habitat of owls and other night-hunting birds. The disruption of migration has been well documented (eg Gauthreaus & Belser, 2006; Cliff & Henshaw, 2009).</p> <p>3.25 Bats Illuminating a bat roost creates disturbance and may cause the bats to desert the roost. Artificial lighting schemes can damage bat foraging habitat directly, through loss of land and fragmentation, or indirectly by severing commuting routes from roosts, light pollution of water-courses and foraging habitat (Stone, 2009). While pipistrelles, noctules, Leisler’s, and serotine are able to take advantage of moths attracted to light, studies have shown a negative effect of high-pressure sodium lights on the slower flying broadwinged species such as long eared bats, Myotis species (including Brandt’s, whiskered, Daubenton’s, Natterer’s and Bechstein’s), Barbastelle and greater and lesser horseshoe. These species feed by quartering along hedgerows and between trees taking insects on the wing as they move. For these species road</p>					

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											<p>lighting offers no benefits. Indeed, the adverse impact is made worse because insects are attracted to lit areas from further afield, resulting in adjacent habitats supporting reduced numbers of insect prey. It is notable that most of Britain's rarest bats are among those species listed as avoiding light. Artificial light increases the potential for bats to be preyed upon. Lighting can be particularly harmful if used along river corridors, near woodland edges and near hedgerows used by bats. Further details and recommendations on mitigation of lighting impacts on bats are given in a working document produced by the Bat Conservation Trust and ILE, 2009.</p> <p>3.26 Other Mammals Small nocturnal herbivorous mammals are known to restrict foraging in bright moonlight so reducing predation. It is thus reasonable to conclude that artificial night lighting similarly increases risk of predation and decreases food consumption. Circadian rhythms and melatonin production are believed to be disrupted in all mammals with implications for human health (Lockley, 2009).</p> <p>4. Light pollution</p> <p>4.1 In general, light at night provides social benefits and is needed for :</p> <ul style="list-style-type: none"> • Road safety • Personal security against crime • Evening activities – social and commercial <p>But more is not necessarily better. What is needed is careful design to provide appropriate light levels where it is really needed. There is no evidence that lighting deters criminals. While this may seem counter-intuitive, all studies showing some link are funded or part-funded by the lighting industry. Most break-ins occur during daylight, and lit premises are targeted routinely. Light is not a crime reduction agent (CfDS, website)</p> <p>4.2 Light pollution is light in the wrong place or at the wrong time. It can take various forms, originating from both diffuse and point sources.</p> <p>Glare: the excessive contrast between bright and dark areas in the field of view.</p> <p>Light intrusion: Unwanted light eg from adjacent properties and activities.</p> <p>Light clutter: Excessive grouping of lights eg in roadside advertising</p> <p>Light profligacy: Over-illumination which wastes energy and money.</p> <p>Sky glow: A combination of reflected and refracted light from the atmosphere. A major effect is to reduce contrast in the sky. This is the most pervasive form of light pollution and can affect many miles from the original light source.</p> <p>4.3 Causes of light pollution include:</p> <ul style="list-style-type: none"> • Poor lighting design exacerbated by poor installation and maintenance. • Indirect reflection from road and building surfaces. • Quantity of lighting installations. • Light in the wrong place including more and brighter road lighting and light emissions from modern buildings with large areas of windows. • Polarisation of light on wet surfaces and cars . 					

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											<ul style="list-style-type: none"> • Private lighting of external space, security lighting of homes, commercial buildings and floodlighting of sports grounds. • Use of inappropriate lighting that emits UV. <p>5. Recommendations for consideration in developing the Core Strategy</p> <p>5.1 Section 2 above lists legislation and national planning guidance on lighting. The summarised recommendations of the Royal Commission of Light Pollution and those of Buglife (Bruce-White & Shardlow) are given in Appendix 1. ETAG offers the following recommendations for consideration in the further development of the Core Strategy cross-referenced to these two documents as RC and BWS as appropriate).</p> <p>i) Identify those areas (eg Cranborne Chase and West Wilts AONB, AGLVs , urban/rural interface and quiet urban areas) that currently have low levels of artificial night light These areas should be designated according to the Institute of Lighting Engineers environmental zones and protected. (RC1, BWS4)</p> <p>ii) Identify those locations that are particularly sensitive to light pollution: lighting schemes in these areas should be carefully planned to avoid negatively affecting invertebrates and the environment. In particular, lighting should not be installed near</p> <ul style="list-style-type: none"> • ponds, lakes, rivers and the sea; • areas of high conservation value; • sites supporting particularly light-sensitive species of conservation concern (eg glow-worms and rare moths); or • habitat used by protected species of conservation concern (RC 4, BWS 3) <p>These two recommendations have implications for Core Strategy options that are close to the River Allen, Stour and Crane/Moors River system (SSSI) and other BAP habitats and species, and areas where light trespass would impact on the wider countryside. They underline the advice already provided in ETAG's response to Core Strategy Options.</p> <p>iii) Sources of polarised light should be identified and reduced. Measures should include:</p> <ul style="list-style-type: none"> • locating car parks far enough away from rivers/other waterbodies so that aquatic insects are not attracted to cars for egg-laying; • incorporating a rough top-layer or white granules that scatter light to make asphalt road surfaces near waterbodies non-polarising; • in new buildings not using glass that produces horizontally polarised light; and • in solar panels include a pattern of roughened or painted glass or a horizontal light blocking grid so that they are no longer attractive to aquatic invertebrates. (RC4, BWS6) <p>This is particularly important for proposals affecting the Allenvie area and for sports facilities and employment sites (existing and proposed) that are near rivers or other waterbodies.</p> <p>iv) Prepare Supplementary Planning Guidance to deliver:</p> <ul style="list-style-type: none"> • The adoption of revised standards that ensure the provision of light at an intensity no greater than the minimum necessary to deliver the intended benefits and the direction of light at only those areas which are intended to be illuminated. Structures in the 					

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											<p>countryside should not be painted with colours that attract insects. (RC 7, BWS1,7)</p> <ul style="list-style-type: none"> • A master plan that avoids lights that emit a broad spectrum of light with a high UV component. (RC 5) • Reassessment of lighting of roads against potential road safety and crime reduction benefits (RC 1) • Replacement programmes for road lighting in a way that explicitly minimises the negative impacts of stray light: this should include installation of glare cut off on existing installations (RC 6) • An area wide campaign to raise awareness of the damaging impact of light pollution seeking commitment from lighting suppliers and installers. (RC3, BWS5) <p>Acknowledgements ETAG wishes to thank Bob Mizon MBE FRAS, UK Co-ordinator of the BAA Campaign for Dark Skies, for his detailed advice and consideration of the Core Strategy proposals. We are also very grateful to Matt Shardlow, Chief Executive of Buglife – The Invertebrate Conservation Trust, for a pre-publication copy of his paper, A Review of the Impact of Artificial Light on Invertebrates. Appendix 1: Advice and recommendations of Royal Commission on Light Pollution, Buglife and British Astronomical Society A. Recommendations made by the Royal Commission that are relevant to the Core Strategy</p> <ol style="list-style-type: none"> 1. Those responsible for the management of existing National Parks and AONBs ... should seek to eliminate unnecessary outdoor light and to better design and manage that which cannot be eliminated: efforts should be made to retain or create dark skies over urban areas so that people in major centres of population may have access to the night sky. 2. Highways Authorities and Local Authorities should reassess the lighting of roads against potential road safety and crime reduction benefits. 3. The sale of all new external lighting and floodlighting should be accompanied by best practice advice, in order to help installers to aim them correctly, so as to avoid light nuisance and minimise light pollution. 4. There should be explicit consideration of light in planning policy. Planning guidance should include a presumption against the provision of artificial light in some areas where it may have a negative impact on species of concern. Guidance should be expanded specifically to enable local authorities to assess the likely ecological impacts of changes to the amount and quality of artificial light. 5. Local authorities should develop a lighting master plan in consultation with their local communities, professional lighting designers and their own public lighting engineers. 6. Authorities responsible should carry out replacement programmes for road lighting in a way that explicitly minimises the negative impacts of stray light. 7. Lighting standards should require the provision of light at an intensity no greater than the minimum necessary to deliver the intended benefits and that the light should be directed at only those 						

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											<p>areas which are intended to be illuminated.</p> <p>B Recommendations to avoid, minimise or mitigate impacts on wildlife (Bruce-White & Shardlow, 2011)</p> <ol style="list-style-type: none"> 1. Restrict lighting to a functional minimum in all areas. 2. Avoid lights that emit a broad spectrum of light with a high UV component. 3. Some locations are particularly sensitive to light pollution: lighting schemes in these areas should be carefully planned to avoid negatively affecting invertebrates and the environment. In particular, lighting should not be installed <ul style="list-style-type: none"> • near ponds, lakes, rivers and the sea; • areas of high conservation value; • sites supporting particularly light-sensitive species of conservation concern (eg glow-worms and rare moths); • habitat used by protected species of conservation concern 4. Areas with natural or near natural lighting regimes should be officially conserved. 5. Light pollution from domestic security lighting should be reduced through awareness raising. 6. Sources of polarised light should be identified and reduced. Measures should include : <ul style="list-style-type: none"> • locate car parks far enough away from rivers/other waterbodies so that aquatic insects are not attracted to cars for egg-laying; • incorporate a rough top-layer or white granules that scatter light to make asphalt road surfaces near waterbodies non-polarising; • in new buildings do not include glass that produces horizontally polarised light; and • include in solar panels a pattern of roughened or painted glass or a horizontal light blocking grid so that they are no longer attractive to aquatic invertebrates. 7. Structures in the countryside should not be painted with colours that attract insects – grey, yellow and white. These colours are likely to divert pollinators away from flowers and also attract their pollinators. <p>C Advice given by British Astronomical Association, Campaign for Dark Skies (pers.comm. 2010)</p> <p>Technical lighting matters</p> <p>White street lighting (which has replaced narrower spectrum orange light) is multi-chromatic, ranging from blue to red extremes of the spectrum. Orange light is not visible to insects but white light is seen by all other animals. The police like white light, arguing that it is better for visibility of potential offenders: however, then tend to forget that conversely it gives the potential offenders a better view of their target.</p> <p>If the new specification street lights are set up properly there is no need for them to have closer spacing than orange lights. Closer spacing unnecessarily wastes money on infrastructure, uses more power (hence adds to carbon emissions) and adds to light pollution. Key design requirements are position and direction of light. Shielding is essential. To minimise cost, it must be included at the time of installation and not retro-fitted.</p> <p>There are significant problems with reflective surfaces in particular</p>					

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											<p>because of the polarisation of light. Tarmac roads are bad, white or roughened surfaces cause least problems. Grass verges rather than wide pavements reduce the problem. It is essential to take care with lighting on any school campus.</p> <p>Although much is known about the adverse impacts of light pollution, there is still a long way to go in fully understanding the implications and impacts on organisms, food webs and ecosystems. Aquatic ecosystems are particularly vulnerable. Owls are particularly sensitive to bright light and are adversely affected by inappropriate lighting.</p> <p>Light pollution potential of Core Strategy Options</p> <p>Corfe Mullen Proposals would probably make little difference to the existing situation. It is important that the building line is kept back from the edge of the escarpment.</p> <p>Wimborne - Cranborne Road The main problem now in this location is the light from the present football club. Ringwood FC has flat glass lights and this should be adopted by the much larger Wimborne club. The loss of the football ground at WMC1 would be beneficial in terms of light pollution. With any development in this location, it is essential to bear in mind that the West Wilts and Cranborne Chase AONB is the darkest place in Southern Central England. There is potential for development to have a serious impact on this unique area: it has been mapped by CPRE as tranquillity but includes light pollution. The nearest other dark area is Exmoor. There is potential for damaging impact from the proposed new neighbourhood.</p> <p>Wimborne - Stone Lane There is currently relatively little light pollution due to under use of the site and little if any use after dark. There is not much to choose between upgrading industrial use or changing to housing. Particular care should be taken not to cause light pollution problems for the River Allen.</p> <p>Wimborne Rugby Club, Leigh Park Change to housing would reduce light pollution.</p> <p>Wimborne - Land South of Leigh Road There would be a significant increase in light pollution from floodlighting of football and rugby clubs and associated car park as well as from the additional housing. Care should be taken so that light does not affect the R Stour (impact on fish and hence otters).</p> <p>Ferndown and West Parley The open aspect of Dudsbury could cause problems and increase light pollution of the R Stour.</p> <p>Verwood VWM 1 and 2 Because of the open aspect across the AGLV there would be significant light trespass problems with a high impact on landscape and wildlife. Particular concerns about impact on Stephens Castle (SSSI) (Habitats Regulations assessment required)</p> <p>Verwood VWM 3 The site is relatively contained but would increase light levels in the wooded heath.</p> <p>Verwood VWM 4 Low lying so is less intrusive but there are concerns about the impact on the R Crane (SSSI): this should be discussed with the Environment Agency.</p> <p>Verwood VMW 7 Proposed new Upper School The impact of light on Dewlands Common would need to be assessed (Habitats</p>					

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											<p>Regulations).</p> <p>Proposed Industrial Estates</p> <p>There is a blanket lighting problem. Installations are designed by site developer and site users have to accept what is there. (A Lighting SPG could ensure good practice was a planning condition). Need flat glass lighting on roads is as now being adopted county wide but good lighting practice can be (and frequently is) negated by bad lighting next to them. Floodlighting of buildings and trees is problematic.</p> <p>Proposals for Woolsbridge are particularly worrying as the site is adjacent to Moors River SSSI.</p> <p>St Leonards Hospital. The present new car park lighting is unacceptable and damaging due to incorrect mounting of lights. It needs urgent attention. Any new development must address existing problems and the impact on adjacent heathland (Habitats Regulations). Although the lights have been angled down further (from 70 deg to approximately 35 deg above the horizontal), they are still well above the manufacturer's recommended angle for the glass of 17 degrees above the horizontal.</p> <p>Airport site. Light pollution in this area is currently high. Riding Manege and the Garden Centre both create major problems.</p> <p>Local examples of lighting:</p> <p>Good : Sainsburys, Tricketts Cross – good lighting award about 10 years ago</p> <p>Haskins – good lighting award</p> <p>Car dealer B3073 (Longham roundabout - Parley road)</p> <p>Beaucroft Road – plastic curves to shield lights – cost pence to produce – need to be fitted when installed</p> <p>New lights in Ham Lane are good example of large road</p> <p>Bad: St Leonards Hospital have mounted lights incorrectly so they illuminate distance – should point downwards. Can be seen 12 miles away in New Forest.</p> <p>Iford Golf course/range –worst in the area. Unnecessary – now possible to obtain glowing golf balls and small lights at tees.</p> <p>Beaucroft School. D shaped tube lights mounted flat on walls – light goes everywhere and dazzles if look straight at it. Reduces security rather than helping</p> <p>Allenbourne School – looking from Allendale Car park – school disappears behind glare – ineffective for security.</p> <p>Sports facilities and riding establishments are the worst “offenders” re light pollution</p> <p>References</p> <p>Bat Conservation Trust & Institute of Lighting Engineers (2009) Bats and Lighting in the UK www.bats.org.uk/data/files/bats_and_lighting_in_the_UK_final_version_3_may_09.pdf</p> <p>Brahic, C (2009) Wildlife confused by polarised light pollution. New Scientist. 8 Jan. http://www.newscientist.com/article/dn16380-wildlife-confused-by-polarised-light-pollution.html</p> <p>Bruce-White, C and M Shardlow (2011) A Review of the Impact of Artificial Light on Invertebrates.</p>					

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											<p>http://www.buglife.org.uk/News/Save+bugs+from+light+pollution CfDS (2009) Blinded by the Light, British Astronomical Society. Paper cited: Lockly, S W. Human health implications of light pollution CfDS (website) Lighting and Crime http://www.britastro.org/dark-skies/crime.html DCLG (1997) Lighting in the Countryside – Towards Good Practice http://www.communities.gov.uk/archived/publications/planningandbuilding/lighting Fox et al (2006) The State of Britain’s Larger Moths http://aolsearch.aol.co.uk/aol/search?s_it=clientsbox&query=The%20State%20of%20Britain%27s%20Larger%20Moths ILE (2005) Guidance Notes for the Reduction of Obtrusive Light http://www.theilp.org.uk/uploads/File/Technical/RLP%202005.pdf Mizon, Bob (2011) pers. comm.. Ninth European Symposium for the Protection of the Night Sky (2009) http://www.arm.ac.uk/publicevents/2009/enwright/pgm04.pdf papers cited: • Stone, E et al Shedding Light on Bat Behaviour – How Street Lights Disturb Commuting Bats Parsons, M et al (2011) Light pollution – a menace to moths and much more. Butterfly 106, 17-19 Rich, Catherine and Travis Longcore (2006) Ecological Consequences of Artificial Night Lighting. Island Press. ISBN 1-55963-129-5 Rydell, J & H J Bago (1996) Bats and Streetlamps BATS magazine 14, 4. http://www.batcon.org/index.php/media-and-info/bats-archives.html?task=viewArticle&magArticleID=783 SANA (Scottish Anglers National Association) (2007) Light nuisance. www.sana.org.uk The Royal Commission on Environmental Pollution (2009) Artificial Light in the Environment. TSO. ISBN 9780108508547 Other Reading British Astronomical Association’s Campaign for Dark Skies http://www.britastro.org/dark-skies/ The International Commission on Illumination (CIE) is due to publish a guide to master planning but it is not yet on their website (May 2011).</p>					
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS3443	17.4		Yes					<p>Policy WMC3-Support in part Layout and design We welcome recognition of the importance of this location as a gateway to the historic market town. Green Infrastructure We welcome the principle of riverside access, a SANG and replacement allotments. Transport and access We welcome the proposals for improved traffic, pedestrian and cycle access. The site selection and design have not been informed by</p>	<p>Parkland would be inappropriate in this riverside setting. Open green space should seek to enhance the biodiversity and create an area suitable for people and wildlife. The people and wildlife corridor between the River Stour and built area should be substantially wider and link to a SANG when identified. The location of the allotments should be informed by biodiversity and archaeological</p>	<p>No, I do not wish to participate at the oral examination</p>		760	

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											<p>biodiversity survey. Parkland would be inappropriate in this setting. We are concerned that the green infrastructure between the R Stour and the built environment is too narrow, as little as 20m in places. This indicates the need for FRA of the site and SUDs. There should be no ecological damage to the river corridor and the priority species it supports.</p> <p>Please see ETAG's detailed supplementary advice to the Options consultation (Light Pollution – Issues for consideration in developing the Core Strategy submitted to EDDC, 5.6.11) which includes details of why light pollution is harmful and where and why particular developments (roads, car parks and buildings, as well as lighting) can have devastating effects.</p> <p>No SANG has been identified which puts doubt on the deliverability of the site. Any SANG proposed should not be liable to flooding: if parts of it are, then the development area should include adequate alternative space for informal recreation space that is easily accessible.</p> <p>From the map, the allotment area would appear to include land that is identified on Dorset Explorer as having archaeological interest (Scheduled Ancient Monument). Deep cultivation could damage this.</p> <p>Sustainability Appraisal SA Objective 1 Protect, enhance and expand habitats and protected species Scoring of this policy depends on the widening of the riverside area and its recognition of existing and potential biodiversity interest and linkages to a SANG (as yet not identified).</p>	survey.				
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS3444	17.4	Yes						<p>Policy WMC2 Support in part We welcome the proposals for the riverside park and the conservation assessment of the impact of development on the historic setting of Allendale House and for these to be planned as part of an Area Brief.</p> <p>The policy does not recognise adequately the importance of the sub-region's environmental assets. Sustainable development must include all three strands of Sustainability - social, economic and environmental. (NPPF para 7). Given the importance of the River Allen as a BAP priority habitat (chalk stream) and the priority/protected species it supports, the Policy should seek to enhance wildlife opportunities for the benefit of local residents and tourism and to re-create an appropriate setting for this area of the historic market town. Light pollution of the river should be avoided. Please see ETAG's detailed supplementary advice to the Options consultation (Light Pollution – Issues for consideration in developing the Core Strategy submitted to EDDC, 5.6.11) which includes details of why light pollution is harmful and where and why particular developments (roads, car parks and buildings, as well as lighting) can have devastating effects.</p> <p>In addition to Flood Risk Assessment, the Area Brief should include an appraisal of the potential for biodiversity restoration and consequent enjoyment of the River Allen corridor within WCM 2.</p> <p>Sustainability Appraisal SA Objective 1 Protect, enhance and expand habitats and protected</p>	<p>Amend item 4 to A riverside wildlife and linear park.</p> <p>Add bullet point, An appraisal of the potential for restoration of the biodiversity and consequent enjoyment of the River Allen corridor within the urban area.</p>	No, I do not wish to participate at the oral examination		760	

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											species If (but only if) the opportunity is taken to restore the biodiversity and setting of the River Allen corridor in Wimborne for the benefit of people and wildlife this could score positively.					
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS3446	17.4	No	No	No	No	No	No	Policy KS10 Sustainability Appraisal SA Objective 1 Protect, enhance and expand habitats and protected species It is not only designated sites that are at risk but direct habitat loss and connectivity as a result of B3073 improvements and A31 dualling. Congestion will be transferred to Merley. (Policy derives from LTP3.) Score negative SA Objective 2 Make sustainable use of resources Resources required for road construction particularly minerals indicate that this should score negatively. SA Objective 3 Minimise pollution Available evidence indicates some aspects score positively: others are neutral or negative Principle concerns are employment sites and housing development adjacent to sensitive habitats (particularly aquatic habitats) and landscapes (AONB and AGLV). GHG emissions will increase as a result of • embodied energy in road construction • increasing the desire to travel to and from employment sites (particularly HGVs) and the airport (including air travel) • moving points of congestion. New roads increase light pollution and there may be an increased risk of accidental spillages. Mitigation will not be provided simply by monitoring traffic rises. Habitats Regulations Assessment More explicit guidance on mitigation of light pollution is required than is covered by Policy HE3		No, I do not wish to participate at the oral examination		760	
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS3447	17.4	No	No	No	No	No	No	KS9 Sustainability Appraisal Policy KS9 Prime Transport Corridors SA Objective 1 Protect, enhance and expand habitats and protected species "Improvements" to the B3073 will result in significant loss of and damage to sensitive habitats. ME1 cannot ensure no impact. Mitigation and compensation have not been identified SA Objective 5 Provide access to meet people's needs Although Prime Transport Corridors have been identified in LTP 3, poor bus services remain a significant barrier to ensuring sustainable transport is the preferred choice, particularly north of the A31. Habitats Regulations Assessment More explicit guidance on mitigation of light pollution is required than is covered by Policy HE3		No, I do not wish to participate at the oral examination		760	
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS3448	17.4	No	No	No	No	No	No	KS5 The wording of the policy appears to seek environmental acceptability only for live/work units. This should be corrected to apply to all forms of development.	Amend wording to ensure no confusion about application of policy on environmental acceptability.	No, I do not wish to participate at the oral examination		760	

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											<p>Sustainability Appraisal</p> <p>SA Objective 1 Protect, enhance and expand habitats and protected species</p> <p>It is not only carbon emissions that are damaging: NOx emissions are also harmful.</p> <p>The opportunity to enhance and expand habitats, especially heathland, will be lost to development. The Moors River is particularly vulnerable.</p> <p>Score is negative not 0</p> <p>SA Objective 8 Help make suitable housing available and affordable for everybody</p> <p>Increased demand for housing will lead to higher prices and will fuel the demand and need for more affordable homes – a vicious cycle.</p> <p>Cumulative effects and summary</p> <p>Careful balancing of housing and employment will be needed to avoid unsustainable growth.</p>					
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS3450	17.4	No	Yes	No	No	No	No	<p>Objective 6 Support in part</p> <p>We welcome proposals for reducing the need to travel and encouraging sustainable travel choices. The CS contains specific proposals (notably for new roads and junction changes at West Parley) designed to reduce congestion. Traffic calming measures proposed for other centres may increase GHG emissions due to inefficiencies of vehicle engines at lower speeds but encourage HGVs to choose other routes so reducing emissions and noise where pedestrians and local residents quality of life should take precedence.</p> <p>The overall aim should be to reduce fossil fuel consumption and GHG emissions. This will be achieved by reducing the need to travel and traffic congestion.</p> <p>Where good transport links (particularly bus services) do not exist or are unlikely to be introduced for all the proposed new residential development (“new neighbourhoods”), the policies conflict with the objective and fail to meet the requirements of NPPF para 17 (penultimate bullet point) .</p> <p>As noted in comments on the Vision, the objective repeats proposals in LTP3. The road proposals for the B3073 and A31 will have damaging consequences for SNCIs.</p> <p>Sustainability Appraisal</p> <p>SA Objective 1 Protect, enhance and expand habitats and protected species</p> <p>The best we can hope for with ME1 is to reduce the impact of some of these routes – it will not ensure “no adverse impact on biodiversity”.</p> <p>Score is negative not 0</p>		No, I do not wish to participate at the oral examination		760	
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS3451	17.4	Yes	Yes	Yes	Yes	Yes	Yes	<p>Objective 5 Support particularly the recognition of the need to reduce demand while maintaining the character of local communities. Both are equally important in ensuring the maintenance of social cohesion. We also welcome recognition of the need for affordable housing of all sizes so that new families do not rapidly outgrow their homes. Integrated development of all sizes and tenures is essential to ensure sustainability.</p>		No, I do not wish to participate at the oral examination		760	

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											<p>Sustainability Appraisal SA Objective 1 Protect, enhance and expand habitats and protected species There will undoubtedly be some habitat losses and others will be put at risk. In the absence of survey these cannot be quantified. Not all will be mitigated through the provision of SANGs. Scoring has to be "Unknown" but without adequate design and management of the SANGs could be negative.</p>					
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS3452	17.4	No	No	No				<p>Objective 4 Support in part While welcoming the acknowledgement of the importance of the natural environment to the economy of the Districts, the role of "features" is overemphasised and we suggest is not the most appropriate wording. While welcoming the acknowledgement of the importance of the natural environment to the economy of the Districts, the role of selected "features" is overemphasised at the expense of landscape and natural environment which create and shape those features. The present wording has elicited comments of "theme park" approach. We need to manage those assets that attract large numbers of visitors so that they are not damaged by too many people ie achieve sustainable tourism. Sustainability Appraisal SA Objective 1 Protect, enhance and expand habitats and protected species Policies for employment sites largely preclude any habitat enhancement and expansion. Rivers in East Dorset will be at risk. To minimise risk to coherent ecological networks, impacts on BAP habitats and species should be considered (not only designated sites). A neutral score cannot be justified overall. It is definitely negative. Cumulative effects and summary We welcome acknowledgement that opportunities for habitat expansion and enhancement will be lost permanently on these sites. This loss should be mitigated or, where that is not possible, through off-site compensation.</p>	<p>Change penultimate sentence to, Sustainable tourism will ensure low impact on the historic and natural environment while helping to generate employment for local people. Change final sentence to Opportunities will be taken to enhance landscapes and townscapes and to improve, extend and link habitats.</p>	No, I do not wish to participate at the oral examination		760	
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS3453	17.4	No		No	No			<p>Objective 3 We support the proposals for sustainable transport, requirements for developments to reduce their impact on climate change and for the sequential and exception tests to be applied locally to FRA. However, the considerations of necessary adaptations to climate change are incomplete. Adaptation to the challenges of climate change include recognition of the role of ecosystem services (including carbon sequestration through retention and appropriate management of permanent vegetation such as grassland and heathland, and habitat restoration and creation), watershed protection and flood risk attenuation, pollination, pest and disease control (NPPF para 109) Ensuring we have resilient and coherent ecological networks on a landscape scale is an essential part of our adaptation to climate change. Sustainability Appraisal SA Objective 1 Protect, enhance and expand habitats and protected species Biodiversity interest and the ecosystem services of proposed sites</p>	<p>Amend 2nd sentence to: To reduce impact on climate change, developments will be expected to incorporate measures to increase carbon sequestration, reduce greenhouse gas emissions and improve water and energy efficiency</p>			760	

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											must be identified to ensure this challenge is addressed. There is no doubt that transport and development will impact on this objective.					
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS3454	17.4	No	No	No	No	No	No	<p>Objective 1 Support in part</p> <p>While welcoming the commitment to the natural environment of the Districts we are concerned that the sub-text is incomplete. The qualifying text of this objective is selective in the areas and habitats that it seeks to protect, and fails to emphasise the need to achieve landscape scale coherent ecological networks to ensure resilience of our natural environment: this cannot be achieved through simply avoiding direct impact on designated sites (NPPF para 117). The Core Strategy does not include an assessment of existing and potential components of ecological networks (NPPF para 165): this is compounded by the absence of biodiversity survey of the proposed development sites. The Strategy has focused solely on the development constraints posed by the requirement to protect internationally designated heathland.</p> <p>Sustainability Appraisal</p> <p>SA Objective 1 Protect, enhance and expand habitats and protected species</p> <p>While ME policies provide for protection of sites in general, there have been no biological surveys to inform site selection or the way in which they can be managed to ensure net biodiversity gains, no loss of ecosystem services or how proposals can contribute to establishing coherent ecological networks.</p> <p>Losses and risks include:</p> <ul style="list-style-type: none"> • large scale heathland habitat restoration potential (particularly at Blunts Farm FWP8, Woolsbridge VTSW6 and West Moors VTSW8 and acid grassland particularly West Parley FWP7; • areas of unimproved/semi-improved grassland; • sensitive water courses (the Allen and Moors River system) threatened by employment and large scale residential development. Potential for expansion and linkages have not been identified for heathland, woodland or grasslands. <p>The Wild Purbeck NIA and River Allen SNA should be considered. Scoring should be no better than unknown (0), possibly negative (-)</p> <p>SA Objective 2 Make sustainable use of resources</p> <p>Green Belt is the only resource that has been considered: most development (in East Dorset) will take place on green field sites.</p> <p>SA Objective 3 Minimise pollution</p> <p>The admitted increase in risk of pollution on employment sites is of concern. Light pollution and tranquillity have not been considered adequately in site selection for housing or employment.</p> <p>SA Objective 7 Create conditions to improve health, promoting healthy lifestyles</p> <p>There is a risk of damage to/loss of some high quality habitat. Careful design and management of the SANGs can provide opportunities for habitat restoration</p> <p>SA Objective 12 Facilitate a sustainable and growing economy etc.</p> <p>The proposed employment sites pose the greatest threat to the Moors River and to opportunities for significant heathland restoration.</p>	Amend 2nd sentence so it does not imply that development takes place on heathland.eg ...mitigation of development near heathland habitats Change 3rd sentence to New greenspace will be provided as part of major housing proposals to reconnect people and nature and improve our natural environment on a landscape scale.	Yes, I wish to participate at the oral examination	As part of the East Dorset Community Partnership, ETAG's remit on biological sciences and sustainability is wider than that of Natural England or Dorset Wildlife Trust. Membership includes highly qualified natural scientists and town & parish representatives .	760	

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											Overall scoring is marginal between negative and unknown Cumulative effects and summary This objective scores positively on only 4 of the objectives. There is no assessment of how the Core Strategy will contribute to coherent ecological networks or the balance of ecosystem function across the District as a whole. There may be some wins through SANGs but in the absence of survey there are far too many unknowns.					
656737	Mrs Hilary Chittenden		CSPS3456	17.4	No	No	No	No	No	No	Officers' explanation in the Options consultation for excluding Coopers Lane South from the Green Belt was , This option would reduce the opportunity to provide housing to meet the needs of local people. This option is assessed as positive in relation to the natural environment and sustainable use of resources but would clearly be negative for the provision of appropriate housing. This is illogical. As it is adjacent to N2K heathland (Stephens Castle) all the land lies within 400m and therefore cannot deliver housing. The reasons given for Woodland Walk, Ferndown to be included in the Green Belt were, The land is now covered by woodland and protected by a TPO which means it has limited development potential. This provides the necessary exceptional circumstance to justify the land being included within the Green Belt. Coopers Lane South is also covered by a blanket TPO which should preclude it from development but this only tells half the story in terms of its ecological and historical importance. It is characterised by its tranquillity and lack of light pollution. It should not be assessed simply by viewing as an area of land on a map. It is special to the people of Verwood and acts as a buffer between the truly urban area and the heathland LNR Stephens Castle (SSSI, SPA, SAC, Ramsar). The extent of tree cover (including magnificent mature/veteran oaks) would preclude development as it would compromise their root protection zones. This is clearly visible on aerial photographs on Dorset Explorer. The trees are on substantial old boundary banks that, according to deeds of the properties, were in existence at the time of Nelson's ownership of the land. One property is a private arboretum which is a Dorset gem with many rare specimens. Another area includes secondary woodland/scrub. There is only one small area that is used as a paddock – partly in private ownership and partly leased from EDDC. One elderly horse has limited grazing here. Although the land has not been surveyed formally, I have identified significant biodiversity including good grassland and woodland edge flora (some Dorset Notable species), bats, Red Data book birds: Nightjars have been recorded in the oaks. In essence this is a wooded area with ecological links to the mature/veteran oaks that border Coopers Lane Meadow and extend to Burrows Lane and properties to the East and West of it. Key planning issues 1. Moorlands Road is a bridleway that borders Stephens Castle	Amend Policy VTSW3 to read: New Green Belt boundaries will be drawn to include land at Coopers Lane and Doe's Lane and shown on the proposals map.	Yes, I wish to participate at the oral examination	I have known the area well for many years and have appropriate formal qualifications to represent the residents. The Policy was not included in the ETAG response to ensure propriety.	760	

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											<p>(N2K heathland) and cannot be widened for access.</p> <p>2. It is a Bern Convention requirement for no new roads to be built on or near heathlands.</p> <p>3. No new housing may be built within 400m of Stephens Castle – this area is adjacent to it and all of it is well within the 400m zone.</p> <p>4. Any development would require an appropriate assessment under the Habitats Regulations to determine the impact on the heathland.</p> <p>5. Urbanisation of the area would drive dog walkers in particular straight onto Stephens Castle, so reducing use of Coopers Lane Meadow which has already been identified as a potential SANG in the Heathlands IPF and is supported in Core Strategy proposals.</p> <p>6. Any development would necessitate removal of veteran oaks and historic boundary banks and compromise the root systems of other veteran oaks. There would be significant risk of light pollution of the remaining woodland area and any BAP species that it supports as well as impact on the heathland.</p> <p>7. No logical argument has been put forward to include this land in the Urban area. In Core Strategy Options it was claimed</p> <ul style="list-style-type: none"> • (KS4) that the land was able to provide new housing without compromising the heathlands. • (KS6) The option would reduce the opportunity to provide housing to meet the needs of local people • (KS6) This option is assessed as positive in relation to the natural environment and sustainable use of resources but would clearly be negative for the provision of appropriate housing. <p>These arguments are invalid for this site.</p> <p>8. The land is adjacent to Stephens Castle and is open countryside where it borders Moorlands Road and Coopers Lane Meadow. The inclusion of some buildings in the Green Belt is not inappropriate.</p> <p>9. NPPF para 123 states Planning policies and decisions should aim to: ...</p> <ul style="list-style-type: none"> • Identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason. <p>Including it within the Urban Area would compromise this highly prized area.</p> <p>10. Most of the residents affected by the proposal were unaware of the policy as it was within the broader Key Issues section of the Options document rather than the Verwood section. None of them wish to see any development here.</p> <p>The owners of 67, 47 and 49 Moorlands Road wish the whole area to be included in the Green Belt. The owners of 67 have confirmed that they would be happy for their property to be included if that would remove the Council's concerns over any anomalies. The owners of 29, 41 and 63 Moorlands Road confirmed that they want to see the land remain undeveloped but declined any further involvement.</p> <p>On behalf of the named residents, I recommend that the area is included within the Green Belt.</p> <p>SUSTAINABILITY APPRAISAL SA Objective 1 Protect, enhance and expand habitats and protected</p>					

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											<p>species</p> <p>Proposals for Coopers Lane North and Does Lane score positively. However, excluding Coopers Lane South from the Green Belt would put at risk BAP habitat and species (including foraging areas for Nightjar) and important features such as ancient boundary banks. Any urbanisation of the area would drive people onto adjacent N2K heathland.</p> <p>This area scores negatively.</p> <p>SA Objective 11 Maintain and enhance local distinctiveness etc Urbanisation of Coopers Lane South would destroy its tranquillity and impact on adjacent N2K heathland.</p> <p>Score negative</p>					
656737	Mrs Hilary Chittenden		CSPS3460	17.4	No	No	No	No	No	<p>Officers' explanation in the Options consultation for excluding Coopers Lane South from the Green Belt was ,</p> <p>This option would reduce the opportunity to provide housing to meet the needs of local people.</p> <p>This option is assessed as positive in relation to the natural environment and sustainable use of resources but would clearly be negative for the provision of appropriate housing.</p> <p>This is illogical. As it is adjacent to N2K heathland (Stephens Castle) all the land lies within 400m and therefore cannot deliver housing.</p> <p>The reasons given for Woodland Walk, Ferndown to be included in the Green Belt were,</p> <p>The land is now covered by woodland and protected by a TPO which means it has limited development potential. This provides the necessary exceptional circumstance to justify the land being included within the Green Belt.</p> <p>Coopers Lane South is also covered by a blanket TPO which should preclude it from development but this only tells half the story in terms of its ecological and historical importance.</p> <p>It is characterised by its tranquillity and lack of light pollution. It should not be assessed simply by viewing as an area of land on a map. It is special to the people of Verwood and acts as a buffer between the truly urban area and the heathland LNR Stephens Castle (SSSI, SPA, SAC, Ramsar). The extent of tree cover (including magnificent mature/veteran oaks) would preclude development as it would compromise their root protection zones.</p> <p>This is clearly visible on aerial photographs on Dorset Explorer. The trees are on substantial old boundary banks that, according to deeds of the properties, were in existence at the time of Nelson's ownership of the land.</p> <p>One property is a private arboretum which is a Dorset gem with many rare specimens.</p> <p>Another area includes secondary woodland/scrub. There is only one small area that is used as a paddock – partly in private ownership and partly leased from EDDC. One elderly horse has limited grazing here. Although the land has not been surveyed formally, I have identified significant biodiversity including good grassland and woodland edge flora (some Dorset Notable species), bats, Red Data book birds: Nightjars have been recorded in the oaks. In</p>	<p>Amend Policy VTSW3 to read: New Green belt boundaries will be drawn to include land at Coopers Lane and Doe's Lane and shown on the proposals map.</p>	<p>Yes, I wish to participate at the oral examination</p>	<p>I have known the area well for many years and have appropriate formal qualifications to represent the residents. The Policy was not included in the ETAG response to ensure propriety.</p>	760		

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656737	Mrs Hilary Chittenden		CSPS3457	17.4	No	No	No	No	No	<p>Officers' explanation in the Options consultation for excluding Coopers Lane South from the Green Belt was , This option would reduce the opportunity to provide housing to meet the needs of local people. This option is assessed as positive in relation to the natural environment and sustainable use of resources but would clearly be negative for the provision of appropriate housing. This is illogical. As it is adjacent to N2K heathland (Stephens Castle) all the land lies within 400m and therefore cannot deliver housing. The reasons given for Woodland Walk, Ferndown to be included in the Green Belt were, The land is now covered by woodland and protected by a TPO which means it has limited development potential. This provides the necessary exceptional circumstance to justify the land being included within the Green Belt. Coopers Lane South is also covered by a blanket TPO which should preclude it from development but this only tells half the story in terms of its ecological and historical importance. It is characterised by its tranquillity and lack of light pollution. It should not be assessed simply by viewing as an area of land on a map. It is special to the people of Verwood and acts as a buffer between the truly urban area and the heathland LNR Stephens Castle (SSSI, SPA, SAC, Ramsar). The extent of tree cover (including magnificent mature/veteran oaks) would preclude development as it would compromise their root protection zones. This is clearly visible on aerial photographs on Dorset Explorer. The trees are on substantial old boundary banks that, according to deeds of the properties, were in existence at the time of Nelson's ownership of the land. One property is a private arboretum which is a Dorset gem with many rare specimens. Another area includes secondary woodland/scrub. There is only one small area that is used as a paddock – partly in private ownership</p>	Amend Policy VTSW3 to read: New Green Belt boundaries will be drawn to include land at Coopers Lane and Doe's Lane and shown on the proposals map.	Yes, I wish to participate at the oral examination	I have known the area well for many years and have appropriate formal qualifications to represent the residents. The Policy was not included in the ETAG response to ensure propriety.	760		

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656737	Mrs Hilary Chittenden		CSPS3459	17.4	No	No	No	No	No	No	<p>Officers' explanation in the Options consultation for excluding Coopers Lane South from the Green Belt was ,</p> <p>This option would reduce the opportunity to provide housing to meet the needs of local people.</p> <p>This option is assessed as positive in relation to the natural environment and sustainable use of resources but would clearly be negative for the provision of appropriate housing.</p> <p>This is illogical. As it is adjacent to N2K heathland (Stephens Castle) all the land lies within 400m and therefore cannot deliver housing.</p> <p>The reasons given for Woodland Walk, Ferndown to be included in the Green Belt were,</p> <p>The land is now covered by woodland and protected by a TPO which means it has limited development potential. This provides the necessary exceptional circumstance to justify the land being included within the Green Belt.</p> <p>Coopers Lane South is also covered by a blanket TPO which should preclude it from development but this only tells half the story in terms of its ecological and historical importance.</p> <p>It is characterised by its tranquillity and lack of light pollution. It should not be assessed simply by viewing as an area of land on a map. It is special to the people of Verwood and acts as a buffer between the truly urban area and the heathland LNR Stephens Castle (SSSI, SPA, SAC, Ramsar). The extent of tree cover (including magnificent mature/veteran oaks) would preclude development as it would compromise their root protection zones.</p> <p>This is clearly visible on aerial photographs on Dorset Explorer. The trees are on substantial old boundary banks that, according to deeds of the properties, were in existence at the time of Nelson's</p>	<p>Amend Policy VTSW3 to read: New Green Belt boundaries will be drawn to include land at Coopers Lane and Doe's Lane and shown on the proposals map.</p>	<p>Yes, I wish to participate at the oral examination</p>	<p>I have known the area well for many years and have appropriate formal qualifications to represent the residents. The Policy was not included in the ETAG response to ensure propriety.</p>	760	

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656629	John Campbell	Roeshot Hill Allotment Association	CSPS3841	17.4							<p>We appreciate that the strategy within the Document relates to a wide geographic area and the rationalisation of demands from a wide range of competing interests. Whilst the interests and concerns of Christchurch allotment gardeners may seem almost incidental in such context, they are by no means so. We have examined the Document from three perspectives: (1) proposals affecting Christchurch; (2) allotment provision in Christchurch and (3) the impact on the rural environment of Christchurch. We have found that a number of the issues that concern us touch upon fundamental principles contained in the document.</p> <p>HOUSING POLICY - Christchurch</p> <p>The Document draws upon a number of assessments of housing supply and predicted demand to conclude that urban infill will be insufficient to meet future housing needs. After briefly reviewing the physical constraints on building elsewhere in Christchurch, it is proposed to adjust the Green Belt area at Roeshot Hill, Burton and Marsh Lane to accommodate housing developments.</p> <p>1. We consider these proposals to be unjustified in that:</p> <p>1.1 They rest on the assumption that 'housing trumps environment' in a Borough which is characterised by its urban, rural and coastal mix, which makes 'life pleasant' for its inhabitants and which attracts a large volume of visitors and vacationers. Our view is that the assumption in the document is merely a subjective assessment, and that it fails to grasp the inconvenient truth that Christchurch cannot</p>		Yes, I wish to participate at the oral examination		760	2267876_0_1.pdf

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											<p>accommodate all who may wish to live in the Borough whilst maintaining its present character.</p> <p>1.2 The proposals for housing at Burton fail to explain how an additional 45 dwellings will serve the 'specific needs' of the village. On the contrary, the effect of the proposal would be negative by turning Burton from a village into a conurbation.</p> <p>1.3 The Document contemplates the development of 'exception sites' in order to meet the need for affordable housing in the area. This weakens the case for provision of new market homes at the expense of the rural environment.</p> <p>2. The proposals are ineffective in that:</p> <p>2.1 They would adversely affect the Green Belt by releasing some of the 'best and most versatile agricultural land' at Roeshot Hill and substituting unspecified land of lesser value.</p> <p>2.2 They do not ensure the reduction of local demand for new market homes in the absence of a residential qualification (such as applied elsewhere in Dorset) and/or other measures to ensure that local residents have the ability and opportunity to absorb new housing as it becomes available. The document admits the attractions of Christchurch as a retirement location, and the phenomenon of 'supply stimulating demand' could well result in migrants from other areas of the country exacerbating rather than reducing the demands on local resources without reducing local housing needs.</p> <p>3. The proposals are non-compliant with section 110 Localism Act 2011</p> <p>Christchurch shares a housing market area and travel to work area with Bournemouth and Poole, New Forest Council and adjacent local authorities in Hampshire. It is mostly a matter of preference rather than strategic issues that determine where people live. If it is the case that Christchurch cannot accommodate more than 2060 additional homes without impacting on its rural villages and Green Belt, the question arises as to whether there has been a reasonable allocation of resources to absorb regional housing needs.</p> <p>Despite some reference to joint working with neighbouring Dorset authorities (but not Hampshire) there is no evidence of any specific arrangement whereby unmet requirements in Christchurch might be met by neighbouring authorities, particularly by Bournemouth, which is by far the largest authority. We feel that it is reasonable to conclude that the Christchurch Borough Council and East Dorset District Council have failed to fully exhaust the duty to co-operate with adjoining local authorities within the spirit of section 110.</p> <p>4. The proposals are non-compliant in respect of Sustainability</p> <p>The Sustainability Assessment is not on consultation and is only referred to in paragraph 1.21. By not have the SA open for consultation in the same way as the Core Strategy the Council are failing to complete stage D of the Sustainability Assessment effectively and thus the Core Strategy is unsound. This could be subject to Judicial Review.</p>					
359571	Mr Renny Henderson	Royal Society for the Protection	CSPS3763	17.6							With respect to policies ME1-ME3 above, we note that these have been excluded from the HRA process (page 18) on the basis they		Yes, I wish to participate at the oral examination	we would like to confirm that	762	

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		of Birds									are being promoted to safeguard biodiversity. We are concerned that this potentially overlooks impacts associated with the implementation of these policies on European sites, for example, possible adverse impacts on hydrology, traffic and pollution associated with the development of a substantial SANG in proximity to an European site. We would wish to discuss this with Natural England, but have not been able to during the consultation period. The same general point may also apply to the remainder of policies within Chapter 13, namely ME4-ME7.						
359571	Mr Renny Henderson	Royal Society for the Protection of Birds	CSPS4002	17.6							The Habitats Regulations Assessment (HRA) We welcome the pre-submission Habitats Regulations Assessment Report (HRA) dated February 2012 and prepared by Land Use Consultants. We consider this provides a reasonable basis for the assessment of potential policy impacts and identifies the broad range of mitigation measures that must be put in place to ensure that the Core Strategy does not have an adverse impact on the European sites. We note the concerns expressed in the HRA (pages 24-30) regarding potential adverse impacts on European sites from Core Strategy policies, especially: Potential habitat loss, associated with policies KS9 and KS10 and the aspiration of Christchurch Borough Council in regard to a Christchurch by-pass (paragraphs 3.17-3.25); Physical disturbance/damage, associated with policies CN3, KS10 and FWP6 (paragraphs 3.26-3.31); Recreation and 'urban pressure' (paragraphs 3.32-3.35); Noise, vibration and light pollution, from vehicle traffic or increased recreational pressure (paragraphs 3.36-3.39); Air pollution, associated with housing, employment and transport improvements (paragraphs 3.40-3.46). Issues surrounding water quality and water quantity (paragraph 3.47) are ruled out within the HRA. We would like to test the explanation given within the HRA (paragraphs 2.24-2.25) as to why		Yes, I wish to participate at the oral examination		we would like to confirm that we wish to reserve the right to appear at the Examination into the Core Strategy, on the grounds the Core Strategy raises significant issues relating to the protection of internationally important wildlife sites (as highlighted in the HRA) and that there remains	762	

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											these issues have been screened out, and plan to raise the matter with Natural England. However we support many of the conclusions of the HRA in connection with the potential adverse impacts. Having reviewed the Core Strategy and the HRA we consider that: Without effective mitigation there will be an adverse impact on one or more European sites; The range of mitigation measures recommended in the HRA are largely feasible and that if implemented successfully could eliminate adverse effects on these sites; Significant uncertainties remain about the delivery of an effective package of mitigation measures because of the complexity of some key elements, and that this need to be resolved to provide the required level of certainty of delivery of effective mitigation; The HRA cannot be considered completed until the final series of mitigation measures attached to the Core Strategy are in place. These comments provide an important backdrop to our further comments on the Core Strategy. In principle, whilst we strongly support the direction of key policies we consider it necessary to object to a number of policies at this stage pending progression and resolution of the above issues.			uncertainty over the delivery of appropriate and effective mitigation measures.		
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS3998	17.6	No	No	No	No	No	No	<p>VTSW7 We recommend that the proposal should acknowledge in the text the significant biodiversity constraints. These include substantial SNCI areas within the site (encompassing important neutral grassland with Green Winged Orchids and heathland) and the adjoining Moors River SSSI system, valley bogs and more N2K heathland. The extensive potential for heathland restoration and habitat linkages from this site have been mapped by the RSPB. More detailed mapping and biological survey together with FRA is required and should be taken into account in considering potential ecological links and buffering to ensure net biodiversity gain and contribute to coherent and resilient ecological networks (NPPF para 109). We consider that normal residential development would be extremely damaging.</p> <p>The policy has not identified criteria such as Layout and Design, Green Infrastructure, Transport and Access, Phasing or, most critically for this site, Drainage.</p> <p>Sustainability Appraisal</p> <p>SA Objective 1 Protect, enhance and expand habitats and protected species</p> <p>Despite claim that residential housing cannot take place here it is understood that proposals for 180 houses are being considered. . There is high risk to the SNCI. This area of important neutral grassland (together with Corfe Mullen Meadows and Alderney) was described by the leading authority on Dorset orchids (Martin Jenkinson) as being the finest site in the country for GreenWinged Orchids. Autumn Ladies Tresses is equally abundant on this site later in the year. Any loss of SNCI should be compensated to provide net biodiversity gain.</p> <p>SA Objective 3 Minimise pollution</p> <p>There is high risk of damaging light pollution to heathland and aquatic ecosystems.</p> <p>Habitats Regulations Assessment</p>	<p>Add new para to follow 11.43 The allocation should be informed by biological survey. The SNCI will be protected and buffered from the development and a Management Plan for the SNCI will be agreed with Dorset Wildlife Trust and arrangements put in place for its long term application.</p> <p>Include design criteria including a specific commitment that the Moors River SSSI will be protected from pollution.</p>	No, I do not wish to participate at the oral examination		762	

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											More explicit guidance on mitigation of light pollution is required than is covered by Policy HE3 The implications of new road access to the site have not been addressed.					
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS399	17.6	No	No	No	No	No	No	<p>VTS6 This site drains into the Moors River SSSI, a riverine system which supports an exceptional range of biodiversity including rare Odonata and the Otter. There have been serious pollution incidents in the past from employment estates which drain into the Moors River which have proved highly damaging to its biodiversity. We are therefore deeply concerned about the pollution threat from this proposal, both from acute accidental pollution and ongoing diffuse pollution via ongoing surface water pollution. Both sections of the allocation lies within Flood Zones 2 & 3 and partially within areas that are susceptible to surface flooding (which is likely to increase in the longer term due to climate change NPPF para 99), so the issue of surface water pollution when this flooding inevitably occurs is especially worrying. Without absolute certainty that no damage will result to the Moors River system, the policy fails to comply with NPPF para 120.</p> <p>The Environment Agency's GP3 (2011), Groundwater Protection, Policy and Practice explains the need for the precautionary approach and the very real problems that pollution can cause, sometimes taking decades to resolve. Of particular relevance is Part 2, the Technical Framework and the section on pollutants. (http://www.environment-agency.gov.uk/research/library/publications/40741.aspx)</p> <p>In our response to the Options consultation, we advised, Of the several employment estates in the catchment of the Moors River, the Woolsbridge Estate is arguably one of the most threatening due to</p> <ul style="list-style-type: none"> its extreme proximity to the river so that any contaminated surface water runoff can reach the river very quickly, lessening the opportunity for detection and containment; and its susceptibility to flood (as witnessed by the constraints map and the transecting public footpath being flooded/waterlogged for 6 months of the year) allowing pollutants to be washed into the nearby river. <p>Further Para 11.37 refers only to Moors River SSSI and thus fails to take into account the adjacent N2K heathland and the Woolsbridge Farm Carr SNCI, neither of which are marked on the proposals map.</p> <p>We advise that all SSSIs and SNCIs that are close to proposed development sites should be shown on proposals maps to demonstrate that these are planning constraints that need to be taken on board by developers.</p> <p>There has been no biological survey of the actual allocations, the eastern of which at least would appear to be an undisturbed grassland habitat.</p> <p>The potential for damaging light pollution, to both heathland and aquatic ecosystems, is high.</p> <p>Please see ETAG's detailed supplementary advice to the Options</p>	<p>The allocation should be informed by full biological survey.</p> <p>All designated habitats and flood risk zones should be shown on proposals maps – in this case Map 11.7.</p> <p>Include reference to the adjacent SNCI and N2K heathlands in para 11.37 and add a prerequisite for the wildlife strategy to consider the SNCI and N2K heathland..</p> <p>The policy should explicitly refer to the risk of light pollution and the need to comply with Lighting SPG.</p> <p>Add a prerequisite to direct all surface water from the new and existing estate through a pollution control balancing feature for which a detailed management plan must be agreed by the Council, Environment Agency and Natural England.</p>	<p>Yes, I wish to participate at the oral examination</p>	<p>As part of the East Dorset Community Partnership, ETAG's remit on biological sciences and sustainability is wider than that of Natural England or Dorset Wildlife Trust. Membership includes highly qualified natural scientists and town & parish representatives</p>	762	

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											<p>consultation (Light Pollution – Issues for consideration in developing the Core Strategy submitted to EDDC, 5.6.11) which includes details of why light pollution is harmful and what particular developments (roads and buildings, as well as lighting) can have devastating effects.</p> <p>We consider that deliverability of this policy is in doubt. The proposal lacks flexibility to deliver objectives if part or all of the potential allocation fails. It should be noted that the bus service to the site has been terminated recently (May 2012) so sustainable travel to work plans are less likely to be achieved. The present site is significantly under occupied, calling into question the need for such an extensive extension.</p> <p>Notwithstanding our view that the site should not be taken forward for development, we support the prerequisites but recommend that they are strengthened to take better account of the Moors River SSSI and the nearby SNCI and N2K heathland</p> <p>Sustainability Appraisal SA Objective 1 Protect, enhance and expand habitats and protected species There is no evidence that the policy will meet the objective. High risk of damaging water borne pollution and light pollution affecting Moors River SSSI, SNCI and N2K heathland. Aquatic and terrestrial protected and priority species will be at risk. Negative score not neutral SA Objective 3 Minimise pollution Travel to work plans may limit GHG emissions but the high risk of polluting ecosystems remains. Scoring possibly negative SA Objective 4 Minimise factors contributing to climate change Travel to work plans may limit GHG emissions but bus service has been withdrawn. Service industries (such as boiler maintenance companies etc as on the present site) depend on using fleets of vehicles. Such additional vehicle movements can only be controlled by defining carefully the type of business use that is acceptable. SA Objective 5 Provide access to meet people’s needs Travel to work plans may limit GHG emissions but the bus service has been withdrawn. A meaningful travel to work plan may not be achievable. Current plans for improving cycleways will contribute to meeting the objective. Habitats Regulations Assessment More explicit guidance on mitigation is required than is covered by Policy HE3</p>					
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS4000	17.6	No	No	No	No	No	No	<p>KS10 Sustainability Appraisal SA Objective 1 Protect, enhance and expand habitats and protected species It is not only designated sites that are at risk but direct habitat loss and connectivity as a result of B3073 improvements and A31 dualling. Congestion will be transferred to Merley. (Policy derives from LTP3.) Score negative SA Objective 2 Make sustainable use of resources</p>		No, I do not wish to participate at the oral examination		762	

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											<p>Resources required for road construction particularly minerals indicate that this should score negatively.</p> <p>SA Objective 3 Minimise pollution</p> <p>Available evidence indicates some aspects score positively: others are neutral or negative</p> <p>Principle concerns are employment sites and housing development adjacent to sensitive habitats (particularly aquatic habitats) and landscapes (AONB and AGLV).</p> <p>GHG emissions will increase as a result of</p> <ul style="list-style-type: none"> embodied energy in road construction increasing the desire to travel to and from employment sites (particularly HGVs) and the airport (including air travel) moving points of congestion. <p>New roads increase light pollution and there may be an increased risk of accidental spillages.</p> <p>Mitigation will not be provided simply by monitoring traffic rises.</p> <p>Habitats Regulations Assessment</p> <p>More explicit guidance on mitigation of light pollution is required than is covered by Policy HE3</p>						
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS4001	17.6	No	No				No	<p>KS9 Sustainability Appraisal</p> <p>Policy KS9 Prime Transport Corridors</p> <p>SA Objective 1 Protect, enhance and expand habitats and protected species</p> <p>“Improvements” to the B3073 will result in significant loss of and damage to sensitive habitats. ME1 cannot ensure no impact.</p> <p>Mitigation and compensation have not been identified</p> <p>SA Objective 5 Provide access to meet people’s needs</p> <p>Although Prime Transport Corridors have been identified in LTP 3, poor bus services remain a significant barrier to ensuring sustainable transport is the preferred choice, particularly north of the A31.</p> <p>KS9 Habitats Regulations Assessment</p> <p>More explicit guidance on mitigation of light pollution is required than is covered by Policy HE3</p>		No, I do not wish to participate at the oral examination		762		