



Core Strategy

Main Modifications to the Submitted Core Strategy

Responses received during the consultation 11 December 2013 – 22 January 2014



Prepared by Christchurch Borough Council and
East Dorset District Council

February 2014

Submission Document SD37

Mod ref	Comment ID	Consultee	Wish to appear at hearing	Legally compliant	Sound	Reason why document is not legally compliant or is unsound	Change sought	Councils' Comments
MM 1	CSMM34	Ms Gill Smith Dorset County Council (ID: 359437)	No	Yes	Yes	Dorset County Council supports the transport related modifications listed above as identified in the Schedule of Proposed Main Modifications to the Core Strategy.	None	
MM 1	CSMM106	Mrs Jane Merrett (ID: 662829)	Yes		No	Increased development as the proposed road amendments will not provide solutions to Christchurch traffic problems. In fact, development can only increase it. In January 2014, both Burton Road and Stony Lane were flooded on several days (closing both for considerable time). To get through Christchurch was a nightmare. Likewise in summer, additional holiday traffic causes long queues often to the top of Roeshot Hill (A35).	Scale down the proposed Christchurch development or build a bypass first.	A range of transport improvements are planned and are being delivered for the A35 corridor through Christchurch. Development will mitigate it's negative impact on the transport network by contributing towards and providing transport improvements adjacent to their site and on the wider network.
MM 1	CSMM74	Mrs Nicola Brunt Dorset Wildlife Trust (ID: 359461)		Yes	Yes	Dorset Wildlife Trust supports this modification as it acknowledges the need to meet local and national policy requirements. This recognises concerns over the environmental constraints that would affect provision of a by-pass.		
MM 1	CSMM152	Sir Roger Palin (ID: 499596)	Yes		No	Dualling of the A31(T). This response applies to both MMs 1 and 3. There remains confusion about the status of the proposal to "dual the A31 (T) from Ferndown to Merley". This project has been deleted both from the Core Strategy Vision (MM1) and from Core Strategy	Either the dualling of the A31(T) should be reinstated into the Core Strategy or at the very least the Merley roundabout improvements	The word 'improvement' has been used to encompass likely interim improvements such as junction improvements as well as the longer term

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						<p>Objective 6 (MM3), but remains in Policy KS10 (MM8) and the revised Infrastructure Delivery Plan (MM67, para 2.14 and pp 41 and 67).</p> <p>The deletion of the plan to dual the A31(T) from Ferndown to Merley from the Core Strategy Vision and the substitution of improvement of the A31 (T) around Wimborne (MM3) is a very significant change which can only have seriously deleterious consequences for traffic flows in East Dorset, particularly around Wimborne. This is new information which only became known in response to questioning at the Examination in Public.</p> <p>The Bournemouth, Dorset and Poole Local Transport Plan (LTP3, ED50) states (para 12.4.3) “ the dualling of the section of the A31 from Aymesford to Merley is considered an essential prerequisite to the implementation of urban extensions proposed for East Dorset”.</p> <p>To move from this official policy position to one where there remains only one specific improvement proposal for the A31(T) (the Merley roundabout, which is not planned until the period 2018-2022 according to the revised IDP (p 39)), is a fundamental change of which the implications should be assessed fully as part of the revised Sustainability Assessment. It is noticeable that the Sustainability Report of the Main Modifications (MM1 and MM3) makes no attempt to analyse the impact of this fundamental change, contenting itself with mention of the decision to exclude reference to a possible Christchurch By-Pass and to the recently completed changes to the Canford Bottom junction. Assuming that these improvements to the Merley roundabout are completed by end 2022 (itself a</p>	<p>should be planned in the early part of the planning period; if neither of these is possible for funding reasons, the residential development proposals for Wimborne/Colehill (2490 new households, over 6000 additional people, and over 3700 extra private vehicles plus increased commercial vehicles) must be scaled back.</p> <p>(See attachment)</p>	<p>planned dualling of the A31. Improvement of the A31 will mean more local traffic is likely to use this route rather than less appropriate routes to the north of the A31 through Wimborne, Colehill and the rural lanes.</p>

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						<p>doubtful proposition given that they are as yet neither specified nor costed and have not been given a high priority in the revised IDP), about 66% of the urban and non urban developments in East Dorset will have been completed, including 74% of the urban extensions. This equates to about 2700 New Neighbourhood dwellings (FD1 Chart 1, as amended by MM66, Table 1), with over 4000 additional private vehicles plus an unspecified number of extra commercial vehicles to service these strategic sites. To this number must be added the increase consequent on the urban developments, probably a similar number (ie another 4000 or so vehicles of one type or another).</p> <p>In Wimborne/Colehill the equivalent number in this timeframe is 1050 new dwellings in New Neighbourhoods (FD1, Chart 1) plus a possibly similar number in the urban area, giving rise to in the region of an additional 3100 private vehicles, plus commercial vans, lorries etc. It is widely recognised that the road system in the Wimborne /Colehill area is inadequate for the current levels of traffic. Also, given the reduction in employment opportunities in Wimborne/Colehill consequent on other Core Strategy development proposals (WMCs 1 and 4) the vast majority of these new households, either those with an employed person or with someone seeking employment, will need to access the A31(T) somewhere along its local length in order to reach the most likely employment locations; these are sited mainly to the south (Bournemouth/Poole) but also to the east (Ferndown/Uddens industrial estates and Bournemouth Airport, all planned to be expanded) and</p>		

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						<p>to the west (Baillies Gate, also planned to be expanded). This will inevitably lead to gridlock on not just the A31(T) and its crossing points but also on the local roads as drivers seek to reroute. This has been amply demonstrated in the Option Testing Summary Report of the Wimborne Transport Model Study (the unexpurgated version, ED53.5), despite this having been modelled on what are now very much out of date assumptions, both national and local.</p> <p>The inescapable conclusion is that the developments proposed for Wimborne/ Colehill (Chapter 8 of the Core Strategy) are not sustainable where traffic is concerned. It is up to the Council to provide evidence that their development proposals are sustainable, as required by the NPPF. As far as traffic flows around Wimborne/Colehill are concerned, the available evidence points decidedly to the contrary.</p> <p>(See attachment)</p>		
MM 1	CSMM141	Miss Alison Appleby Natural England South West (ID: 612438)		Yes	Yes	Natural England supports this modification which clarifies that any possible future provision of a Christchurch bypass would be subject to meeting the necessary local and national policy requirements		
MM 2	CSMM75	Mrs Nicola Brunt Dorset Wildlife Trust (ID: 359461)		Yes	Yes	Dorset Wildlife Trust supports this modification as it follows an agreed wording between ourselves, Natural England and ETAG and addresses our original objection.		
MM 2	CSMM87	Mrs Hilary Chittenden Environment		Yes	Yes	ETAG, DWT and NE sought this change for the reasons given at EiP.		

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		TAG (East Dorset) (ID: 360302)						
MM 2	CSMM148	Miss Alison Appleby Natural England South West (ID: 612438)		Yes	Yes	Natural England supports this modification that confirms that impacts on or close to designated sites will be avoided, and residential development will contribute to mitigation of its the effects on heathland habitats.		
MM 2	CSMM258	Charborough Estate (ID: 718912)	Yes	Yes	No	The Charborough Estate objects to the approach to addressing the impacts from residential development close to the Dorset heathlands set out in MM2, MM46, MM48 and MM49. The protection of the Dorset heathlands should be considered in the context of the importance of sustaining other landscapes and rural land uses which support thriving rural communities in East Dorset, such as those resulting from commercial and amenity woodland, agricultural land uses and alternative land and building uses providing employment and sustainable use of rural areas. Some flexibility is required, as minor changes to existing heathlands and their buffer zones would be reasonable and should be permitted in connection with development where alternative or enhanced areas of heathland could be delivered. Compensation, such as the creation of replacement habitat in a suitable location, should be included in addition to avoidance and mitigation measures. It seems illogical that minor changes to or impacts on existing heathland should be prohibited when the landowner may have the ability to help deliver alternative areas for heathland or mitigation measures that will help protect existing	MM2, MM46, MM48 and MM49 should allow some changes to or impacts on existing heathlands and their buffer zones where appropriate and in the context of wider proposals, particularly where landowners are able to promote compensation measures; MM46, MM48 and MM49 should consider other factors in addition to the simplistic criteria of distance of a development from the Dorset heathlands when assessing the likely impact; MM48 and MM49 should ensure that SANGs reflect the ecosystems services	The policy approach towards the heathlands set out in Objective 1 and Policy ME2 is consistent with the advice of Natural England, evidence available to the authority and the Core Strategy Habitats Regulations Assessment. It is also in accordance with the Habitats Regulations.

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						<p>heathland.</p> <p>Other factors should be considered in addition to the distance of a development from the Dorset heathlands when assessing the likely impact. For example, the residential development of a site with a direct footpath to protected heathland would undoubtedly have a greater impact from recreation and cat predation than the development of a closer site which is physically separated by a road or river.</p> <p>SANGs should reflect the ecosystems services approach. For example, subject to careful management provisions, commercial woodland can provide public access to an attractive natural experience as SANG, whilst continuing to contribute to a prosperous rural economy through forestry activity. Farmland could be used to provide SANGs via designated routes across privately owned land which might also be grazed or cropped.</p> <p>Amendments to MM2, MM46, MM48 and MM49 are needed to ensure that the Core Strategy is effective. Policy should be flexible enough to respond to a range of circumstances. The changes are necessary to secure consistency with paragraph 17 of the National Planning Policy Framework (NPPF) which includes the core planning principle of supporting thriving rural communities in the countryside. Further, paragraph 109 of the NPPF states that the planning system should recognise the wider benefits of ecosystems services and paragraph 118 identifies that planning permission should be approved if significant harm to biodiversity can be avoided, adequately mitigated or compensated for.</p>	<p>approach.</p>	
MM 3	CSMM35	Ms Gill Smith	No	Yes	Yes	Dorset County Council supports the transport related	None	

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		Dorset County Council (ID: 359437)				modifications listed above as identified in the Schedule of Proposed Main Modifications to the Core Strategy.		
MM 3	CSMM249	Mrs Tracy Paine Colehill Parish Council (ID: 359416)	No		No	The insertion of the word 'improvement' of the A31(T) around Wimborne... implies that an improvement of the A31(T) will be sufficient to improve the traffic flow around and through the Town. No such schemes are proposed. The preceding paragraph identifies that in the medium term further prime transport corridors will be developed to the north of the A31(T), but gives no detail as to where these will be. The information is misleading and probably incorrect and should be modified accordingly.	<ol style="list-style-type: none"> 1. Revert to the original wording for this bullet point which was ' Dualling' of the A31(T)around Wimborne. 2. Identify the prime transport corridors to be developed to the North of the A31(T) in the medium term. <p>Such changes will remove the ambiguity from the document and ensure that residents in Wimborne and Colehill understand that there might not be relief from the traffic congestion that a 50% increase in their local population will incur.</p>	The word 'improvement' has been used to encompass likely interim improvements such as junction improvements as well as the longer term planned dualling of the A31. Improvement of the A31 will mean more local traffic is likely to use this route rather than less appropriate routes to the north of the A31 through Wimborne, Colehill and the rural lanes. The transport corridors to the north of the A31 are the B3073 and the B3078 in Wimborne, these improvements will be development related.
MM 3	CSMM228	Mr L Hewitt Wimborne Minster Town Council (ID: 359555)	No		No	The insertion of the word improvement of the A31(T) around Wimborne... implies that an improvement of the A31(T) will be sufficient to improve the traffic flow around and through the Town. No such schemes are proposed. The preceding paragraph identifies that in the medium term further prime transport corridors will be developed to the north of the A31(T), but gives no detail as to where these will be. The information is	<ol style="list-style-type: none"> 1. Revert to the original wording for this bullet point which was Dualling of the A31(T)around Wimborne. 2. Identify the prime transport corridors to be developed to the North of the A31(T) in the medium 	The word "improvement" has been used to encompass likely interim improvements such as junction improvements as well as the longer term planned dualling of the A31. Improvement of the

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MM 3	CSMM186	Sir Roger Palin (ID: 499596)	Yes		No	<p>Dualling of the A31(T). This response applies to both MMs 1 and 3. There remains confusion about the status of the proposal to “dual the A31 (T) from Ferndown to Merley”. This project has been deleted both from the Core Strategy Vision (MM1) and from Core Strategy Objective 6 (MM3), but remains in Policy KS10 (MM8) and the revised Infrastructure Delivery Plan (MM67, para 2.14 and pp 41 and 67).</p> <p>The deletion of the plan to dual the A31(T) from Ferndown to Merley from the Core Strategy Vision and the substitution of improvement of the A31 (T) around Wimborne (MM3) is a very significant change which can only have seriously deleterious consequences for traffic flows in East Dorset, particularly around Wimborne. This is new information which only became known in response to questioning at the Examination in Public.</p> <p>The Bournemouth, Dorset and Poole Local Transport Plan (LTP3, ED50) states (para 12.4.3) “ the dualling</p>	Either the dualling of the A31(T) should be reinstated into the Core Strategy or at the very least the Merley roundabout improvements should be planned in the early part of the planning period; if neither of these is possible for funding reasons, the residential development proposals for Wimborne/Colehill (2490 new households, over 6000 additional people, and over 3700 extra private vehicles plus increased commercial vehicles) must be scaled back.	

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						<p>of the section of the A31 from Aymesford to Merley is considered an essential prerequisite to the implementation of urban extensions proposed for East Dorset".</p> <p>To move from this official policy position to one where there remains only one specific improvement proposal for the A31(T) (the Merley roundabout, which is not planned until the period 2018-2022 according to the revised IDP (p 39)), is a fundamental change of which the implications should be assessed fully as part of the revised Sustainability Assessment. It is noticeable that the Sustainability Report of the Main Modifications (MM1 and MM3) makes no attempt to analyse the impact of this fundamental change, contenting itself with mention of the decision to exclude reference to a possible Christchurch By-Pass and to the recently completed changes to the Canford Bottom junction. Assuming that these improvements to the Merley roundabout are completed by end 2022 (itself a doubtful proposition given that they are as yet neither specified nor costed and have not been given a high priority in the revised IDP), about 66% of the urban and non urban developments in East Dorset will have been completed, including 74% of the urban extensions. This equates to about 2700 New Neighbourhood dwellings (FD1 Chart 1, as amended by MM66, Table 1), with over 4000 additional private vehicles plus an unspecified number of extra commercial vehicles to service these strategic sites. To this number must be added the increase consequent on the urban developments, probably a similar number (ie another 4000 or so vehicles of one type or another).</p>	<p>(See attachment)</p>	

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						<p>In Wimborne/Colehill the equivalent number in this timeframe is 1050 new dwellings in New Neighbourhoods (FD1, Chart 1) plus a possibly similar number in the urban area, giving rise to in the region of an additional 3100 private vehicles, plus commercial vans, lorries etc. It is widely recognised that the road system in the Wimborne /Colehill area is inadequate for the current levels of traffic. Also, given the reduction in employment opportunities in Wimborne/Colehill consequent on other Core Strategy development proposals (WMCs 1 and 4) the vast majority of these new households, either those with an employed person or with someone seeking employment, will need to access the A31(T) somewhere along its local length in order to reach the most likely employment locations; these are sited mainly to the south (Bournemouth/Poole) but also to the east (Ferndown/Uddens industrial estates and Bournemouth Airport, all planned to be expanded) and to the west (Bailies Gate, also planned to be expanded). This will inevitably lead to gridlock on not just the A31(T) and its crossing points but also on the local roads as drivers seek to reroute. This has been amply demonstrated in the Option Testing Summary Report of the Wimborne Transport Model Study (the unexpurgated version, ED53.5), despite this having been modelled on what are now very much out of date assumptions, both national and local.</p> <p>The inescapable conclusion is that the developments proposed for Wimborne/ Colehill (Chapter 8 of the Core Strategy) are not sustainable where traffic is concerned. It is up to the Council to provide evidence that their development proposals are sustainable, as</p>		

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						required by the NPPF. As far as traffic flows around Wimborne/Colehill are concerned, the available evidence points decidedly to the contrary. (See attachment)		
MM 5	CSMM88	Mrs Hilary Chittenden Environment TAG (East Dorset) (ID: 360302)		Yes	Yes	We support proposals to use up to date evidence for delivery of housing.		
MM 5	CSMM217	Wyatt Homes (ID: 359366)	Yes	Yes	Yes	The MM further contributes to soundness in all regards.		
MM 5	CSMM133	Mr Paul Hanson Meyrick Estate Management (ID: 360382)	Yes	Yes	No	There is no additional evidence to support the increase in urban capacity by 110 units within Christchurch representing an increase of 5%. The evidence by MEM Ltd to the examination under matter 1 and matter 13 on housing delivery/ urban capacity already clearly demonstrated the significant problems with a over reliance on urban capacity in Christchurch, as demonstrated by past performance coupled with the viability problems as a result of the proposed affordable housing policy (as explained in matter 7c) requiring all sites to provide affordable housing under policy LN3 (which has not been proposed for modification). With high existing use values of land within the Christchurch urban area and the negative impact this proposed change will have on maintaining the quality of the existing built environment, as identified in the Christchurch Borough wide character assessment (ED16) where it stated that: "there was limited prospect of redevelopment of older	In order to increase the overall supply of housing within the Core Strategy area additional greenfield sites will need to be identified, or extended for example under policy CN2, which MEM Ltd propose could accommodate an additional 45 dwellings. Additional suitable sites were also identified in the EDDC area, and MM 41 has already supported the inclusion of one additional site. This process needs to continue to ensure that delivery can be stepped up	The Council has not made any changes to the housing land supply figures that were discussed at the Core Strategy hearings. The Core Strategy housing target in the Main Modifications Schedule (MM6) has been amended at the direction of the Inspector and reflects the housing land supply discussed at the hearings. See Councils' Statements for Matter 1 and documents FD1, FD1.1 and FD1.2.

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						<p>housing stock as the area contains many well-maintained high value properties. In addition to the general pattern of low rise bungalows, which may be difficult to integrate developments of radically higher density.”</p> <p>There is no justification for any further increase in urban capacity, as it is not underpinned by evidence. The SHLAA is not an indicator of delivery and cannot be relied upon for to confirm effective supply of deliverable sites and the proposed housing trajectory in MM66 is flawed and cannot be relied upon therefore the change is not justified and cannot be effective and fails to comply with NPPF.</p> <p>The combination of the two authorities housing targets in a single target is not supported as it does not represent a workable solution when each authority retains its own sovereignty. The two councils occupy two housing markets split by the Dorset Heaths and the airport as identified in evidence on matter 1. (Refer also to representations on MM66)</p>	<p>particularly in the first five years of the plan. (see response on MM 11)</p> <p>Two separate housing targets should remain whilst the Council's have separate sovereignty so that supply in each council matches demand in each council and where this is contested s78 appeals on housing land supply, this can be assessed separately to reflect local demand and supply.</p>	
MM 5	CSMM143	Sir Roger Palin (ID: 499596)	No		No	<p>Combined Housing Target for East Dorset and Christchurch.</p> <p>Combining the housing targets for East Dorset and Christchurch into a single target may seem superficially attractive and is no doubt convenient for the Councils' officers, but it raises serious constitutional issues for the Councillors and also complicates understanding by local people to whom the Councillors remain accountable.</p> <p>East Dorset and Christchurch are two separate statutory authorities whose Councillors must be responsive to their respective electorates for reasons of local government democracy. Residents in East</p>	<p>See my comments on MM66 where I suggest how the data might be presented in a more helpful way. (See attachment)</p>	

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						<p>Dorset need to be able to track Core Strategy developments within East Dorset in order to hold their Councillors to account.</p> <p>In drafting my response to MM1/MM3 I found it impossible to analyse accurately the proposed housing delivery trajectory for East Dorset, urban and New Neighbourhood combined and over the full Core Strategy planning period.</p> <p>The Duty to Cooperate should not extend to effectively disenfranchising the electorate on this key subject. (See attachment)</p>		
MM 5	CSMM192	South West HARP Consortium South West HARP Planning Consortium (ID: 507536)	No			We support the increase in housing capacity figures.		
MM 5	CSMM169	Taylor Wimpey Ltd in conjunction with Bodorgan Properties CI Ltd & Sainsburys PLC (ID: 507541)	Yes	No	No	We continue to object to the proposal to merge the housing provision target in Christchurch and East Dorset. This does not represent a sound change, given the plan would not be sufficiently effective in ensuring the delivery of defined housing needs within each District in accordance with the proposed spatial strategy and objectives. By merging the requirement figures, there is a risk that delivery may come forward more within one District than the other, holding back development on defined allocations. The proposal is therefore not 'effective' in meeting defined housing needs.	As above	The Council has not made any changes to the housing land supply figures that were discussed at the Core Strategy hearings. The Core Strategy housing target in the Main Modifications Schedule (MM6) has been amended at the direction of the Inspector and reflects the housing land supply discussed at the

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								hearings. See Councils' Statements for Matter 1 and documents FD1, FD1.1 and FD1.2.
MM 5	CSMM233	Mr Stefan Briddon Bellway Homes (Wessex) (ID: 521740)	Yes	No	No	<p>Ref: MM5 – Page 31, Paragraph 4.17 to 4.19 (Urban Capacity) Ref: MM6 – Page 34, Policy KS3 (Housing Numbers) Ref: MM11 – Page 65, Paragraph 6.10</p> <p>We note the increase to the JCS housing requirement, primarily through the re-introduction of the North East Verwood allocation (65 dwellings) and adjustments to the capacity on other strategic allocations. However, we do not consider the plan as amended by MM5, MM6 or MM11 meets the 'Positively Prepared', 'Effective' or 'Justified' tests of soundness in NPPF. Nor is there evidence to conclude the Councils' have fulfilled their Duty to Co-operate in accordance with the Localism Act and NPPF. We refer the Inspector to our submissions on Examination Matter 1, which for ease of reference can be summarised as follows:</p> <ul style="list-style-type: none"> • The Council have not 'Positively Prepared' their housing requirement in accordance with NPPF. The evidence base informing the JCS housing requirement has not sufficiently accounted for planned economic growth over the plan period, nor the impacts of any unmet housing needs from adjoining authorities under the Duty to Co-Operate. In respect to the latter, we draw the Inspector's attention to recent Inspector's Reports concerning such matters in Mid Sussex, Brighton & Hove, West Dorset and Weymouth & Portland areas. In each instance the Inspector found the plan unsound on the grounds we have submitted 		The Council has not made any changes to the housing land supply figures that were discussed at the Core Strategy hearings. The Core Strategy housing target in the Main Modifications Schedule (MM6) has been amended at the direction of the Inspector and reflects the housing land supply discussed at the hearings. See Councils' Statements for Matter 1 and documents FD1, FD1.1, FD1.2 and SD4.

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						<p>to the Examination and in respect to these latest Modifications.</p> <ul style="list-style-type: none"> • We contend that once economic growth and unmet needs from adjoining authorities are factored in, the housing requirements for the JCS would be much higher than those tested by the joint authorities to justify the JCS. We elaborate on such figures in our statements to the Examination. • The joint authorities have not assessed or indeed tested such higher figures to determine whether the approach the JCS advocates is 'Justified'. • Part of this assessment in our view should have comprised a comprehensive Green Belt review to determine whether more of the areas housing needs could be met within the joint authority area. It has not therefore in our view been demonstrated that the plan represents the most appropriate strategy when considered against all reasonable alternatives. The amended plan does not therefore in our view satisfy the 'Positively Prepared' or 'Justified' tests of soundness; • The SHLAA submitted in support of the JCS is insufficiently robust to justify no further Green Belt releases or that a comprehensive Green Belt assessment should not be undertaken. Many urban sites identified in the SHLAA are in multiple ownerships, some yet to be confirmed. The delivery of housing from such sources and the joint authorities over optimistic reliance on the early delivery of the strategic allocations is insufficiently evidenced and hence 'Effective' at the point of adoption as assessed against the requirements of NPPF. This has been conceded at the Christchurch Urban Extension, with 		

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						<p>trajectories amended slightly, but there are many other examples where such evidence is lacking. For example, the relocation of Cuthbury allotments, pre-delivery infrastructure requirements at the Cranborne Road site and the relocation of school / compensatory open space and SANG at the Lockyers School. In relation to the latter, the uncertainty regards the timescales for vacating and relocating the school cast into doubt the deliverability of this allocation as indicated.</p> <p>To assist the Inspector, we would like to highlight conclusions reached by other Inspectors (all letters attached) since the JCS hearing sessions concluded, which support our submissions on the above points: Mid Sussex District Plan (Appendix A) - the Inspector has advised the plan to be withdrawn as it had not met the Duty to Cooperate in respect of cross-boundary housing needs.</p> <p>Brighton & Hove City Plan (Appendix B) – The Inspector concluded the Council had not done enough to meet housing needs through the release of urban fringe sites.</p> <p>West Dorset and Weymouth and Portland Local Plan (Appendix C) – In terms of housing, the Inspector considered that the Councils have not demonstrated that all reasonable alternatives have been explored. In reaching this conclusion, the Inspector commented that the SHMA was out of date. It should be noted that the WD&WP SHMA was produced by the same consultants that produced the SHMA for ED&C JCS and published at the same time (January 2012), and which is therefore being relied upon to support the Councils position for the ED&C JCS.</p>		

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						For the reasons identified above, the Main Modifications do not resolve the fundamental flaws in the plan in respect of housing numbers and overall strategy, which we set out in detail in our earlier submissions. On this basis the modified plan does not satisfy the 'positively prepared', 'effective' or 'justified' tests of soundness in the NPPF.		
MM 5	CSMM162	Andrew Thunder Sembcorp Bournemouth Water (ID: 558499)	No	Yes	No	<p>Main Modification 5 seeks to increase the amount of housing from within the existing urban area of Christchurch from 2,140 to 2,250; an additional 110 dwellings. The reason for the change is stated to be: "Updated evidence base for information on future household projections and consequent amendments to housing targets across the Plan area."</p> <p>However, a note following this reason for change confirms that the use of the latest census data is best avoided because household formation may be suppressed due to the state of the economy. Therefore, the modification is based solely on a change to housing targets, without explaining why. This is compounded by the fact that at the Examination in Public into the Local Plan, no evidence was presented to support the case for increasing the dwelling supply from within the urban area of Christchurch. Indeed, quite the reverse; most of the submitted evidence pointed to an over-estimate from this supply source.</p> <p>Without evidence to support more housing from within the existing urban area, the Local Plan cannot be considered sound. It fails the tests of being (1) positively prepared; (2) justified; or (3) effective. However, if the housing target for Christchurch is to be increased, the land owned by Sembcorp at Marsh</p>	Allocate land east of Marsh Lane for the residential development of up to 90 dwellings; as previously set out in Policy CN 3 of the Core Strategy Pre-Submission document.	<p>The Council has not made any changes to the housing land supply figures that were discussed at the Core Strategy hearings. The Core Strategy housing target in the Main Modifications Schedule (MM6) has been amended at the direction of the Inspector and reflects the housing land supply and evidence discussed at the hearings.</p> <p>Policy CN3 and land East of Marsh Lane was deleted from the Core Strategy because Natural England are not satisfied that effective measures can be put in place to avoid / mitigate harm to the heathlands and other</p>

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						<p>Lane still represents an opportunity to accommodate up to 90 dwellings on an urban extension; and without creating any adverse impacts that cannot be the subject of acceptable mitigation. Our case on this point is supported by Main Modification 49, the wording of which is consistent with the approach advocated on behalf of Sembcorp by Nicholas Pearson Associates (NPA) in their report that comprised Appendix 1 to our evidence in respect of Matter 1: Overall Strategy (Evidence 558499).</p> <p>The second bullet point (Page 59 of the Schedule of Main Modifications) now requires development between 400 metres and 5 kilometres of Dorset Heathlands to mitigate through a range of measures, including: “Provision of other appropriate avoidance / mitigation measures.”</p> <p>Such measures are clearly set out by NPA; and summarised in Paragraphs 2.22 and 2.27 of their report.</p> <p>For these new reasons, the re-allocation of land at Marsh Lane to accommodate the additional housing required in Christchurch is merited, and would render the Local plan sound.</p>		nearby designations in order to satisfy the Habitats Regulations.
MM 6	CSMM27	Mr Ian Jones Ferndown Town Council (ID: 490823)	No	Yes	No	Members believed that the increased number of dwellings will have a direct impact on the number of vehicles using the roads especially the impact of vehicles joining the existing roadways from the new developments. This needed to be factored into the proposals so that traffic flow could be improved by better roads etc.	As above	Development will mitigate it's negative impact on the network by providing and contributing towards the necessary transport improvements identified in the Infrastructure Delivery Plan.

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MM 6	CSMM33	Ms Susan Green Home Builders Federation (South West) (ID: 619967)			No	Under Modification MM6 to Policy KS3 the proposed figures of 5,000 homes within the existing urban areas and 3,465 homes provided as new neighbourhoods do not equal the modified figure of 8,490 new homes to be provided in the plan area between the years 2013 – 2028. Likewise in the new Appendix proposed under Modification MM64 the target figures quoted for Policy KS3 are the former housing figures rather than the proposed modified figures. Whilst the increase in proposed housing provision from 4,200 to 4,490 homes is a move in the right direction for the reasons previously set out in our Hearing Statement for Matter 1 of the Christchurch & East Dorset Core Strategy Examination, the proposed modified figure remains too low to meet an objective assessment of housing need in the plan area.		The Council has not made any changes to the housing land supply figures that were discussed at the Core Strategy hearings. The Core Strategy housing target in the Main Modifications Schedule (MM6) has been amended at the direction of the Inspector and reflects the housing land supply discussed at the hearings. See Councils' Statements for Matter 1 and documents FD1, FD1.1 and FD1.2.
MM 6	CSMM56	Linden Homes Linden Homes (ID: 662201)	Yes	Yes	No	(See accompanying statement) Under the proposed changes to the Core Strategy, the housing target has been increased from 8,200 to 8,490 new homes, The proportion to come from within the existing urban areas has been increased from 4,800 to 5,000 while the proportion from the new neighbourhoods has increased from 3,400 to 3,465. The increased housing target has been updated to reflect the SHMA figure with an additional 2% allowance to allow for vacant dwellings and second homes. We support the increase in housing target in the Core Strategy which reflects the identified housing needs of the SHMA. It is however considered that that the	(See accompanying statement) It is considered that a minimum 3.6% allowance should be made for vacant dwellings and second homes thereby increasing the housing target to 8,623 dwellings. This will ensure sufficient flexibility is allowed for over the plan period to ensure the identified needs of the authority areas are met.	The Council has not made any changes to the housing land supply figures that were discussed at the Core Strategy hearings. The Core Strategy housing target in the Main Modifications Schedule (MM6) has been amended at the direction of the Inspector and reflects the housing land supply discussed at the

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						contingency to allow for vacant dwellings and second homes should be increased. Given the nature of the area of the two authorities areas and the desirability of these areas for holiday homes, it is likely that a significant proportion of second homes will exist. Typically a second home allowance of 1.1% is applied, although a higher percentage may be justifiable in this case to allow for holiday homes. In addition, the Bournemouth and Poole SHMA recommends the inclusion of a 2.5% allowance for vacant dwellings.		hearings. See Councils' Statements for Matter 1 and documents FD1, FD1.1 and FD1.2.
MM 6	CSMM218	Wyatt Homes (ID: 359366)	Yes	Yes	Yes	The MM further contributes to soundness in all regards.		
MM 6	CSMM144	Sir Roger Palin (ID: 499596)	Yes		No	Housing Requirement v Housing Target There has been a subtle shift away from emphasis on the housing requirement and ways of meeting it towards a housing target and how many new houses can be delivered. This change leads to a significant degree of overprovision, particularly for East Dorset, as explained below. It is probably sensible to base calculation of the housing requirement on the SHMA 2012 projection of new household growth, rather than the ONS 2013 figures, as the former took account of pre economic downturn inward migration. However, para 4.18 of the Core Strategy cites the SHMA calculation of the housing requirement as 7500, to which a 10% contingency margin has been added, arriving at the quoted target of 8200. To this a further 2% margin (for second homes) has been added thus increasing the target to 8490? Relative to the latest ONS projections of 7742 new	In view of the scale of overprovision in East Dorset relative to assessed need the numbers of new houses to be built in the District should be reduced. This applies particularly to Wimborne/Colehill where the allocation of new housing (2490 units) is grossly disproportionate and grossly excessive. (See attachment)	The Council has not made any changes to the housing land supply figures that were discussed at the Core Strategy hearings. The Core Strategy housing target in the Main Modifications Schedule (MM6) has been amended at the direction of the Inspector and reflects the housing land supply discussed at the hearings. See Councils' Statements for Matter 1 and documents FD1, FD1.1 and FD1.2.

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						<p>households (FD1, page 1, Table 1) the target of 8490 represents a 9.6% contingency, not 6% as implied by the footnote to the table. For East Dorset the contingency margin is 19.5%, which represents a massive overprovision. This arises from the fact that the ONS projections when compared to the SHMA, although showing an increase in the annual requirement for Christchurch, in fact reveal a significant reduction for East Dorset (13% lower, on top of a 4% reduction between SHMA 2008 and the updated SHMA 2012).</p> <p>The above numbers show that East Dorset is being required to take a significant share of the Christchurch load, which is of particular interest to Wimborne/Colehill residents who are being compelled to take over 50% of the East Dorset load, with 4 New Neighbourhoods to be built on Green Belt land, despite their very justified concerns. It also reinforces the point I made in my response to MM5 reference the need to present the housing data for the two authorities in a manner which facilitates understanding by the two separate constituencies.</p> <p>It also raises the question whether the "reason for change" at MM11, revised national statistical information, is entirely accurate.</p> <p>Finally, it raises the fundamental question as to whether the EDDC's sole reason for inappropriate building on Green Belt land (CS para 4.20: The difficulty in meeting housing needs provides the exceptional circumstances required to amend Green Belt boundaries, where appropriate) is justified. (See attachment)</p>		
MM 6	CSMM193	South West	No		No	We support the increase in the housing target by 290,		The Council has not

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		HARP Consortium South West HARP Planning Consortium (ID: 507536)				however we are still concerned that this fails to reflect the substantial housing need over the plan area. The NPPG states: "an increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes". This is material in Christchurch and East Dorset, where affordable housing need is at 758 per annum (SHMA Updates 2012), and the updated housing target only provides for total housing delivery of 566 units per annum. We reiterate our previous concerns that the housing target should be increased to meet projected housing needs.		made any changes to the housing land supply figures that were discussed at the Core Strategy hearings. The Core Strategy housing target in the Main Modifications Schedule (MM6) has been amended at the direction of the Inspector and reflects the housing land supply discussed at the hearings. See Councils' Statements for Matter 1 and documents FD1, FD1.1 and FD1.2.
MM 6	CSMM174	Taylor Wimpey Ltd in conjunction with Bodorgan Properties CI Ltd & Sainsburys PLC (ID: 507541)		Yes	Yes	We support the uplift in housing requirement on the basis that the revised target better reflects the findings of the Council's own housing evidence base.		
MM 6	CSMM236	Mr Stefan Briddon Bellway Homes (Wessex) (ID: 521740)	Yes	No	No	Ref: MM5 – Page 31, Paragraph 4.17 to 4.19 (Urban Capacity) Ref: MM6 – Page 34, Policy KS3 (Housing Numbers) Ref: MM11 – Page 65, Paragraph 6.10 We note the increase to the JCS housing requirement,		The Council has not made any changes to the housing land supply figures that were discussed at the Core

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						<p>primarily through the re-introduction of the North East Verwood allocation (65 dwellings) and adjustments to the capacity on other strategic allocations. However, we do not consider the plan as amended by MM5, MM6 or MM11 meets the 'Positively Prepared', 'Effective' or 'Justified' tests of soundness in NPPF. Nor is there evidence to conclude the Councils' have fulfilled their Duty to Co-operate in accordance with the Localism Act and NPPF. We refer the Inspector to our submissions on Examination Matter 1, which for ease of reference can be summarised as follows:</p> <ul style="list-style-type: none"> • The Council have not 'Positively Prepared' their housing requirement in accordance with NPPF. The evidence base informing the JCS housing requirement has not sufficiently accounted for planned economic growth over the plan period, nor the impacts of any unmet housing needs from adjoining authorities under the Duty to Co-Operate. In respect to the latter, we draw the Inspector's attention to recent Inspector's Reports concerning such matters in Mid Sussex, Brighton & Hove, West Dorset and Weymouth & Portland areas. In each instance the Inspector found the plan unsound on the grounds we have submitted to the Examination and in respect to these latest Modifications. • We contend that once economic growth and unmet needs from adjoining authorities are factored in, the housing requirements for the JCS would be much higher than those tested by the joint authorities to justify the JCS. We elaborate on such figures in our statements to the Examination. • The joint authorities have not assessed or indeed tested such higher figures to determine whether the 		<p>Strategy hearings. The Core Strategy housing target in the Main Modifications Schedule (MM6) has been amended at the direction of the Inspector and reflects the housing land supply discussed at the hearings. See Councils' Statements for Matter 1 and documents FD1, FD1.1 and FD1.2.</p>

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						<p>approach the JCS advocates is 'Justified'.</p> <ul style="list-style-type: none"> Part of this assessment in our view should have comprised a comprehensive Green Belt review to determine whether more of the areas housing needs could be met within the joint authority area. It has not therefore in our view been demonstrated that the plan represents the most appropriate strategy when considered against all reasonable alternatives. The amended plan does not therefore in our view satisfy the 'Positively Prepared' or 'Justified' tests of soundness; The SHLAA submitted in support of the JCS is insufficiently robust to justify no further Green Belt releases or that a comprehensive Green Belt assessment should not be undertaken. Many urban sites identified in the SHLAA are in multiple ownerships, some yet to be confirmed. The delivery of housing from such sources and the joint authorities over optimistic reliance on the early delivery of the strategic allocations is insufficiently evidenced and hence 'Effective' at the point of adoption as assessed against the requirements of NPPF. This has been conceded at the Christchurch Urban Extension, with trajectories amended slightly, but there are many other examples where such evidence is lacking. For example, the relocation of Cuthbury allotments, pre-delivery infrastructure requirements at the Cranborne Road site and the relocation of school / compensatory open space and SANG at the Lockyers School. In relation to the latter, the uncertainty regards the timescales for vacating and relocating the school cast into doubt the deliverability of this allocation as indicated. 		

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						<p>To assist the Inspector, we would like to highlight conclusions reached by other Inspectors (all letters attached) since the JCS hearing sessions concluded, which support our submissions on the above points:</p> <p>Mid Sussex District Plan (Appendix A) - the Inspector has advised the plan to be withdrawn as it had not met the Duty to Cooperate in respect of cross-boundary housing needs.</p> <p>Brighton & Hove City Plan (Appendix B) – The Inspector concluded the Council had not done enough to meet housing needs through the release of urban fringe sites.</p> <p>West Dorset and Weymouth and Portland Local Plan (Appendix C) – In terms of housing, the Inspector considered that the Councils have not demonstrated that all reasonable alternatives have been explored. In reaching this conclusion, the Inspector commented that the SHMA was out of date. It should be noted that the WD&WP SHMA was produced by the same consultants that produced the SHMA for ED&C JCS and published at the same time (January 2012), and which is therefore being relied upon to support the Councils position for the ED&C JCS.</p> <p>For the reasons identified above, the Main Modifications do not resolve the fundamental flaws in the plan in respect of housing numbers and overall strategy, which we set out in detail in our earlier submissions. On this basis the modified plan does not satisfy the 'positively prepared', 'effective' or 'justified' tests of soundness in the NPPF.</p>		
MM 6	CSMM262	Charborough Estate (ID: 718912)	Yes	Yes	No	The Charborough Estate supports the consideration of the rolling 5 year housing land supply across both Districts, as set out in MM5. However, the Estate	MM6 should encourage housing delivery, both affordable and market, in	See Councils' Statement for Matter 1

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						<p>objects to the over concentration of new homes in the urban areas and new neighbourhoods as suggested in MM6. Housing delivery should be balanced across the Districts to ensure that the needs of each community, including the rural communities, are adequately provided.</p> <p>A greater proportion of the housing target should be delivered in the rural areas, through both the conversion of existing buildings and new development. This will ensure that the Core Strategy is positively prepared to meet objectively assessed needs for market and affordable housing throughout the Districts. Some flexibility is required to ensure that the Core Strategy proposals are deliverable and therefore effective.</p> <p>MM6 should be amended, as set out above, to secure consistency with national policy. Paragraph 17 of the NPPF states that every effort should be made to identify and meet the housing needs of an area, and respond to wider opportunities for growth. Paragraph 47 requires Local Planning Authorities to boost significantly the supply of housing by ensuring that the Local Plan meets the full, objectively assessed needs for market and affordable housing.</p> <p>Paragraph 54 establishes that Local Planning Authorities should be responsive to local circumstances in rural areas and plan housing development to meet local need. Housing should be located where it will enhance or maintain the vitality of rural communities, in accordance with paragraph 55 of the NPPF.</p>	the rural areas.	
MM 8	CSMM36	Ms Gill Smith Dorset County	No	Yes	Yes	Dorset County Council supports the transport related modifications listed above as identified in the Schedule	None	

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		Council (ID: 359437)				of Proposed Main Modifications to the Core Strategy.		
MM 8	CSMM70	Fowler Fortescue Malmesbury Estate (ID: 360378)	Yes	Yes	No	<p>The Malmesbury Estate objects to proposed Main Modifications 8 and 64 relating to essential transportation infrastructure necessary to support the vision and allocation identified in policy KS10. The Modifications refer to and rely on an Infrastructure Delivery Plan, also said to be a consultation document, which raises fundamental issues on uncertainty relating to funding and deliverability which go to the heart of the Plan's soundness. These issues were raised by the Inspector as issue 4 in the EIP Session 6 on Bournemouth Airport.</p> <p>MM64 adds a new appendix which is said to have been added to ensure clarity regarding monitoring of specific policies in the Plan. It makes specific reference to the Infrastructure Delivery Plan (IDP) and comments that the delivery of infrastructure is an issue of great relevance to policy delivery. However, on page 90 of the IDP it is stated that delivery of the strategic infrastructure set out in policy KS10 will be monitored through the Local Transport Plan.</p> <p>The Estate is concerned that the IDP makes statements concerning funding and delivery of essential infrastructure which are inconsistent with the evidence presented at the EIP. At paragraph 2.19 the IDP states that "Improvements to the A35, B3073 and A338 are scheduled to be delivered in the medium term (2018-2022) through developer contributions and major scheme bids for Government funding". However, the tables in the document – pages 24-26 set out infrastructure required (our emphasis) to support development relating to Bournemouth Airport – all</p>		The IDP is an evolving document which will progressively identify the precise nature and cost of transport schemes as further details become clearer through on going work. At this stage it is only schemes for short term delivery which have been designed and cost estimates applied. The sequence, phasing and timing of development and associated transport improvements will be crucial to delivery. This will depend on the timescales for proposed development, once this is known we can establish our future programme of work and future spending profile. Dorset CC and their partners are submitting bids as and when opportunities for government funding become available.

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						<p>state under the heading "Risk to Delivery/Contingency Measures" that the schemes require public and developer funding and that the most likely reason for non-delivery is likely to be lack of funding, which means that the infrastructure schemes will be redesigned or scaled back in a more cost effective way or another alternative will be sought.</p> <p>This caveat is highly significant. As the infrastructure is required to support the proposed development it would logically imply that if funding is not available then the development would need to be scaled back. This raises questions regarding the soundness of the Plan. The Council's Statement on Matter 6: Bournemouth Airport included at Appendix 2 a coloured chart setting out required infrastructure for delivery in three phases and with the estimated cost of each scheme and source of funding. Much of the funding, particularly items relating to S106/CIL, was said to be aspirational but with some certainty.</p> <p>If this table is compared with the IDP there are some significant differences. Although the IDP tables have a heading "Funding Secured/Funding Gap" the text in the relevant column gives a potential source of funding but provides no information on whether funding has been secured. This is unsatisfactory in the light of the Inspector's question.</p> <p>The cost estimates have changed. For example, the A338 resurfacing has increased from £22m to £30m, but others have reduced – Chapel Gate junction improvements have been reduced from £5m to £2m and the Hurn roundabout is now said the cost £1.7m whereas previously it was £2.4m. The table submitted to the EIP included the proposed southern bypass to</p>		

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						Hurn which was estimated to cost £10m but the scheme is not included in the IDP. (See accompanying report)		
MM 8	CSMM231	Mr Steven Coates Wimborne Allotment Association (ID: 476256)	Yes	Yes	No	MM8 – Strategic Transport Improvements – The amendments do not include any improvements to the B3078 road, especially the mini-roundabout at Pye Corner. We consider the existing road network will not be able to efficiently handle the extra traffic, generated by the 220 new homes proposed for the Cuthbury Allotments as well as the proposal to the north of Wimborne and therefore the document is considered unsound.	The amended document should include an upgrade to the B3078 at the junction of Victoria and St. Julians Roads.	Policy KS11 states that development will mitigate it's negative impact on the network by providing and contributing towards necessary transport improvements. This applies to all development and officers will work with developers for this site to assess the impact of development related traffic on the Pye Corner roundabout.
MM 9	CSMM37	Ms Gill Smith Dorset County Council (ID: 359437)	No	Yes	Yes	Dorset County Council supports the transport related modifications listed above as identified in the Schedule of Proposed Main Modifications to the Core Strategy.	None	
MM 10	CSMM176	Taylor Wimpey Ltd in conjunction with Bodorgan Properties CI Ltd & Sainsburys PLC (ID: 507541)		Yes	Yes	We support this modification as it adds clarity to the latest planning policy position.		

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MM 11	CSMM105	Mrs Jane Merrett (ID: 662829)	Yes		No	<p>Roeshot Hill Allotments Policy CN1 was flawed and option 3 was altered before voting (without informing residents in a consultation period). This was not just a typing error as it was rephrased. Why ask residents for input, initially and along the whole process, if you are prepared to change initial options to suit.</p> <p>The Allotments as community land are not even being used to provide the excuse of affordable homes for local residents but for expensive homes for incomes (the core strategy document explains). There is sufficient adjoining land available for development.</p>	<p>Roeshot Hill Allotments Please amend CN1 (and subsequent amendments) to:-</p> <p>Development under Option 3 and bury the pylons, retaining the allotments in their present position. This will prove that Christchurch residents did have a say (Option 1 was not their preferred option) and retains community land. The Council has no right to sell it against residents' wishes.</p>	<p>The principle of relocating the allotments was discussed at the Core Strategy hearings. Main Modification MM17 provides more flexibility for relocation of the Roeshot Hill Allotments.</p>
MM 11	CSMM136	Mr Paul Hanson Meyrick Estate Management (ID: 360382)	Yes	Yes	No	<p>The plan is not sound as it is not justified that there is capacity for 2250 homes to be built in the urban area in Christchurch, as this is not supported by evidence regarding actual and realistic deliverability given the proposed policy framework. The SHLAA is cited as 'evidence', but this is not an effective method to rely on for delivery as demonstrated by recent performance in the urban area. This requires on average 150 dwellings annually to be developed in the Christchurch urban area, there are simply not enough "specific deliverable" urban sites within Christchurch to provide this significant element of the five-year supply as required by paragraph 47 of the NPPF. The Council has details of the full range of sites in the SHLAA but there is no evidence that the owners of the sites have confirmed they are either available or deliverable in the plan period. Many of the sites are no more than</p>	<p>In order to increase the overall supply of housing within the Core Strategy area additional greenfield sites will need to be identified, or extended as shown with policy CN2, which MEM Ltd propose could accommodate an additional 45 dwellings. Additional suitable sites were also identified in the EDDC area, and MM 41 has already supported the inclusion of one additional site. This process needs to continue to ensure that</p>	<p>The Council has not made any changes to the housing land supply figures that were discussed at the Core Strategy hearings. The Core Strategy housing target in the Main Modifications Schedule (MM6) has been amended at the direction of the Inspector and reflects the housing land supply and associated evidence discussed at the hearings.</p>

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						<p>windfalls, and should not be relied upon to make up the five-year supply. Given the housing supply trajectory in MM66 (table 2) relies on the urban supply for early delivery in the plan, as the strategic sites will not start to deliver in significant volumes until after 2016, this results in an over-reliance on urban sites in difficult market conditions. If the urban sites fail to deliver as required and based on immediate past performance shown in the last five years, where the average delivery of all sites in Christchurch was 111 units, there will be a short fall overall in the plan but specifically in the first five years of the plan. There is no evidence to justify why the urban area will deliver a higher capacity than the last five years and no credible evidence to counter the significant doubts regarding proposed affordable housing policy LN3 and links with affordable viability as part of CIL testing expressed at the hearings on matter 7c. Discounting the previous local plan's greenfield sites this new urban capacity figure represents a 50% increase in supply in the urban area (based on immediate past performance of supply) with no new justification. The plan cannot be effective in this regard and cannot be found sound.</p>	<p>delivery can be maintained particularly in the first five years of the plan. (see response on MM 5)</p>	
MM 11	CSMM177	Taylor Wimpey Ltd in conjunction with Bodorgan Properties CI Ltd & Sainsburys PLC (ID: 507541)		Yes	Yes	<p>We support these changes that appropriately reflect the capacity of the strategic Roeshot Hill site as discussed in our examination statements and at the hearing sessions.</p>		

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MM 11	CSMM237	Mr Stefan Briddon Bellway Homes (Wessex) (ID: 521740)	Yes	No	No	<p>Ref: MM5 – Page 31, Paragraph 4.17 to 4.19 (Urban Capacity) Ref: MM6 – Page 34, Policy KS3 (Housing Numbers) Ref: MM11 – Page 65, Paragraph 6.10</p> <p>We note the increase to the JCS housing requirement, primarily through the re-introduction of the North East Verwood allocation (65 dwellings) and adjustments to the capacity on other strategic allocations. However, we do not consider the plan as amended by MM5, MM6 or MM11 meets the 'Positively Prepared', 'Effective' or 'Justified' tests of soundness in NPPF. Nor is there evidence to conclude the Councils' have fulfilled their Duty to Co-operate in accordance with the Localism Act and NPPF. We refer the Inspector to our submissions on Examination Matter 1, which for ease of reference can be summarised as follows:</p> <ul style="list-style-type: none"> • The Council have not 'Positively Prepared' their housing requirement in accordance with NPPF. The evidence base informing the JCS housing requirement has not sufficiently accounted for planned economic growth over the plan period, nor the impacts of any unmet housing needs from adjoining authorities under the Duty to Co-Operate. In respect to the latter, we draw the Inspector's attention to recent Inspector's Reports concerning such matters in Mid Sussex, Brighton & Hove, West Dorset and Weymouth & Portland areas. In each instance the Inspector found the plan unsound on the grounds we have submitted to the Examination and in respect to these latest Modifications. • We contend that once economic growth and unmet needs from adjoining authorities are factored in, the housing requirements for the JCS would be much 		<p>The Council has not made any changes to the housing land supply figures that were discussed at the Core Strategy hearings. The Core Strategy housing target in the Main Modifications Schedule (MM6) has been amended at the direction of the Inspector and reflects the housing land supply discussed at the hearings. See Councils' Statements for Matter 1 and documents FD1, FD1.1, FD1.2 and SD4.</p>

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						<p>higher than those tested by the joint authorities to justify the JCS. We elaborate on such figures in our statements to the Examination.</p> <ul style="list-style-type: none"> • The joint authorities have not assessed or indeed tested such higher figures to determine whether the approach the JCS advocates is 'Justified'. • Part of this assessment in our view should have comprised a comprehensive Green Belt review to determine whether more of the areas housing needs could be met within the joint authority area. It has not therefore in our view been demonstrated that the plan represents the most appropriate strategy when considered against all reasonable alternatives. The amended plan does not therefore in our view satisfy the 'Positively Prepared' or 'Justified' tests of soundness; • The SHLAA submitted in support of the JCS is insufficiently robust to justify no further Green Belt releases or that a comprehensive Green Belt assessment should not be undertaken. Many urban sites identified in the SHLAA are in multiple ownerships, some yet to be confirmed. The delivery of housing from such sources and the joint authorities over optimistic reliance on the early delivery of the strategic allocations is insufficiently evidenced and hence 'Effective' at the point of adoption as assessed against the requirements of NPPF. This has been conceded at the Christchurch Urban Extension, with trajectories amended slightly, but there are many other examples where such evidence is lacking. For example, the relocation of Cuthbury allotments, pre-delivery infrastructure requirements at the Cranborne Road site and the relocation of school / compensatory 		

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						<p>open space and SANG at the Lockyers School. In relation to the latter, the uncertainty regards the timescales for vacating and relocating the school cast into doubt the deliverability of this allocation as indicated.</p> <p>To assist the Inspector, we would like to highlight conclusions reached by other Inspectors (all letters attached) since the JCS hearing sessions concluded, which support our submissions on the above points: Mid Sussex District Plan (Appendix A) - the Inspector has advised the plan to be withdrawn as it had not met the Duty to Cooperate in respect of cross-boundary housing needs.</p> <p>Brighton & Hove City Plan (Appendix B) – The Inspector concluded the Council had not done enough to meet housing needs through the release of urban fringe sites.</p> <p>West Dorset and Weymouth and Portland Local Plan (Appendix C) – In terms of housing, the Inspector considered that the Councils have not demonstrated that all reasonable alternatives have been explored. In reaching this conclusion, the Inspector commented that the SHMA was out of date. It should be noted that the WD&WP SHMA was produced by the same consultants that produced the SHMA for ED&C JCS and published at the same time (January 2012), and which is therefore being relied upon to support the Councils position for the ED&C JCS.</p> <p>For the reasons identified above, the Main Modifications do not resolve the fundamental flaws in the plan in respect of housing numbers and overall strategy, which we set out in detail in our earlier submissions. On this basis the modified plan does not</p>		

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						satisfy the 'positively prepared', 'effective' or 'justified' tests of soundness in the NPPF.		
MM 12	CSMM178	Taylor Wimpey Ltd in conjunction with Bodorgan Properties CI Ltd & Sainsburys PLC (ID: 507541)		Yes	Yes	We support these changes that appropriately reflect the capacity of the strategic Roeshot Hill site as discussed in our examination statements and at the hearing sessions.		
MM 13	CSMM179	Taylor Wimpey Ltd in conjunction with Bodorgan Properties CI Ltd & Sainsburys PLC (ID: 507541)		Yes	Yes	This change appropriately reflects the content of our examination statements and the discussions held at the hearing sessions.		
MM 13	CSMM108	Mrs Jane Merrett (ID: 662829)	Yes		No	Your document refers that a SANG must be provided in perpetuity. SANGS are important so are allotments. If SANGS are in perpetuity so should allotments. Roeshot Hill allotments over the last 35 years have provided a wildlife haven together with healthy exercise for fresh food generally for older residents and more recently for younger residents.	Roeshot Hill Allotments In your document please alter 'in perpetuity' add 'retain all community allotments in perpetuity if they meet the Allotments Act criteria'.	The principle of relocating the allotments was discussed at the Core Strategy hearings. Main Modification MM17 provides more flexibility for relocation of the Roeshot Hill Allotments.
MM 14	CSMM172	Taylor Wimpey Ltd in		Yes	Yes	We support this change that appropriately reflects the developer's phasing position.		

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		conjunction with Bodorgan Properties CI Ltd & Sainsburys PLC (ID: 507541)						
MM 15	CSMM194	South West HARP Consortium South West HARP Planning Consortium (ID: 507536)	No			We support the amendments to the Green Belt boundary in response to housing need.		
MM 15	CSMM168	Taylor Wimpey Ltd in conjunction with Bodorgan Properties CI Ltd & Sainsburys PLC (ID: 507541)		Yes	Yes	We support this change that visually illustrates Roeshot Hill's status as a strategic allocation excluded from the green belt designation to the north.		
MM 15	CSMM139	Messrs RJ & MC Newsome (ID: 656271)	Yes	Yes	No	DPDS Consulting Group note that there have been a significant number of changes scheduled in the Main Modifications document, pertaining to boundary definition of Green Belt designated land. Indeed a total of 15 changes to the original boundaries have been outlined within the Main Modifications (Main Modifications 15, 19, 23, 26, 27, 28, 31, 33, 36, 38, 39, 40, 42, 43, and 45). In each case the justification for	PLEASE REFER TO ORIGINAL REPORT SUBMITTED IN RELATION TO THE CORE STRATEGY PRE-SUBMISSION, FOR PARAGRAPH WORDING AND ASSOCIATED	See page 322 of document SD10 and SD15.8.

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						<p>the proposed change is the same; stating that the new boundary line now '...complies with paragraph 85 of the National Planning Policy Framework'. It is envisaged (as each modification contains similar wording), that the section of paragraph 85 being referred to is:</p> <p>'satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and define boundaries clearly, using physical features that are readily recognisable and likely to be permanent'.</p> <p>The proposed changes to the Green Belt boundaries are not in their entirety arguable, however they do highlight the need and willingness by the council to comply with National Policy. In respect of this DPDS Consulting Group would like to draw attention back to the proposed inclusion of land at Woodland Walk, Ferndown, into the Green Belt (Policy FWP2), due to its relevance with the other amended boundaries. Representations were submitted in June 2012 in respect of the Core Strategy Pre Submission and the applicable Policy FWP2 contained within.</p> <p>Subsequently, upon review of the main modifications there does appear to have been many boundary changes, as highlighted above, but disappointingly none of which improve the position of Woodland Walk and therefore our opinion on the soundness of the overall plan.</p> <p>To reaffirm, the inclusion of Woodland Walk into the Green Belt does not fulfil the essential "openness" characteristic of Green Belts, as defined by the NPPF, as it is enclosed by existing urban areas of Ferndown to the east, west and south. With particular relevance</p>	<p>INFORMATION.</p>	

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						<p>to the Main Modifications that have been published, Woodland Walk's inclusion does not comply with paragraph 85 of the NPPF where it is stated that LPA's should 'not include land which it is unnecessary to keep permanently open'. Moreover it seems pertinent to assess Policy FWP2 in conjunction with paragraph 85, as this seems to have been a catalyst for changes that have already been made in relation to other sites. In assessing this policy it is clear that it does not 'ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development', as there is an identified and admitted housing supply shortage, to which this site can offer some alleviation. Furthermore the LPA cannot be said to have created boundaries that 'will not need to be altered at the end of the development plan period', nor have they defined the 'boundaries clearly, using physical features that are readily recognisable and likely to be permanent'. As previously stated the site is situated at the edge of urban development on 3 sides and therefore would appear to be natural development territory. Also because of the aforementioned urban development it cannot be stated that the boundary will not need to be altered within the plan period. Planning history surrounding this site lends it to sustainable development as does its location and proximity to amenities. The site is also constrained from further development to the north because to the A31, therefore once developed it would simply infill and complete the urban development boundary that is already in situ. Where other areas of Green Belt are being released in order to create sites suitable for housing, Woodland Walk is being designated as</p>		

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						Green Belt, which seems not only illogical but is also contrary to policy as explained. The original report submitted in representation of the Core Strategy Pre Submission contains a full and comprehensive evidence base along with justified reasoning as to why Policy FWP2 is both inappropriate and contrary to National Planning Policy. It is therefore asked that this matter is revisited as it is apparent that there have been some other contractions with National Policy brought to light, which have since been rectified. DPDS Consulting Group would like to see amendments to FWP2 in relation to this, as currently the original opinion of unsoundness is reiterated by the company.		
MM 16	CSMM171	Taylor Wimpey Ltd in conjunction with Bodorgan Properties CI Ltd & Sainsburys PLC (ID: 507541)		Yes	Yes	This change reflects our examination statements and the discussions at the hearing sessions and comprises a realistic timescale for the delivery of the strategic site.		
MM 17	CSMM94	Mr Hugh Merrett Roeshot Hill Allotment Association (ID: 527907)	Yes		No	In your document 'Reason for Change says. The Council will work closely with Roeshot Hill Allotment Ass'n (R.H.A.A.), the landowner & developer to deliver replacement allotments. Having over the years destroyed other X'ch allotments to development and given little or no help in 35 years at R.H.A.A., why the sudden change ? Up to six months & for road mending scalpings. Not cut their front hedge for at least 20 years Estate cuts their hedge regularly. Unless land is	RHAA has 200+ allotments, well managed by a community lead association. For the last 2 years the site has a Green Flag community award (only 9 in the S. West) confirming they are a quality Green Space. The	The principle of relocating the allotments was discussed at the Core Strategy hearings. Main Modification MM17 provides more flexibility for relocation of the Roeshot Hill Allotments.

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						purchased by CBC we would lose our legal security.	Allotments should remain in their present position. Please amend your documents to this effect.	
MM 17	CSMM167	Taylor Wimpey Ltd in conjunction with Bodorgan Properties CI Ltd & Sainsburys PLC (ID: 507541)		Yes	Yes	We support this modification that adds flexibility to the plan and reflects the content of our examination statement.		
MM 17	CSMM110	Mrs Jane Merrett (ID: 662829)	Yes		No	Roeshot Hill Allotments Your document under 'Reason for Change' says 'The Council will work closely with Roeshot Hill Allotment Association, the landowner and developer to deliver replacement Allotment'. This is a hollow statement. Why the sudden interest to help as the Allotments have had little or no help or investment from or by the Council in 35 years so this appears to be a tongue in cheek statement. Could this statement only be because the Council can see no value (except money) in this community owned land valued for its present use by generations of Christchurch residents.	Roeshot Hill Allotments Please amend your wording to 'The Inspector on behalf of the Secretary of State instructs the Council to work closely to deliver replacement allotments only if the present allotments do not meet the vigorous criteria under the present/then current Allotment Acts'.	The principle of relocating the allotments was discussed at the Core Strategy hearings. Main Modification MM17 provides more flexibility for relocation of the Roeshot Hill Allotments.
MM 18	CSMM76	Mrs Nicola Brunt Dorset Wildlife Trust (ID: 359461)		Yes	Yes	Dorset Wildlife Trust supports the need for an on-site ecological survey which will enable assessment of the biodiversity of the site and ensure this is given due regard in the application.		
MM	CSMM149	Miss Alison		Yes	Yes	Natural England supports the modification relating to		

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18		Appleby Natural England South West (ID: 612438)				the requirement for any planning application for the site to be accompanied by an on-site ecological survey.		
MM 19	CSMM120	Mr Paul Hanson Meyrick Estate Management (ID: 360382)	Yes	Yes	No	<p>The plan is unsound as it is not consistent with national policy. The boundary is not consistent with paragraph 85 of the NPPF. The plan cannot be effective in this regard and cannot be found sound. On matter 2 –MEM expressed serious concerns regarding the proposed southern boundary of site CN2 and consistency with paragraph 85 of NPPF.</p> <p>The proposed southern boundary shown on map 6.3 does not meet the tests of the NPPF. It is not distinct or clear and does not relate to any recognisable physical feature that is likely to be permanent on the ground. The proposed southern green belt boundary is arbitrary and does not even relate to a field boundary and clearly does not have a degree of permanence to endure beyond the plan period. The boundary should relate to a physical defensible feature. The boundary could not be defined clearly, as required by the NPPF, from any feature on the ground.</p> <p>(See attached Plan)</p>	Along with other changes requested by MEM to resolve housing delivery issues it is recommended that the boundary is changed to increase the capacity of the site CN2 and use the recognisable southern woodland boundary and existing urban southern edge to the settlement adjacent to the Youth centre (off Sandy Plot), and southern boundary of Burton Farm to accommodate development as indicated in the masterplan prepared by MEM (below) and shown in detailed evidence presented in representations and supported detailed technical studies made through the consultation process. The proposed increase in allocation at Burton to 90 units has	The detailed issue of the site boundary for Land South of Burton (Policy CN2) was discussed at the hearings and no further change has been recommended as a modification by the Inspector.

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							<p>already been tested in the sustainability appraisal and there is no barrier to a further modification to the plan to revise the green belt boundary to allow it to comply with the NPPF paragraph 85 and assist with housing delivery in the first five years of the plan.</p> <p>Alternative masterplan for site CN2 proposed by MEM Ltd (See attached Plan)</p>	
MM 19	CSMM195	South West HARP Consortium South West HARP Planning Consortium (ID: 507536)	No			We support the amendments to the Green Belt boundary in response to housing need.		
MM 20	CSMM77	Mrs Nicola Brunt Dorset Wildlife Trust (ID: 359461)		Yes	Yes	Dorset Wildlife Trust supports this modification as it clarifies the zoning approach and retains a buffer and countryside between the airport and the Moors River.		
MM 20	CSMM252	Mr Andrew Murray Manchester Airport (ID: 360379)				1. We support the alteration set out at Ref MM20 subject to the following minor text alterations to paragraph 7.27: a) within the 6th bullet point, add 'as a key priority' after 'identified'. b) 7th bullet point, remove 'in facilitating' and replace with 'to facilitate'.	1. We support the alteration set out at Ref MM20 subject to the following minor text alterations to paragraph	Point noted, existing wording is considered adequate.

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							7.27: a) within the 6th bullet point, add 'as a key priority' after 'identified'. b) 7th bullet point, remove 'in facilitating' and replace with 'to facilitate'.	
MM 20	CSMM151	Miss Alison Appleby Natural England South West (ID: 612438)		Yes	Yes	Natural England supports the modification as it clarifies zonation and retention of a buffer zone for the Moors River SSSI.		
MM 21	CSMM253	Mr Andrew Murray Manchester Airport (ID: 360379)				We support the alteration set out at Ref MM21.		
MM 22	CSMM17	Mr Terry Wheeler Friends of Victoria Hospital, Wimborne (ID: 808582)	No	Yes	No	We believe the phrase 'or housing if shown not to be required' is neither effective nor positively prepared. The comment suggests the Council will at some time force the Health Authority to make an early decision about their intent, but does not say when. The reason land has been allocated for hospital expansion is because both the hospital and medical practitioners in Wimborne recognise that a 40% increase in population in the Wimborne & Colehill area(as per the Core Strategy's proposals) will require the hospital to expand to maintain its current level of service. The Hospital is built to the boundary already, leaving no room for expansion within the existing footprint. Furthermore, the transfer of commissioning health	The phrase should either be removed or If the council insists on retaining the phrase then the Health Authority should be allowed an appropriate amount of time during the lifetime of the Core Strategy to decide whether it wants to utilize the land or otherwise.	

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						<p>services to a Clinical Commissioning Group will increase demand, as this group will be expected to source services locally. Clearly, local people would prefer to be treated at Victoria Hospital rather than having to travel. 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.</p> <p>We believe the statement is also unjustified given that the plot of land in question will no longer be in the green belt. Any future use can therefore be determined through the normal local planning process. It should not be included in the SLHAA during the period of the Core Strategy.</p>		
MM 22	CSMM89	Mrs Hilary Chittenden Environment TAG (East Dorset) (ID: 360302)	Yes	Yes	No	<p>Victoria Hospital Wimborne has a long standing record of community support which has protected it from closure and resulted in significant improvements in the facilities and treatment that it offers. The Friends website http://www.friendswimbornehospital.org.uk/ highlights some of the major projects for which they have raised funds in recent years including construction work. The £2.7M operating theatre was completed on time and on budget and is in use as are the offices above it. The official opening was in 2011.</p> <p>1991 Cuthbury Elderly Rehabilitation Ward £200,000 Ambulance £18,000 1992 Ultrasound Machine (X-Ray Department) £69,000 1993 Extension to Hanham Ward £58,000 New X-Ray Department £175,000 Endoscopy equipment £59,000 1995-7 Equipment for the enhancement of surgical services, £135,000</p>	Delete the suggested modification "or housing if shown to be not required..."	<p>The proposed wording highlights that the land is first and foremost allocated for an extension to the Hospital, and if not required can then be used for housing. Although the Hospital has clearly indicated a need for the land it is possible that the relevant health authorities through the life of the plan could decide that this is not the case.</p>

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						<p>particularly non-invasive, diagnostic & therapeutic treatments</p> <p>1997 Ambulance £35,000</p> <p>1999 Ultrasound and other equipment £188,000</p> <p>2000 Various medical equipment £72,000</p> <p>2001 Outpatient and Clinical Investigations building £1,893,000</p> <p>2002 Equipment for new services £188,000</p> <p>2003 Contribution to upgrade of Hanham Ward £75,000</p> <p>2006 Contribution to upgrade of Clinical Investigations £250,000 Unit</p> <p>2007 Echocardiogram £19,000</p> <p>Wheel-chair accessible vehicle £24,000</p> <p>2008 Equipment for new surgical procedures £22,000</p> <p>2009 New high-definition camera system £63,000 and laparoscopes</p> <p>2010-11 Contribution [95% of cost] to Operating Theatre £2,700,000 Rebuild</p> <p>2011 Echocardiogram machine £43,000</p> <p>2012 Sonosite S-Nerve Ultrasound system £24,900</p> <p>This list does not include smaller items contributed by the Friends or the regular services they provide, such as Hospital Radio Bedside, trolley services and drinks machines.</p> <p>Given how recent these major developments are, we suggest that it is unrealistic for the hospital to be expected to come up with concrete plans for further expansion during the lifetime of Plan.</p> <p>Bournemouth and Poole General Hospitals are under increasing strain. With the reduction in bus services</p>		

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						<p>they will become more difficult to get to, even from our urban areas, taxis are prohibitively expensive and parking at either location is a nightmare and costly. Over 5000 new homes are to be built in East Dorset in the next 15 years With the corresponding increase in population and longevity of residents the suggestion of losing the potential for expanding this wonderful resource well beyond this Plan Period is utter folly and unsound.</p> <p>The only trigger for the land to be developed for housing should be if the hospital were to close permanently with no prospect of re-opening.</p>		
MM 22	CSMM8	Mrs Sheila Bourton (ID: 474462)	Yes	Yes	Yes	The contents of this last paragraph clarifies how the land should be used if additional building is not required by Victoria Hospital.		
MM 22	CSMM1	Mrs Sheila Bourton Keep Wimborne Green (ID: 474490)	Yes	Yes	Yes			
MM 22	CSMM219	Wyatt Homes (ID: 359366)	Yes	Yes	Yes	The MM further contributes to soundness in all regards.		
MM 22	CSMM248	Mrs Tracy Paine Colehill Parish Council (ID: 359416)	No		No	<p>The inclusion of the statement of: or housing if shown not to be required implies that the Council is forcing the NHS to make an early decision about their intent. The reason land has been allocated for hospital expansion is because both the hospital and medical practitioners in Wimborne recognise that a 50% increase of population in Wimborne & Colehill will require the hospital to expand to maintain its current</p>	<p>Please delete the inclusion of: or housing if shown not to be required. It is unjustified because the land has been specifically identified for required hospital expansion. Many of the</p>	

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						level of service. The statement is unnecessary given that the plot of land in question will no longer be in the green belt. Its use can therefore be determined through the normal local planning process. It should not be included in the SLHAA during the period of the Core Strategy.	friends of Victoria hospital also consider the plot allocated is of sufficient size to fulfil the Hospitals ambitions.	
MM 22	CSMM227	Mr L Hewitt Wimborne Minster Town Council (ID: 359555)	No		No	The inclusion of the statement of: or housing if shown not to be required risks encouraging the NHS to make an early decision about its intentions for this land. The reason land has been allocated for hospital expansion is because both the hospital and medical practitioners in Wimborne recognise that a 50% increase in population in Wimborne & Colehill will require the hospital to expand to maintain its current level of service. The statement is unnecessary given that the plot of land in question will no longer be in the green belt. Its use can therefore be determined through the normal local planning process. It should not be included in the SLHAA during the period of the Core Strategy.	Please delete the inclusion of: or housing if shown not to be required. It is unjustified because the land has been specifically identified for future hospital expansion. Many of the Friends of Victoria Hospital also consider the plot allocated is of sufficient size to fulfil the Hospital's ambitions for future expansion.	
MM 22	CSMM189	Mrs Pippa Wheatley (ID: 360167)	No		No	What is the wording "or housing if shown to be not required" likely to trigger? 1. Pressure on housing developers to get their proposals accepted 2. Pressure on the landowner to accept plans for a housing development 3. Pressure on the Victoria Hospital to come up with a specific plan 4. Pressure on the latest next tier of management, Dorset HealthCare University Foundation Trust, to see the land put to NHS use. This may lead to Victoria Hospital accepting something not of their choice if the	delete "or housing if shown not be required."	

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						<p>aspect of competing for the land is introduced. What are possible outcomes because of the new wording?</p> <ol style="list-style-type: none"> 1. The wrong plan in place to extend the hospital 2. Loss of flexibility in the use of the land 3. Financial difficulties if funds are needed in a shorter timescale than is practical 4. Housing if the hospital is unable to put forward a plan within a timescale which is unclear. <p>Why should this wording be removed?</p> <ol style="list-style-type: none"> 1. Victoria Hospital is almost certainly going to need the land in the long term and this location is the only practical choice to expand. 2. Population increase resulting from the Core Strategy logically means the need for expansion of the hospital is inevitable. 3. Formulating the right plan for the hospital takes time as there are many constraints. Policy changes arising from the political party in power, local policy, management changes, clinical guidelines and funding are some. Also time is probably needed to regroup following the recent major development of the Theatre suite and the current upgrading of Hanham ward. 4. A temporary use in the short term may be needed e.g. car parking or a temporary building. Would this be possible? 5. The landowner has been generous and supportive toward Victoria Hospital throughout its 125 years. They should be commended for this and not subjected to undue pressure. 6. Victoria Hospital is exceptionally well supported by the community, both financially and through voluntary help. The Friends website 		

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						<p>http://www.friendswimbornehospital.org.uk/ lists £6.3m raised in significant contributions since 1990 as well as smaller items not listed. £2.7m (95% of the cost) for the new Operating Theatres in 2011 demonstrates the commitment and the high regard people have for the hospital.</p> <p>7. Local GPs encourage the use of services at Victoria Hospital. It was reported in a talk by the local Clinical Commissioning Group Chair to Verwood Local Action Group, in April 2013, that many of the services such as tests and clinical investigations can be done at a lower cost to the NHS than the district hospitals</p> <p>8. In the unlikely event of the hospital ceasing to exist what is to stop the land being used for housing or perhaps, more appropriately a care facility? If not, the Core Strategy is only intended to be for the next 14 years and will allow some time for thought on the best use of the land.</p>		
MM 22	CSMM142	Sir Roger Palin (ID: 499596)	No		No	<p>Clarification of the Number of Houses to be Built in WMC3</p> <p>The number of new houses to be built (220) requires clarification.</p> <p>Policy WMC3 embraces St Margaret's Hill as well as the Cuthbury Allotments and land to the south of Julians Road. Document FD1 Chart 1page 4 shows 45 houses are to be built at St Margaret's Hill in addition to the 220 to be built to the west of the road, giving a total of 265. This has been carried forward to MM66 Table 1, where the 45 houses are shown as being built in the period 2016 to 2018.</p> <p>Is the number of houses to be built in WMC3 220 or 265? I raised this question at the Examination in Public but neither Richard Henshaw nor the Planning</p>	<p>Clarify whether the number of houses to be built in WMC3 is 220 or 265.</p> <p>Correct the number of years capacity remaining at the Wimborne Cemetery (IDP, para 2.62) (See attachment)</p>	<p>As stated at the Hearing Sessions it is proposed that 30 homes can be built at St Margaret's Close and 190 at Cuthbury.</p>

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						<p>Consultant representing the developer could provide a definitive answer.</p> <p>The land behind St Margaret's Close slated for this development is required for the eventual extension of the Wimborne Cemetery. The statement at para 2.62 of the revised IDP that there remains 50 to 100 years capacity at the cemetery takes no account of the increased population consequent on the Core Strategy residential development proposals. At the Examination in Public the representatives of the Joint Cemetery Committee stated capacity to be in the region of 30 to 50 years.</p> <p>(See attachment)</p>		
MM 22	CSMM165	Mr Alan Spencer (ID: 654817)	No		No	<p>The Council, having agreed to an allocation of land for the extension to Victoria Hospital now seems eager to grab it back for housing development. If the Council had taken notice of previous "consultations" it would be aware that the Friends of Victoria Hospital consider the allocation insufficient for future hospital needs considering the astronomical expansion that will occur in the Wimborne and Colehill locality following approval of the Core Strategy and therefore are unlikely not to want this parcel of land but significantly more.</p> <p>Further it is unnecessary for the Council to make any statement about housing in this area since the nominated land is being taken out of the Green Belt and will therefore be subject to Local Planning Authority rules.</p>	The Friends of Victoria Hospital having requested land for expansion are unlikely not to use it. They may take some time to decide exactly the nature and shape of the proposed extension but should not be hassled into making a quick decision. The statement "or housing if shown to be not required..." should be deleted from this Core Strategy period at least, since normal local planning rules will apply.	
MM 23	CSMM90	Mrs Hilary Chittenden		Yes	Yes	We support proposals to include the SANG and allotments in the Green Belt.		

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		Environment TAG (East Dorset) (ID: 360302)						
MM 23	CSMM91	Mrs Hilary Chittenden Environment TAG (East Dorset) (ID: 360302)	Yes	Yes	No	To comply with the SE Dorset Green Infrastructure Strategy and to ensure that there is no creeping development or infill, there should be a clear statement within policy that once the planning application for the new neighbourhood has been approved, the areas of open greenspace will be secured for the lifetime of the development.	Insert in Policy WMC3 or LN2 wording to clarify that open greenspace, including SANG, in new neighbourhoods will be protected in perpetuity from creeping development and infill by legal agreement.	Open space will be secured and protected through S.106 agreements.
MM 23	CSMM220	Wyatt Homes (ID: 359366)	Yes	Yes	Yes	The MM further contributes to soundness in all regards.		
MM 23	CSMM235	Mrs Tracy Paine Colehill Parish Council (ID: 359416)	Yes		No	The original version of the Main Modifications show the green Belt boundary to run to the south of the proposed housing at St. Margarets (some 45 approx. homes). An amendment has moved the boundary to a line north of the proposed housing. Wimborne and Colehill Cemetery as at present offers the prospect of further burials for about 50 years/60 years.. The development generally of housing under the Core Strategy will see this drop to about a 30 year supply of spaces. The initial green belt boundary should be maintained and the land earmarked for housing should be prioritized for cemetery use rather than force a search for land outside the area, a costly and unreasonable proposal.	The modifications should revert to the original proposal for green belt boundary allowing the St. Margarets land to be considered for cemetery expansion. EDDC documentation already indicates that the needs overall would be likely to be exceeded. 45 homes removed from WMC3 would not be a significant reduction.	See document SD10
MM	CSMM78	Mrs Nicola		Yes	Yes	Dorset Wildlife Trust supports this modification to bring		

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24		Brunt Dorset Wildlife Trust (ID: 359461)				this policy in line with other housing allocation policies and ensure the River Allen is protected. We agreed this wording with EDDC, ETAG and NE.		
MM 24	CSMM92	Mrs Hilary Chittenden Environment TAG (East Dorset) (ID: 360302)		Yes	Yes	ETAG, DWT and NE sought this change so that it was consistent with the wording of WMC5		
MM 24	CSMM10	Mrs Sheila Bourton (ID: 474462)	Yes	Yes	Yes			
MM 24	CSMM4	Mrs Sheila Bourton Keep Wimborne Green (ID: 474490)	Yes	Yes		We strongly support this proviso because it is imperative that existing homes AND BUSINESSES are safeguarded from flooding FOR THE LIFE OF THE NEW DEVELOPMENT Also important is that the wild life, flora and fauna, is protected by ensuring that there is no pollution of the River Allen from the proposed new developments		
MM 25	CSMM38	Ms Gill Smith Dorset County Council (ID: 359437)	No	Yes	Yes	Dorset County Council supports the transport related modifications listed above as identified in the Schedule of Proposed Main Modifications to the Core Strategy.	None	
MM 25	CSMM93	Mrs Hilary Chittenden Environment TAG (East Dorset) (ID: 360302)		Yes	Yes	We support the removal of the vehicular access to the new neighbourhood from Burts Hill to increase safety.		

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MM 25	CSMM95	Mrs Hilary Chittenden Environment TAG (East Dorset) (ID: 360302)	No	Yes	No	Burts Hill already carries a lot of traffic wishing to avoid both the Town Centre and the complexities of Canford Bottom roundabout. The new neighbourhoods will add to the traffic generated. Parents and children from elsewhere in Wimborne will be encouraged to get to and from the new first school on foot or bicycle so removing the requirement for traffic control measures along Burts Hill would make this potentially dangerous crossing for them. Similarly, new neighbourhood residents will be encouraged to access the town centre on foot or bicycle. Consideration should be given to reducing traffic flow and speed and installing a pelican (or similar) crossing to mitigate the risks.	Reinstate the deleted wording in Bullet Point 2 so that the best options for this problem can be sought as part of the Planning Application.	DCC officers are working with developers to ensure traffic management measures will be implemented along Burts Hill. A crossing point on Burts Hill will also be investigated. Details such as this are worked out through the planning application stage which includes a Transport Assessment of the development and are covered by policy KS11 which requires developers to provide safe access for all.
MM 25	CSMM9	Mrs Sheila Bourton (ID: 474462)	Yes	Yes	Yes	I am pleased to see that the Inspector has identified that the access from the new proposed development at Cranborne Road into Burts Hill should be for pedestrians and cyclists only. This will hopefully prevent Burts Hill becoming a "rat run" by commuters.		
MM 25	CSMM2	Mrs Sheila Bourton Keep Wimborne Green (ID: 474490)	Yes	Yes	Yes	We are pleased to see that it is proposed that the Burts Hill access to the Cranborne Road development site will be for pedestrians and cyclists only; this will help prevent Burts Hill from being used as a "rat run" and should also prevent the village of Colehill being inundated with through traffic.		
MM 25	CSMM247	Mrs Tracy Paine Colehill	Yes		No	The Council having signed a common agreement with Bloor Homes for this development knows very well that	Transport and access • Vehicular access is to be	Agree with the majority of these comments but

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		Parish Council (ID: 359416)				<p>the proposed cycle and pedestrian access into the new Wimborne 1st School will be predominantly from Burts Hill. It being the shortest route for parents and children coming to school on foot from the existing settlement. Therefore at some point between the Cranborne Road and Allenview Road parents and children on foot will have to cross Burts Hill to get to the school. The path on the south side of Burts Hill from Cranborne Road to the garages opposite Walford Close is single file only, this means that pedestrians have to step into the road to pass each other; this is not acceptable during peak traffic times. The scheme creates a safety issue for parents and children travelling to and from school on foot. It is absolutely essential that a traffic calming scheme is introduced to the east of the Allenview Road / Burts Hill junction to reduce the speed of vehicles speeding down Burts Hill and to discourage traffic from using this area. Additionally it is recommended that a pedestrian crossing is provided to cross Burts Hill close to the proposed pedestrian access to the new estate. The route is already a rat run for traffic travelling East to West from Canford Bottom to Blandford and one can visualise that when the Cranborne Road estate is complete the weight of traffic going in the opposite direction will be significantly increased.</p>	<p>provided from Cranborne Road. Access from Burts Hill will be for pedestrians and cyclists only.</p> <ul style="list-style-type: none"> • Traffic management measures will be required along the lower reaches of Burts Hill, Cranborne and Wimborne Roads to limit speeds to less than 30 mph. Additionally, a traffic calming scheme will need to be put in place on Burts Hill, to the east of the junction between Allenview Road and Burts Hill, in order to slow traffic. A pedestrian crossing needs to be provided to allow safe crossing of Burts Hill by children on their way to and from school. This will make the document sound by recognising that children's safety is of paramount importance to our Local and District Councils. If this change is not approved then MM 25 contained within the Sustainability report 	<p>further changes are unnecessary. As the modification states, there will be pedestrian and cycle access only from the development on to Burts Hill. DCC officers are working with developers to ensure traffic management measures will be implemented along Burts Hill. A crossing point on Burts Hill will also be investigated. Details such as this are worked out through the planning application stage which includes a Transport Assessment of the development and are covered by policy KS11 which requires developers to provide safe access for all.</p>

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							should show that it does affect the Health Impact Assessment particularly in regard to pedestrian safety.	
MM 25	CSMM223	Mr L Hewitt Wimborne Minster Town Council (ID: 359555)	Yes		No	The District Council having signed a common agreement with Bloor Homes for this development is aware that the proposed cycle and pedestrian access into the new Wimborne 1st School will be predominantly from Burts Hill as it is the shortest route for parents and children coming to school on foot from the existing settlement. Therefore at some point between the Cranborne Road and Allenview Road parents and children on foot will have to cross Burts Hill to get to the school. The path on the south side of Burts Hill from Cranborne Road to the garages opposite Walford Close is single file only, this means that pedestrians have to step into the road to pass each other; this is not acceptable during peak traffic times. The scheme creates a safety issue for parents and children travelling to and from school on foot. It is absolutely essential that a traffic calming scheme is introduced to the east of the Allenview Road / Burts Hill junction to reduce the speed of vehicles speeding down Burts Hill and to discourage traffic from using this area. Additionally it is recommended that a pedestrian crossing is provided to cross Burts Hill close to the proposed pedestrian access to the new estate. The route is already a rat run for traffic travelling East to West from Canford Bottom to Blandford and the Town Council is of the view that when the Cranborne Road estate is complete the amount of traffic going in the opposite direction will be	Transport and access <ul style="list-style-type: none"> • Vehicular access is to be provided from Cranborne Road. Access from Burts Hill will be for pedestrians and cyclists only. • Traffic management measures will be required along the lower reaches of Burts Hill, Cranborne and Wimborne Roads to limit speeds to less than 30 mph. Additionally, a traffic calming scheme will need to be put in place on Burts Hill, to the east of the junction between Allenview Road and Burts Hill, in order to slow traffic. A pedestrian crossing needs to be provided to allow safe crossing of Burts Hill by children on their way to and from school. This will make the document sound by recognising that children's 	Agree with the majority of these comments but further changes are unnecessary. As the modification states, there will be pedestrian and cycle access only from the development on to Burts Hill. DCC officers are working with developers to ensure traffic management measures will be implemented along Burts Hill. A crossing point on Burts Hill will also be investigated. Details such as this are worked out through the planning application stage which includes a Transport Assessment of the development and are covered by policy KS11 which requires developers to provide safe access for all.

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						significantly increased.	safety is of paramount importance. If this change is not approved then MM 25 contained within the Sustainability report should show that it does affect the Health Impact Assessment particularly in regard to pedestrian safety.	
MM 25	CSMM150	Sir Roger Palin (ID: 499596)	No		No	Traffic Calming in Burts Hill The deletion of the proposal to put in place traffic calming measures in Burts Hill is a retrograde step. Such measures have been required for many years to reduce the speed of traffic approaching from Long Lane towards the Allenvie Road junction and beyond to the Wimborne/Cranborne Road/Burts Hill junction, where there have been many accidents. This will be all the more necessary consequent on WMC5 (600 new homes etc) and the siting of a new first school behind Walford Close. (See attachment)	At the very least the 30mph zone should be extended to the north by half a mile or so and a pedestrian crossing of some sort put in place to enhance the safety of pedestrians, particularly schoolchildren, and cyclists. (See attachment)	DCC officers are working with developers to ensure traffic management measures will be implemented along Burts Hill. A crossing point on Burts Hill will also be investigated. Details such as this are worked out through the planning application stage which includes a Transport Assessment of the development and are covered by policy KS11 which requires developers to provide safe access for all.
MM 25	CSMM155	Mr & Mrs Andrew Patrick (ID: 515864)	Yes	Yes	No	Why the proposed MM 25 is unsound MM 25 proposes to delete any requirement for the WMC 5 North Wimborne development to manage	EITHER : Retain the wording which MM 25 proposes to delete	

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						<p>traffic along Burts Hill MM 25 is unsound because it</p> <p>a) conflicts with, and is thus not justified by, evidence presented by the Highway Authority in ED 53.4 and ED 53.5, and by ourselves in Statements 1/515864 and 5/515864</p> <p>b) conflicts with, and is therefore not consistent with, NPPF 32 and 35</p> <p>The Highways Authority's own evidence at ED 53.5 Figure 5 shows that traffic along Burts Hill and along Long Lane (the continuation of Burts Hill) is expected to increase by over 50%</p> <p>This may be an underestimate because:</p> <p>a) ED 53.4 Figure 17 shows that junctions at Allenvie Rd / Hannam Way and Waitrose in Wimborne Town Centre are likely to be at or over capacity, so there will be significant incentive to use Burts Hill / Long Lane to access destinations to the east</p> <p>b) Statement 1/515864 para 5.7 and Table 4 makes the point that 52 % of housing growth will be in Wimborne & Colehill, whereas Over 92 % of employment growth will be to the east, so traffic to the easts may be more than estimated</p> <p>Burts Hill and Long Lane are demonstrably unsuited to additional vehicular traffic, which would be likely put at risk pedestrians or cyclists using the route</p> <p>Statement 1 / 515864 Table 4 demonstrates clearly that road safety is a particular issue in Dorset, and especially in East Dorset District</p> <p>MM 25 thus conflicts with NPPF 32 (limiting significant impacts on the transport network) and 35 (safe and secure layouts minimising conflicts between traffic cyclists and pedestrians)</p>	<p>This would overcome the unsoundness identified above in response to Question 6 of the Response Form</p> <p>OR</p> <p>Substitute the following wording :</p> <p>A Traffic management Scheme must be agreed with the Council and Highways Authority with the aim of preventing safety problems for Burts Hill / Long Lane and the B3078 within the built up area</p> <p>This would be preferable way of overcoming the unsoundness identified above, particularly in the light of the evidence presented at Statement 1 / 515864 Table 3</p> <p>(See attachment)</p>	

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						(See attachment)		
MM 25	CSMM164	Mr Alan Spencer (ID: 654817)	Yes		No	<p>In a situation where child safety is involved outside of a school I find it incredible that the District Council feel it is unnecessary to regulate the speed of traffic to other than a 30mph speed restriction. The very fact that Burts Hill will be the favoured entrance for pedestrians and cyclists to the school demands that some form of traffic calming measures and a permanent road crossing solution is provided.</p> <p>The pedestrian and cyclist entrance from Burts Hill is at the bottom of a narrow country lane and on a rat run from Canford Bottom to Blandford avoiding Wimborne Town Centre. At peak times this road becomes very difficult for pedestrians to cross due to a constant stream of traffic in both directions, coupled in the future with school traffic this will be an absolute nightmare for children and parents to cross when walking to school. Additionally the pavements close to the Cranborne Road / Burts Hill junction are single file meaning that people have to step out into the road to pass each other. Not a sensible idea.</p> <p>The Councils need to apply a lot more thought to ensure that the traffic at Burts Hill is properly controlled to preserve pedestrian and child safety.</p>	Referring to NPPF para 32 bullet 2 and NPPF para 35 bullet 3 it is clear that "plans should create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians". In this regard it is essential to reinstate and modify the sentence "Additionally, traffic calming measures will need to be put in place to the east of the Allenvie Road / Burts Hill junction to slow down traffic approaching the school's pedestrian entrance and also provide a pedestrian crossing across Burts Hill for safe access to pedestrian and cycling routes within the new neighbourhood".	DCC officers are working with developers to ensure traffic management measures will be implemented along Burts Hill. A crossing point on Burts Hill will also be investigated. Details such as this are worked out through the planning application stage which includes a Transport Assessment of the development and are covered by policy KS11 which requires developers to provide safe access for all.
MM 26	CSMM96	Mrs Hilary Chittenden Environment TAG (East Dorset) (ID: 360302)	Yes	Yes	No	We have not had the benefit of seeing any of the survey reports that are to accompany the Planning Application including any ecological survey that may have been carried out. As advised in our responses to all stages of the development of Core Strategy, site allocations and layout, SANGs and Green Belt boundaries should have been informed by survey. We	<ol style="list-style-type: none"> 1. Amend GB boundaries to ensure all SANG remains in the Green Belt. 2. Amend text of Policy WMC5. Green Infrastructure: Bullet point 2 Suitableand land 	Green Belt boundaries are defined by defensible features, not land uses. Open space will be secured and protected through S.106 agreements.

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						<p>were assured that this would be so but it has not happened. The requirement for SANG to be provided in perpetuity would be assured by including it in the Green Belt.</p> <p>The differences between Map 8.5 (MM26) and that on p 6 of the Statement of Common Ground should be reconciled. The out of date Map 8.5 is confusing and areas labelled "Potential SANG" should be deleted where it is know that they will not be delivered. Land to the East of the Cranborne Road is currently screened from view. With this site we have to accept the advice of the Planners that the Green Belt boundaries do comply with NPPF. To comply with the SE Dorset Green Infrastructure Strategy and to ensure that there is no creeping development or infill, there should be a clear statement within policy that once the planning application for the new neighbourhood has been approved, the areas of open greenspace will be secured for the lifetime of the development.</p> <p>Policy WMC5 states that the SANG will utilise the River Allen Valley and land to the north of the housing. The layout as shown in the SoCG map shows the SANG wrapping round three sides of the land East of Cranborne Road. The text should be modified to reflect this.</p>	<p>surrounding the development. 3. Insert in Policy WMC5 or LN2 wording to clarify that open greenspace in new neighbourhoods will be protected in perpetuity from creeping development and infill by legal agreement.</p>	
MM 26	CSMM11	Mrs Sheila Bourton (ID: 474462)	No	Yes	Yes	I am pleased to see that the SANG element of the proposed development is shown to be in the greenbelt and thus (hopefully) protected from further development.		
MM 26	CSMM5	Mrs Sheila Bourton Keep Wimborne	Yes	Yes	Yes	We welcome the fact that the new Greenbelt boundary indicates that the proposed SANGS remain in the greenbelt which should ensure that they are not		

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		Green (ID: 474490)				developed in the future and remain open spaces.		
MM 26	CSMM246	Mrs Tracy Paine Colehill Parish Council (ID: 359416)	Yes		No	The Council having agreed an indicative plan with the Landowner, which indicates SANGs, allotments a community orchard and play areas must protect these areas under green belt provision to avoid development creep. However rather than doing this on the North side of the development the Council has pushed the boundary to the very edge of the Landowners holding on the West side of the Cranborne Road and halved that to the East side of the allocation. Since an illustration of the development exists which is greater in size than that put out to consultation the boundary should be set on the street plan now proposed to avoid any more development creep and loss of open space.	The green belt boundary to the North of the estate should be set on the street plan provided by Bloor Homes to the Council as contained in their common agreement. Such an amendment will avoid development creep and protect the SANGs, allotments, community orchard and play areas for the life of the development.	
MM 26	CSMM232	Mr Steven Coates Wimborne Allotment Association (ID: 476256)		Yes	No	MM26 – Policy WMC5 – Cranborne Road New Neighbourhood - map 8.5, has been amended to show the new green belt boundary but does not show an area reserved for new and replacement allotments. Core Strategy, consolidated version March 2013, page 102, refers to allotment provision, in the text, but these are not shown on the map, Page 104.	MM26, Policy WMC5, map 8.5, to be amended to clearly show area proposed for allotments	The Modification deals only with the Green Belt boundary. Policy WMC5 requires allotment provision
MM 26	CSMM196	South West HARP Consortium South West HARP Planning Consortium (ID: 507536)	No			We support the amendments to the Green Belt boundary in response to housing need.		

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MM 26	CSMM250	Bloor Homes Bloor Homes (ID: 523897)	Yes		No	<p>The NPPF is clear that Green Belt boundaries should be established in local plans (paragraph 83) and therefore the most appropriate place to establish the revised green belt boundary for the Cranborne Road New Neighbourhood (WMC5) is in this Core Strategy. The NPPF then proceeds to provide guidance on reviewing and establishing new Green Belt boundaries. Significantly, paragraph 85 of the NPPF, the final point requires Local Planning Authorities to “define boundaries clearly, using physical features that are readily recognisable and likely to be permanent”.</p> <p>The boundary defined by change MM26 in part follows physical features that are “readily recognisable and likely to be permanent”. This is on the western side of Cranborne Road, along the Row and the mature hedgerow to the north. However, the north eastern and eastern boundary of the site does not follow existing features that could be described as such. Instead, the line is currently drawn to reflect the Council’s estimate of the agreed extent of future development. However, we understand that the line has been drawn by eye and, when checked against CAD information, it is clear that the currently proposed line fails to exclude from the Green Belt all of the land which has been identified (and agreed with the Council) to provide the new homes proposed.</p> <p>The extent of the built development has been agreed between Bloor Homes and the Council as part of the on-going discussion in regard to the allocation of the site and recently submitted planning application (reference: 3/14/0016/OUT) under a PPA. This line of built development was agreed follow detailed landscape and visual assessment work and extensive</p>	Please see attached drawing number: 151048/GB001 for the proposed Green Belt boundary.	As described in the Modification, the boundaries have been largely defined by physical features. There is one small area on the north eastern border which runs across an open field, connecting two sections which are well defined by strong hedgerows. The suggested alternative would unnecessarily remove a large area which is intended to remain open and will therefore continue to meet the purposes of the Green Belt.

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						<p>discussions with the Council in terms of an appropriate boundary for built development. The extent of the proposed development in this location follows a ridgeline that is not readily recognisable on a map or in plan form on the base the Council has used. Unfortunately, the boundary currently identified by change MM26, does not reflect those discussion and has left a section of land proposed for housing development in the north eastern part of the site in the Green Belt. This will cause unnecessary Green Belt issues with the determination of the application and should therefore be resolved now.</p> <p>To resolve this problem and enable the plan to be found sound and consistent with the NPPF, we have included with this representation a plan (drawing number: 151048/GB001) identifying a more appropriate Green Belt boundary using existing physical features, such as Dogdean Lane and existing mature hedge line to link to Burt's Hill to define the Green Belt in this location.</p> <p>Whilst this incorporates a significant area of land not required for (or proposed for) residential development, the majority of the land this boundary includes will become SANG land and as such will be secured as open green space to be retained in perpetuity through a section 106 in order to mitigate the impact of the residential development on the Dorset Heathlands. The SANG land is the subject of a live planning application for the change of use of the agricultural land to SANG land, planning application reference number: 3/14/0017/COU. As such, whilst an additional area of Green Belt is lost, the land is still retained either as SANG land in open recreational use or will be</p>		

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						<p>open countryside outside the settlement boundary beyond the SANG.</p> <p>Our proposed approach to the Green Belt, ensures that the boundary's defined use existing "readily recognisable" features that are likely to be permanent. As described above, our proposed boundary provides flexibility and a positive mechanism to allow the detail of the built development boundary to be determined as part of the development control process.</p> <p>If this approach is not accepted then some flexibility needs to be included to enable the Green Belt boundary to follow the line of the development, in due course.</p> <p>(See map attachment)</p>		
MM 27	CSMM28	Mr M Jackson (ID: 220620)	Yes		No	<p>The proposed Green Belt boundary on the eastern side of the proposed urban extension is too tightly drawn to allow flexibility in the detailed masterplanning of the development. In other locations, such as at the sites subject to Policies WMC5 and FWP3, the proposed green belt boundary is set back from the proposed development area and would not constrain the detailed design of the development.</p> <p>At Leigh Road the Council's proposed boundary strikes an arbitrary straight line, unrelated to any physical feature on the ground (or indeed the indicative site access road), directly south from the eastern edge of the housing at Brookside Manor to the A31 over-bridge. The highway access into the development from Leigh Road will need to be located to ensure that is compliant with the highway authority's requirements and to achieve related sight lines within land ownerships over which the developer or highway authority have control. Until detailed design is</p>	<p>In this context we propose that the eastern boundary should be indicated clearly on the key plan as an indicative approximate edge to the Green Belt, supported by appropriate explanatory text that would indicate (or in similar words):</p> <p>'the proposed boundary of the Green Belt on the eastern side of the urban extension will be defined as part of the masterplanning and design process to ensure that it follows 'readily recognisable' designed</p>	

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						<p>undertaken it is not possible to know whether an access could be achieved in the location shown and therefore be contained within land released from the Green Belt (the Council's plan indeed shows the notional access point being located just within the Green Belt, as opposed to forming the boundary). If there are constraints the access point may need to be positioned further east and therefore within land remaining within the Green Belt leading to the creation of a poorly defined boundary that is not consistent with the need to define boundaries 'using physical features that are readily recognisable and likely to be permanent' (NPPF para. 85).</p> <p>The Council wishes to ensure that an area of land between the eastern edge of Wimborne and Colehill should remain within Green Belt. We do have concerns that such land is forming a local separation function between a town and its suburb as opposed to the proper function of strategic separation between separate towns envisaged in Green Belt purposes. It is clear from the Council's approach in respect of Policy FWP8 that such areas of land separating areas of development are not regarded as having to be of a minimum width and therefore the width of the land retained in Green Belt in this location could be less than currently indicated yet still maintain the required separation.</p> <p>What is required is flexibility. It is premature to try to pre-judge the final form of the development (and the requirements for the adjoining sports pitches) and delineate a definitive boundary, given the many factors and considerations that will have a bearing on the final form of the development which have not been fully</p>	<p>features on the ground that will endure in the long term, in accordance with the requirements of NPPF para. 85. The boundary will be drawn to ensure that clear separation between the urban extension and edge of Colehill is achieved with no urban features (other than necessary infrastructure) lying east of the line indicated by the solid green tone on the plan. The alignment and definition of the boundary will be subject to public consultation and agreement with the Council in advance of the submission of the planning application'.</p> <p>The approach is shown on Plan attached to this Representation.</p> <p>Another option would be to remove all the land between Leigh Road and A31 from the Green Belt. This approach would reflect the fact that there are no existing</p>	

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						<p>considered at this early stage. The definition of the precise Green Belt boundary should be an integral part of the masterplanning process to ensure that the boundary is properly defined in accordance with policy guidance and along well-defined new features (as none exist at present). The process will need to consider all of the following which will have a bearing on the final shaping of the development:</p> <ul style="list-style-type: none"> – location of highway access off Leigh Road – the form and residential mix of the development – density (a lower density in this location and on the edge of the Green Belt is likely to be appropriate and more keeping with local character) and achieving the target of 350 homes – land-take associated with the proposed school – surface water drainage strategy – open space requirements – sports pitch provision, and the rugby and football club requirements. <p>The CS EIP paper dealing with Matter 2: Green Belt, clearly recognises the impossibility (and undesirability) of trying to establish fixed boundaries at this stage and envisages that boundaries will be fixed once detailed planning consent is granted (para's. 3.6-3.8). This is supported by CS KS2.</p>	<p>recognisable, potentially enduring features within this area that could form the basis of a new boundary further to the east of the Leigh. Essentially the WMC6 site and land to the east is open and one landscape compartment. Redrawing the boundaries in this location would create a very clear enduring boundary along well defined primary features and would remove some land that contributes little to Green Belt purposes (the small areas of land between the A31, houses fronting onto Wimborne Road West and employment at Ham Lane). This would provide a clear boundary line and avoid an arbitrarily drawn Green Belt boundary along the eastern edge of the WMC6 development allocation that could hinder the proper planning of that development. Recreational land (properly protected by</p>	

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							such in policy) would be able to fulfil the function of retaining an undeveloped gap between the new development and housing on the south west edge of the suburb of Colehill.	
MM 27	CSMM97	Mrs Hilary Chittenden Environment TAG (East Dorset) (ID: 360302)		Yes	Yes	ETAG supports: i) the retention of the Green Belt gap separating Wimborne and Colehill, and ii) the inclusion in the Green Belt of unlit sports fields and access to the SANG.		
MM 27	CSMM98	Mrs Hilary Chittenden Environment TAG (East Dorset) (ID: 360302)	Yes	Yes	No	To comply with the SE Dorset Green Infrastructure Strategy and to ensure that there is no creeping development or infill, there should be a clear statement within policy that once the planning application for the new neighbourhood has been approved, the areas of open greenspace will be secured for the lifetime of the development.	Insert in Policy WMC6 or LN2 wording to clarify that open greenspace in new neighbourhoods will be protected in perpetuity from creeping development and infill by legal agreement.	
MM 27	CSMM12	Mrs Sheila Bourton (ID: 474462)	Yes	Yes	Yes	I am relieved that the Inspector has drawn the Greenbelt boundary line to ensure that the important Greenbelt Gap between Wimborne and Colehill is retained. I am especially pleased that the greenbelt boundary line has also been extended to the north of Leigh/ Wimborne Road West and follows the line of the existing properties thus ensuring that this Strategic Greenbelt Gap is not eroded.		
MM	CSMM3	Mrs Sheila	Yes	Yes	Yes	We are relieved and pleased to see that the Inspector		

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27		Bourton Keep Wimborne Green (ID: 474490)				has drawn a new Green belt boundary which will protect the important Green belt Gap between Wimborne and Colehill, thus preventing coalescence of these settlements. With the new Green belt boundary following the line of existing houses to the north of Leigh Road, the Green belt Gap is not eroded.		
MM 27	CSMM243	Mrs Tracy Paine Colehill Parish Council (ID: 359416)	Yes		No	The Council having agreed a plan with the Landowners, which requires SANGs, allotments and sports fields must protect these areas under green belt provision to avoid development creep. However rather than doing so the Council has pushed the boundary to the A31(T) giving opportunity for further development to be considered beyond the illustrated property boundaries. The boundary should be set on the street plan proposed to avoid any development creep and loss of open space.	The green belt boundary to the South of the estate should be set on the street plan proposed and agreed with the developers contained within their common agreement with the Council. Such an amendment will avoid development creep and protect the SANGs, allotments, and sports facilities for the life of the development.	
MM 27	CSMM183	Mr D Verguson (ID: 503554)	Yes	No	No	In July shortly before the hearing sessions, the Secretary of State for Communities and Local Govt felt it necessary to issue to the Planning Inspectorate new guidelines that promised local communities a greater say in planning and to give greater weight to the protection of landscape, heritage and local amenities. These guidelines have been totally ignored as the modifications scheduled as a result of the hearings do not address any of the concerns expressed by local residents, principally the scope and impact of the vast building programme for Wimborne/Colehill implying a	We are told housing should be limited to what can be delivered sustainably therefore before numbers are agreed should not the problems of employment, the dearth of school places, the extra commuting traffic and pressure on amenities and	

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						40% plus increase in population.	<p>services be resolved to determine sustainability. In this context in WMC6 the local residents have had no say in the plans for 350 houses on a site which does not conform to Council's criteria. This is Green Belt land which according to govt. guidelines, may only be used for housing when all other options are exhausted. Yet locally there are brownfield and empty sites which match council's criteria standing empty and unused. This area of WMC6 is also a major part of the Stour Valley flood plain and subject to flooding. So housing built there will have insurance problems. Finally given the reluctance of the rugby club to relocate to WMC6 then surely the boundary changes to the Green Belt, which give no added protection to the Green Belt corridor, appear redundant and should be</p>	

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							dropped.	
MM 27	CSMM197	South West HARP Consortium South West HARP Planning Consortium (ID: 507536)	No			We support the amendments to the Green Belt boundary in response to housing need.		
MM 28	CSMM99	Mrs Hilary Chittenden Environment TAG (East Dorset) (ID: 360302)		Yes	Yes	We welcome the retention of the GB boundary being drawn adjacent to existing housing to ensure the protection of the AGLV at Pardy's Hill, and the retention in the Green Belt of land for the proposed replacement school.		
MM 28	CSMM198	South West HARP Consortium South West HARP Planning Consortium (ID: 507536)	No			We support the amendments to the Green Belt boundary in response to housing need.		
MM 28	CSMM256	Canford Estate, Harry J Palmer Canford Estate & Harry J Palmer Holdings (ID: 523532)			Yes	The proposed Green Belt boundary change set out in MM28 is supported.		
MM 29	CSMM40	Ms Gill Smith Dorset County	No	Yes	Yes	Dorset County Council supports the transport related modifications listed above as identified in the Schedule	None	

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		Council (ID: 359437)				of Proposed Main Modifications to the Core Strategy.		
MM 30	CSMM26	Mr Ian Jones Ferndown Town Council (ID: 490823)	No	Yes	No	The justification for increasing the number of houses at the proposed Holmwood House development has not been justified and members believed the original lower figure should remain	See above	The Council is satisfied that the increased number can be delivered without further harm to the Green Belt and other factors.
MM 30	CSMM100	Mrs Hilary Chittenden Environment TAG (East Dorset) (ID: 360302)	Yes	Yes	No	The delivery of this increased number of houses will depend on ecological survey and drainage issues.	Amend wording to "...up to 150 homes".	
MM 30	CSMM49	Mr A Rance Libra Homes Ltd (ID: 521642)	No	Yes	Yes			
MM 31	CSMM50	Mr A Rance Libra Homes Ltd (ID: 521642)	No	Yes	Yes			
MM 31	CSMM101	Mrs Hilary Chittenden Environment TAG (East Dorset) (ID: 360302)	Yes	Yes	No	The fence line south of the proposed development area at Holmwood House was erected to contain horses in discrete grazing areas. It would be removed as part of the SANG development and restoration/maintenance of this BAP habitat (Lowland Wood and Pasture). No track is shown here on aerial photographs and it may be that this is simply a temporary pathway worn by trampling by horses. We	Change: 1. Amend GB boundary to the east of the driveway so that it is immediately north of the trees that are to be retained. 2. Insert in Policy FWP3 or LN2 wording to clarify that	The proposed Modification follows a clear defensible boundary. The consultee suggestion would reduce the opportunity to provide much needed housing.

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						<p>recommend that the GB boundary that lies to the east of the driveway should be moved to the north of the trees that it is intended to retain.</p> <p>The rough track to the west of the driveway is hogging on wet ground to allow access to the area where manure has been piled and we suggest would comply with NPPF 85. It is likely that this will be resurfaced as part of SANGs works to ensure it is DDA compliant.</p> <p>To comply with the SE Dorset Green Infrastructure Strategy and to ensure that there is no creeping development or infill, there should be a clear statement within policy that once the planning application for the new neighbourhood has been approved, the areas of open greenspace will be secured for the lifetime of the development. This should include any areas of SANG that fall within the Urban Area.</p>	open greenspace (including SANG) in the new neighbourhood will be protected in perpetuity from creeping development and infill by legal agreement	
MM 31	CSMM199	South West HARP Consortium South West HARP Planning Consortium (ID: 507536)	Yes			We support the amendments to the Green Belt boundary in response to housing need.		
MM 32	CSMM25	Mr Ian Jones Ferndown Town Council (ID: 490823)	No	Yes	No	Members believed the increase in the number of homes (33% increase) planned for the site had not been justified. There would be additional traffic joining the main roadway and this would have an impact on traffic flow. Members believed the original figure for new dwellings for the site was correct.	See above	The Council is satisfied that the increased number can be delivered without further harm to the Green Belt and other factors. Policy KS11 states that development will mitigate its negative impact on the

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								network by providing and contributing towards necessary transport improvements. This applies to all development and officers will work with developers for this site to assess the impact of development related traffic.
MM 32	CSMM215	Mr Colin Sewell (ID: 496597)				Agree that the site at Coppins Nursery could provide 40 homes with less impact on the Parley Crossroads area, environment, nature and historic landscape.		As above.
MM 32	CSMM188	Mr J Sewell (ID: 645375)			Yes	I believe that MM32 is probably correct, i.e. that forty houses could be built at Coppins Nursery. This is further away from the Parley Crossroads than other proposed sites and would cause less problems.		
MM 32	CSMM229	Barratt David Wilson Homes (ID: 661008)			Yes	The increase in housing numbers for the former Coppins Nursery site is supported as a more accurate reflection of the capacity of the site and is consistent with the planning application that has recently been submitted.		
MM 33	CSMM79	Mrs Nicola Brunt Dorset Wildlife Trust (ID: 359461)	No		No	As part of Poor Common is a Site of Nature Conservation Interest and the common will provide open green space for people moving into the new developments of FWP3 (Holmwood) and FWP4 (Coppins), it will likely remain as open countryside. Dorset Wildlife Trust therefore suggests that opportunity is taken to further review the green belt boundary here so that all of the greenspace is included	Dorset Wildlife Trust suggests that, to the north, the green belt boundary should tightly follow the lines of housing along Fitzpain Road and Casterbridge Road to incorporate all of the	The Green Belt boundaries relate to defensible features not land uses. Other policies protect this land from development.

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						within the green belt for consistency, rather than retain the current position which cuts across the middle of the common/plantation.	current greenspace at Poor Common/Belle Vue Plantation within the green belt.	
MM 33	CSMM102	Mrs Hilary Chittenden Environment TAG (East Dorset) (ID: 360302)	Yes	Yes	No	The northern Green Belt boundary cuts across the public open space at Poor Common. This land fulfils what is in effect a SANG function for the existing developments to the north and east of it and will play a major role in allowing the delivery of FWP3 (Holmwood) and FWP4 (Coppins): it will need to be kept open permanently. We therefore recommend redrawing this Green Belt boundary tight to the houses and gardens of existing development to the north.	i) Insert in Policy FWP4 or LN2 wording to clarify that open greenspace in the new neighbourhood will be protected in perpetuity from creeping development and infill by legal agreement. ii) Redraw the Green Belt boundary tight to the houses and gardens of existing development to the north.	The proposed boundaries have been defined to follow existing strong defensible features.
MM 33	CSMM200	South West HARP Consortium South West HARP Planning Consortium (ID: 507536)	No			We support the amendments to the Green Belt boundary in response to housing need.		
MM 33	CSMM230	Barratt David Wilson Homes (ID: 661008)			Yes	The proposed Green Belt boundary change set out in MM33 is supported and is considered to be compatible with the planning application recently submitted for the former Coppins Nursery site.		
MM 34	CSMM42	Ms Gill Smith Dorset County	No	Yes	Yes	Dorset County Council supports the transport related modifications listed above as identified in the Schedule	None	

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		Council (ID: 359437)				of Proposed Main Modifications to the Core Strategy.		
MM 35	CSMM43	Ms Gill Smith Dorset County Council (ID: 359437)	No	Yes	Yes	Dorset County Council supports the transport related modifications listed above as identified in the Schedule of Proposed Main Modifications to the Core Strategy.	None	
MM 35	CSMM68	Cllr. Mr John Wilson East Dorset District Council (ID: 360817)			No	We note the intention to insert the word "Potential" into the title of Map 10.8 so that it becomes "Potential West Parley Village Centre Enhancement Scheme". The inclusion of the word implies that the production of the enhancements might not go ahead. If West Parley has to suffer the unwelcome addition of two New Neighbourhoods then it must also enjoy the benefit of the enhancements. We object to the inclusion of "Potential".		The word "potential" was inserted to indicate that the planned improvement is not definitely taking place in this precise form. It's an indicative plan for improvement. An improvement at Parley Cross will take place in conjunction with the associated development link roads. Commitment to a scheme is given in Policy FWP5.
MM 35	CSMM67	Cllr. Mrs B. T. Manuel East Dorset District Council (ID: 360764)			No	We note the intention to insert the word "Potential" into the title of Map 10.8 so that it becomes "Potential West Parley Village Centre Enhancement Scheme". The inclusion of the word implies that the production of the enhancements might not go ahead. If West Parley has to suffer the unwelcome addition of two New Neighbourhoods then it must also enjoy the benefit of the enhancements. We object to the inclusion of "Potential".		As above.
MM	CSMM214	Mr Colin Sewell			No	We disagree strongly with MM35 - claim regarding		As above.

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35		(ID: 496597)				'potential' of the site of West Parley Village Centre enhancement scheme, which could result in more traffic and is considered by local opinion to be unwanted and unnecessary. We are already well catered for with shops, supermarket, post office, chemist, two sports clubs and community hall. (There are many empty shops in nearby villages).		
MM 35	CSMM190	Mr J Sewell (ID: 645375)			No	I do not believe that MM35 is correct, the potential could be that of an increase of traffic and possible accidents.		As above.
MM 36	CSMM30	Mr J.D Head (ID: 500570)	No		No	A) Not consistent with achieving sustainable development. B) No reason has been given for increase in housing or extension of Green Belt removal. C) Will not be deliverable - developers have told hearing they cannot meet 50% target affordable homes + infrastructure costs + pay for SANG D) Green Belt is to stop urban areas merging proposed changes will only create one vast urban area.	Take full account of the West Parley Parish Plan that put forward a sustainable increase in housing stock of 100 homes, not the 500 proposed - remove all alterations to existing Green Belt boundaries.	
MM 36	CSMM47	Ms Gill Smith Dorset County Council (ID: 359437)	Yes	Yes	Yes	Dorset County Council notes that proposed changes to the green belt boundaries in relation to the two housing sites at West Parley (MM36 and MM38) will clearly impact on the development of each site. It is noted that there is a proposed reduction in dwelling numbers on the western site due to the more restrictive green belt boundary proposed. The green belt boundary adjacent to the eastern site is being moved southwards. Regardless of these changes in potential development levels, developers will be required to provide mitigation	None	

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						against any negative transport impacts arising from their development proposals. To this end, Dorset County Council Transport Planning and Development Management Officers will continue to work with the developers of both sites and East Dorset Planning Officers to ensure that the required transport infrastructure is designed, funded and delivered through Section 106 Agreement and the Community Infrastructure Levy (CIL).		
MM 36	CSMM60	Cllr. Mrs B. T. Manuel East Dorset District Council (ID: 360764)			No	We object to this modification which proposes to realign the Green Belt boundary southwards from the footpath that runs from New Road to Church Lane to a new line at the edge of the copse adjoining 108 New Road. We contend that the footpath that marked the original limit is a sufficient natural boundary. The original proposal allowed a valued area of open space south of the footpath to remain part of and continue to be protected by the Green Belt policy. We believe the proposed modification is unnecessary and unjustified and will leave this area unprotected from future development.	However, if this modification has to be incorporated then, to overcome our concerns and those of many local people, we request that this area be designated as an area of open space in perpetuity.	
MM 36	CSMM61	Cllr. Mr John Wilson East Dorset District Council (ID: 360817)			No	We object to this modification which proposes to realign the Green Belt boundary southwards from the footpath that runs from New Road to Church Lane to a new line at the edge of the copse adjoining 108 New Road. We contend that the footpath that marked the original limit is a sufficient natural boundary. The original proposal allowed a valued area of open space south of the footpath to remain part of and continue to be protected by the Green Belt policy. We believe the proposed modification is unnecessary and unjustified and will leave this area unprotected	However, if this modification has to be incorporated then, to overcome our concerns and those of many local people, we request that this area be designated as an area of open space in perpetuity.	

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						from future development.		
MM 36	CSMM103	Mrs Hilary Chittenden Environment TAG (East Dorset) (ID: 360302)		Yes	Yes	We support the inclusion of the housing in Church Lane as the east Green Belt boundary to prevent further urban sprawl. We support the inclusion of the SANG in the Green Belt		
MM 36	CSMM104	Mrs Hilary Chittenden Environment TAG (East Dorset) (ID: 360302)	Yes	Yes	No	To comply with the SE Dorset Green Infrastructure Strategy and to ensure that there is no creeping development or infill, there should be a clear statement within policy that once the planning application for the new neighbourhood has been approved, the areas of open greenspace will be secured for the lifetime of the development.	Insert in Policy FWP3 or LN2 wording to clarify that open greenspace in new neighbourhoods will be protected in perpetuity from creeping development and infill by legal agreement.	
MM 36	CSMM221	Wyatt Homes (ID: 359366)	Yes	Yes	Yes	The MM further contributes to soundness in all regards.		
MM 36	CSMM264	Mrs Linda Leeding West Parley Parish Council (ID: 359553)			No	The proposed change to the green belt boundary, advancing it towards the South and towards Bournemouth, is UNSOUND. It has not been positively prepared, is not justified, and is not consistent with national policy. The proposed change contravenes NPPF 80, which sets out the 5 purposes of the green belt. The change does not, in the words of NPPF 80, "prevent neighbouring towns merging into each other". In fact it does the opposite. The green belt between Ferndown/West Parley and Bournemouth has always been recognised as a Key Gap, and the proposed change virtually eliminates it. All that is left of the gap		

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						is the river Stour and a small field. The accompanying text to the change is UNJUSTIFIED and not PROPERLY PREPARED. The text is labelled as justification but is in fact a description, containing no reasoning and no evidence. As with earlier plans for West Parley, the proposed change contravenes NPPF 155, which calls for early and meaningful engagement and collaboration with neighbourhoods, and for Local Plans to reflect a collective vision and a set of agreed priorities. This change appeared out of the blue with no previous discussion with local councillors or residents. The proposed change is therefore Inconsistent with National Policy. PLEASE SEE ACCOMPANYING MAP.		
MM 36	CSMM212	Mrs Gillian Sewell (ID: 496575)			No	The proposals opposite the shops at West Parley junction could cause much more congestion than at present. The present traffic lights work effectively and were much improved some years ago, both in reduction of traffic accidents and queuing. The areas at Holmwood and Coppins Nursery appear to be much more suitable for the building of homes, as they are further from this junction I support fully the views of our West Parley Parish Council, which are well considered and balanced. I do not consider the main modifications to the Core Strategy to be effective and justified as they do not change much of the basic proposals, which I believe are undemocratic.		The proposed improvements at Parley Cross and the associated development link roads are required to mitigate the transport impact of the development either side of Parley Cross.
MM 36	CSMM213	Mr Colin Sewell (ID: 496597)			No	We find it of great concern that MM20 states that the Green Belt designation is a 'constraint' to sustainable growth. We believe that the present Green Belt should		

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						<p>be upheld and was originally the result of responsible consideration for the future.</p> <p>It would appear that where it states that 'the Green Belt will be retained and protected except for strategic release of land for new housing and employment in East Dorset and Bournemouth Airport', it is presenting an ambiguous case for re-alignment of existing designated Green Belt. This is confirmed by EDDC applying to take a large section of the field to the south of New Road/Church Lane out of the Green Belt, against the wishes of the Parley residents and West Parley Parish Council; especially as it has a significant proximity to heathland (threats posed to SSSI by dog walkers and risk of fire to sandy heathland.)</p>		
MM 36	CSMM201	South West HARP Consortium South West HARP Planning Consortium (ID: 507536)	No			We support the amendments to the Green Belt boundary in response to housing need.		
MM 37	CSMM23	Mr Paul McCann Banner Homes Group PLC (ID: 527789)	Yes	Yes	No	We do not consider the allocation needs to be reduced to 'about 150 homes' in order to ensure the development protects the setting of the adjacent scheduled ancient monument. At a recent meeting with representatives of East Dorset District Council and English Heritage (that was held on 9th January 2014) it was agreed that further studies are required to inform a creative solution that would allow the line (and density) of development to be varied according to the topography and the landscape / heritage setting. This is likely to involve both ground modelling and building	To make the document sound the wording of policy FWP7 should be reworded to state "a New Neighbourhood is allocated to deliver in the region of 150 to 200 homes". The new bullet 4 that follows can remain unchanged.	

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						height restrictions but the final details of this (and the number of homes achievable) will not be available until a detailed planning application is made. At that stage the scheme will be considered fully in the light of the need to protect the setting of the scheduled monument on which English Heritage will be a consultee. This is not an issue that needs to restrict the development to a lower density at this stage.		
MM 37	CSMM44	Ms Gill Smith Dorset County Council (ID: 359437)	No	Yes	Yes	Dorset County Council supports the transport related modifications listed above as identified in the Schedule of Proposed Main Modifications to the Core Strategy.	None	
MM 37	CSMM63	Cllr. Mrs B. T. Manuel East Dorset District Council (ID: 360764)			No	The modification to realign the Green Belt boundary to meet the concerns of English Heritage about the Dudsbury Camp Ancient Monument, consequently reducing the number of projected houses by at least 50, is supported. However, this modification will dramatically increase the difficulty of sustainable development of this now smaller site thereby making the scheme undeliverable and hence unsound. Therefore, we believe FWP7 should now be taken out of the plan in its entirety.		
MM 37	CSMM64	Cllr. Mr John Wilson East Dorset District Council (ID: 360817)			No	The modification to realign the Green Belt boundary to meet the concerns of English Heritage about the Dudsbury Camp Ancient Monument, consequently reducing the number of projected houses by at least 50, is supported. However, this modification will dramatically increase the difficulty of sustainable development of this now smaller site thereby making the scheme undeliverable and hence unsound. Therefore, we believe FWP7 should now be taken out		

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						of the plan in its entirety.		
MM 37	CSMM71	Mr Rohan Torkildsen English Heritage (ID: 359478)	Yes	Yes	No	<p>Context</p> <ul style="list-style-type: none"> On 20 December 2012 English Heritage formally objected to the Pre submission Plan. On 28 August 2013 English Heritage (rep no 359478) submitted Hearing Statements in relation to Matters 5 (FWP West Parley/Dudsbury Hillfort) and Matter 11 regarding Historic Environment Policy HE1. On 4 September 2013 English Heritage met with representatives of the Councils on site at West Parley. Constructive discussions ensued and it was agreed that modifications would be proposed to resolve these substantial concerns and help make the Plan sound. On 9 September 2013 it was confirmed to the Programme Officer that following the above meeting and productive dialogue with Officers, Statements of Common Ground (SOCG) regarding Matters 5 and 11 would be issued and as a result there was now no need for English Heritage to attend the Hearing Sessions. On 24 September 2013 Statements of Common Ground, including explicit modifications to Policy FWP7 were agreed by the Local Authority, Banner Homes, English Heritage and Natural England; and explicit modifications to Policy HE1 by the Local Authority and English Heritage. English Heritage anticipated these modifications would be reflected in the Schedule of Main Modifications to the Submitted Core Strategy. As they have not been included in the Schedule of Modifications as agreed English Heritage must again formally object to the Plan as it is unsound for the following reasons. 	<p>Additional Policy FWP7 bullet points</p> <ul style="list-style-type: none"> To minimise an overly intrusive landscape impact and ensure the setting and significance of the Dudsbury Hillfort Scheduled Monument is appropriately protected, the route of the proposed new road, any associated reforming of the land, and any new roof, should not exceed the height of the new Green Belt Boundary to ensure the retention of existing views of the crest that includes the upper hillside of the Dudsbury Ridge. East Dorset DC will lead on the preparation of a Heritage Strategy for the Hillfort with the local community, Dorset CC Archaeology and English Heritage to support the future management, enhancement and enjoyment of the hill fort. 	The suggested wording is acceptable and we trust can be considered as a minor modification not requiring further consultation.

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						<p>Page 130 Policy FWP7 – West Parley/Dudsbury Hill Fort</p> <p>A New Neighbourhood is allocated to deliver about 200150 homes...</p> <p>Proposed New Bullet 4: The design and setting of the road will need to comply with the requirements of the Historic Landscape Assessment by means of bunding and planting or setting the road in a cutting with appropriate planting.</p> <p>This fails to reflect the agreed SOCG and so Policy FWP7 in its current form would fail to conserve the significance of the scheduled ancient monument contrary to the NPPF.</p> <p>The SOCG agreed that a more modest and responsive scheme on the lower fields of the eastern flank of the hillfort would minimise the harm to the significance of the monument. This will mean that the quantity and location of housing indicated on the allocation set out in FWP7 would need to be reduced, and the alignment of the proposed link road moved to ensure the crest which includes a portion of the upper slopes of the Dudsbury Ridge, retain their visibility and open rural character and the visual impact of development on this prominent hillside is limited.</p> <p>The proposed scheme would need to be reconsidered with regard to the impact on the hill and views into the site. This will be achieved by careful consideration of building heights, lighting, landscaping and the form and construction of the proposed link road which may be helped by some reforming of the land.</p> <p>Our previously submitted statement for the Examination dated 28 August 2013 (Ref no. 359478) sets out in detail how the setting of the hillfort</p>		

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						<p>contributes to its significance; the harmful effects of the proposed development on that significance; and ways to minimize harm. The latter would be reflected in recommended modifications to the Plan.</p> <p>Our statement also disputed certain elements of the Historic Landscape Assessment and so should not be referred to in FWP7 and solely relied upon to guide future development.</p> <p>The schedule of proposed modifications adjusts the capacity of the site to 150 new homes. I would question whether a sloping site at the foot of the Dudsbury Ridge retaining the existing visibility/views of the crest and upper slopes above existing housing has the capacity for 150 homes and a road.</p> <p>The SOCG agreed that as part of the proposal the local authority would lead on the preparation of a Heritage Strategy for the Hillfort with the local community, Dorset CC Archaeology and English Heritage to support the future management, enhancement and enjoyment of the hill fort.</p> <p>Unfortunately this is not reflected in the Schedule of Modifications.</p> <p>In view of the above we would recommend the following further modifications to Policy FWP7 are made in place of those currently proposed.</p> <ul style="list-style-type: none"> • To minimise an overly intrusive landscape impact and ensure the setting and significance of the Dudsbury Hillfort Scheduled Monument is appropriately protected, the route of the proposed new road, any associated reforming of the land, and any new roof, should not exceed the height of the new Green Belt Boundary to ensure the retention of existing views of the crest that includes the upper 		

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						<p>hillside of the Dudsbury Ridge.</p> <ul style="list-style-type: none"> • East Dorset BC will lead on the preparation of a Heritage Strategy for the Hillfort with the local community, Dorset CC Archaeology and English Heritage to support the future management, enhancement and enjoyment of the hill fort. <p>No doubt Natural England will be making separate representations.</p>		
MM 37	CSMM265	Mrs Linda Leeding West Parley Parish Council (ID: 359553)				<p>West Parley Parish Council continues to oppose FWP7 as being inconsistent with the Parish Plan and a misuse of this Key Gap greenbelt field. However the changes to the green belt in the Main Modifications are seen as a major improvement on earlier plans.</p> <p>The changed green belt boundary now means that over half the area of the site cannot be built on, yet the proposed number of houses has only fallen from 200 to 150. This is unrealistic. The accompanying plan shows the housing site area before and after the modifications. The original site area was 37187 sq. mtrs; the new site area is 14179 sq mtrs. The mathematics are that at the same overall housing density only 76 houses could be accommodated in the reduced site.</p> <p>To attempt to pack in 200 houses would result in a solid mass of small houses at the edge of the village. The development would have an adverse visual impact and would also be totally out of character with the adjacent residential area.</p> <p>It would result in very small houses or perhaps flats, packed very closely together, and altogether at odds with the character of the site and the adjacent houses.</p> <p>PLEASE SEE ACCOMPANYING MAP</p>		

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MM 37	CSMM107	Mrs Hilary Chittenden Environment TAG (East Dorset) (ID: 360302)		Yes	Yes	We support the reduction in housing numbers here and the new bullet point to address the concerns of English Heritage. The consequent moving of the new link road may reduce light pollution. This does not remove the objections to other aspects of this allocation that have been raised in previous responses		
MM 37	CSMM211	Mrs Gillian Sewell (ID: 496575)			No	<p>The idea that the present Green Belt is a 'constraint' (MM20), (MM2), is very worrying. I agree with English Heritage that the Dudsbury area is 'sensitive' and has an 'especially high heritage significance. The reduction in the numbers of houses is to be welcomed; however, should any houses be built in this lovely area? There is certainly wealth of wildlife, including deer, otters, kingfishers, buzzards and river fish etc. This area is a flooded valley every winter and has great natural beauty.</p> <p>I support fully the views of our West Parley Parish Council, which are well considered and balanced. I do not consider the main modifications to the Core Strategy to be effective and justified as they do not change much of the basic proposals, which I believe are undemocratic.</p>		
MM 37	CSMM216	Mr Colin Sewell (ID: 496597)			No	<p>With reference to MM37, we would agree that less homes should be built in this important historic area. We would refer to rep no. 359478, matter no.5 by English Heritage, with reference to policy FWP7, which states that this is a 'sensitive area of river landscape' and that the Dudsbury Camp iron age hillfort has an 'especially high heritage significance'. Its 'setting' is beautiful and should be conserved for posterity for future generations.</p> <p>In conclusion, although MM37 proposes less housing</p>		

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						<p>and a better way into the housing, we consider any building to be inappropriate on Dudsbury Hill area, but that the area should be enjoyed by local wildlife and residents, and conserved indefinitely. We believe the present Green Belt should be observed unaltered. We agree with English Heritage's poor opinion of the proposed link roads in this sensitive area. It has never been built on because of the very extensive flood plains around the rivers, which has flooded regularly (all our lives).</p> <p>The modification presents a slight improvement, but the housing proposed does not harmonise with the present housing stock in its extent, design, size, gardens or layout.</p>		
MM 37	CSMM191	Mr J Sewell (ID: 645375)			No	This proposes less building, but building homes in this area is still problematic due to proximity of wonderful river areas, historic iron age fort, views and flooding areas. I believe this to be unjustified and unsound.		
MM 38	CSMM54	Ms Gill Smith Dorset County Council (ID: 359437)	Yes	Yes	Yes	<p>Dorset County Council notes that proposed changes to the green belt boundaries in relation to the two housing sites at West Parley (MM36 and MM38) will clearly impact on the development of each site. It is noted that there is a proposed reduction in dwelling numbers on the western site due to the more restrictive green belt boundary proposed. The green belt boundary adjacent to the eastern site is being moved southwards.</p> <p>Regardless of these changes in potential development levels, developers will be required to provide mitigation against any negative transport impacts arising from their development proposals. To this end, Dorset County Council Transport Planning and Development</p>	None	

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						Management Officers will continue to work with the developers of both sites and East Dorset Planning Officers to ensure that the required transport infrastructure is designed, funded and delivered through Section 106 Agreement and the Community Infrastructure Levy (CIL).		
MM 38	CSMM66	Cllr. Mr John Wilson East Dorset District Council (ID: 360817)			No	The modification to realign the Green Belt boundary to meet the concerns of English Heritage about the Dudsbury Camp Ancient Monument, consequently reducing the number of projected houses by at least 50, is supported. However, this modification will dramatically increase the difficulty of sustainable development of this now smaller site thereby making the scheme undeliverable and hence unsound. Therefore, we believe FWP7 should now be taken out of the plan in its entirety.		
MM 38	CSMM65	Cllr. Mrs B. T. Manuel East Dorset District Council (ID: 360764)			No	The modification to realign the Green Belt boundary to meet the concerns of English Heritage about the Dudsbury Camp Ancient Monument, consequently reducing the number of projected houses by at least 50, is supported. However, this modification will dramatically increase the difficulty of sustainable development of this now smaller site thereby making the scheme undeliverable and hence unsound. Therefore, we believe FWP7 should now be taken out of the plan in its entirety.		
MM 38	CSMM109	Mrs Hilary Chittenden Environment TAG (East Dorset) (ID:		Yes	Yes	ETAG supports this clarification of the Green Belt boundary.		

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		360302)						
MM 38	CSMM202	South West HARP Consortium South West HARP Planning Consortium (ID: 507536)	No			We support the amendments to the Green Belt boundary in response to housing need.		
MM 38	CSMM257	Mr Paul McCann Banner Homes Group PLC (ID: 527789)	Yes	Yes	No	National policy on Green Belts as contained in paragraph 85 of the NPPF sets out considerations for green belt boundaries and states "define boundaries clearly, using physical features that are readily recognisable and likely to be permanent". In the case of MM38 the proposed Green Belt boundary follows an arbitrary line across an open field. We understand that the justification for this is that any new development should not visually encroach further on the existing slope of the Dudsbury escarpment (on which the Dudsbury hill fort stands) than the existing development on the west side of new road. However such a line does not follow any recognisable physical feature contrary to advice in the NPPF. At a recent meeting with representatives of East Dorset Council and English Heritage that was held on 9th January 2014 it was agreed that further studies are required to inform a creative solution that would allow the line of development to be varied according to the topography and the landscape/heritage setting. This is likely to involve both ground modelling and building height restrictions but the final details of this will not be available until a detailed planning application is made. At that stage the scheme will be considered fully in the	To make the document sound the Green Belt boundary should be redrawn to follow the well defined and defensible boundaries of the original allocation FWP7 as shown on the attached extract from the Core Strategy Consolidated Version March 2013 (Submission Documents SD28). This is further defined as a blue line on the plan attached to these representations which is an overmark of the plan included in the main modifications . This will create a long term defensible boundary for the Green Belt. Any intervening land between the finally agreed development area and the	

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						light of the need to protect the setting of the scheduled monument on which English Heritage will be a statutory consultee. This is not an issue that is relevant to determining a Green Belt boundary at this stage which should be drawn back to follow clear physical features in line with guidance in the NPPF. It must also be recognised that wherever the development line of this site is eventually determined the land beyond up to the Green Belt boundary will be designated as "SANGs" that will have protection from development in perpetuity either through a legally binding planning obligation and/or public adoption and will therefore remain undeveloped ensuring the setting of Dudsbury Fort remains unharmed. (See attached plans)	Green Belt will also enjoy long term protection as SANGs. (See attached plans)	
MM 39	CSMM111	Mrs Hilary Chittenden Environment TAG (East Dorset) (ID: 360302)		Yes	Yes	ETAG supports this clarification of the Green Belt boundary.		
MM 39	CSMM166	Mr & Mrs Brian Glover, Stourbank Nurseries Ltd (ID: 498035)				(See attachment) a. No Green Belt Review was undertaken for the proposed employment allocations, such that the impacts have not been assessed (for example in terms of landscape character or in relation to previously developed-v-greenfield land) and the area of land for release for each proposed site, including the setting of long-term defensible boundaries, has not been justified by means of an objective assessment of the evidence. This impacts on the credibility and merit of MM39. b. Despite the Council's FD12 stating that a	(See attachment) We request that the Local Plan is modified by the Inspector to limit Blunt's Farm to the employment area that it is capable of supporting – ie 21 hectares.	

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						<p>'qualitative' assessment of employment need has been undertaken, this is not the case. There is no ELR2 and ELR3 available that would satisfy the requirements of the 2004 guidelines. This means that only a 'quantitative' assessment has been made, which means that the different types of employment need (for SMEs or large corporates, or offices or warehouses) has not been objectively assessed so that there is no link between the employment allocations made and the local employment need. This means that the plan will be ineffective.</p> <p>c. Specifically with regard to the Blunt's Farm allocation (MM39), we tabled evidence at the EIP questioning whether this site is capable of accommodating the stated 30 hectares of employment land once the SINC and required landscape buffer, in particular, are taken in to account. We consider that Blunt's Farm can only accommodate 21 hectares. Despite repeated requests (for example at the EIP and in our letter of 22 October 2013) EDDC has not chosen to dispute our measurements (MM39 still specifies 30 hectares, which is a material error).</p> <p>3. As a result of (1) and (2) above - an unsound strategy.</p> <p>4. Leading to our principal objection - that the draft Local Plan is 'unsound' because Stourbank Park has been omitted from the employment allocations.</p>		
MM 39	CSMM203	South West HARP Consortium South West HARP Planning Consortium (ID:	No			We support the amendments to the Green Belt boundary in response to housing need.		

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		507536)						
MM 40	CSMM73	Eastworth Farms (ID: 811557)	Yes	No	No	<p>1 Introduction</p> <p>1.1 The main thrust of these representations are that two additional areas of land at Eastworth Farm, Verwood should be excluded from the Green Belt (i.e. additional to the Green Belt revision detailed in MM40) namely land east of the disused railway line and west of Ironmongers Copse and also land north of Edmondsham Road (see attached plan).</p> <p>1.2 The justification for these Green Belt amendments is set out below. However in short these changes are required to comply with the 'Tests of Soundness' that require the Core Strategy to be Positively Prepared, Justified, Effective and Consistent with National Policy.</p> <p>Land East of the Disused Railway Line</p> <p>1.3 National Planning Policy Framework (NPPF) paragraph 85 indicates that in defining Green Belt boundaries, local planning authorities should seek to;</p> <ul style="list-style-type: none"> • Promote sustainable development; • Not include land which it is unnecessary to keep permanently open; • Identify areas of 'safeguarded land' in order to meet longer term development needs stretching well beyond the plan period; • Satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period' • Define boundaries clearly using physical features that are readily recognisable and likely to be permanent. <p>1.4 NPPF guidance also acknowledges (paragraph 80) that Green Belts will serve five purposes;</p> <ul style="list-style-type: none"> • To check the unrestricted sprawl of large built-up areas; 	Please see above	

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						<ul style="list-style-type: none"> • To prevent neighbouring towns merging into one another; • To assist in safeguarding the countryside from encroachment; • To preserve the setting and special character of historic towns; and • To assist in urban regeneration, by encouraging the recycling of derelict and other urban land. <p>1.5 Eastworth Farm Ltd (EFL) have consistently considered that the exclusion from the Green Belt of the land east of the disused railway line complies with NPPF guidance and this amendment will be necessary to achieve the Tests of Soundness requiring that the Core Strategy is Positively Prepared, Justified, Effective and Consistent with National Policy. Specifically, we note that Ironmongers Copse and the disused railway line have been selected as credible Green Belt boundaries on the basis that they represent clear boundaries and identifiable physical features that are readily recognisable and likely to be permanent.</p> <p>1.6 In addition, the inclusion of the land indicated on the attached plan is not necessary to achieve any of the five Green Belt purposes listed above. There can be no question of the land's inclusion in the Green Belt being necessary to prevent neighbouring towns merging into one another or to preserve the setting and special character of an historic town. Similarly inclusion of this modest area of land (0.84 hectares) in the Green Belt is not justified to check the unrestricted sprawl of a large built up area, to assist in safeguarding the countryside from encroachment or to encourage the recycling of derelict and other urban land.</p>		

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						<p>1.7 The land's exclusion from the Green Belt has been discussed with East Dorset District Council officers (Mr Henshaw and Mrs King) who we understood supported this main modification. Hence we believe that the land's inclusion in the Green Belt was an oversight easily rectified by accepting the Main Modification EFL now seek.</p> <p>Land North of Edmondsham Road</p> <p>1.8 We note that Main Modification 40 Map 11.5 and the Reason for Change indicates; ...'The Green Belt boundary will then be formed by the southern edge of Edmondsham Road until it reaches the eastern boundary of Eastworth Farm. It then heads north along the line of the public footpath until it meets the field boundary which heads east to meet the existing urban area boundary around Trinity First School.</p> <p>Map 11.5 also indicates the 400m boundary from the Special Protection Area (SPA), a circular footpath and areas identified as potential SANG and Allotments.'</p> <p>1.9 An alternative logical Green Belt boundary north of Edmondsham Road is identified on the attached plan. We submit that the 5.8 hectare area north of Edmondsham Road and south of the alternative proposed Green Belt boundary shown on the attached plan should be identified for either a mixed use housing, open space and landscaping area or as 'safeguarded land' to meet longer term development needs beyond the plan period.</p> <p>1.10 Duly made representations were submitted and debated at the Examination Hearing Sessions demonstrating that:</p> <p>1. The available evidence base indicates that the</p>		

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						<p>proposed joint authority housing provision falls well short of meeting housing needs and will not deliver the CS housing growth objective. Our assessment of Housing Requirement in East Dorset Report demonstrated that the 5,250 dwelling East Dorset component of the Joint CS 8,200 dwelling requirement should be increased to between 6,000 and 7,000 units.</p> <p>2. The Council have failed to test the total housing requirement nor assessed alternative ways to meet needs either alone or in partnership with neighbouring authorities including a comprehensive review of the Green Belt to establish whether more of the areas housing need can be accommodated within the joint authority area. Hence, the joint authorities have not adequately discharged their duty to co-operate under the NPPF.</p> <p>3. Green Belt releases particularly to meet housing needs in the early part of the plan period will be required given that the urban capacity provision is over estimated (many of the SHLAA sites are in multiple ownership) and over optimistic reliance is placed on the early delivery of strategic sites, e.g. Christchurch Urban Extension, relocation of allotments at Cuthbury Allotments, pre-delivery infrastructure requirements at the Cranborne Road site and relocation of school/compensatory open space provision at the Lockyers School.</p> <p>1.11 These factors justify serious consideration being given to deleting land north of Edmonshaw Road from the Green Belt and allocating the 5.8 hectares for a mixed use development comprising housing, incidental open space and landscaping.</p> <p>1.12 Numerous other locational and site specific</p>		

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						<p>considerations also support the land's exclusion from the Green Belt.</p> <p>1.13 First, the land's inclusion is not necessary to achieve any of the five Green Belt purposes listed at paragraph 1.4 above. Verwood is not an historic town and the land's inclusion in the Green Belt is not necessary to prevent neighbouring towns from merging into one another. The 12.25 hectare area to the north (see attached plan) is a potential Suitable Alternative Natural Greenspace (SANG) which, together with this land's inclusion in the Green Belt, will serve to check the unrestricted sprawl of a large built up area and safeguard the countryside from encroachment. Notwithstanding the purpose or objective to assist in urban regeneration by encouraging the recycling of derelict and other urban land, the CS acknowledges the essential requirement to confirm Green Belt releases to meet housing needs including the urgent need to deliver affordable housing. Just as such Green Belt releases are justified elsewhere, the redrawing of the Green Belt boundary north of Edmondsham Road is similarly justified.</p> <p>1.14 Second, Verwood is the second largest settlement in East Dorset and contains a wide range of shopping, education and community facilities. There are no significant infrastructure constraints. However, the total housing provision allocated to the Verwood settlement compares unfavourably with settlements such as Wimborne (1,300 dwellings) and West Parley (520 dwellings). The CS currently advocates only 230 dwellings at the Policy VTSW4 housing allocation with up to a further 65 dwellings at the Main Modification 41 New Policy VTSW5 allocation. In recognition of the</p>		

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						<p>Verwood settlement's merits as a settlement suitable to accommodate housing growth, the East Dorset Housing Options Masterplan Report: Verwood (November 2010) examined the residential development potential of sites south of Verwood. The sites in question have not been taken forward resulting in the low housing growth provision at Verwood. A housing development north of Edmondsham Road would bolster the settlement's total housing provision in a location accessible to a wide range of shopping, education and community facilities.</p> <p>1.15 Third, we submit that the North Eastern Verwood New Neighbourhood (Main Modification 41: New Policy VTSW5) is a far inferior potential housing development to meet strategic housing requirements in particular in terms of the site's proximity to a wide range of shopping, education and community facilities.</p> <p>1.16 Fourth, we note that the Housing Options Masterplan Report commented that the land north of Edmondsham Road should be left undeveloped as it is open and gently undulating countryside designated as an Area of Great Landscape Value (AGLV). It is not accepted that these considerations represent a primary constraint to development particularly when one considers that land north of Wimborne designated as an Area of Outstanding Natural Beauty and various sites acknowledged to lie in gaps between settlements (eg south of Leigh Road, Wimborne) have been identified for residential development. The 5.8 hectares north of Edmondsham Road is relatively flat land rising gently further to the north which possesses few landscape features of particular merit. The 230 dwelling Policy VTSW4 housing allocation south of</p>		

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						<p>Edmondsham Road will inevitably impact on the character and appearance of the land on the opposite side of Edmondsham Road and unlike at present the effect of the Policy WTSW4 allocation will be to ensure that the public will perceive that they are entering Verwood when they pass over the disused railway line. The disused railway line provides containment. A strong landscape edge could also be provided along the northern edge as part of a highly sustainable residential development located close to a range of shopping, education and community facilities.</p> <p>1.17 Fifth, suitable SANG provision will be provided. Based on an average density of 30 dwellings per hectare, the 5.8 hectares north of Edmondsham Road could deliver approximately 170 dwellings. Together with the 230 dwelling Policy VTSW4 North East Verwood allocation, the total provision north and south of Edmondsham Road would comprise some 400 dwellings. Negotiations have already been held with the Council and Natural England to demonstrate satisfactory SANG provision (ie land and 2.3-2.5km pedestrian route). The attached plan indicates three potential SANG areas including:</p> <p>Land north of Trinity School and West of Burrows Lane - 12.2 hectares Dismantled Railway - 1.7 hectares West of Ironmongers Copse - 1.1 hectares Total - 15.0 hectares</p> <p>1.18 The quantum provided by the three areas listed above would exceed a 16 hectare per 1,000 requirement, ie 400 dwellings x 2.2 persons per dwellings = 880 people x 16 hectares =14.08 hectares. The attached plan indicates 3.4 km pedestrian route</p>		

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						<p>which has been the subject of discussions with Mr Henshaw and Mrs King.</p> <p>1.19 Given the land's proximity to the SPA a very major advantage of the potential SANG land area and the pedestrian route are that they will be effective in diverting recreation pressures away from the SPA.</p> <p>Safeguarded land</p> <p>1.20 Representations have been submitted and debated at the Examination Hearing Sessions highlighting the NPPF guidance which acknowledges that Core Strategies should "where necessary" identify in their plans areas of safeguarded land between the settlement area and the Green Belt, in order to meet longer-term development needs stretching beyond the plan period. The CS has legitimately been criticised for not considering the need for Green Belt releases beyond the plan period. This approach conflicts with the Tests of Soundness requiring that the CS is Positively Prepared, Justified, Effective and Consistent with National Policy.</p> <p>1.21 The representations set out above justify the amendment to the Green Belt boundary north of Edmondsham Road to deliver a comprehensive development of approximately 170 dwellings, incidental open space and landscaping. This is EFT's preferred position. If a 170 dwelling allocation is not supported, EFT's alternative proposition is to seek the proposed redefinition of the Green Belt boundary north of Edmondsham Road to facilitate the identification of the 5.8 hectare area as safeguarded land. The NPPF strongly recommends that Local Planning Authorities build in a contingency provision. Unforeseen circumstances can and do occur. The identification of</p>		

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						<p>safeguarded land is justified both to meet longer term development needs stretching beyond the plan period and also to provide an element of contingency.</p> <p>1.22 Finally, EFT wish to confirm their commitment to the early delivery of the North East Verwood New Neighbourhood. EFT will within the next month appoint a housebuilder partner who will be responsible for the appointment of a consultant team whose responsibility it will be to submit an application for planning permission to deliver a comprehensive development. The application proposals will either deliver the Policy VTW4 230 dwelling allocation or if, as we hope, these Main Modifications are supported by the Inspector, a comprehensive development comprising 400 dwellings plus an appropriate SANG area and pedestrian route. (Please see attached representations and map)</p>		
MM 40	CSMM187	Mrs Pippa Wheatley (ID: 360167)	No		No	<p>1. The eastern Green Belt boundary does not comply with paragraph 85 NNPF. The “public footpath” wavers around some distance from an unsubstantial boundary. The “field boundary” is a post and wire fence with posts leaning in all directions and no permanent features to help mark its location.</p> <p>2. Increased land drainage problem at eastern part of the Eastworth Road potential housing site. Flooding has occurred throughout December 2013 and January 2014 at the roundabout on Edmondsham Road and Coopers Lane and also the Verwood Fire Station roundabout. The five new houses (Rosemead BH31 7AZ) are being built on the old natural flood defence area of wet ground. The builders are out on an almost daily basis extracting debris from the inadequate culvert in the fast flowing stream. It will be</p>	<p>Delete until it reaches the eastern boundary of Eastworth Farm. It then heads north along the line of the public footpath until it meets the field boundary which heads east to meet the existing urban area boundary around Trinity First School Replace this text as follows until it reaches the junction with Coopers Lane. It then heads north along the stream to meet the</p>	

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						very difficult to do this when the machinery leaves the site. There was always flooding there before the development and this is far worse now. Further houses on the land adjacent, sloping down from Eastworth Farm towards this site is almost certainly going to add to this problem. This needs reassessing.	existing urban area boundary around Trinity First School	
MM 40	CSMM204	South West HARP Consortium South West HARP Planning Consortium (ID: 507536)	No			We support the amendments to the Green Belt boundary in response to housing need.		
MM 40	CSMM251	Mrs Hilary Chittenden (ID: 522117)	Yes	Yes	No	As advised in responses to previous consultations and Matters and Issues 2 at EiP, Eastworth Road was identified as being a permanent Green Belt boundary at the time of the last Local Plan. This has not endured into the current Core Strategy proposals and local residents have little confidence that the former railway line will have any degree of permanence as a Green Belt boundary for land to the west of Edmondsham Road. To the east of Edmondsham Road, the land identified for housing is bordered by an ill defined footpath which in no way meets the criterion in NPPF of being a physical boundary that is readily recognisable and likely to be permanent. The only feature meeting that criterion is the stream shown on the map below (from Dorset Explorer) which is the present Green Belt boundary. The current GB boundary to the north east of Trinity First School should be retained as proposed.	Retain current Green Belt boundary along the line of the stream (tributary of R Crane SSSI) to the west of Trinity First School. See attached plan	

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						See attached plan		
MM 41	CSMM15	Mr P Allen (ID: 654815)		No	No	<p>I object to main modifications MM41 and MM42 regarding VTSW5 on the following grounds:-</p> <ul style="list-style-type: none"> • The proposed site is on GREEN BELT land and that status should be maintained. • To create the proposed vehicular access would mean destroying mature Oak Trees that are protected by a Tree Preservation Order (TPO ref. VE/271 – see map ref. A1). This destruction is not justified to gain access to GREEN BELT land. • The proposed vehicular access to a new estate of 65 houses is totally unsuitable and unsafe. <p>Access out of Ringwood Road/Parkland Close onto the B3081 is already very hazardous, especially when turning right towards Verwood, as visibility is severely restricted due to the access point being on a blind bend. This problem is compounded by vehicles nearly always travelling much faster than the 30mph speed limit when going towards Ringwood.</p> <p>For existing residents, to enter Parkland Close (using the proposed vehicular access) from the Verwood town centre direction, a vehicle would have to come to almost a standstill on the B3081, then have to perform a hard left 90 degree turn and immediately then a hard 90 degree right turn in the space of a few feet at the access point. As a result there will be a high probability of collisions from vehicles travelling along the B3081 towards Ringwood and collisions with vehicles trying to exit Ringwood Road/Parkland Close/the proposed site. This is an existing problem (for the few existing residents) but with an increase of 65-130 vehicles (belonging to the occupants of the new estate), the problem will be enormously exacerbated.</p>		A new, safe access to the development will be provided directly on to Ringwood Road. The developer will also provide speed management measures for Ringwood Road to reinforce the 30mph speed limit. This is currently being negotiated through the outline planning application process.

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						<p>The proposed vehicular access would also be close to being opposite to the entrance/exit to Virginia Close and the Verwood Cemetery. The close proximity of all these roads on a blind bend, on the already very busy B3081, will increase the chance of a serious accident occurring.</p> <ul style="list-style-type: none"> • The proposed development was not in the submitted East Dorset Core Strategy because this Core Strategy identified enough land for development to meet the housing need for the next 15 years. Therefore, there is no need for this development on GREEN BELT land. • The proposed development site is already subject to groundwater flooding. This fact has already been acknowledged by documents associated with Outline Planning Application 3/13/0480/OUT. The proposed houses are being located at the southern end of the site because the northern end of the site is acknowledged to be subject to flooding. The result of this unsound proposal will be that existing properties in Ringwood Road/Parkland Close will be subject to additional run-off from the proposed development. Coupled with the existing high run-off from Ringwood Forest/Blue Haze landfill site, there will be potential for serious flooding to existing properties. The risk of contamination to Ebblake Bog will be exacerbated by the proposed development. • The proposed development is remote from existing shops and schools. The site is miles from any school. Traversing the B3081 would be very dangerous for school children as the road is subject to very heavy traffic and visibility in both directions is very poor. Additionally there is no footpath on the north side of the B3081 until the Ebblake Industrial Estate traffic 		

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						<p>lights are reached (where pedestrians can safely cross the road).</p> <ul style="list-style-type: none"> • Verwood is already over developed and there is barely enough infrastructure to support the existing residents. • The proposal would wantonly destroy mature specimen trees that are adjacent to Ringwood Forest. These trees give the area a magnificent backdrop and are home to many birds and animals. These trees are also protected by a Tree Preservation Order (TPO ref. VE/271 – see map ref. W1). • The GREEN BELT land is home for flora and endangered fauna including smooth snakes. This sanctuary should not be destroyed. The land is also directly adjacent to heathland. <p>What with Hampshire and Dorset County Council's Purple Haze plans, and this unsound proposal, it seems that local councils and non-local developers are hell bent on environmental destruction.</p>		
MM 41	CSMM18	Miss Dawn Leader (ID: 649505)	Yes	No	No	<p>Allowing development on this land will significantly increase the likelihood of existing properties being flooded. I believe that it is illegal and unsound to carelessly put people/dwellings at risk and would like this objection to be legally noted so that any future flood damage to the existing properties will be wholly the fault of the local authorities and all costs should be paid by them and not by the insurers of the properties</p>	<p>The site is not suitable for this type or size of development for a number of reasons:</p> <ol style="list-style-type: none"> 1. The boundary is adjacent to a number of bungalows, of which a number are at a lower level than the level of the field. These bungalow already have their gardens flooded in the winter. Any development of this nature needs to be over to the 	

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							<p>other side of the land with adequate flood mitigation to ensure existing properties are not flooded.</p> <p>2. Natural England need to fully investigate the wildlife on the land and investigate the Red Book endangered diving beetle that was discovered there in 2012. The investigation should be fully funded by the developer and carried out by an expert in the field and their advice sort on any change of ecology in the area.</p> <p>3. The removal of 250+ ever green trees with TPO's on the site is going to significantly increase the water that comes down from the forest and the suds put in place need to large enough be able to cope with all of that water without harming Ebblake Stream of the new properties.</p> <p>4. the layout and structure of the SANG, which will boarder the forest and needs to be a safe and</p>	

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							<p>secure place for children and young people. Everyone seems to be more worried about dog walkers than personal safety.</p> <p>5. If the development is to give access to a SANG out into the forest there is need to adequate car parking to be included as this will attract forest users from outside the development and provision needs to be made. Lastly the inspector states that this land is needed to meet the housing needs in the area but the housing numbers are already met without this site. The much needed housing in this area is affordable housing that can get lower wage earners onto the property ladder and this site should only be added back in if at least 50% of the homes are affordable.</p>	
MM 41	CSMM20	MR ROBERT PENN (ID: 810312)	Yes	Yes	No	The document should be considered unsound when considering VTSW5 in relation to the European Union water framework directive and also Habitat regulations and specific regard to flood risk.	In order to ensure compliance and soundness, development consideration for VTSW5	

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						<p>Over the last few years there has been an increase to unacceptable levels in groundwater and holding water .</p> <p>In the most recent example (Jan 2014) water reached 253 Ringwood Road and flooded the ground floor of the property. This occurred as a direct result of the volume of water running out of Ringwood Forest from the general direction of VTSW5 as well as from the Blue Haze dump. Although we have had heavy rainfall, it is clear that the area is at high risk of flooding. the further development of the VTSW5 site will lead to a much greater risk of further flooding, and evidence exists that removal of trees on the scale planned would enhance the flooding risk. The provision of SUDA ponds and mires will be overwhelmed and much more survey work will be required to alleviate this risk.</p> <p>We understand that Ebblake Bog is a SSSI/RAMSAR site . the impact of this flooding on the Bog should the development take place would be very serious.</p> <p>The weather concerns are supported by evidence published by the Met Office 2011 for the Department of energy and climate change.</p>	<p>site must include a ground water management plan based on current information and conditions. This should include hydrology, geology and related flooding risks on the site and the surrounding areas, with consideration as to the impact of Blue and Purple haze Dump sites.</p>	
MM 41	CSMM29	Mrs Margaret Hankin (ID: 648930)	No		No	<p>I consider this site unsound because (although not classed as flood plain at present) it does flood in severe weather as does half of my garden, which backs directly onto it. I have very serious concerns that disturbing this land will push the water towards and in my property, putting me at risk. There is Ebblake Bog to consider. All the land is boggy. There is an underground spring under my fence.</p>	<p>It is, I believe, my democratic right to put forward my concerns and hope it will remain so.</p> <p>Major concerns:</p> <ol style="list-style-type: none"> 1) Flooding, our climate is getting much wetter, especially in the south, proven recently. 2) This main road B3081 	

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							most dangerous now to negotiate - more traffic would make it lethal.	
MM 41	CSMM48	Mrs B Lawford (ID: 656214)			No	<p>Further to the above I detail below why I consider the document relating to location VTSW5 to be unsound in relation to the EU Water Framework Directive and Habitat Regulations with specific regard to flood risk.</p> <p>1. The area surrounding VTSW5 has seen an unacceptable increase in both groundwater and ponding over a number of years – I have lived here for 28 years. A nearby resident had the ground floor of his property flooded which I believe occurred as a result of the amount of water running from Ringwood Forest from the direction of VTSW5 as well as from the adjacent Blue Haze Landfill site. Despite the fact rainfall has been abnormal it is clearly evident that current protection measures for properties in the area are inadequate and despite assurances from developers it is obvious conditions would be further aggravated by the development of VTSW5. Even though the rainfall has been abnormally high who is to say it won't happen again!! Incidentally the water as mentioned above, the run off stream to the south west of the B3081 also leaked into Ebblake bog an SSI/RAMSAR site.</p> <p>If these types of localised flooding can occur now it is of concern that little consideration has been given to the further impact of additional surface run off from the proposed development of VTSW5. This is an unacceptable to more properties being placed at risk and also eventual contamination of Ebblake bog (SSI/RAMSAR site) The concerns are also supported by published evidence relating to weather patterns and</p>		

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						<p>climate observations prepared by the Met office 2011 for the Department of Energy and Climate Change.</p> <p>2. In order to ensure soundness and compliance development considerations for VTSW5 must include a ground water management appraisal based on current information and conditions. This should include an assessment of the hydrology, geology and related flood risk of both the site and surrounding areas likely to be impacted to be undertaken to enable inclusion of the site in the Core Strategy to be considered sound. I would further draw attention to the horrendous situation in many parts of the country where flooding has taken place. The time is now to prevent this problem in VTSW5 not after any proposed development. If the VTSW5 is included and development goes ahead could we have assurances from the council's and developers that if flooding occurs in the future they will be liable for compensation and to put matters right.</p>		
MM 41	CSMM52	Linden Homes Linden Homes (ID: 662201)	Yes	Yes	No	<p>(See accompanying statement)</p> <p>Although we support the reintroduction of the allocation we consider that there are a number of minor modifications that should be made to the proposed policy wording to improve its effectiveness. We address each of these proposed amendments in turn below before providing our proposed amended wording for the policy as a whole. Design Code Given the scale of the new neighbourhood, the development will be brought forward as a single phase. As such it is not considered that a design code to tie together individual elements of the proposals is required.</p> <p>Boyer Planning submitted a Development Brief for the</p>	<p>(See accompanying statement)</p> <p>It is considered that the following modifications to the proposed policy wording should be made:</p> <ul style="list-style-type: none"> • The removal of the requirement for a design code; • Removal of reference to half the site being set out as informal open space along with children's play space; 	

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						<p>site in May 2013 which included design considerations. The submission of the Development Brief was agreed with the Council prior to the submission of an outline application for the residential development of the site. It was agreed that the Development Brief largely fulfils the intended purpose of the proposed design code and that no additional information was required above that included in the Brief.</p> <p>Further, the detailed design of the proposals would be the subject of consideration by the Council during the planning application process and under its control. As such it is not considered that a separate design code is required.</p> <p>Open Space Under the previous allocation the capacity of the site was restricted to 50 dwellings to allow for a financial contribution to be made towards the provision of SANGs. With the changed policy requirements in relation to SANG there is no justification for the artificial restriction of the capacity of the site and as such the allocation has been increased to 65 dwellings.</p> <p>Given the increased capacity of the site and the agreement to provide a SANG immediately adjacent to the site, it is considered that the requirement for approximately half of the identified land to be provided as informal open space is not necessary and has no clear rationale or justification. Informal open space with children's play will be provided as part of the development, in accordance with Council standards, based on meeting the needs of the residents of the 65 dwellings. Restricting the developable area of the site</p>	<ul style="list-style-type: none"> • The affordable housing requirement for the allocation should be decreased to 40%. <p>Policy VTSW5 North Eastern Verwood New Neighbourhood A New Neighbourhood to the north east of Verwood is identified to provide about 65 homes. To enable this, the Green Belt Boundary will be amended to exclude the land identified for new housing.</p> <p>Affordable Housing Up to 40% of all housing on the site will be affordable.</p> <p>Layout and Design</p> <ul style="list-style-type: none"> • The new neighbourhood will be set within the new Green Belt boundary defined on the illustrative diagram. • A design code will be agreed by the Council, setting out the required high standards. <p>Green Infrastructure</p> <ul style="list-style-type: none"> • Approximately half of the identified land is to be An appropriate proportion of 	

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						<p>therefore has no clear purpose and goes beyond the requirements of the Council's open space requirements and the needs of the development. To have such an onerous constraint for the site could stifle delivery and will have significant implications for the design of any scheme going forward.</p> <p>Masterplan The policy requires the new neighbourhood to be set out according to the principles of the masterplan. However, the masterplan was prepared by Broadway Malyan on behalf of the Council on the basis of a site capacity for 50 units and it is important that this is interpreted flexibly in the light of the increased capacity that the policy now provides for. We would therefore suggest that the policy removes direct reference to the masterplan and that the masterplan be retained only for the purpose of defining the new Green Belt boundary (which is the purpose defined for reinstating the plan in the modification) with other detail for illustrative purposes only.</p> <p>Affordable Housing Throughout the Core Strategy process we have raised concerns regarding the proposed affordable housing target. In January 2010 East Dorset District Council published the Affordable Housing Provision and Developer Contributions in East Dorset final report, produced by Three Dragons (The Three Dragons Report). The report divided the District into the following market value areas:</p> <ul style="list-style-type: none"> • High Value Rural East Dorset; • East Dorset Rural; • Wimborne Minster & St Leonards; • Southern Settlements; 	<p>the site will be set out as informal open space along with children's play...</p>	

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						<p>• Low Value East Dorset (including Verwood). In testing the residual values across these areas, the report concluded that there was a “significant variance in residual values by market value area, reflecting the different housing prices found in each of them” (Para. 3.10). The report concluded by providing three possible policy options regarding affordable housing provision:</p> <ul style="list-style-type: none"> • “A single percentage target across the whole district and which is realistic in the lower value market areas. We consider that a target of 40% would be a reasonable percentage and would be a continuation of current policy; • A split target which achieves 40% generally across the district and 50% in High Value Rural; • A more refined split target which achieves 50% in High Value Rural, 40% in East Dorset Rural and Wimborne Minster and 35% in Southern Settlements and Low Value East Dorset.” <p>The Christchurch Borough Council Affordable Housing Provision and Developer Contributions final report, produced by Three Dragons, was also released in January 2010. The report divided the District into the following market value areas:</p> <ul style="list-style-type: none"> • Christchurch Rural North • Christchurch Coastal • Christchurch North <p>The report concluded by providing two possible policy options regarding affordable housing provision:</p> <ul style="list-style-type: none"> • “A single percentage target across the whole borough and which is realistic in the lower value market areas (and therefore readily achievable in the higher value Rural North market). We consider that a 		

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						<p>target of 40% would be a reasonable percentage.</p> <ul style="list-style-type: none"> • A split target which achieves 40% in the Christchurch North and Christchurch Coastal markets and 50% in Christchurch Rural North.” <p>The Councils have chosen to proceed with an overall affordable housing target of 40%, but this is increased on greenfield sites to 50%. This 50% requirement for greenfield sites will apply unless otherwise stated in strategic allocation policies (the only greenfield allocation to have its affordable housing target reduced below the 50% target is the Christchurch Urban Extension which has been reduced to 35%).</p> <p>The VTSW5 new neighbourhood is located within the lower value area of East Dorset District where the Council’s evidence base indicates that the affordable housing target should be a maximum of 40%. In addition to the provision of affordable housing the site will also need to provide appropriate Section 106 contributions as well as on site contributions to open space and children’s play space and the provision of a SANG. Paragraph 173 of the NPPF states:</p> <p>“Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable.</p> <p>Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and</p>		

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						<p>mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.”</p> <p>The affordable housing requirement for the VTSW5 allocation should be reduced to 40%. The modification would ensure that the proposed policy is consistent with the evidence base of the Core Strategy and in accordance with the NPPF and as such is justified.</p>		
MM 41	CSMM59	Ms Gill Smith Dorset County Council (ID: 359437)	Yes	Yes		<p>Dorset County Council is concerned that access to the proposed new neighbourhood at North East Verwood should be directly off Ringwood Road and not via the service road that runs parallel to it. To reinforce the 30mph speed limit on this section of Ringwood Road, speed management measures on Ringwood Road should also be a requirement of the development.</p>	<p>Amend MM41 Transport and Access first bullet to read: “ A new vehicular access is to be provided directly from Ringwood Road” Add new (third) bullet in this section to read: “Speed management measures on Ringwood Road”.</p>	
MM 41	CSMM46	Mr Peter Knight (ID: 652701)	No	Yes	No	<p>The document is considered unsound when considering VTSW5 in relation to the EU Water Framework Directive and the Habitat Regulations and with specific regard to flood risk. Local resident’s experiences confirm that the area surrounding VTSW5 has seen an unacceptable increase in both ground water and ponding over a number of years. This was evidenced recently when water reached 253 Ringwood Road and flooded the ground floor of the property. This occurred in our opinion as a direct result of the volume of water running out of Ringwood Forest from the general direction of VTSW5 as well as from</p>	<p>In order to ensure soundness and compliance, development considerations for the VTSW5 site must include a ground water management appraisal based on current information and conditions. This must include an assessment of the hydrology, geology and related flood risk of both</p>	

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						<p>the adjacent Blue Haze Landfill site. We accept that rainfall was abnormal and that the ground was already saturated; however, it is clearly evident that current protection measures for properties in the area are inadequate. We believe conditions would be further aggravated by the development of VTSW 5 despite the assurances offered by developers.</p> <p>Incidentally as a result of the volume of water flowing from Ringwood Forest as mentioned above the run off stream to the south west of the B3081 also leaked into Ebblake bog (an SSI/RAMSAR site) at its North West perimeter.</p> <p>If these types of localised flooding events can occur now we are concerned that little consideration has been given to the cumulative effect of additional surface run off resulting from the development of VTSW5 . We consider this to be an unacceptable risk even when allowing for the provision of SUDS ponds and mires. It is our belief that current evidence confirms that the proposed SUDS ponds and mires will be overwhelmed by any excessive rainfall resulting in more properties being placed at risk of flooding and the eventual contamination of Ebblake bog (SSI/RAMSAR site).</p> <p>Our concerns are further supported by published opinion to weather pattern changes as covered by the Climate observations, projections and impacts report prepared by the Met office in 2011 for the Department of Energy and Climate Change.</p>	<p>the site and the surrounding areas likely to be impacted in order for the Core Strategy to be considered sound with the inclusion of VTSW5. Please see our response to section 6 for the driving factors.</p>	
MM 41	CSMM153	Miss Alison Appleby Natural England South		Yes	Yes	Natural England welcomes the inclusion of a reference to a SANG strategy forming part of the Green Infrastructure.		

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		West (ID: 612438)						
MM 41	CSMM175	Mr Brian Uncle (ID: 654808)		No	No	<p>The document is considered unsound when considering VTSW5 in relation to the EU Water framework Directive and habitat Regulations and specific regard to FLOOD RISK .</p> <p>local residents experience confirms that the area surrounding VTSW5 has seen an unacceptable increase in both ground water and ponding over a number of years.</p> <p>This has been evidenced by one recent example where water reached 253 Ringwood road and flooded the ground floor of the property. This occurred in our opinion as a direct result of the volume of water running out of Ringwood Forest from the general direction of VTSW5 as well as from the adjacent Blue Haze landfill site. We accept that rainfall was abnormal and that the ground was already saturated, it is clearly evident that protection measures for properties in the area are inadequate and despite the assurances offered by developers we believe conditions would be further aggravated by the development of VTSW5. Incidentally given the volume of water flowing from Ringwood Forest as mentioned above, the run off steam to the southwest of the B3081 also leached into Ebblake Bog [an SSSI/RAMSAR Site] at its Northwest perimeter .</p> <p>In these types of localised flooding events can occur now we are concerned that little consideration has been given to the cumulative impact of additional surface run off from the development of VTSW5 We consider this is an unacceptable risk even when allowing for provision of SUDS ponds and mires</p>	<p>In order to ensure soundness and compliance ,development considerations for the VTWS5 site must include a ground water management appraisal based on current information and conditions .This should include an assessment of the hydrology geology and related flood risk of both the site and the surrounding areas likely to be impacted to be undertaken to enable inclusion of this site in the Core Strategy to be considered sound please see our response to section 6 for the driving factors</p>	

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						<p>It is our belief that current evidence confirms that the proposed SUDS ponds and mires will be overwhelmed by excessive rainfall which will result in more properties being placed at risk of flooding and also to the eventual contamination of Ebblake Bog [SSSI/RAMSAR] site</p> <p>Our concerns are also supported by published evidence relating to Weather pattern changes as covered under the Climate observations & projections & impacts report prepared by the met office 2011 for the Department of energy and climate change</p>		
MM 41	CSMM184	Mr Ronald Swaffield (ID: 656210)			No	<p>With reference to the Inspector putting back VTSW5 into the Core Strategy. We stand by our previous objections to this site being included.</p> <p>We consider this plan to be still unsound. After recent bad weather we are even more concerned about flooding to our property. As recently our neighbours have had their gardens flooded and one property in the immediate area having their house flooded and property destroyed.</p> <p>If this development is allowed it is proposed to remove several hundred trees which are subject to a Tree Preservation Order. These trees currently soak up large amounts of water that run off from Ringwood Forest and the Blue Haze landfill site.</p> <p>The building of houses and roadways serving them would further aggravate the situation. We believe that the proposed mitigation by the developers would be insufficient to stop flooding in the area. Their proposals do not conform to the European Union Water Framework Directive.</p>		
MM	CSMM19	Miss Dawn	Yes		No	The National Planning Policy Framework it lists a	Housing development	

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42		Leader (ID: 649505)				<p>number of reason why greenbelt should and should not be changed. This site fails on a number of counts: Section 4 - Sustainable transport. developing this site will add to the traffic pollution as it is too far away from local amenities. It will increase congestion on the B3081. There is no safe or suitable access to the town for disabled people unless they too use their cars. 1 bus an hour weekdays from Verwood to Ringwood that stops just after 6pm cannot be considered high quality transport. Wheel chair users will not be able to use the existing forest track to access the town unless substantial improvements are made to the track. School children will not be able to use this track unless lighting is provided.</p> <p>Section 10 deals with climate change and flood. With our climate getting wetter and higher winds it makes no sense to remove land from the green belt that homing large amounts of trees that mitigate both wind and flood from this edge of the town. At Christmas 2013 one of the homes nearer to Ebblake stream was flooded downstairs isn't that warning enough of what is to come. Are the government liable for flooding costs of communities if they remove a green belt boundary to allow housing in an area that is at risk of flooding?</p>	should be placed in areas that are away from flood risk. The land at VTSW5 should be retained as green belt.	
MM 42	CSMM22	Mr P Allen (ID: 654815)			No	<p>I object to main modifications MM41 and MM42 regarding VTSW5 on the following grounds:-</p> <ul style="list-style-type: none"> - The proposed site is on GREEN BELT land and that status should be maintained. - To create the proposed vehicular access would mean destroying mature Oak Trees that are protected by a Tree Preservation Order (TPO ref. VE/271 – see map ref. A1). This destruction is not justified to gain access to GREEN BELT land. 		A new, safe access to the development will be provided directly on to Ringwood Road. The developer will also provide speed management measures for Ringwood Road to reinforce the 30mph

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						<p>- The proposed vehicular access to a new estate of 65 houses is totally unsuitable and unsafe. Access out of Ringwood Road/Parkland Close onto the B3081 is already very hazardous, especially when turning right towards Verwood, as visibility is severely restricted due to the access point being on a blind bend. This problem is compounded by vehicles nearly always travelling much faster than the 30mph speed limit when going towards Ringwood. For existing residents, to enter Parkland Close (using the proposed vehicular access) from the Verwood town centre direction, a vehicle would have to come to almost a standstill on the B3081, then have to perform a hard left 90 degree turn and immediately then a hard 90 degree right turn in the space of a few feet at the access point. As a result there will be a high probability of collisions from vehicles travelling along the B3081 towards Ringwood and collisions with vehicles trying to exit Ringwood Road/Parkland Close/the proposed site. This is an existing problem (for the few existing residents) but with an increase of 65-130 vehicles (belonging to the occupants of the new estate), the problem will be enormously exacerbated. The proposed vehicular access would also be close to being opposite to the entrance/exit to Virginia Close and the Verwood Cemetery. The close proximity of all these roads on a blind bend, on the already very busy B3081, will increase the chance of a serious accident occurring.</p> <p>- The proposed development was not in the submitted East Dorset Core Strategy because this Core Strategy identified enough land for development to meet the housing need for the next 15 years. Therefore, there is</p>		<p>speed limit. This is currently being negotiated through the outline planning application process.</p>

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						<p>no need for this development on GREEN BELT land.</p> <ul style="list-style-type: none"> - The proposed development site is already subject to groundwater flooding. This fact has already been acknowledged by documents associated with Outline Planning Application 3/13/0480/OUT. The proposed houses are being located at the southern end of the site because the northern end of the site is acknowledged to be subject to flooding. The result of this unsound proposal will be that existing properties in Ringwood Road/Parkland Close will be subject to additional run-off from the proposed development. Coupled with the existing high run-off from Ringwood Forest/Blue Haze landfill site, there will be potential for serious flooding to existing properties. The risk of contamination to Ebblake Bog will be exacerbated by the proposed development. - The proposed development is remote from existing shops and schools. The site is miles from any school. Traversing the B3081 would be very dangerous for school children as the road is subject to very heavy traffic and visibility in both directions is very poor. Additionally there is no footpath on the north side of the B3081 until the Ebblake Industrial Estate traffic lights are reached (where pedestrians can safely cross the road). - Verwood is already over developed and there is barely enough infrastructure to support the existing residents. - The proposal would wantonly destroy mature specimen trees that are adjacent to Ringwood Forest. These trees give the area a magnificent backdrop and are home to many birds and animals. These trees are also protected by a Tree Preservation Order (TPO ref. 		

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						VE/271 – see map ref. W1). - The GREEN BELT land is home for flora and endangered fauna including smooth snakes. This sanctuary should not be destroyed. The land is also directly adjacent to heathland. What with Hampshire and Dorset County Council's Purple Haze plans, and this unsound proposal, it seems that local councils and non-local developers are hell bent on environmental destruction.		
MM 42	CSMM112	Mrs Hilary Chittenden Environment TAG (East Dorset) (ID: 360302)	Yes	Yes	No	To comply with the SE Dorset Green Infrastructure Strategy and to ensure that there is no creeping development or infill, there should be a clear statement within policy that once the planning application for the new neighbourhood has been approved, the areas of open greenspace will be secured for the lifetime of the development. This should include any areas of SANG that fall within the Urban Area The mapping shows a smaller housing allocation than that proposed in policy. It also indicates that the site includes SANG whereas it is a relatively small area of open greenspace as defined in the text.	1. Insert in Policy VTSW5 or LN2 wording to clarify that open greenspace in this new neighbourhood will be protected in perpetuity from creeping development and infill by legal agreement. 2. Delete reference to SANG on the map 3. Amend map to show extent of housing development proposed.	
MM 42	CSMM205	South West HARP Consortium South West HARP Planning Consortium (ID: 507536)	No			We support the amendments to the Green Belt boundary in response to housing need.		
MM 42	CSMM181	Mr Brian Uncle (ID: 654808)		No	No	If this access Road was to go ahead in our opinion this proposal will not be safe with the level of traffic on the		A new, safe access to the development will be

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						Ringwood Road, as the proposed developed would create another 150 more car journeys per day as the local facilities are not within walking distance which would lead to some serious accidents and more environmental damage		provided directly on to Ringwood Road. The developer will also provide speed management measures for Ringwood Road to reinforce the 30mph speed limit. This is currently being negotiated through the outline planning application process.
MM 42	CSMM185	Mr Ronald Swaffield (ID: 656210)				The area is Green Belt and should not even be considered for development. It should remain an open space.		
MM 43	CSMM113	Mrs Hilary Chittenden Environment TAG (East Dorset) (ID: 360302)		Yes	Yes	ETAG supports this clarification of the Green Belt boundary.		
MM 43	CSMM206	South West HARP Consortium South West HARP Planning Consortium (ID: 507536)	No			We support the amendments to the Green Belt boundary in response to housing need.		
MM 44	CSMM80	Mrs Nicola Brunt Dorset		Yes	Yes	Dorset Wildlife Trust supports this modification which was agreed with EDDC, NE, ETAG and Tetlow King in		

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		Wildlife Trust (ID: 359461)				a Statement of Common Ground and satisfies our previous objection.		
MM 44	CSMM114	Mrs Hilary Chittenden Environment TAG (East Dorset) (ID: 360302)		Yes	Yes	NE, DWT and ETAG sought this change for reasons given at EiP.		
MM 44	CSMM154	Miss Alison Appleby Natural England South West (ID: 612438)		Yes	Yes	Natural England supports this modification which addresses the need to demonstrate avoidance of harm, and that likely compensatory measures for any recreational pressure may include provision of a SANG.		
MM 45	CSMM207	South West HARP Consortium South West HARP Planning Consortium (ID: 507536)	No			We support the amendments to the Green Belt boundary in response to housing need.		
MM 46	CSMM81	Mrs Nicola Brunt Dorset Wildlife Trust (ID: 359461)		Yes	Yes	Dorset Wildlife Trust supports this modification as a more accurate reflection of the Dorset Heathland Planning Framework SPD.		
MM 46	CSMM115	Mrs Hilary Chittenden Environment TAG (East Dorset) (ID:		Yes	Yes	NE, DWT and ETAG sought this change for reasons given at EiP.		

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		360302)						
MM 46	CSMM156	Miss Alison Appleby Natural England South West (ID: 612438)		Yes	Yes	Natural England supports this modification which clarifies the 400m to 5km zone which the Dorset Heathlands Planning Framework SPD refers to		
MM 46	CSMM259	Charborough Estate (ID: 718912)	Yes	Yes	No	<p>The Charborough Estate objects to the approach to addressing the impacts from residential development close to the Dorset heathlands set out in MM2, MM46, MM48 and MM49. The protection of the Dorset heathlands should be considered in the context of the importance of sustaining other landscapes and rural land uses which support thriving rural communities in East Dorset, such as those resulting from commercial and amenity woodland, agricultural land uses and alternative land and building uses providing employment and sustainable use of rural areas. Some flexibility is required, as minor changes to existing heathlands and their buffer zones would be reasonable and should be permitted in connection with development where alternative or enhanced areas of heathland could be delivered. Compensation, such as the creation of replacement habitat in a suitable location, should be included in addition to avoidance and mitigation measures. It seems illogical that minor changes to or impacts on existing heathland should be prohibited when the landowner may have the ability to help deliver alternative areas for heathland or mitigation measures that will help protect existing heathland.</p> <p>Other factors should be considered in addition to the</p>	<p>MM2, MM46, MM48 and MM49 should allow some changes to or impacts on existing heathlands and their buffer zones where appropriate and in the context of wider proposals, particularly where landowners are able to promote compensation measures;</p> <p>MM46, MM48 and MM49 should consider other factors in addition to the simplistic criteria of distance of a development from the Dorset heathlands when assessing the likely impact;</p> <p>MM48 and MM49 should ensure that SANGs reflect the ecosystems services approach.</p>	<p>The policy approach towards the heathlands set out in Objective 1 and Policy ME2 is consistent with the advice of Natural England, evidence available to the authority and the Core Strategy Habitats Regulations Assessment. It is also in accordance with the Habitats Regulations.</p>

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						<p>distance of a development from the Dorset heathlands when assessing the likely impact. For example, the residential development of a site with a direct footpath to protected heathland would undoubtedly have a greater impact from recreation and cat predation than the development of a closer site which is physically separated by a road or river.</p> <p>SANGs should reflect the ecosystems services approach. For example, subject to careful management provisions, commercial woodland can provide public access to an attractive natural experience as SANG, whilst continuing to contribute to a prosperous rural economy through forestry activity. Farmland could be used to provide SANGs via designated routes across privately owned land which might also be grazed or cropped.</p> <p>Amendments to MM2, MM46, MM48 and MM49 are needed to ensure that the Core Strategy is effective. Policy should be flexible enough to respond to a range of circumstances. The changes are necessary to secure consistency with paragraph 17 of the National Planning Policy Framework (NPPF) which includes the core planning principle of supporting thriving rural communities in the countryside. Further, paragraph 109 of the NPPF states that the planning system should recognise the wider benefits of ecosystems services and paragraph 118 identifies that planning permission should be approved if significant harm to biodiversity can be avoided, adequately mitigated or compensated for.</p>		
MM 47	CSMM82	Mrs Nicola Brunt Dorset Wildlife Trust		Yes	Yes	Dorset Wildlife Trust supports this modification which was submitted in a Statement of Common Ground agreed between DWT, Natural England, ETAG and		

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		(ID: 359461)				EDDC.		
MM 47	CSMM13	Mrs Sheila Bourton (ID: 474462)	No	Yes	Yes	I am very pleased to see that the Inspector has now included artificial lighting as an aspect that should be designed to avoid harm to priority habitats and species.		
MM 47	CSMM116	Mrs Hilary Chittenden Environment TAG (East Dorset) (ID: 360302)		Yes	Yes	NE, DWT and ETAG sought this change for reasons given at EiP.		
MM 47	CSMM157	Miss Alison Appleby Natural England South West (ID: 612438)		Yes	Yes	Natural England supports this modification which clarifies the avoid, mitigate and compensate hierarchy		
MM 48	CSMM83	Mrs Nicola Brunt Dorset Wildlife Trust (ID: 359461)		Yes	Yes	Dorset Wildlife Trust supports this modification as an improved reflection of planning policy relating to the protection of Dorset Heaths.		
MM 48	CSMM24	Mr B Pliskin Clemdell Limited/Etchtre Limited (ID: 779551)	Yes	Yes	No	This representation is to MM48. It is considered that the soundness of that modification requires an explanation of how SANG will be brought forward in practice.	MM48 Suitable Alternative Natural Green Space (SANGs) 13.16 The provision of SANGs is one of the key tools in mitigating the adverse impacts of development on the	The Council considers that the current wording as supported by Natural England is appropriate.

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							<p>Dorset Heaths. Once SANGs are secured they need to be retained in perpetuity unless alternative sites offering the same degree of protection and benefit can be delivered. For large sites of approximately 50 dwellings and above it will be expected that the provision of SANGs will form part of the infrastructure provision of that site particularly where new neighbourhoods or greenfield sites are proposed.</p> <p>WHERE THE PROVISION OF SANG WILL FORM PART OF THE INFRASTRUCTURE PROVISION FOR A SPECIFIC DEVELOPMENT SANG SHOULD BE PART OF THE PLANNING APPLICATION FOR THE DEVELOPMENT. OTHER SANGS MAY BE IDENTIFIED BY A PLANNING APPLICATION FOR THAT</p>	

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							USE.	
MM 48	CSMM6	Mrs Sheila Bourton Keep Wimborne Green (ID: 474490)	Yes	Yes	No	We are concerned that the perpetuity of the SANG sites could be undermined if alternative sites were identified for whatever reason. This could lead to even more development taking place over an area where the SANG is removed. We consider that a SANG should be adjacent to or very near residential development to enable residents to use the SANG easily and not resort to using protected Heathland.	the phrase "unless alternative sites offering the same degree of protection and benefit can be delivered", (in our opinion) should be deleted.	The Council considers that the current wording as supported by Natural England is appropriate.
MM 48	CSMM242	Mr Stefan Briddon Bellway Homes (Wessex) (ID: 521740)	Yes	No	No	New paragraph 13.16 – Second Sentence We query the need for the inclusion of reference to "...large sites of approximately 50 dwellings..." being expected to provide SANG as part of their infrastructure provision. Although not specified, we understand that the 50 unit threshold originates from a standard that requires 16 hectares of SANG to be provided per 1,000 people. The earlier versions of the Core Strategy included specific reference to SANG being provided between 8 and 16 hectares per 1,000 people, although this was deleted from the Submission version of the plan. The Councils' reasoning for this was due to the conclusions reached in the Purbeck Core Strategy Inspector's Report, which focused on establishing guidance on the quality of SANG provision rather than prescribed standards. The adopted Purbeck Core Strategy duly includes the detailed SANG guidance (which is replicated in Appendix 5 of the ED&C plan), but makes no reference to the need for a minimum dwelling threshold. In view of this, no evidence is forthcoming	We therefore suggest that the second sentence of para 3.16 is deleted and replaced with the following wording: "The Councils' framework for delivering SANG and other measures necessary to mitigate adverse impacts upon the heathlands, either through on-site provision or financial contributions is set out in Appendix 5 and the Dorset Heathlands Planning Framework SPD."	The Council considers that the current wording as supported by Natural England is appropriate.

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						for why the Council seek to deviate away from the approach accepted at Purbeck (and also subsequently with the Bournemouth Core Strategy) and we contend that the same approach should be applied in respect of ED&C. We therefore suggest that the second sentence of para 3.16 is deleted and replaced with the following wording: "The Councils' framework for delivering SANG and other measures necessary to mitigate adverse impacts upon the heathlands, either through on-site provision or financial contributions is set out in Appendix 5 and the Dorset Heathlands Planning Framework SPD."		
MM 48	CSMM158	Miss Alison Appleby Natural England South West (ID: 612438)	No	Yes	No	Natural England welcomes the modifications as they seek to clarify the principal planning documents relating to Dorset Heathlands and the requirements for SANGs. However, the wording for 13.16 as currently proposed does not explicitly include a requirement for the SANG to be managed in perpetuity. Also in our view the wording as currently written would not be consistent with the plans Strategic Objective 1 "to manage and safeguard the natural environment of Christchurch and East Dorset or Policy ME2 protection of the Dorset Heathlands."	We suggest that the wording for 13.16 is altered to 'retained and managed in perpetuity' rather than solely retained. This will then clarify that the SANG not only needs to be retained in perpetuity, but also actively managed and cared for.	The Council considers that the proposed wording presents no material change to the current wording and no further modifications are required.
MM 48	CSMM260	Charborough Estate (ID: 718912)	Yes	Yes	No	The Charborough Estate objects to the approach to addressing the impacts from residential development close to the Dorset heathlands set out in MM2, MM46, MM48 and MM49. The protection of the Dorset heathlands should be considered in the context of the importance of sustaining other landscapes and rural land uses which support thriving rural communities in East Dorset, such as those resulting from commercial	MM2, MM46, MM48 and MM49 should allow some changes to or impacts on existing heathlands and their buffer zones where appropriate and in the context of wider proposals, particularly where	The policy approach towards the heathlands set out in Objective 1 and Policy ME2 is consistent with the advice of Natural England, evidence available to the authority and the Core Strategy

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						<p>and amenity woodland, agricultural land uses and alternative land and building uses providing employment and sustainable use of rural areas. Some flexibility is required, as minor changes to existing heathlands and their buffer zones would be reasonable and should be permitted in connection with development where alternative or enhanced areas of heathland could be delivered. Compensation, such as the creation of replacement habitat in a suitable location, should be included in addition to avoidance and mitigation measures. It seems illogical that minor changes to or impacts on existing heathland should be prohibited when the landowner may have the ability to help deliver alternative areas for heathland or mitigation measures that will help protect existing heathland.</p> <p>Other factors should be considered in addition to the distance of a development from the Dorset heathlands when assessing the likely impact. For example, the residential development of a site with a direct footpath to protected heathland would undoubtedly have a greater impact from recreation and cat predation than the development of a closer site which is physically separated by a road or river.</p> <p>SANGs should reflect the ecosystems services approach. For example, subject to careful management provisions, commercial woodland can provide public access to an attractive natural experience as SANG, whilst continuing to contribute to a prosperous rural economy through forestry activity. Farmland could be used to provide SANGs via designated routes across privately owned land which might also be grazed or cropped.</p>	<p>landowners are able to promote compensation measures; MM46, MM48 and MM49 should consider other factors in addition to the simplistic criteria of distance of a development from the Dorset heathlands when assessing the likely impact; MM48 and MM49 should ensure that SANGs reflect the ecosystems services approach.</p>	<p>Habitats Regulations Assessment. It is also in accordance with the Habitats Regulations.</p>

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						Amendments to MM2, MM46, MM48 and MM49 are needed to ensure that the Core Strategy is effective. Policy should be flexible enough to respond to a range of circumstances. The changes are necessary to secure consistency with paragraph 17 of the National Planning Policy Framework (NPPF) which includes the core planning principle of supporting thriving rural communities in the countryside. Further, paragraph 109 of the NPPF states that the planning system should recognise the wider benefits of ecosystems services and paragraph 118 identifies that planning permission should be approved if significant harm to biodiversity can be avoided, adequately mitigated or compensated for.		
MM 49	CSMM84	Mrs Nicola Brunt Dorset Wildlife Trust (ID: 359461)		Yes	Yes	Dorset Wildlife Trust supports this modification as an improved reflection of planning policy relating to the protection of Dorset Heaths and satisfies one of our previous objections.		
MM 49	CSMM118	Mrs Hilary Chittenden Environment TAG (East Dorset) (ID: 360302)		Yes	Yes	ETAG supports wording that clarifies the status of planning documents and provides clearer guidance on when SANGs are required. We support the final proposed change to wording which we requested at EiP.		
MM 49	CSMM134	Mr Paul Hanson Meyrick Estate Management (ID: 360382)	Yes	Yes	No	Although MEM welcome changes to the policy introduced by MM49, the plan is still unsound as it is not effective. The policy change identifies that SANG will not be secured through CIL in the majority of cases, however the IDP has not been correctly modified to reflect this and includes SANG to be secured by CIL. The plan cannot be effective as there	The IDP needs to be revised to be consistent with the changes made in MM49.	MM49 and Policy ME2 is consistent with the Core Strategy IDP as they both refer to the Council's Regulation 123 List in clarifying how SANGs will be delivered. No further

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						<p>is an inconsistency in the policy basis in this regard and cannot be found sound.</p> <p>The IDP at 2.4 states: The allocation of sites for residential development will include the provision of Suitable Alternative Natural Greenspaces. "The Council's Regulation123 list will confirm how SANGs will be secured and further detail is set out in Core Strategy Policy ME2". Yet the policy modification MM49 says that "the delivery of heathland mitigation measures will be secured as set out in the Council's regulation 123 list." Evidence provided on matter 10 showed that in order to avoid double counting with CIL it was necessary to secure SANG by legal agreement in CIL free zones where physical SANG is provided associated with a strategic development site, otherwise if CIL was paid it would in effect being paying for general heathland mitigation projects as well as providing SANG which is in effect double counting for heathland mitigation which is precluded in the CIL regulations.</p>		modification is required as they are consistent. The issue of potential for double counting was discussed at the hearings and MM49 addresses this.
MM 49	CSMM180	Taylor Wimpey Ltd in conjunction with Bodorgan Properties CI Ltd & Sainsburys PLC (ID: 507541)			No	<p>We refer to our examination statement regarding matter 10 in regard to SANG provision. In the absence of a submitted CIL charging schedule identifying Roeshot Hill as a CIL free zone, there remains a risk of double charging on the Roeshot Hill site given the potential request for on-site SANG by way of a Section 106 agreement and an additional CIL rate whereby funds will be put towards other heathland mitigation projects across Christchurch and East Dorset. The plan therefore remains unsound in this respect having regard to the 'effective' test contained in paragraph 182 of the NPPF.</p>		The issue of potential for double counting was discussed at the hearings and MM49 addresses this.

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MM 49	CSMM244	Mr Stefan Briddon Bellway Homes (Wessex) (ID: 521740)	Yes	No	No	<p>Second Sentence</p> <p>We query the justification for replacing reference to the Dorset Heathlands DPD with reference to mitigation measures being set out in the “Core Strategy, Site Specific Allocations DPD and Dorset Heathland Planning Framework SPD”. The submitted plan’s approach to heathland mitigation was predicated on the adoption of a Joint Dorset Heathlands (JDH) DPD, which would have set out a SANG delivery strategy to mitigate the impact from non-allocated housing. The need for a SANG strategy for non-allocated development in ED&C is paramount given that 59% of the Council’s housing target will be met from this source.</p> <p>We note that the Council now propose for a Site Specific Allocations DPD to come forward, which we assume (although not confirmed) is intended to allocate the required level of SANG. However, we query whether it is appropriate for the Councils to defer such a critical strategic issue to the SSA DPD when there is currently no programme in place for when it will be adopted (in contrast the JDH DPD was due to be adopted in 2014).</p> <p>The problems with this approach are highlighted in the recent New Forest District Council Local Plan Part 2 Examination, where the Inspector found (letter attached – Appendix E) that the Council had not made sufficient progress in its allocations plan to provide the wider SPA mitigation measures which the Core Strategy assumed would be delivered. The same concerns raised at New Forest apply here and before this Examination can proceed we request that the Council provide assurances that the proposed change</p>		<p>The current wording an approach to delivering heathland mitigation is supported by Natural England and no further modifications to the policy are required.</p>

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						<p>has been tested and is the appropriate course of action to take.</p> <p>In absence of a clear SANG strategy, the only other delivery mechanism currently available to the Council is through continuation of the Dorset Heathland Planning Framework (DHPF) SPD. However, we query whether the DHPF is the appropriate document to address SANG strategy as by only being an SPD is not subject to Examination in Public nor is it part of the Development Plan. SPD's in any case should flow from a high level strategy set out in a DPD and be used primarily to set out further details in respect of implementation rather than being used to address strategic issues.</p> <p>Notwithstanding our concerns over whether the SPD can be relied upon to address the strategic SANG issues, the current adopted DHPF SPD expires on 31/3/14 and no progress is yet made on a replacement version. On this basis, the Councils' appear to be asking the Inspector to find their strategic level plan sound where no strategy exists in a DPD or related SPD that will mitigate the impact for 59% of the planned housing.</p> <p>The issues with the Councils' SANG strategy identified above also emphasise our overall concerns that the Core Strategy has an over-reliance on urban capacity sites, and consideration should be given to further greenfield allocations that are able to deliver their own SANG provision to ensure that the areas' housing needs can be met.</p>		
MM 49	CSMM159	Miss Alison Appleby Natural		Yes	Yes	Natural England welcome the modifications as they seek to clarify the principal planning documents relating to Dorset Heathlands and the requirements for		

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		England South West (ID: 612438)				SANGs		
MM 49	CSMM261	Charborough Estate (ID: 718912)	Yes	Yes	No	<p>The Charborough Estate objects to the approach to addressing the impacts from residential development close to the Dorset heathlands set out in MM2, MM46, MM48 and MM49. The protection of the Dorset heathlands should be considered in the context of the importance of sustaining other landscapes and rural land uses which support thriving rural communities in East Dorset, such as those resulting from commercial and amenity woodland, agricultural land uses and alternative land and building uses providing employment and sustainable use of rural areas. Some flexibility is required, as minor changes to existing heathlands and their buffer zones would be reasonable and should be permitted in connection with development where alternative or enhanced areas of heathland could be delivered. Compensation, such as the creation of replacement habitat in a suitable location, should be included in addition to avoidance and mitigation measures. It seems illogical that minor changes to or impacts on existing heathland should be prohibited when the landowner may have the ability to help deliver alternative areas for heathland or mitigation measures that will help protect existing heathland.</p> <p>Other factors should be considered in addition to the distance of a development from the Dorset heathlands when assessing the likely impact. For example, the residential development of a site with a direct footpath to protected heathland would undoubtedly have a greater impact from recreation and cat predation than</p>		The policy approach towards the heathlands set out in Objective 1 and Policy ME2 is consistent with the advice of Natural England, evidence available to the authority and the Core Strategy Habitats Regulations Assessment. It is also in accordance with the Habitats Regulations.

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						<p>the development of a closer site which is physically separated by a road or river.</p> <p>SANGs should reflect the ecosystems services approach. For example, subject to careful management provisions, commercial woodland can provide public access to an attractive natural experience as SANG, whilst continuing to contribute to a prosperous rural economy through forestry activity. Farmland could be used to provide SANGs via designated routes across privately owned land which might also be grazed or cropped.</p> <p>Amendments to MM2, MM46, MM48 and MM49 are needed to ensure that the Core Strategy is effective. Policy should be flexible enough to respond to a range of circumstances. The changes are necessary to secure consistency with paragraph 17 of the National Planning Policy Framework (NPPF) which includes the core planning principle of supporting thriving rural communities in the countryside. Further, paragraph 109 of the NPPF states that the planning system should recognise the wider benefits of ecosystems services and paragraph 118 identifies that planning permission should be approved if significant harm to biodiversity can be avoided, adequately mitigated or compensated for.</p>		
MM 50	CSMM119	Mrs Hilary Chittenden Environment TAG (East Dorset) (ID: 360302)		Yes	Yes	ETAG supports all the proposed modifications that provide clarification of requirements and targets.		
MM	CSMM208	South West	No			We support the amendments to this policy and the role		

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50		HARP Consortium South West HARP Planning Consortium (ID: 507536)				it will play in delivering sustainable development over the plan period.		
MM 51	CSMM121	Mrs Hilary Chittenden Environment TAG (East Dorset) (ID: 360302)		Yes	Yes	Clarification provided by the additional text is welcome.		
MM 52	CSMM85	Mrs Nicola Brunt Dorset Wildlife Trust (ID: 359461)		Yes	Yes	Dorset Wildlife Trust supports this modification which addresses our concern, shared with ETAG, that ME1 and ME8 could be in conflict. This ensures biodiversity is given due protection and opportunity for enhancement.		
MM 52	CSMM122	Mrs Hilary Chittenden Environment TAG (East Dorset) (ID: 360302)		Yes	Yes	The revised wording has addressed DWT and ETAG concerns re potential conflict with ME1.		
MM 52	CSMM160	Miss Alison Appleby Natural England South West (ID: 612438)		Yes	Yes	Natural England welcomes the modification as it affords protection of priority habitats and species, whilst at the same time aspiring to a level of biodiversity enhancement.		
MM	CSMM263	Charborough	Yes	Yes	No	Paragraph 54 establishes that Local Planning	MM52 should include a	The Councils believe the

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52		Estate (ID: 718912)				<p>Authorities should be responsive to local circumstances in rural areas and plan housing development to meet local need. Housing should be located where it will enhance or maintain the vitality of rural communities, in accordance with paragraph 55 of the NPPF.</p> <p>The requirement for assessments in support of planning applications for renewable and low carbon energy development proposed in MM52 should be proportionate. The Core Strategy should promote the delivery of renewable and low carbon energy development, recognising the local and national need for such technology. This will ensure that the Strategy is positively prepared to meet objectively assessed infrastructure needs. The changes will support the effectiveness of the Core Strategy in delivering renewable and low carbon energy development. Paragraph 97 of the NPPF states that Local Planning Authorities should have a positive strategy to promote energy from renewable and low carbon sources. Policies should be designed to maximise renewable and low carbon energy development.</p>	proportionate requirement for assessments in support of planning applications for renewable and low carbon energy development. The delivery of renewable and low carbon energy development should be supported.	<p>wording regarding the requirement for assessments reflects the national planning practice guidance and the policy is sufficiently flexible for the detail of the assessments to be proportionate to the development proposed. However if revised wording is necessary (i.e. add at end of third bullet ...that are proportionate to the proposed development), the Councils consider this wording would constitute a Minor Modification to the plan.</p> <p>The opening paragraph of the policy is also already worded to support proposals for renewable energy development.</p>
MM 53	CSMM7	Mrs Sheila Bourton Keep Wimborne Green (ID: 474490)	Yes	Yes	Yes	We strongly support these modifications regarding the protection and enhancement of heritage assets.		

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MM 53	CSMM72	Mr Rohan Torkildsen English Heritage (ID: 359478)	Yes	Yes	No	<p>Context</p> <ul style="list-style-type: none"> On 20 December 2012 English Heritage formally objected to the Pre submission Plan. On 28 August 2013 English Heritage (rep no 359478) submitted Hearing Statements in relation to Matters 5 (FWP West Parley/Dudsbury Hillfort) and Matter 11 regarding Historic Environment Policy HE1. On 4 September 2013 English Heritage met with representatives of the Councils on site at West Parley. Constructive discussions ensued and it was agreed that modifications would be proposed to resolve these substantial concerns and help make the Plan sound. On 9 September 2013 it was confirmed to the Programme Officer that following the above meeting and productive dialogue with Officers, Statements of Common Ground (SOCG) regarding Matters 5 and 11 would be issued and as a result there was now no need for English Heritage to attend the Hearing Sessions. On 24 September 2013 Statements of Common Ground, including explicit modifications to Policy FWP7 were agreed by the Local Authority, Banner Homes, English Heritage and Natural England; and explicit modifications to Policy HE1 by the Local Authority and English Heritage. English Heritage anticipated these modifications would be reflected in the Schedule of Main Modifications to the Submitted Core Strategy. As they have not been included in the Schedule of Modifications as agreed English Heritage must again formally object to the Plan as it is unsound for the following reasons. <p>Schedule of Modifications reference no. MM53</p>	<p>Pre-ambule to Policy HE1</p> <ul style="list-style-type: none"> Christchurch has 2 scheduled monuments on the National Heritage at Risk Register (2012) East Dorset has 41 scheduled monuments; 3 buildings and 1 registered park on the National at Risk Register. <p>Relevant Evidence.</p> <ul style="list-style-type: none"> National Heritage List for England – a searchable database of all nationally designated heritage assets in England and Wales National Heritage at Risk Register - In addition to historic buildings at risk, the Heritage at Risk Register includes England's most important archaeological sites, registered historic parks and gardens, registered battlefields, and the protected wreck sites that lie off the coastline. An updated survey, listing the buildings at risk in England, is published annually by English Heritage each autumn. 	<p>The suggested wording is acceptable and we believe should constitute a Minor Modification to the Plan.</p>

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						<p>Page 174. Policy HE1 - Valuing and conserving our Historic Environment.</p> <p>Why the modifications fail to help to make the Plan sound and what further adjustments could be made to help do so.</p> <p>The Plan does not contain a clear policy/strategy for enhancing the historic area and is therefore inconsistent with the NPPF and the obligation to enable the delivery of sustainable development in accordance with its policies - one of the core dimensions of sustainable development being the protection and enhancement of the historic environment .</p> <p>Pre-amble to Policy HE1</p> <p>In the pre-amble to Policy HE1, the Key Facts Table (page 174 in the Consolidated Plan & page166 in the Pre-Submission Plan), it was agreed should be updated to include details of the heritage assets on the national at risk register as the condition of the areas heritage assets is an important consideration to inform the Plan's positive strategy for the conservation and enhancement of the historic environment (its heritage strategy). It provides the basis from which improvements to the historic environment can be measured.</p> <p>Consequently the following text was set out in the SOCG for inclusion. Unfortunately this does not appear in the Schedule of Proposed Modifications so is again promoted here:</p> <ul style="list-style-type: none"> • Christchurch has 2 scheduled monuments on the National Heritage at Risk Register (2012) • East Dorset has 41 scheduled monuments; 3 buildings and 1 registered park on the National at Risk 	<ul style="list-style-type: none"> • Dorset Historic Environment Record - A wide ranging record of buildings and structures. Most of the buildings in the Historic Environment Record are listed buildings, but it includes historic buildings of all types, wrecks, structures, single finds, remote contacts, and strandings. • Conservation Character Appraisals – East Dorset has written locally prepared statements for each Conservations Area, providing a detailed appraisal about the particular characteristics and attributes of the Conservation Area and where there might be potential for enhancement. • In-house and local knowledge and expertise in built conservation, archaeology and urban design. <p>Policy HE1</p> <ul style="list-style-type: none"> • Heritage assets will be protected and enhanced especially elements of the 	

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						<p>Register. Relevant Evidence. In the SOCG it was agreed the following documents were to be referred to in this section as valuable documents that informed/justified the policy. Unfortunately these changes appear not to have been included in the Schedule of Modifications.</p> <ul style="list-style-type: none"> • National Heritage List for England – a searchable database of all nationally designated heritage assets in England and Wales • National Heritage at Risk Register - In addition to historic buildings at risk, the Heritage at Risk Register includes England’s most important archaeological sites, registered historic parks and gardens, registered battlefields, and the protected wreck sites that lie off the coastline. An updated survey, listing the buildings at risk in England, is published annually by English Heritage each autumn. • Dorset Historic Environment Record - A wide ranging record of buildings and structures. Most of the buildings in the Historic Environment Record are listed buildings, but it includes historic buildings of all types, wrecks, structures, single finds, remote contacts, and strandings. • Conservation Character Appraisals – East Dorset has written locally prepared statements for each Conservations Area, providing a detailed appraisal about the particular characteristics and attributes of the Conservation Area and where there might be potential for enhancement. • In-house and local knowledge and expertise in built conservation, archaeology and urban design. <p>Policy HE1</p>	<p>historic environment which contribute to the distinct identity of Christchurch and East Dorset. Such key historic elements include the market towns of Wimborne Minster and Christchurch; Christchurch Quay; Highcliffe and Christchurch Castles; 11th Century Christchurch Priory Church and Saxon Mill; site of a civil war siege in 1645; the setting of Wimborne Minster; significant Neolithic, Iron Age, and Roman archaeological landscape; and prominent estates such as Cranborne and Wimborne St Giles.</p> <ul style="list-style-type: none"> • As part of its Heritage Strategy, a publicly accessible Dorset Historic Environment Record will be maintained; Conservation Area Appraisals will be kept up to date, and Article 4 Directions used where necessary. • Local Lists of heritage assets will be maintained 	

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						<p>I note and endorse the proposed modification that renames Policy HE1 to valuing and conserving our Historic Environment.</p> <p>I also note that in the SOCG in was agreed that paragraphs 1, 3 and 4 would be deleted and paragraph 2 retained.</p> <p>Unfortunately I also note that the agreed SOCG proposed the following text which does not appear to have been accurately reflected in the modifications.</p> <ul style="list-style-type: none"> • Heritage assets will be protected and enhanced especially elements of the historic environment which contribute to the distinct identity of Christchurch and East Dorset. Such key historic elements include the market towns of Wimborne Minster and Christchurch; Christchurch Quay; Highcliffe and Christchurch Castles; 11th Century Christchurch Priory Church and Saxon Mill; site of a civil war siege in 1645; the setting of Wimborne Minster; significant Neolithic, Iron Age, and Roman archaeological landscape; and prominent estates such as Cranborne and Wimborne St Giles. • As part of its Heritage Strategy, a publicly accessible Dorset Historic Environment Record will be maintained; Conservation Area Appraisals will be kept up to date, and Article 4 Directions used where necessary. • Local Lists of heritage assets will be maintained to support the conservation of non-designated assets of distinctive local character. • Both Councils will seek to promote and support initiatives to reduce the number of heritage assets at risk including the sensitive re-use and adaptation of historic buildings. • Working with the Highways Authority, and Town and 	<p>to support the conservation of non-designated assets of distinctive local character.</p> <ul style="list-style-type: none"> • Both Councils will seek to promote and support initiatives to reduce the number of heritage assets at risk including the sensitive re-use and adaptation of historic buildings. • Working with the Highways Authority, and Town and Parish Councils, highway infrastructure and public realm works will be designed to protect and enhance the historic environment. <p>Delivery and Monitoring The general protection of designated sites from inappropriate development will be carried out through the Development Management process, through pre-application discussions and through the assessment of planning and listed building applications. Monitoring of the condition</p>	

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						<p>Parish Councils, highway infrastructure and public realm works will be designed to protect and enhance the historic environment.</p> <p>Delivery and Monitoring In this section it was agreed the following would be included as a modification, again this does not appear to have occurred.</p> <p>The general protection of designated sites from inappropriate development will be carried out through the Development Management process, through pre-application discussions and through the assessment of planning and listed building applications.</p> <p>Monitoring of the condition of heritage assets will be undertaken through the Heritage at Risk annual survey and through local inspection of sites.</p> <p>Historic Environment Indicators and Targets (page 86 of the Schedule of Modifications) Column 1 should be updated to reflect the new title of Policy HE1 - Valuing and conserving our Historic Environment.</p> <p>Column 3 should not be limited to monitoring merely Grade 1 and II* listed buildings at risk. As data is gathered on the condition of other types of heritage assets this column should also refer to Conservation Areas and Scheduled Monuments, mindful that there are many such assets on the current at risk register.</p> <p>Column 4 should refer to an intended target of reducing the number of heritage assets on the national at risk register.</p> <p>Column 4 relating to conservation area appraisals and management plans should include a target of having up to date appraisals and management plans for the District and Borough's Conservation Areas.</p>	<p>of heritage assets will be undertaken through the Heritage at Risk annual survey and through local inspection of sites.</p> <p>Historic Environment Indicators and Targets (page 86 of the Schedule of Modifications) Column 1 should be updated to reflect the new title of Policy HE1 - Valuing and conserving our Historic Environment.</p> <p>Column 3 should not be limited to monitoring merely Grade 1 and II* listed buildings at risk. As data is gathered on the condition of other types of heritage assets this column should also refer to Conservation Areas and Scheduled Monuments, mindful that there are many such assets on the current at risk register.</p> <p>Column 4 should refer to an intended target of reducing the number of heritage assets on the national at risk register.</p> <p>Column 4 relating to</p>	

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						It is respectfully requested that these changes are accepted as further modifications to the schedule of proposed modifications.	conservation area appraisals and management plans should include a target of having up to date appraisals and management plans for the District and Borough's Conservation Areas.	
MM 53	CSMM14	Mrs Sheila Bourton (ID: 474462)	No	Yes	Yes	Creating and maintaining a local list of Heritage Assets should greatly assist town planners in the future.		
MM 53	CSMM123	Mrs Hilary Chittenden Environment TAG (East Dorset) (ID: 360302)		Yes	Yes	The detailed clarification of this policy is welcome.		
MM 53	CSMM147	Sir Roger Palin (ID: 499596)	No		No	<p>Wimborne Minster as a Heritage Asset</p> <p>The increased emphasis on protecting and enhancing all heritage assets and their settings (both designated and non designated) is welcomed, as is the inclusion of the market town of Wimborne Minster as a key element of the historic environment. This accords well with NPPF para 80 which states to preserve the setting and special character of historic towns as one of the 5 purposes of green Belt policy.</p> <p>It is difficult to see how the proposed Cranborne Road New Neighbourhood (WMC5) which will destroy the rural landscape bordering the town to the north, thus changing the setting of the historic town forever, meets the admirable aspirations of policy HE1.</p>	There is no way of rendering WMC5 sound and it should be deleted from the Core Strategy in its entirety. (See attachment)	

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						(See attachment)		
MM 53	CSMM255	Mr Christopher Clarke (ID: 501560)	No	Yes	No	Comment made on behalf of the Dorset Gardens Trust. The rewording of this policy is good - except for one point. The creation of a local list of Heritage Assets should apply to both East Dorset and Christchurch. As written it does not apply to Christchurch.	In the 3rd bullet point: '...will be created in East Dorset and Christchurch, and the...'	Christchurch already has a local list, whereas East Dorset does not. If a change to the wording is required we believe that this should constitute a Minor Modification.
MM 54	CSMM124	Mrs Hilary Chittenden Environment TAG (East Dorset) (ID: 360302)		Yes	Yes	Clarification of this policy is welcome.		
MM 55	CSMM125	Mrs Hilary Chittenden Environment TAG (East Dorset) (ID: 360302)		Yes	Yes	Clarification of this policy is welcome.		
MM 56	CSMM126	Mrs Hilary Chittenden Environment TAG (East Dorset) (ID: 360302)		Yes	Yes	ETAG support measures to ensure quality of life is enhanced.		
MM 56	CSMM170	Taylor Wimpey Ltd in conjunction with Bodorgan	Yes	No	No	The main modifications proposed to the wording of paragraph 15.4 of the submitted Core Strategy do not resolve the flaws in the proposed approach (which seeks to impose space standards through the	Given the implications of the Standards Review and the HSR, and the draft status of the Submitted	The justification for the introduction of space standards and consideration of viability

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		Properties CI Ltd & Sainsburys PLC (ID: 507541)				<p>submitted Core Strategy) which render Policy LN1 unsound.</p> <p>With the proposed modification to the paragraph 15.4 the wording continues to require that all new residential development is constructed to achieve minimum space standards (i.e. to standards in excess of those set out within Building Regulations). The standards referred to are the Homes and Communities Agency Housing Quality Indicator standards for open space, unit sizes, unit layout and accessibility within the dwelling.</p> <p>There is no requirement in national guidance for standards in excess of Building Regulations to be imposed upon market housing or on non-grant funded affordable housing.</p> <p>Both the paragraph 15.4 and Policy LN1 of the Submitted Core Strategy (as modified) fail to reflect the clear indications by Government set out in a recent consultation as to the approach to be taken to seeking standards other than Building Regulations from residential developments.</p> <p>The 'Housing Standards Review' ("HSR") consultation paper was published by the Department for Communities and Local Government in mid-August 2013 and proposes that there should be: "a clear differentiation between standards which can be asked for subject to viability – which will be set out in a "nationally described standard set" under the National Planning Policy Framework: and areas where voluntary, market led approaches are to be encouraged, but cannot be mandated through planning policy." (paragraph 13, HSR)</p>	<p>Core Strategy, it is recommended that the space standards requirements are deleted and that to this end the proposed higher level policy approach set out in draft CS Policy LN1 and supporting wording (as modified through MM56 and MM57) is subject to rigorous review with immediate effect.</p> <p>Where the Council wishes to introduce standards included in any finalised Nationally Described Standards this will need to be subject to a review of Plan policy via the appropriate statutory process – the national standards are yet to be published in a final form, but it is apparent that the imposition of standards through Plan policy without demonstrating both the need for and the viability of any such approach is: not supported by the Government; is not justified; will not result in</p>	<p>issues is set out in the Councils' examination statement for Matter 7 Housing and was considered as part of the hearings. The Council does not consider that any further modification is required.</p>

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						<p>The HSR clarifies that where local authorities wish to apply any of the standards set out in the 'nationally described standards' they will be required to demonstrate a need for the standard (and such claims will be tested rigorously) to a Planning Inspector. The intention is that Local Authorities will only adopt those standards which are needed, as opposed to all of the standards 'because they are seen as nice to have' (paragraph 31, HSR). It is not clear that the requirement for the proposed standards has been robustly / objectively demonstrated to be necessary as part of the Submitted Core Strategy preparation process or that the proposed main modifications reflect that any rigorous testing has been undertaken. In addition to the needs based test the HSR proposes that local authorities will have to cost each standard they wish to apply having regard to local circumstances and in accordance with the 'local plan viability test set out in the National Planning Policy Framework'(paragraph 32, HSR). The cost of the application of the standards sought should not be such that this will 'hinder development' (paragraph 33, HSR).</p> <p>The HSR proposes that standards will be applied equally to both market and affordable housing (paragraph 56, HSR). The HSR includes a specific section on space standards. The HSR acknowledges that there are cost implications associated with imposing space standards on new homes, (paragraph 103, HSR) both to the developer and to the potential purchaser (paragraph 112, HSR).</p> <p>The HSR concludes that: "...in many respects the market is performing well in</p>	<p>policy that has been positively prepared or that will be effective, and is not in accordance with the NPPF.</p> <p>Outside of this process any such standards should be applied on a voluntary basis – further amendments should be made to paragraph 15.4 and proposed Policy LN1 which reflect this.</p> <p>Similarly, in the light of the above points, any requirement for affordable housing to meet Homes and Communities Agency standards should reflect that this will only be sought in respect of affordable housing in receipt of public subsidy.</p>	

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						<p>the absence of national space standards and government's preference remains for market led solutions." (paragraph 116, HSR) As such, the imposition of space standards is suggested to be unnecessary by the Government, with the market already functioning well in terms of providing the form of housing for which there is demand. Instead the Government suggests that a 'space labelling' approach would be preferable to enable potential purchasers to make informed choices (paragraph 125, HSR). The HSR states that: "...there is no ergonomic justification for space standards to vary on a local basis in meeting a specified level of performance." (paragraph 127, HSR) The HSR concludes that space standards should 'only be applied in conjunction with access standards: "...and where the costs and impacts are thoroughly tested in a transparent and challengeable manner and subject to a robust viability assessment taking into account other costs and pressures on development. We take the view that this can only be the case where any requirement for space standards forms part of a local plan (rather than supplementary planning guidance)." (paragraph 135, HSR -emphasis added) The above makes it clear that, going forwards, local authorities seeking to introduce space standards requirements outside the local plan process and which have not been thoroughly, and transparently tested, and made available for comment, in terms of the</p>		

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						<p>impact upon development, are likely to be challenged and are unlikely to be supported at appeal. This will similarly apply to the imposition of any access standards in excess of Building Regulations. Regard should be given to paragraph 153 of the NPPF which specifies that:</p> <p>'Each local planning authority should produce a Local Plan for its area. This can be reviewed in whole or in part to respond flexibly to changing circumstances. Any additional development plan documents should only be used where clearly justified. Supplementary planning documents should be used where they can help applicants make successful applications or aid infrastructure delivery, and should not be used to add unnecessarily to the financial burdens on development.'</p> <p>In this regard, it is noted that the proposed modifications suggest that further consideration to 'bespoke standards' will be given within a Supplementary Planning Document as opposed to requiring such matters to be defined within Plan policy – the modified approach is not in accordance with the NPPF and does not reflect Government concerns raised recently within the HSR. Crucially, it is unclear that the cumulative economic impacts of the proposed standards on residential development have been robustly tested in the local authorities' supporting evidence base.</p> <p>Leaving the matter of space standards to a later SPD will have undeniable implications for scheme viability. SPDs should be used only to aid the delivery of development plan policy, and not to define policy itself as will be the result of the modified wording.</p>		

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MM 57	CSMM39	Ms Susan Green Home Builders Federation (South West) (ID: 619967)			No	Under Modifications MM56 and MM57 the reference to the Homes & Communities Agency Housing Quality Indicators as minimum internal and external space standards for all new housing remains unacceptable for the reasons previously set out in our Hearing Statement on Matter 7 of the Christchurch & East Dorset Core Strategy Examination.		The justification for the introduction of space standards and consideration of viability issues is set out in the Councils' examination statement for Matter 7 Housing and was considered as part of the hearings. The Council does not consider that any further modification is required.
MM 57	CSMM127	Mrs Hilary Chittenden Environment TAG (East Dorset) (ID: 360302)		Yes	Yes	ETAG supports measures to ensure quality of life is enhanced and welcomes clarification of this policy.		
MM 57	CSMM173	Taylor Wimpey Ltd in conjunction with Bodorgan Properties CI Ltd & Sainsburys PLC (ID: 507541)	Yes	No	No	The main modifications proposed to the wording of paragraph 15.4 of the submitted Core Strategy do not resolve the flaws in the proposed approach (which seeks to impose space standards through the submitted Core Strategy) which render Policy LN1 unsound. With the proposed modification to the paragraph 15.4 the wording continues to require that all new residential development is constructed to achieve minimum space standards (i.e. to standards in excess of those set out within Building Regulations). The standards referred to are the Homes and Communities Agency Housing Quality Indicator standards for open	Given the implications of the Standards Review and the HSR, and the draft status of the Submitted Core Strategy, it is recommended that the space standards requirements are deleted and that to this end the proposed higher level policy approach set out in draft CS Policy LN1 and supporting wording (as	The justification for the introduction of space standards and consideration of viability issues is set out in the Councils' examination statement for Matter 7 Housing and was considered as part of the hearings. The Council does not consider that any further modification is required.

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						<p>space, unit sizes, unit layout and accessibility within the dwelling.</p> <p>There is no requirement in national guidance for standards in excess of Building Regulations to be imposed upon market housing or on non-grant funded affordable housing.</p> <p>Both the paragraph 15.4 and Policy LN1 of the Submitted Core Strategy (as modified) fail to reflect the clear indications by Government set out in a recent consultation as to the approach to be taken to seeking standards other than Building Regulations from residential developments.</p> <p>The 'Housing Standards Review' ("HSR") consultation paper was published by the Department for Communities and Local Government in mid-August 2013 and proposes that there should be: "a clear differentiation between standards which can be asked for subject to viability – which will be set out in a "nationally described standard set" under the National Planning Policy Framework: and areas where voluntary, market led approaches are to be encouraged, but cannot be mandated through planning policy." (paragraph 13, HSR)</p> <p>The HSR clarifies that where local authorities wish to apply any of the standards set out in the 'nationally described standards' they will be required to demonstrate a need for the standard (and such claims will be tested rigorously) to a Planning Inspector. The intention is that Local Authorities will only adopt those standards which are needed, as opposed to all of the standards 'because they are seen as nice to have' (paragraph 31, HSR). It is not clear that the</p>	<p>modified through MM56 and MM57) is subject to rigorous review with immediate effect.</p> <p>Where the Council wishes to introduce standards included in any finalised Nationally Described Standards this will need to be subject to a review of Plan policy via the appropriate statutory process – the national standards are yet to be published in a final form, but it is apparent that the imposition of standards through Plan policy without demonstrating both the need for and the viability of any such approach is: not supported by the Government; is not justified; will not result in policy that has been positively prepared or that will be effective, and is not in accordance with the NPPF.</p> <p>Outside of this process any such standards should be applied on a voluntary basis – further</p>	

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						<p>requirement for the proposed standards has been robustly / objectively demonstrated to be necessary as part of the Submitted Core Strategy preparation process or that the proposed main modifications reflect that any rigorous testing has been undertaken. In addition to the needs based test the HSR proposes that local authorities will have to cost each standard they wish to apply having regard to local circumstances and in accordance with the 'local plan viability test set out in the National Planning Policy Framework'(paragraph 32, HSR). The cost of the application of the standards sought should not be such that this will 'hinder development' (paragraph 33, HSR).</p> <p>The HSR proposes that standards will be applied equally to both market and affordable housing (paragraph 56, HSR). The HSR includes a specific section on space standards. The HSR acknowledges that there are cost implications associated with imposing space standards on new homes, (paragraph 103, HSR) both to the developer and to the potential purchaser (paragraph 112, HSR).</p> <p>The HSR concludes that: "...in many respects the market is performing well in the absence of national space standards and government's preference remains for market led solutions." (paragraph 116, HSR)</p> <p>As such, the imposition of space standards is suggested to be unnecessary by the Government, with the market already functioning well in terms of providing the form of housing for which there is demand. Instead the Government suggests that a</p>	<p>amendments should be made to paragraph 15.4 and proposed Policy LN1 which reflect this. Similarly, in the light of the above points, any requirement for affordable housing to meet Homes and Communities Agency standards should reflect that this will only be sought in respect of affordable housing in receipt of public subsidy.</p>	

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						<p>'space labelling' approach would be preferable to enable potential purchasers to make informed choices (paragraph 125, HSR). The HSR states that: "...there is no ergonomic justification for space standards to vary on a local basis in meeting a specified level of performance." (paragraph 127, HSR) The HSR concludes that space standards should 'only be applied in conjunction with access standards: "...and where the costs and impacts are thoroughly tested in a transparent and challengeable manner and subject to a robust viability assessment taking into account other costs and pressures on development. We take the view that this can only be the case where any requirement for space standards forms part of a local plan (rather than supplementary planning guidance)." (paragraph 135, HSR -emphasis added) The above makes it clear that, going forwards, local authorities seeking to introduce space standards requirements outside the local plan process and which have not been thoroughly, and transparently tested, and made available for comment, in terms of the impact upon development, are likely to be challenged and are unlikely to be supported at appeal. This will similarly apply to the imposition of any access standards in excess of Building Regulations. Regard should be given to paragraph 153 of the NPPF which specifies that: 'Each local planning authority should produce a Local Plan for its area. This can be reviewed in whole or in part to respond flexibly to changing circumstances.</p>		

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						<p>Any additional development plan documents should only be used where clearly justified. Supplementary planning documents should be used where they can help applicants make successful applications or aid infrastructure delivery, and should not be used to add unnecessarily to the financial burdens on development.'</p> <p>In this regard, it is noted that the proposed modifications suggest that further consideration to 'bespoke standards' will be given within a Supplementary Planning Document as opposed to requiring such matters to be defined within Plan policy – the modified approach is not in accordance with the NPPF and does not reflect Government concerns raised recently within the HSR. Crucially, it is unclear that the cumulative economic impacts of the proposed standards on residential development have been robustly tested in the local authorities' supporting evidence base.</p> <p>Leaving the matter of space standards to a later SPD will have undeniable implications for scheme viability. SPDs should be used only to aid the delivery of development plan policy, and not to define policy itself as will be the result of the modified wording.</p>		
MM 58	CSMM128	Mrs Hilary Chittenden Environment TAG (East Dorset) (ID: 360302)		Yes	Yes	ETAG supports this updating.		
MM 59	CSMM31	Mr & Mrs K Healy (ID:	Yes	No	No	The modifications suggest that it is not necessary to take into account the 5 considerations in LN5 if	'The following considerations should be	The Current wording is considered appropriate

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		360082)				determining an application for sites allocated for development in the Dorset-wide Gypsy, Travellers and Travelling Showpeople Joint Sites Allocation DPD. We understand that East Dorset District Council would determine all applications, including those in the above DPD, and we should hope they would determine each application on the considerations of LN5. It is unsafe to assume the more centralised County Council is fully conversant with the needs and aspirations of the local residents.	taken into account when determining planning applications for Gypsy and travellers sites and Travelling Showpeople Sites.' The rest of the modifications should be deleted. This would give our District Council full authority to determine each application equally, not to just rubber stamp the County Council applications.	for the purposes of guiding decision making on proposals not contained in the county-wide gypsy and traveller DPD, or in advance of its adoption. No further amendment is considered necessary.
MM 59	CSMM130	Mrs Hilary Chittenden Environment TAG (East Dorset) (ID: 360302)		Yes	Yes	ETAG supports this clarification.		
MM 60	CSMM62	Ms Gill Smith Dorset County Council (ID: 359437)	Yes	Yes	Yes	At the Pre-submission and Proposed Changes stages Dorset County Council noted its concern that there was no clearly set out general policy requiring developers to provide, or meet the reasonable costs of providing, the on-site and off-site infrastructure, facilities and/or mitigation necessary to make a development acceptable in planning terms, including the mitigation of the effect of cumulative developments. Main Modification 60 proposes an amendment to Policy LN6 which states	None	

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						<p>that: "The provision of facilities and services will be secured in accordance with the Council's current Regulation 123 list."</p> <p>The proposed modification helps to clarify the Councils' intent to secure contributions. Although it does not go as far as setting a clear policy hook as Policies KS11 and ME6 do in respect of contributions towards transport and drainage, there is an advantage in using the Regulation 123 list as it can be updated more regularly than the Plan itself.</p> <p>Dorset County Council will have an opportunity to comment on the Regulation 123 list and will need to ensure that it does reflect our current funding requirements each time it is updated. On this basis it is considered appropriate to support the proposed Modification.</p>		
MM 63	CSMM131	Mrs Hilary Chittenden Environment TAG (East Dorset) (ID: 360302)		Yes	Yes	ETAG supports the change of wording to update the approach to secure mitigation.		
MM 64	CSMM45	Ms Gill Smith Dorset County Council (ID: 359437)	No	Yes	Yes	Dorset County Council supports the transport related modifications listed above as identified in the Schedule of Proposed Main Modifications to the Core Strategy.	None	
MM 64	CSMM55	Ms Gill Smith Dorset County Council (ID: 359437)	No	Yes	Yes	At the Pre-submission and Proposed Changes consultations, Dorset County Council raised concerns about the lack of evidence regarding the linkages between the levels of housing and employment land/job creation in the Plan area. We were concerned	Add to MM64 Christchurch and East Dorset Monitoring Framework a monitoring indicator on commuting levels.	The housing target set out in the monitoring framework can be amended in line with Policy KS3 as a minor

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						<p>that if the levels of housing and employment are not in balance it could lead to an increased level of commuting into or out of the area.</p> <p>The proposed new Monitoring Framework is a welcome addition to the Plan, making clear that the process continues, rather than ends with adoption of the Plan. The approach, indicators and measurement of effects are clearly stated. The Monitoring Framework Table appears very thoroughly thought-out but will need to be checked to ensure that it corresponds with modifications elsewhere in the report. For instance, the overall housing target to be monitored is still quoted as 8,200 dwellings, rather than the new figure of 8,490. The annual rate and other breakdowns will also need to be amended. The delivery of housing supply by site (shown at MM66) and annual trajectory breakdown is clearly presented and will be a helpful framework against which to monitor.</p> <p>One further area that the Councils may wish to consider monitoring, which would help address Strategic Objectives 4 (Economy), 5 (Housing) and 6 (reduce the need to travel) as well as this Council's concerns, is the level of commuting into and out of the Plan area. ONS provide annual statistics by District from the Annual Population Survey which can be found at: http://www.neighbourhood.statistics.gov.uk/HTMLDocs/Commute_APS_Chart/APS_2010_11.html</p> <p>The Annual Population Survey is a sample survey and therefore subject to sample error but, notwithstanding this, may be of help in monitoring the transport impacts relating to the scale of housing and job provision in the</p>		<p>amendment. No further modifications are considered necessary.</p>

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						Plan area. The 2011 Census results on commuting will also be available later in 2014.		
MM 64	CSMM86	Mrs Nicola Brunt Dorset Wildlife Trust (ID: 359461)	Yes		No	<p>Regarding monitoring of Policy ME1, we do not consider that monitoring 'changes in areas of biodiversity importance (loss and addition of sites)' will provide a sufficiently accurate reflection of the impacts of development on biodiversity. The quality of those areas is of importance and consideration also needs to be given to populations of priority species</p> <p>ME 1 states that the following criteria should be addressed when development is proposed</p> <ul style="list-style-type: none"> • Monitoring of habitats and species for a suitable period of time after completion of the development to indicate any changes in habitat quality or species numbers, and put in place corrective measures to halt or reverse any decline. 	Dorset Wildlife Trust suggests that the monitoring indicator should examine changes in habitat quality and species numbers as well as areas. Whilst areas of biodiversity importance might give an overall indication of habitats for the Core Strategy area, species numbers should also be included for key species. Monitoring requirements may need to be tailored for each development to reflect local biodiversity issues and provide additional information on habitat quality and species to enhance the more contextual area information	The Council considers that existing indicators for Policy ME1 are appropriate with no further modifications required.
MM 64	CSMM41	Ms Susan Green Home Builders Federation (South West) (ID: 619967)			No	In the new Appendix proposed under Modification MM64 the monitoring of the Design of New Housing will be measured against Building for Life. However the original Building for Life scheme, which involved assessment of residential developments by accredited assessors, has been superseded by Building for Life 12, which does not involve such assessments.		The Councils consider this to be a minor amendment.

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						Therefore the Councils should re-consider this proposal and seek an alternative monitoring mechanism.		
MM 64	CSMM69	Fowler Fortescue Malmesbury Estate (ID: 360378)	Yes	Yes	No	<p>The Malmesbury Estate objects to proposed Main Modifications 8 and 64 relating to essential transportation infrastructure necessary to support the vision and allocation identified in policy KS10. The Modifications refer to and rely on an Infrastructure Delivery Plan, also said to be a consultation document, which raises fundamental issues on uncertainty relating to funding and deliverability which go to the heart of the Plan's soundness. These issues were raised by the Inspector as issue 4 in the EIP Session 6 on Bournemouth Airport.</p> <p>MM64 adds a new appendix which is said to have been added to ensure clarity regarding monitoring of specific policies in the Plan. It makes specific reference to the Infrastructure Delivery Plan (IDP) and comments that the delivery of infrastructure is an issue of great relevance to policy delivery. However, on page 90 of the IDP it is stated that delivery of the strategic infrastructure set out in policy KS10 will be monitored through the Local Transport Plan.</p> <p>The Estate is concerned that the IDP makes statements concerning funding and delivery of essential infrastructure which are inconsistent with the evidence presented at the EIP. At paragraph 2.19 the IDP states that "Improvements to the A35, B3073 and A338 are scheduled to be delivered in the medium term (2018-2022) through developer contributions and major scheme bids for Government funding". However, the tables in the document – pages 24-26 set out infrastructure required (our emphasis) to support</p>		The IDP is an evolving document which will progressively identify the precise nature and cost of transport schemes as further details become clearer through on going work. At this stage it is only schemes for short term delivery which have been designed and cost estimates applied. The sequence, phasing and timing of development and associated transport improvements will be crucial to delivery. This will depend on the timescales for proposed development, once this is known we can establish our future programme of work and future spending profile. Dorset CC and their partners are submitting bids as and when opportunities for government funding become available.

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						<p>development relating to Bournemouth Airport – all state under the heading “Risk to Delivery/Contingency Measures” that the schemes require public and developer funding and that the most likely reason for non-delivery is likely to be lack of funding, which means that the infrastructure schemes will be redesigned or scaled back in a more cost effective way or another alternative will be sought.</p> <p>This caveat is highly significant. As the infrastructure is required to support the proposed development it would logically imply that if funding is not available then the development would need to be scaled back. This raises questions regarding the soundness of the Plan. The Council’s Statement on Matter 6: Bournemouth Airport included at Appendix 2 a coloured chart setting out required infrastructure for delivery in three phases and with the estimated cost of each scheme and source of funding. Much of the funding, particularly items relating to S106/CIL, was said to be aspirational but with some certainty.</p> <p>If this table is compared with the IDP there are some significant differences. Although the IDP tables have a heading “Funding Secured/Funding Gap” the text in the relevant column gives a potential source of funding but provides no information on whether funding has been secured. This is unsatisfactory in the light of the Inspector’s question.</p> <p>The cost estimates have changed. For example, the A338 resurfacing has increased from £22m to £30m, but others have reduced – Chapel Gate junction improvements have been reduced from £5m to £2m and the Hurn roundabout is now said the cost £1.7m whereas previously it was £2.4m. The table submitted</p>		

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						to the EIP included the proposed southern bypass to Hurn which was estimated to cost £10m but the scheme is not included in the IDP. (See accompanying report)		
MM 64	CSMM238	Mrs Tracy Paine Colehill Parish Council (ID: 359416)	No		No	It is noted that Policy VTSW 2 is included in relation to the progress of an upper school in Verwood and that the 1st school proposed in Policy WMC5 is omitted. Since the 1st school is not only a replacement for Wimborne 1st school it is being expanded to absorb an increase forecast in the local population and provide for a 2 tier system should this become future DCC education policy. An appropriate indicator should therefore be added to MM 64.	Add the following under the given headings on Page 83 Policy WMC5 Cranborne Road New Neighbourhood 7 • Progress of delivery of site for 1st school Sets criteria for implementation Annual survey of completions of educational facilities	Noted, this is considered a minor modification.
MM 64	CSMM239	Mrs Tracy Paine Colehill Parish Council (ID: 359416)	Yes		No	There are 208 schemes identified in the IDP in order to support development in the Core Strategy. There are 94 schemes that identify the following risk; To deliver transport schemes requires both public and developer funding. If the scheme cannot be delivered as originally intended, it will most likely be due to a lack of funding. Therefore, either the scheme will be redesigned or scaled back in order to deliver a reduced, more cost effective scheme or another alternative will have to be sought. There are 110 schemes which have no costs identified against them. The plan is unworkable and unprofessional, especially in regard to alternative means of transportation and	The IDP needs to reflect what can actually be achieved and should therefore be a business plan identifying estimated expenditure and sources of income to support each infrastructure scheme. The Council needs to look at the plan again; realistically assess the 208 schemes identified and indicate which can / cannot be funded. The policies which	The deliverability of transport schemes and the IDP was discussed at the hearings and changes made to the IDP at the direction of the inspector. No further amendments are considered necessary to the IDP.

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						routes. The emphasis by the Councils to rely less on personal vehicles hinges on the need for more public transport, cycling and walking, all of which need to be funded. These facilities are being shown to be difficult to establish and are therefore unlikely to be sustained.	rely on the schemes that cannot be funded need to be reviewed and modified accordingly.	
MM 64	CSMM241	Mrs Tracy Paine Colehill Parish Council (ID: 359416)	No		No	Employment Since this section deals with employment it seems strange that there are no indicators for the number of jobs created by the appropriate schemes. Surely with an increase in the areas population due to the increased number of homes we need to be assured that land set aside for employment purposes is providing jobs and not just unoccupied buildings. Such information will also provide data about the local economy and social and welfare needs too.	Under Policies FWP8 and Policy BA2 add a further bullet as follows; • Number of additional employment opportunities created per category in each allocation.	The Council considers that the current indicators are appropriate.
MM 64	CSMM224	Mr L Hewitt Wimborne Minster Town Council (ID: 359555)	No		No	Employment There are no indicators as to the number of jobs created by the appropriate schemes. Given the rise in population as a result of the increased number of dwellings, the Town Council wishes to be assured that land set aside for employment purposes is providing jobs and not just unoccupied buildings. Such information will also provide data about the local economy and social and welfare needs.	Under Policies FWP8 and Policy BA2 add a further bullet point as follows; • Number of additional employment opportunities created per category in each allocation.	The Council considers that the current indicators are appropriate.
MM 64	CSMM225	Mr L Hewitt Wimborne Minster Town Council (ID: 359555)	No		No	It is noted that Policy VTSW 2 is included in relation to the progress of an upper school in Verwood and that the 1st school proposed in Policy WMC5 is omitted. Since the 1st school is not only a replacement for Wimborne 1st school it is being expanded to absorb an increase in the local population and provide for a 2 tier system should this become future DCC education	Add the following under the given headings on Page 83 Policy WMC5 Cranborne Road New Neighbourhood 7	Noted, this is considered a minor modification.

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						policy. An appropriate indicator should therefore be added to MM 64.	<ul style="list-style-type: none"> Progress of delivery of site for 1st school Sets criteria for implementation Annual survey of completions of educational facilities 	
MM 64	CSMM226	Mr L Hewitt Wimborne Minster Town Council (ID: 359555)	Yes		No	<p>There are 208 schemes identified in the IDP in order to support development in the Core Strategy. There are 94 schemes that identify the following risk; To deliver transport schemes requires both public and developer funding. If the scheme cannot be delivered as originally intended, it will most likely be due to a lack of funding. Therefore, either the scheme will be redesigned or scaled back in order to deliver a reduced, more cost effective scheme or another alternative will have to be sought.</p> <p>There are 110 schemes which have no costs identified against them.</p> <p>The plan appears to be impracticable, particularly with regard to alternative means of transportation and routes. The emphasis by the Principal Councils for less use of personal vehicles relies on people using public transport or cycling and walking, all of which need additional funding in terms of infrastructure or subsidy. These facilities are being shown to be difficult to establish and are therefore unlikely to be sustained</p>	<p>The IDP needs to reflect what can actually be achieved and should therefore be a business plan identifying estimated expenditure and sources of income to support each infrastructure scheme. The Council needs to look at the plan again; realistically assess the 208 schemes identified and indicate which can / cannot be funded. The policies which rely on schemes that cannot be funded need to be reviewed and modified accordingly.</p>	<p>The IDP is an evolving document which will progressively identify the precise nature and cost of transport schemes as further details become clearer through on going work. At this stage it is only schemes for short term delivery which have been designed up and cost estimates applied. The sequence, phasing and timing of development and associated transport improvements will be crucial to delivery. This will depend on the timescales for proposed development, once this is known we can establish our future programme of work and future spending profile.</p>

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MM 64	CSMM132	Mrs Hilary Chittenden Environment TAG (East Dorset) (ID: 360302)	Yes	Yes	No	<p>Monitoring Framework Sustainability Appraisal. ETAG's overall assessment was that the Core Strategy scored unknown or negatively on SA1 (Protect, enhance and expand habitats) primarily as baseline data had not and still have not been gathered through survey. Impacts therefore cannot be assessed. It is disturbing to see that yet again biodiversity is being ignored: only landscaping and the provision of SANGs are being considered as ways to "reduce impacts on the countryside".</p> <p>Managing the Natural Environment ME1 The indicator is restricted to designated sites The final bullet point of Policy ME1 commits to Monitoring of habitats and species for a suitable period of time after completion of the development to indicate any changes in habitat quality or species numbers, and put in place any corrective measures to halt or reverse any decline. This should be achieved by individual site survey at appropriate frequency and time of year and records retained on DERC database.</p> <p>ME4 Combining all criteria under one heading does not provide a meaningful measure of meeting targets or flag up where there may be problems. We suggest that monitoring should include compliance with each of the criteria identified in para. 2 of ME4. The final bullet point in para 2 of this policy is Minimising soil disturbance to reduce soil carbon losses. This was discussed at EiP and Natural England proposed (and we understood it was agreed by all parties) that this should be included in the</p>	<p>Managing the Natural Environment ME1 Add Monitoring indicator Changes in habitat quality and species numbers on development sites and associated SANGs. Monitoring source: Individual site survey.</p> <p>ME4 Amend monitoring to include compliance with each of the criteria identified in para. 2 of ME4</p> <p>PC5 Add to list of Monitoring Indicators</p> <ul style="list-style-type: none"> • Total visitors • Visitors to the Dorset Heaths • Sustainable transport (by type) to tourist and cultural sites. 	The Council considers that the current indicators are appropriate and relevant to the impact of development.

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						<p>Monitoring Framework. We suggest that soil disturbance should be measured by area.</p> <p>PC5</p> <p>Visitor pressure on the Dorset Heaths has been omitted. This will be monitored under the Heathlands Planning document but should be included here for the sake of completeness</p> <p>There is no monitoring indicator for sustainable transport to tourist and cultural sites.</p> <p>Changes in visitor numbers would be a useful additional indicator.</p>		
MM 64	CSMM254	Mr Andrew Murray Manchester Airport (ID: 360379)				We support the alteration set out at Ref MM64 in particular the four monitoring indicators set out for Policies BA1 & BA2,		
MM 64	CSMM138	Ms Helen Patton New Forest National Park Authority (ID: 361028)		Yes	Yes	<p>Thank you for consulting the New Forest National Park Authority on the above. The Authority does not have any comments to make on the Schedule of Proposed Main Modifications. The Authority would however, like to make the following comment on the Infrastructure Development Plan.</p> <p>Heathland Mitigation page 3</p> <p>The Authority welcomes the inclusion of the information provided in the Risk to Delivery/Contingency Measures column on the far right hand side of the table whereby it is recognised that a planning application will be required for part of the SANG within the administrative control of the New Forest National Park Authority. This highlights the importance of joint working between all parties concerned in order to ensure a SANG of an</p>		

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						appropriate quality and quantity can be delivered to support the Christchurch urban extension development.		
MM 64	CSMM146	Sir Roger Palin (ID: 499596)	No		No	<p>Annual Monitoring Framework Core Strategy Policy LN2 (Design, layout and density of new housing development) encourages a minimum density of net 30dph, not a minimum of 30dph. The Masterplan report makes it clear that densities of less than 30dph will be appropriate, particularly on the edges of New Neighbourhoods.</p> <p>Policy LN3, Affordable Housing, needs two additional Indicators:</p> <ul style="list-style-type: none"> • "Numbers (or %) of affordable houses allocated to meet local need". • "% of local need satisfied". <p>The Localism Act has changed the nature of the Housing Register and enjoins Councils to give priority to meeting local need. (See attachment)</p>	<ul style="list-style-type: none"> • Add the two new indicators as at para 6. • Correct the statement at foot of page 77 to "minimum density of net 30dph". (See attachment) 	<p>The Councils have introduced a new housing allocations policy. As the Councils do not intend to be meeting anything but local need there is no purpose in having these indicators.</p> <p>The second point can be met by a minor modification if deemed necessary.</p>
MM 64	CSMM209	South West HARP Consortium South West HARP Planning Consortium (ID: 507536)	No		No	<p>We support the inclusion of monitoring indicators within the Core Strategy.</p> <p>LN7 – monitoring of specialist housing for vulnerable people should not be limited to C2 developments. As part of the specialist housing provision, C3 specialist accommodation will form an important role in meeting extra care housing need, and C3 developments subject to specialist legal agreements should also be monitored under this policy.</p>	<p>We suggest a single change to ensure adequate data collection and to aid in the understanding of housing need over the plan period.</p>	<p>The current indicator is considered appropriate without further modification.</p>
MM 64	CSMM245	Mr Stefan Briddon Bellway Homes	Yes	No	No	<p>Affordable Housing - Policy LN3</p> <p>We note that the indicators refer to monitoring delivery of affordable housing from "Greenfield locations" and</p>	<p>On this basis we request that the second paragraph of Policy LN3 be revised</p>	<p>No changes have been proposed to Policy LN3 in the Main Modifications</p>

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		(Wessex) (ID: 521740)				<p>the "existing urban area". This highlights an overarching concern we have in respect to the Council's affordable housing policy. Should the Council want to persist with a 40% and 50% split between different land types, we suggest that it would be more effective if LN3 and the corresponding monitoring indicators simply differentiated between 'urban area' sites (where the 40% would apply) and 'sites outside of the urban area' (where the 50% would apply) rather than to use the term 'Greenfield'.</p> <p>The rationale for this is that the current approach is confusing as there may be 'Greenfield' sites within urban areas (where land values will reflect the urban area location or inclusion in the SHLAA as a deliverable housing site) that will be required to provide up to 50% affordable under the current LN3 policy wording. We are unclear whether the Council's viability evidence has assessed or indeed justified a 50% requirement from urban greenfield sites. Or as we contend, the evidence substantiates a higher requirement from greenfield sites outside the existing settlement policy boundaries on new allocations and / or exception sites.</p>	<p>as follows; All greenfield residential development which results in a net increase of housing is to strategic residential allocation sites shall provide a minimum of 50% of the residential units as affordable housing on the site unless otherwise stated in strategic allocation policies. All other residential development within defined settlement policy boundaries which results in a net increase of housing is to provide a minimum of 40% of the residential units as affordable housing on the site. This modification would then allow for an effective framework to be established to monitor affordable housing delivery between urban and non-urban sites.</p>	<p>following discussion at the Core Strategy hearings. The current policy wording of Policy LN3 and monitoring indicators in MM64 are considered appropriate.</p>
MM 64	CSMM161	Miss Alison Appleby Natural England South	No	Yes	No	<p>Monitoring framework for policy ME1 This currently refers only to changes in areas of biodiversity importance (loss and addition of sites). Consideration should also be given to the monitoring</p>	<p>Consideration should also be given to the monitoring changes in the quality of those sites of biodiversity</p>	<p>The Council considers that the current indicators are appropriate and relevant to the impact of</p>

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		West (ID: 612438)				<p>changes in the quality of those sites of biodiversity importance, as well as the populations of those priority species which may inhabit the site.</p> <p>ME 1 states that the following criteria should be addressed when development is proposed</p> <ul style="list-style-type: none"> • Monitoring of habitats and species for a suitable period of time after completion of the development to indicate any changes in habitat quality or species numbers, and put in place corrective measures to halt or reverse any decline. <p>Therefore we are proposing a change to the monitoring framework to ME1 in order for it to measure the success of policy ME1.</p>	importance, as well as the populations of those priority species which may inhabit the site.	development.
MM 64	CSMM163	Mr Alan Spencer (ID: 654817)	Yes	No	No	<p>The Infrastructure Delivery Plan is nothing more than a wish list in relation to transport schemes. The following statement "To deliver transport schemes require both public and developer funding. If the scheme cannot be delivered as originally intended, it will most likely be due to a lack of funding.</p> <p>Therefore, either the scheme will be redesigned or scaled back in order to deliver a reduced, more cost effective scheme or another alternative will be sought." means that the council hasn't got a clue as to when or how 50% of the Infrastructure will be delivered. Since hardly any of these schemes are costed, the Council has no idea of their cost and therefore how much is has to allocate from the public purse, there being an obvious limit on that which developers will / can fund. The document is nonsense and should be rejected in its entirety. The public is entitled to know at this stage of the Core Strategy exactly what is being funded and what isn't and I fail to see how the Inspector can make a decision on the soundness of the Infrastructure plan</p>	<p>The IDP in its current form fails to assure sustainable development. (Section 4 of the NPPF) It should be rewritten to identify what will be provided and not that which is desirable and has very little chance of being delivered. The public have a right to know what is feasible and what is not feasible. It is only on this basis that the Councils and the Inspector can make a judgment of soundness and the sustainability of the Core Strategy.</p>	<p>The IDP is an evolving document which will progressively identify the precise nature and cost of transport schemes as further details become clearer through on going work. At this stage it is only schemes for short term delivery which have been designed up and cost estimates applied. The sequence, phasing and timing of development and associated transport improvements will be crucial to delivery. This will depend on the timescales for proposed</p>

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						or indeed on the soundness of the Core Strategy as a whole while it is unclear what elements of the Infrastructure plan will not be funded and therefore not provided.		development, once this is known we can establish our future programme of work and future spending profile.
MM 66	CSMM57	Ms Gill Smith Dorset County Council (ID: 359437)	No	Yes	Yes	<p>At the Pre-submission and Proposed Changes consultations, Dorset County Council raised concerns about the lack of evidence regarding the linkages between the levels of housing and employment land/job creation in the Plan area. We were concerned that if the levels of housing and employment are not in balance it could lead to an increased level of commuting into or out of the area.</p> <p>The proposed new Monitoring Framework is a welcome addition to the Plan, making clear that the process continues, rather than ends with adoption of the Plan. The approach, indicators and measurement of effects are clearly stated. The Monitoring Framework Table appears very thoroughly thought-out but will need to be checked to ensure that it corresponds with modifications elsewhere in the report. For instance, the overall housing target to be monitored is still quoted as 8,200 dwellings, rather than the new figure of 8,490. The annual rate and other breakdowns will also need to be amended. The delivery of housing supply by site (shown at MM66) and annual trajectory breakdown is clearly presented and will be a helpful framework against which to monitor.</p> <p>One further area that the Councils may wish to consider monitoring, which would help address Strategic Objectives 4 (Economy), 5 (Housing) and 6 (reduce the need to travel) as well as this Council's</p>	Add to MM64 Christchurch and East Dorset Monitoring Framework a monitoring indicator on commuting levels.	The housing target set out in the monitoring framework can be amended in line with Policy KS3 as a minor amendment. No further modifications are considered necessary.

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						<p>concerns, is the level of commuting into and out of the Plan area. ONS provide annual statistics by District from the Annual Population Survey which can be found at: http://www.neighbourhood.statistics.gov.uk/HTMLDocs/Commute_APS_Chart/APS_2010_11.html The Annual Population Survey is a sample survey and therefore subject to sample error but, notwithstanding this, may be of help in monitoring the transport impacts relating to the scale of housing and job provision in the Plan area. The 2011 Census results on commuting will also be available later in 2014.</p>		
MM 66	CSMM58	Linden Homes Linden Homes (ID: 662201)	Yes	Yes	Yes	<p>(See accompanying statement) We support the inclusion of the Housing Trajectory in the main modifications which clearly demonstrates how the housing will be delivered over the plan period. We can confirm that subject to the receipt of planning permission, Linden Homes intend to deliver the units allocated under Policy VTSW5 over the period 2015/16-2017/18 as set out in the trajectory.</p>		
MM 66	CSMM222	Wyatt Homes (ID: 359366)	Yes	Yes	Yes	The MM further contributes to soundness in all regards.		
MM 66	CSMM137	Mr Paul Hanson Meyrick Estate Management (ID: 360382)	Yes	Yes	No	<p>The plan is unsound as it is not justified. A single housing target is not justified by evidence. It is quite clear from evidence provided under Matter 1 that in practice there are distinct housing sub markets between the two Councils, and this was demonstrated by the example of households in Wimborne and Christchurch where occupiers would not substitute one town for the other. There are single Councils that have two market housing market areas for example Test</p>	<p>There are two ways to increase the pipeline of housing supply firstly the designation of more greenfield sites in the Core Strategy. This effect can be seen from neighbouring authorities who have significantly performed</p>	<p>The Councils have not made any changes to the housing land supply figures that were discussed at the Core Strategy hearings. The Core Strategy housing target in the Main Modifications Schedule</p>

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						<p>Valley in Hampshire, Aylesbury Vale in Buckinghamshire these are good comparative examples and here s78 appeals have confirmed that supply in one part of the Council in a different housing sub market area will not substitute for supply in the other part of the sub market area. The plan cannot be effective in this regard and cannot be found sound as a single market area is not effective. Under this policy change it would be possible to have supply skewed in one or other of the Council areas and this would not match demand.</p> <p>Housing delivery is not realistic and is not justified on the basis of evidence. The SHLAA 2012 update – did not confirm the availability of the urban sites and the timescale for delivery, the council have not approached owners of SHLAA sites.</p> <p>Evidence was presented on Matter 7c and 13 by a number of respondents that reflected local developer's experience of urban recycling within Christchurch and the significant problems due to very high current use values and the lack of profit incentive for owners of SHLAA sites to bring them forward and this evidence was based on current affordable housing policy and not the more onerous proposed LN3 policy and the imposition of CIL, which makes urban recycling even less attractive financially.</p> <p>Table 2 shows that housing delivery will not meet the annual supply requirements for the first four years of the plan. Given the reliance on SHLAA sites for the delivery target as set out in table 2, any under delivery on urban sites or delay with the allocated strategic sites within the first five years will result in delivery well below the 622 required annually, given the cumulative</p>	<p>with housing delivery where a good choice of greenfield opportunities have been made through allocations. There are opportunities to increase greenfield housing allocations to increase supply in both Councils as set out in the main hearings. Secondly, the modification of draft policy LN3 to reduce affordable housing thresholds and percentages to allow urban sites to become viable, and thereby ensure that the urban area will deliver its maximum potential. The Government have indicated in the Autumn statement that they are concerned that low thresholds for affordable provision is stifling housing supply and have committed to a consultation on this matter, this indicates a real concern that unrealistic affordable housing targets stifle the market and suppress supply.</p>	<p>(MM6) has been amended at the direction of the Inspector and reflects the housing land supply discussed at the hearings. There has been no change to Policy LN3 following discussion during the Core Strategy hearings.</p>

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						<p>deficit the Councils jointly will only reach the annualised target in Year 5. The Council's joint past performance in the last five years to 2012 only achieved an average of 233 dwellings, with this as an indicator of performance in the near future (with similar market conditions) the current strategy looks set to fail as there is over-reliance on the urban areas in the first five years.</p> <p>Table 2 assumes that the strategic sites will deliver 170 units within the monitoring year 2014/15 meaning that they will be occupied by March 2015. The trajectory assumes supply on those sites where none of the preliminaries have even started, indeed none of those sites providing 170 units currently have planning permission. EDDC have advised that they will take the planning applications to the first committee following the issue of the Inspector's report for determination of three of the four early sites. The North Wimborne planning application scheme (site WMC5) which provides 50 of the units in 2014/15 was only submitted to the Council for determination two weeks ago, therefore, taking the lead in time for planning permission, completion of legal agreements, six week period for legal challenge, site preparation works, and then time taken for construction, fitting out, snagging, landscaping, formation of SANGS, and legal completion the likelihood of residents occupying any of those dwellings in less than 14 months is very low. The same difficulties face the other three sites whose planning applications have been submitted longer and they may deliver a small proportion of the 170 units required. As the continued pipeline of supply is on three of the same of the four earliest sites this will</p>		

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						affect the later years resulting in an inability to meet the required housing supply in the first five years of the plan.		
MM 66	CSMM145	Sir Roger Palin (ID: 499596)	No		No	<p>Housing Trajectory</p> <p>Please see my comments on MM5 where I explained the need for the presentation of housing data, including the Housing Trajectory, to facilitate understanding of the data pertaining to the two authority areas separately. This does not prevent the two sets of data being presented in a common format and in the same tables or charts.</p> <p>(See attachment)</p>	<ul style="list-style-type: none"> • Table 2, the Housing Supply columns SHLAA, Strategic Sites and Affordable Housing Provision could be sub divided to show the numbers for East Dorset and Christchurch separately. • Table 1, an extra column is required to show how the 1900 figure is broken down by site. This would also overcome the anomaly of a strategic site not due for development within the first 5 years (for example, WMC4 Stone Lane) being omitted from the table entirely, which is misleading. <p>(See attachment)</p>	
MM 66	CSMM210	South West HARP Consortium South West HARP Planning Consortium (ID: 507536)	No			We agree with the approach to housing trajectory and the requirement that housing land supply is calculated across the two local authorities. We would recommend the provision of an affordable housing trajectory would be pertinent given the historical difficulties in delivery in the plan area.		

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MM 66	CSMM182	Taylor Wimpey Ltd in conjunction with Bodorgan Properties CI Ltd & Sainsburys PLC (ID: 507541)		Yes	Yes	<p>We support the inclusion of a housing trajectory as an appendix to the Core Strategy and agree that 2016/17 represents an appropriate first completion date for dwellings at Roeshot Hill. The trajectory therefore appropriately reflects the content of our examination statements and the discussion held at the examination sessions.</p> <p>In regard to paragraph 2.2 the content of the additional text is factual and clearly not to be included in upper case policy. On this basis we do not object to its content but wish to note that the assessment of housing delivery against the Structure Plan over a period 1994 to 2011 is not necessarily the determining one for whether a 5% or 20% buffer applies. Recent case law has determined that far shorter periods can be applied when determining this point.</p>		
MM 67	CSMM32	Mr Andrew Roberts Highways Agency (ID: 654320)			Yes	<p>Thank you for providing the Highways Agency with the opportunity to comment on the latest stage of the above document. We have now reviewed the proposed main modifications issued in December 2013 and confirm that the Agency has no further comments to make on these.</p> <p>However, in relation to the Infrastructure Delivery Plan dated December 2013, and the A31(T) improvement schemes listed (Ameysford to Merley dualling and the interim online/junction improvements on the same section) we note that the risk to delivery boxes have the following text inserted to read:</p> <p>'To deliver transport schemes requires both public and developer funding. If the scheme cannot be delivered as originally intended, it will most likely be due to a lack of funding. Therefore, either the scheme will be redesigned or scaled back in order to deliver a</p>		

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						<p>reduced, more cost effective scheme, or another alternative will have to be sought.</p> <p>The Agency is content with the proposed additional wording. The recent DfT Circular 02/2013 emphasises the importance of plan-making in ways which allows for the uptake of sustainable transport. The Circular also identifies the importance of considering capacity enhancements at the local plan stage in the context of suitability, viability, deliverability and impact on the environment and local and regional community. The Agency will work with your authorities and other partner organisations to identify how the required capacity (having taken account of providing sustainable transport infrastructure) can be provided on the A31(T) to support the development during the plan period.</p>		
MM 67	CSMM135	Mr Paul Hanson Meyrick Estate Management (ID: 360382)	Yes	Yes	No	<p>The IDP as revised by MM67 is not effective as it is inconsistent with the modifications made to the plan in MM49.</p> <p>The IDP at 2.4 states: The allocation of sites for residential development will include the provision of Suitable Alternative Natural Greenspaces. "The Council's Regulation123 list will confirm how SANGs will be secured and further detail is set out in Core Strategy Policy ME2". Yet the policy modification MM49 says that "the delivery of heathland mitigation measures will be secured as set out in the Council's regulation 123 list." Evidence provided on matter 10 showed that in order to avoid double counting with CIL it was necessary to secure SANG by legal agreement in CIL free zones where physical SANG is provided associated with a strategic development site, otherwise if CIL was paid it would in effect being</p>	The IDP needs to be revised to be consistent with the changes made in MM49.	MM49 and Policy ME2 is consistent with the Core Strategy IDP as they both refer to the Council's Regulation 123 List in clarifying how SANGs will be delivered. No further modification is required as they are consistent. The issue of potential for double counting was discussed at the hearings and MM49 addresses this.

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						paying for general heathland mitigation projects as well as providing SANG which is in effect double counting for heathland mitigation which is precluded in the CIL regulations.		
MM 67	CSMM234	Mr Steven Coates Wimborne Allotment Association (ID: 476256)	Yes	Yes	No	MM67 – Infrastructure Delivery Plan 2.8 – Christchurch and East Dorset Allotment Strategy Document which should detail policy and inform provision has not been written.	Christchurch Council have produced an Allotment Strategy document, reference Infrastructure Delivery Plan 2.9, which sets out the Councils allotment strategy up to 2028. The new combined authority, Christchurch and East Dorset, have not produced an equivalent document. This is considered necessary to properly set out policy as regards this very important recreational pursuit and moreover should be the backdrop against which provision is secured and delivery measured. Without a coherent strategy for the next 15 years, there is a danger that provision will be piecemeal and ad hoc.	This is an issue to be considered outside the Core Strategy.
MM 67	CSMM140	Sir Roger Palin (ID: 499596)	Yes		No	Revised Infrastructure Delivery Plan Para 6. It is acknowledged that the EDDC relies on a range of outside providers to meet the infrastructure	• The Housing Trajectory, allied to national planning assumptions regarding the	The IDP is an evolving document which will progressively identify the

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						<p>requirements consequent on the Core Strategy development proposals and that therefore their role is to indicate the types of infrastructure that should be planned for, those responsible for its delivery, and the likely costs where identified. However, it is disappointing to read statements such as (para 2.23) "The Councils have attempted to contact utility providers....and where a response has been received....". Moreover the revised IDP falls seriously short of providing sufficient evidence that the infrastructure requirements will be deliverable and that therefore the CS developments will be sustainable, as required by the NPPF. This applies particularly to roads/transport, schools and educational facilities, and medical facilities, in addition to utilities.</p> <p>Roads/Transport. I have already dealt with roads, in particular the deletion of the dualling of the A 31(T) around Wimborne, in my responses to MMs 1 and 3. However, it is noteworthy that the DCC, as the Highway authority for the area, has given itself a let-out clause on every transport proposal of any significance (see for example chapter 3 pp18 to 27, and elsewhere): "to deliver transport schemes requires both public and developer funding. If the scheme cannot be delivered as originally intended it will be most likely due to a lack of funding. Therefore either the scheme will be redesigned or scaled back in order to deliver a reduced, more cost effective scheme, or another alternative will have to be sought". The implication is that very few of the scheduled improvement proposals will see the light of day.</p> <p>Educational. Although there is now mention (pages 50 and 51) of some spare capacity in the Wimborne</p>	<p>educational and medical facilities required to support major residential development programmes, should enable officers at the relevant authorities to draw up a more detailed plan for the delivery of their respective infrastructure requirements for inclusion in the IDP. Reliance on demand led data inevitably means that the required facilities will be delivered late, which equates to planning for unsustainable development in the meantime.</p> <ul style="list-style-type: none"> • Para 2.62 The estimate of the remaining capacity at the Wimborne Cemetery should be amended from the quoted 50 to 100 years to 30 to 50 years, as advised at the Examination in Public by the representative of the Joint Cemetery Committee. (See attachment) 	<p>precise nature and cost of transport schemes as further details become clearer through on going work. At this stage it is only schemes for short term delivery which have been designed up and cost estimates applied. The sequence, phasing and timing of development and associated transport improvements will be crucial to delivery. This will depend on the timescales for proposed development, once this is known we can establish our future programme of work and future spending profile.</p>

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						<p>schools which could be utilised prior to a significant amount of new housing coming on line, it remains evident that the basic policy for the provision of school places remains demand led, ie to overload existing schools to create the critical mass required to justify the building of a new school. This applies particularly to the proposal for a new Upper School at Verwood which is not planned to come on stream until the end of the planning period. Meantime the QE2 school at Wimborne and the Ferndown Upper School are to be deliberately overcrowded. Such a policy does not meet the terms of the NPPF para 72.</p> <p>Medical. Para 2.69 implies a similar policy for the provision of the additional medical facilities required to meet the needs of a 46% increase in the Wimborne/Colehill population, i.e. await the demand before making the necessary provision and in the meantime rely on the recently completed, but necessarily restricted, extension to the Quarterjack Group Surgery in Wimborne. This is clearly inadequate and not the way of planning for sustainable development.</p> <p>(See attachment)</p>		