

**Matters and Issues 2 Green Belt KS2**

**Part of Plan that is unsound: KS2 and GB issues for sites WMC5, VTSW4 and VTSW3**

**Soundness criteria that it fails:** Previous comments:

**Issue 1 and 2**

**360302** – CSPS KS2, WMC3, WMC5 and Changes KS2, para 13.20 and appended Soil Carbon document. Does not comply with NPPF 80. Plan should not be devised on basis of only two GB criteria. Site specific comments regarding size and location of SANG and open green space, lack of survey data and hydrology issues. Expansion into open countryside and loss of ecosystem services.

**522117** – CSPS VTSW4 NW Verwood Edmondsham Road. Does not comply with NPPF85. No clearly defined physical boundary for eastern section that can be regarded as permanent.

**656737**- CSPS Policy VTSW3 Coopers Lane South is not developable: Bern Convention. Policy **not effective**.

**Issue 4**

**360302** – Changes KS2 ETAG supported the inclusion of Open Space and SANGs within Green Belt. “Changes” document did not include mapping so there are no clearly defined boundaries or potential for assessing beyond the plan period.

***1. Is the proposal to make limited changes to the GB justified?***

ETAG has not objected to the principle of limited changes to the Green Belt as we recognise the need for affordable housing particularly for our young people. We have objected to developing the Core Strategy on the basis of only two of the GB criteria. We consider this is unsound and that the Officers’ response (Changes 5.11) fails to validate this.

**Modification required: Include reference to all the criteria for inclusion of land in the Green Belt (NPPF80) and ensure that adequate regard is had to those criteria that have been sidelined in order to promote development that encroaches into the open countryside and downgrades the setting and special character of historic towns.**

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***2. Have the GB boundaries been assessed to consider their capability to endure beyond the plan period, as advised in NPPF para 83?***

Although KS2 now confirms that significant open space and SANGs will be within the Green Belt, GB boundaries have not been identified for those new neighbourhoods that include significant open space including community orchards and allotments, or potential SANG within the “extent of site” mapping. Potentially this could create “safeguarded” land where development is not intended to take place during the lifetime of this plan but, if additional SANG is identified, it might conceivably be brought forward for additional housing at a later date. This removes any safeguarding of the countryside from encroachment – “creeping development”. The schematic representation of, for example, WMC5 has been re-interpreted by the developers and, we understand, is still undergoing modification prior to submitting a Planning Application. This provides no certainty of the Green Belt boundary and no formal commitment to its endurance. Other examples are given in the tabulated data in response to **Issue 4** below. We have been assured repeatedly that we would have access to the survey data well before EiP and understood that this would inform site boundaries, SANG and GB.

We have urged Council to give thought to what follows this plan period. Continued expansion of the urban area into the open countryside with loss of ecosystem function is not an option that can be considered. It is widely recognised that we have long since passed the carrying capacity of our land and exceeded growth that is sustainable. We have provided detailed evidence of the need to consider ecosystem services provided by natural and semi-natural habitats, including minimising loss of soil carbon.

VTSW4

The Green Belt boundary for that part of VTSW4 between Eastworth Farm and Trinity First School is not defensible. This is encroachment not just into open countryside but into the AGLV. The boundary of the AGLV broadly follows the tributary of the R Crane (SSSI). The present GB includes the school playing fields and extends to the boundaries of homes in Coopers Lane and the small cluster of homes in the southern section of Burrows Lane.

The claims in the Masterplan Report (ED63 p131) regarding the containment of this “parcel of land” are inaccurate. The indicative plan shows development of the East section extending northwards to Footpath FP32. This is an even less defensible boundary than Eastworth Road has proved to be. While the cluster of oaks could be protected by TPO, that would not preclude disease (increasingly likely). We have already lost several veteran oaks in this area that were felled to accommodate the widening and adoption of that part of Coopers Lane that leads off Champtoceaux Avenue. The roots of what was probably the largest oak in Verwood were also compromised by associated (though not essential) roadworks and in time that was felled.

Annotated photographs included in my representation to EDDC (Options and Pre-submission) have not been included in the web version of the responses to Core Strategy consultations and are appended for clarity.

CSPS VTSW3 Coopers Lane/Does Lane

NPPF 81 encourages LPAs to retain and enhance landscape, visual amenity and biodiversity of defined Green Belt. The bridleway at Coopers Lane South is a narrow (2.8m wide) unadopted leafy lane bordered on one side by Stephens Castle. Our response highlighted some

of the special qualities of this area. Additional land adjacent to the Coopers Lane Meadow SNCI is awaiting SNCI survey. The Policy is not consistent with Policy **FWP2**. Photographs are appended.

**Modification required:**

**522117 - Delete of eastern section of VTSW4**

**656737 - Include Coopers Lane South in the Green Belt.**

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**4. Are the GB boundaries for every development proposal clearly defined on proposals maps?**

<b>East Dorset Map</b>	<b>Comment</b>
8.8 St Michael’s School, Colehill	Shown clearly
8.3 Cuthbury, St Margaret’s Close	No – shows extent of site not GB
8.4 Stone Lane	No – shows extent of site not GB
8.5 Cranborne Road	No – shows extent of site not GB. Includes some greenspace but not clear if this is part of SANG
8.6 South of Leigh Road	No – shows extent of site not GB.
9.1 Lockyer’s School and Land N of Corfe Mullen	No – shows extent of site not GB
10.2 and 10.3 Forest View Drive and Woodland Walk	Shown clearly
10.4 Holmwood House	No – shows extent of site not GB but excludes SANG
10.5 Coppins	No – shows extent of site not GB
10.9 E of New Road, W Parley	No – shows extent of site not GB. Appears to exclude houses in Church Lane . Excludes SANG
10.10 W of New Road, W Parley	No – shows extent of site not GB
10.11 Blunts Farm	No – shows extent of site not GB
11.2 Howe Lane - schools	Shows current GB. Indicates no change of status for educational use
11.3, 11.4 Coopers Lane and Does Lane	Shown clearly
11.5 NW Verwood	No – shows extent of site not GB. The SNCI should remain in the Green Belt
11.7 Woolsbridge	Shown clearly but need to refer to text for clarification that site boundary marks GB boundary. SNCI and landscape buffers should remain in the Green Belt.
11.8 St Leonards Hospital	Previously developed site in the Green Belt.
11.9 Blackfield Farm	Shown clearly

**Modification required:**

**360302 -Boundaries should be clearly defined for all proposals subject to being informed by ecological surveys.**





