

Core Strategy

Consultation Responses for Assessments, Background Papers & Evidence Reports

Options for Consideration
October 2010 – January 2012



Prepared by Christchurch Borough Council and
East Dorset District Council

Comments received on Assessments

Report	Paragraph No.	ID Ref	Comments
Health Impact Assessment	General Comment	360653 (Hodges)	Note females age range overtakes males at age 35. 22.1% of Christchurch people are long term sick
Health Impact Assessment	1.4	360653 (Hodges)	No mention of the isolation and loneliness of elderly people without transport in the evenings. Also the problems of personal finance for people on fixed incomes (now with low rates of interest) especially impoverished and lonely elderly widows. No mention of lack of Youth Club at Highcliffe
Health Impact Assessment	1.5	360653 (Hodges)	No mention of lack of space and lack of finance for housing.
Health Impact Assessment	1.7, 1.8 and 1.9	360653 (Hodges)	Lack of public transport especially at end of evenings and lack of service to residential roads. Lack of car parking spaces during the day and very expensive car park charges
Health Impact Assessment	1.10	360653 (Hodges)	Need for school premises to be available for public use in evenings, weekends, holidays
Health Impact Assessment	Table 2.7	360653 (Hodges)	No mention of mental health. No mention of civic pride or area identity and benefits to mental health
Health Impact Assessment	Table 3.2	360653 (Hodges)	No mention of dangerous access to road from both sides of Hinton Admiral Station. No mention of dangerous access to Fairmile from railway station.
Health Impact Assessment	Table 3.3	360653 (Hodges)	Urban expansion would add to the already over burdened roads e.g. the A35. There is already too much development on the flood plains of local rivers. No mention of the need to encourage the opening of antique shops and sale of reproduction goods in keeping with the heritage tourism offers of the area.

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Health Impact Assessment	Table 3.11	360653 (Hodges)	No mention of the need to avoid wind farms as detrimental to visual amenity, danger to birds, lack of wind at usable speeds and at times of peak demand for power.
Health Impact Assessment	Table 3.13	360653 (Hodges)	Need to use car parks to aid commerce and retail activity in towns and not merely to raise cash.
Equalities Impact Assessment	Option KS 19	360653 (Hodges) (Hodges)	The area has few cyclists and age and disability in the elderly limits walking.
Equalities Impact Assessment	Option UE 2	360653 (Hodges)	Need to keep allotments south of the railway where open to public supervision
Equalities Impact Assessment	Option UE 3	360653 (Hodges)	Need to get rid of ugly overhead power cables.
Equalities Impact Assessment	Option UE 4	360653 (Hodges)	Need to get rid of ugly overhead power cables.
Equalities Impact Assessment	Option HE 1	360653 (Hodges)	Need for strong protection of historic interests (cannot rely on Council)
Equalities Impact Assessment	Option LN 9	360653 (Hodges)	35% “affordable” is not defined, impracticable.
Equalities Impact Assessment	Option PC 17	360653 (Hodges)	This concern / issue is vital
Equalities Impact Assessment	Option TA 3	360653 (Hodges)	Consider use of multi storage car parking
Equalities Impact Assessment	Page 39 (not 36)	360653 (Hodges)	Contains an error regarding the calculation of religious groups in Christchurch.

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Habitats Regulations Assessment	Whole document	359482 Natural England	We have reviewed the Habitats Regulations Assessment and find its conclusions reflect our views on the key issues contained within it.
Sustainability Appraisal Scoping Report September 2010	Document	360302 East Dorset Environment Theme Action Group	<p>In reviewing and responding to the Core Strategy Options, we noted that some of the proposals were not sustainable. The problems appeared to stem from the Sustainability Appraisal Scoping and we undertook to provide comment on that.</p> <p>In its <i>Framework for Sustainable Lifestyle</i>, DEFRA refers to the possibility that this could be the generation that leaves things better than when they started. That will only happen if we get our forward planning right. <i>Across Europe we currently consume 30% more natural resources than the earth can replenish. 75% of carbon emissions of UK citizens are from products and services that we buy and use – this includes emissions embedded in the products from manufacture through to disposal.</i> http://archive.defra.gov.uk/environment/economy/documents/sustainable-life-framework.pdf</p> <p>The Core Strategy should seek to provide a framework which enables local residents to respond to the need for the behavioural changes that are required to reduce our carbon emissions. It should establish a framework that prevents waste of all resources through ensuring that infrastructure for public services and ecosystem services are in place before the first building starts. ETAG members remain very critical of the Broadway Malyan reports complaining that they were woefully short on detail or even the ability to recognise what was needed. We acknowledge</p>

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			the need for some housing in this area, particularly affordable housing for local people, but planning for its delivery must not be the be all and end all. As one member has said so aptly, <i>If we muck this up over the next ten years then there will be a very poor inheritance for our descendants.</i>
Sustainability Appraisal Scoping Report September 2010	1.3- 1.4	360302 East Dorset Environment Theme Action Group	1.3- 1.4 The definition of sustainability is included but it is essential that full account is taken of the proviso <i>without compromising the ability of future generations to meet their own needs.</i> In achieving this we should ensure that the Core Strategy increases resilience and reduces vulnerability to, for example, the impacts of climate change, uncertain economic pressures, rising fuel costs, and demographic changes. The overwhelming emphasis in the Core Strategy is on increased housing provision and economic growth with insufficient consideration of sustainability. Although many of the appropriate policies have been cited they are not being applied in practice. Full recognition of the vital role of ecosystem services is essential.
Sustainability Appraisal Scoping Report September 2010	1.11	360302 East Dorset Environment Theme Action Group	1.11 Despite this statement of intent, full consideration has not been given to environmental issues either within the Core Strategy document or the supporting Broadway Malyan reports. It is imperative that it is.
Sustainability Appraisal Scoping Report September 2010	3.5	360302 East Dorset Environment Theme Action Group	3.5 <u>Key messages</u> . Social <ul style="list-style-type: none"> There should be some reference to the issue that new housebuilding is likely to attract more people wishing to retire to the area so exacerbating problems of housing supply and cost. Para 5.44 draws attention to the distortion of the population age structure since 1991 resulting from the previous Local Plan.

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			<ul style="list-style-type: none"> • Access is required to work, shops, health services, high quality open greenspace and sports venues as well as cultural facilities. We suggest that needs of communities (plural) of all our settlements should be considered. <p>Environmental</p> <ul style="list-style-type: none"> • Amend 2nd bullet point to “protected and priority habitats and species” ... • Add Regional biodiversity targets and networks should be supported through restoration or creation of new areas of priority habitat. • Add Ensure good design maximises opportunities for including biodiversity or geological features and enhances heritage assets. • Traffic congestion/car dependency ... Note that they also contribute to climate change and its impact. • Good air quality is important to the health of ecosystems as well as the community. • The problems of noise and light pollution have been omitted – additional development will add to existing levels.
Sustainability Appraisal Scoping Report September 2010	5.2	360302 East Dorset Environment Theme Action Group	5.2 2nd bullet point – something appears to have been omitted.
Sustainability Appraisal Scoping Report	5.13	360302 East Dorset Environment Theme	5.13 Suggest note that Verwood has a population of c 15,000.

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September 2010		Action Group	
Sustainability Appraisal Scoping Report September 2010	Sustainability Appraisal Objectives – Table 3 (p48)	360302 East Dorset Environment Theme Action Group	<p>(Original proposals are in black, recommended changes in blue. Wording to be deleted shown in red. Objectives from Oct 2008 Core Strategy are in violet) Explanatory comments in smaller font (10 point).</p> <p>1. Protect, enhance, expand and link priority habitats: maintain and enhance populations of protected and priority species: protect and enhance ecosystem services: avoid damage to geological sites. (Limiting this to “protected species” is too restrictive. While range is easier to measure (indicators) we could end up with low populations that are worse off and range would not identify or record that Wording of original text implied that we could damage sites in the process if protecting etc. Wording of original text suggests sites depend on species rather than the other way round. The need to protect and enhance ecosystem services must be included)</p> <p>2. Minimise consumption and make sustainable use of natural resources. (slight change of emphasis).</p> <ul style="list-style-type: none"> • Make sustainable use of resources • Minimise consumption & extraction of minerals • Minimise waste then re-use/recover through recycling, composting or energy recovery • Maintain water consumption within local carrying capacity limits (taking account of climate change) <p>(Important to achieve right balance here. Simply suggesting sustainable could risk pushing to the limits and beyond minimum need: conversely, to say only minimise we could become unsustainable if our minimum isn't low enough).</p> <p>3. Minimise pollution (including air, water, soil, noise, vibration, light) to</p>

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			<p>avoid damage to natural systems and human health</p> <ul style="list-style-type: none"> • Limit air, noise and light pollution to levels that do not damage natural systems • Limit water pollution to levels that do not damage natural systems <p>4. Minimise the causes and impact of climate change. (Need to consider the effect of local proposals on global environment eg installation of biofuel plants which may meet Government targets for renewables and possibly be of some short term local benefit but could be severely damaging on a wider scale.)</p> <p>5. Reduce the need /desire to travel by car, lorry, or air by making public transport, cycling and walking easier and more attractive. Simply “providing access to meet people’s needs” takes us back to predict and provide and is unsustainable. Recommend revert to original wording in 2008 version as shown above.</p> <p>6. Provide a safe and secure environment (including protection from major hazards eg blast zones, (crime/fear of crime), flooding and, where appropriate, coastal erosion) (In some places, coastal protection will not always be the correct course of action because of impacts elsewhere and managed retreat will be more appropriate. Have removed crime and fear of crime so that this objective deals with physical hazards rather than social issues).</p> <ul style="list-style-type: none"> • Reduce crime and fear of crime <p>7. Create conditions to improve health and quality of life, providing green infrastructure and access to high quality open green spaces, and promoting healthy lifestyles including routine daily exercise and reducing health inequalities. (Other social inequalities need to be considered)</p> <ul style="list-style-type: none"> • Improve the quantity and quality of publicly accessible open space • Create conditions to improve health promoting healthy lifestyles including routine

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			<p style="text-align: center;">daily exercise and reducing health inequalities.</p> <p>8. Help make (suitable) appropriate housing available and affordable to meet local need. (Essential that we break the vicious circle of providing more housing to fuel in-migration so adding to need for affordable housing and address the problem of cost of running a home – it's not just the bricks and mortar that make it affordable)</p> <p>9. Help communities to support social cohesion through the provision of accessible basic services and facilities and a reduction in crime and the fear of crime.</p> <ul style="list-style-type: none"> • Reduce crime and fear of crime (15) (crime reduction/fear of crime were also in 6 above: suggest this duplication is confusing & if we start doing that with this then other issues could equally be duplicated throughout – suggest inclusion in 9 is the better option and keeps social issues together) • Give everyone access to learning, training, skills and knowledge • Increase access to and participation in cultural activities <p>10. Protect and enhance historic buildings, archaeological sites, landscape and other culturally important features. (Features is important here as includes small things such as old boundary banks etc: see later comments)</p> <ul style="list-style-type: none"> • Protect and enhance landscape • Protect and enhance historic buildings, archaeological sites, and other culturally important features. <p>English Heritage have suggested: To protect and enhance the character and appearance of the historic landscape and townscape including designated and undesignated heritage assets, to help maintain and strengthen Christchurch and East Dorset's local distinctiveness and sense of place. They advised also looking at EH SA Guidance pg 6 (although</p>

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			<p>slightly dated, it may be of interest http://www.helm.org.uk/upload/pdf/Strat-env-ass.pdf?1318604741</p> <p>11. Maintain and enhance local distinctiveness and create places, spaces and buildings that work well, wear well and look well.</p> <p>12. Facilitate a sustainable and growing economy for the District that creates appropriate economic and employment opportunities that meet local needs as well as providing for vital and viable town centres. (Rural and tourist economy, including local produce, should be included when assessing compliance with this objective.)</p> <p>For the purposes of identifying which of these are relevant to the key issues below they have been abbreviated to:</p> <ul style="list-style-type: none"> 1. Protect, enhance, expand and link priority habitats: maintain and enhance populations of protected and priority species: protect and enhance ecosystem services: avoid damage to geological sites. 2. Minimise consumption and make sustainable use of natural resources 3. Minimise pollution 4. Minimise the factors contributing to climate change and the impact of climate change. 5. Reduce the need/desire to travel 6. Provide a safe and secure environment 7. Create conditions to improve health and quality of life 8. Help make appropriate housing available and affordable 9. Help communities to support social cohesion 10. Protect and enhance historic buildings, archaeological sites, and landscape. 11. Maintain and enhance local distinctiveness 12. Facilitate a sustainable and growing economy

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			<p>WARNING: In all cases, to avoid overlooking important issues when considering impact on the criteria, the full wording should be used.</p>
<p>Sustainability Appraisal Scoping Report September 2010</p>	<p>Key Issues and Relevant Sustainability Appraisal Objectives</p>	<p>360302 East Dorset Environment Theme Action Group</p>	<p>The inter-relationship between the SA objectives is much greater than the draft document suggests. If those that are appropriate are not all included then incorrect assumptions are made on the sustainability of projects or proposals. This level of detail will help in dealing with any unforeseen adverse effects of implementing the plan and checking the delivery and performance of mitigation measures. The following notes show additions and recommended changes in blue. Comments on objectives are shown in a smaller font (10 point).</p> <p>The column headed “Source” is largely blank and does not refer to the correct level of policies in each case (International, National, County etc). If this column is included then it is essential that every source is listed: given the number of sources for each Key issue this is likely to be cumbersome and confusing. ETAG has not attempted to work through this in detail but we have drawn attention to some key additional sources that should be included in Appendix 1 (see p 28-29 below).</p> <p>Climate Change (p12-13) Para 5.17 Final sentence should also refer to forestry. Important also to recognise the impact of high temperatures on elderly and disabled people (particularly those with respiratory problems) and how extremes of temperature may isolate them and prevent them from going out.</p> <p>Key Issue 1. How can planning policy be used to reduce any negative</p>

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			<p>impact of climate change on the Districts? (Amended to a single question – suggest that sustainability appraisal should focus on negative impacts of climate change)</p> <p>2. How can planning policy be used to limit greenhouse gas emissions?</p> <p>Relevant SA objectives</p> <p>1. Protect, enhance, expand and link priority habitats: maintain and enhance populations of protected and priority species: protect and enhance ecosystem services: avoid damage to geological sites.</p> <p>2. Minimise consumption and make sustainable use of natural resources</p> <p>3. Minimise pollution. Pollution contributes to GHG emissions: higher temperatures exacerbate air pollution problems.</p> <p>4. Minimise the causes and impact of climate change.</p> <p>5. Reduce the need/desire to travel</p> <p>6. Provide a safe and secure environment</p> <p>7. Create conditions to improve health and quality of life. This will include Urban Green Infrastructure to reduce heat island effects.</p> <p>10. Protect and enhance historic buildings and archaeological sites</p> <p>11. Local distinctiveness & sustainable buildings. Climate change will also affect existing buildings and the way in which new ones will need to be designed (10 and 11).</p> <p>12. Facilitate a sustainable and growing economy Location and type of employment opportunities will be an important factor in limiting GHG emissions</p>

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			<p>Biodiversity (p14-15)</p> <p>5.18 Typo - final sentence – Ramsar</p> <p>5.19 typos – insert “and” penultimate line. Change Holt heath to Holt Heath.</p> <p>Key issue - 2nd sentence - amend to read, “ These are under threat from urban pressures including fragmentation and isolation, disturbance and damage from recreational use.</p> <p>Key Issue 3 How can the valuable biodiversity of the area be maintained and enhanced?</p> <p>Relevant SA objectives</p> <p>1. Protect, enhance, expand and link priority habitats: maintain and enhance populations of protected and priority species: protect and enhance ecosystem services: avoid damage to geological sites.</p> <p>2. Minimise consumption and make sustainable use of natural resources</p> <p>3. Minimise pollution</p> <p>4. Minimise the causes and impact of climate change.</p> <p>5. Reduce the need/desire to travel</p> <p>6. Provide a safe and secure environment</p> <p>As this includes reducing flood risk then it will need to consider functional floodplains</p> <p>7. Create conditions to improve health and quality of life</p> <p>10. Protect and enhance historic buildings, archaeological sites, and landscape.</p>

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			<p>Countryside (p16-17) Key Issue 4 What is the impact of urban influences on the countryside and how can this be managed?</p> <p>5 How can the separate identity and vitality of settlements be maintained?</p> <p>6 How can sustainable access to countryside be fostered?</p> <p>This section should also include the need to ensure vitality of smaller settlements without them being smothered by new development of market housing. Smaller communities face being swallowed up by the apparent greater perceived need of their close neighbours. Transport from rural to urban areas should be included somewhere in the SA Scoping.</p> <p>Relevant SA objectives</p> <ul style="list-style-type: none"> 2. Minimise consumption and make sustainable use of natural resources 3. Minimise pollution 4. Minimise the causes and impact of climate change. 5. Reduce the need/desire to travel Sustainable access to the countryside 6. Provide a safe and secure environment 7. Create conditions to improve health and quality of life 10. Protect and enhance historic buildings, archaeological sites, and landscape. 11. Maintain and enhance local distinctiveness 12. Facilitate a sustainable and growing economy <p>Landscape (p17-18) Key Issue 7 How can the local character and environment of the area</p>

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			<p>be maintained and enhanced, at the same time as meeting changing needs and demands?</p> <p>8 How can development in Christchurch and East Dorset be managed to avoid undue impacts on the New Forest National Park?</p> <p>Relevant SA objectives</p> <p>1. Protect, enhance, expand and link priority habitats: maintain and enhance populations of protected and priority species: protect and enhance ecosystem services: avoid damage to geological sites.</p> <p>3. Minimise pollution (light pollution should be included in particular)</p> <p>5. Reduce the need/desire to travel</p> <p>7. Create conditions to improve health and quality of life</p> <p>10. Protect and enhance historic buildings, archaeological sites, and landscape.</p> <p>11. Maintain and enhance local distinctiveness</p> <p>12. Facilitate a sustainable and growing economy</p> <p><u>Historic Environment</u> (p18- 19)</p> <p>Key Issue 9 How can the character and appearance of the historic landscape and townscape, including designated and undesignated heritage assets, be protected and enhanced? (Conservation Areas, Special Character Areas and areas of historic value best be preserved and enhanced?)</p>

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			<p>10 How can the role of historic town centres such as Wimborne or Christchurch be enhanced while respecting their local distinctiveness and sense of place? conservation area status? Changes made in line with PPS5 and advice from English Heritage</p> <p>Relevant SA Objectives</p> <ul style="list-style-type: none"> 3. Minimise pollution 4. Minimise the causes and impact of climate change. 5. Reduce the need/desire to travel 8. Help make appropriate housing available and affordable 9. Help communities to support social cohesion 10. Protect and enhance historic buildings, archaeological sites, and landscape. 11. Maintain and enhance local distinctiveness 12. Facilitate a sustainable and growing economy <p>Water (p19-21) Please note new numbering to accommodate additional Key Issues – if accepted by Policy Planners this will need to be adjusted Key Issue 11a What response should be made to the threat of sea level rises? Suggest it is better to separate coastal and fluvial flooding – different causes and solutions.</p> <p>12 How can flood defence schemes be better designed to minimise impact on the character of the coast Must recognise that not all coastal protection is advantageous and some will have knock on adverse effects elsewhere. Managed retreat may be required.</p>

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			<p>Relevant SA objectives</p> <p>1. Protect, enhance, expand and link priority habitats: maintain and enhance populations of protected and priority species: protect and enhance ecosystem services: avoid damage to geological sites.</p> <p>4. Minimise the factors contributing to climate change and the impact of climate change. Little opportunity for this to make a difference to sea levels at a local scale but useful to raise awareness</p> <p>6. Provide a safe and secure environment</p> <p>Key Issue 11b What response should be made to the threat of river flooding?</p> <p>Relevant SA objectives</p> <p>1. Protect, enhance, expand and link priority habitats: maintain and enhance populations of protected and priority species: protect and enhance ecosystem services: avoid damage to geological sites.</p> <p>Ecosystem services contribution incl. fully functional flood plains</p> <p>2. Minimise consumption and make sustainable use of natural resources</p> <p>3. Minimise pollution</p> <p>4. Minimise the causes and impact of climate change.</p> <p>6. Provide a safe and secure environment</p>

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			<p>Key Issue 13 What is required to protect and provide sustainable water supplies and maintain natural water systems?</p> <p>Relevant SA objectives</p> <p>1. Protect, enhance, expand and link priority habitats: maintain and enhance populations of protected and priority species: protect and enhance ecosystem services: avoid damage to geological sites. This must include consideration of ecosystem services provided by semi-natural habitats. The R Avon and Moors River are designated and the Allen is an SNA: other rivers are all important for wildlife</p> <p>2. Minimise consumption and make sustainable use of natural resources</p> <p>3. Minimise pollution</p> <p>4. Minimise the causes and impact of climate change.</p> <p>5. Reduce the need/desire to travel</p> <p>12. Facilitate a sustainable and growing economy This should focus on an appropriate economy with no environmental damage particularly to watercourses and river catchments. Please see recommended amended wording in comments on Table 3 above.</p> <p>Energy (p21 – 24) 5.30-5.31 Only gas and electricity have been included. No mention has been made of wood, oil or butane/propane for heating/cooking or transport fuels.</p>

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			<p>Key Issue 14 How can (an) affordable, safe and secure energy provision be secured to meet the needs of the community for the future?</p> <p>Relevant SA objectives</p> <ul style="list-style-type: none"> 2. Minimise consumption and make sustainable use of natural resources 3. Minimise pollution 4. Minimise the causes and impact of climate change. 5. Reduce the need/desire to travel <p>.....</p> <p><u>Pollution</u> (p24-26)</p> <p>5.32 Some areas within the District are close to AQM criteria – this should not be overlooked.</p> <p>5.32 Noise pollution from HGVs using routes through settlements has been omitted. It impacts on quality of life.</p> <p>5.33 – typo – small R in roads. No mention has been made of ozone. It is not emitted directly from any man-made source in significant quantities but is formed in the atmosphere from precursors, the most significant of which are oxides of nitrogen and volatile organic compounds (VOCs). These react in sunlight to form ground level ozone. In high concentrations ozone may cause slight irritation of the eyes and airways and increase sensitivity to pollen. Damage to the airways at lower concentrations can occur.</p>

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			<p>The effects of pollutants on the wider environment should be considered. Ozone damages cell membranes in plants, so inhibiting biochemical and physiological processes including photosynthesis. This results in reduced growth in many plant species. Tree growth is affected and visible leaf injury may be caused. There is also evidence that ozone increases the severity of many fungal diseases. Both have the potential for significantly changing habitats. Ozone and nitrogen dioxide affect the respiratory systems of wild animals as well as man: birds, amphibians and soft bodied invertebrates (such as earthworms) are particularly susceptible. Recent research into the take-up (flux) of ozone into vegetation indicates that ozone damage to vegetation is cumulative at all ambient concentrations. (Please advise if you need references to validate statements made).</p> <p>5.34 See separate technical note submitted by ETAG on light pollution</p> <p>Key Issue 15 How can levels of soil contamination be reduced and future contamination prevented?</p> <p>Relevant SA objectives</p> <p>1. Protect, enhance, expand and link priority habitats: maintain and enhance populations of protected and priority species: protect and enhance ecosystem services: avoid damage to geological sites.</p> <p>2. Minimise consumption and make sustainable use of natural resources</p> <p>3. Minimise pollution</p>

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			<p>4. Minimise the causes and impact of climate change. 5. Reduce the need/desire to travel 6. Provide a safe and secure environment 8. Help make appropriate housing available and affordable 12. Facilitate a sustainable and growing economy</p> <p>Key Issue 16 How can it be ensured that new development does not cause harm in relation to air, noise and light pollution?</p> <p>Relevant SA objectives</p> <p>1. Protect, enhance, expand and link priority habitats: maintain and enhance populations of protected and priority species: protect and enhance ecosystem services: avoid damage to geological sites. 2. Minimise consumption and make sustainable use of natural resources 3. Minimise pollution 4. Minimise the causes and impact of climate change. 5. Reduce the need/desire to travel 6. Provide a safe and secure environment 7. Create conditions to improve health and quality of life 8. Help make appropriate housing available and affordable 9. Help communities to support social cohesion 10. Protect and enhance historic buildings, archaeological sites, and landscape. 11. Maintain and enhance local distinctiveness</p>

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			<p data-bbox="920 284 1621 316">12. Facilitate a sustainable and growing economy</p> <p data-bbox="824 357 1883 464">Key Issue 17 How can it be ensured that water pollution levels do not cause harm to natural systems?</p> <p data-bbox="824 505 1178 537">Relevant SA objectives</p> <p data-bbox="824 544 1883 722">1. Protect, enhance, expand and link priority habitats: maintain and enhance populations of protected and priority species: protect and enhance ecosystem services: avoid damage to geological sites.</p> <p data-bbox="824 729 1883 793">2. Minimise consumption and make sustainable use of natural resources</p> <p data-bbox="920 799 1211 831">3. Minimise pollution</p> <p data-bbox="920 837 1688 869">4. Minimise the causes and impact of climate change.</p> <p data-bbox="920 876 1420 908">5. Reduce the need/desire to travel</p> <p data-bbox="920 914 1514 946">6. Provide a safe and secure environment</p> <p data-bbox="920 952 1720 984">7. Create conditions to improve health and quality of life</p> <p data-bbox="920 991 1621 1023">12. Facilitate a sustainable and growing economy</p> <p data-bbox="824 1096 1883 1166">Key Issue 18 How can light pollution be reduced when urbanisation is likely to continue?</p> <p data-bbox="824 1208 1178 1240">Relevant SA objectives</p> <p data-bbox="824 1246 1883 1350">1. Protect, enhance, expand and link priority habitats: maintain and enhance populations of protected and priority species: protect and enhance ecosystem</p>

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			<p>services: avoid damage to geological sites.</p> <ol style="list-style-type: none"> 2. Minimise consumption and make sustainable use of natural resources 3. Minimise pollution 4. Minimise the causes and impact of climate change. 5. Reduce the need/desire to travel 6. Provide a safe and secure environment 7. Create conditions to improve health and quality of life 8. Help make appropriate housing available and affordable 10. Protect and enhance historic buildings, archaeological sites, and landscape. 12. Facilitate a sustainable and growing economy <p>Key Issue 19 What can be done to maintain and enhance tranquillity?</p> <p>Relevant SA objectives</p> <ol style="list-style-type: none"> 1. Protect, enhance, expand and link priority habitats: maintain and enhance populations of protected and priority species: protect and enhance ecosystem <p>services: avoid damage to geological sites.</p> <ol style="list-style-type: none"> 3. Minimise pollution 4. Minimise the causes and impact of climate change. 5. Reduce the need/desire to travel 7. Create conditions to improve health and quality of life 8. Help make appropriate housing available and affordable

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			<p>9. Help communities to support social cohesion 10. Protect and enhance historic buildings, archaeological sites, and landscape. 11. Maintain and enhance local distinctiveness 12. Facilitate a sustainable and growing economy</p> <p><u>Resource use/Waste & Recycling</u> (p26-27) 5.38 Update figures for household waste/recycling from 2005/6 to provide more accurate baseline data against which improvements can be measured.</p> <p>Key Issue 20 How can waste disposal be managed to prevent significant adverse effects on the environmental quality of the area? 21 Are there adequate existing or potential locations for waste disposal/ recycling facilities within Christchurch/East Dorset?</p> <p>Relevant SA objectives 1. Protect, enhance, expand and link priority habitats: maintain and enhance populations of protected and priority species: protect and enhance ecosystem services: avoid damage to geological sites. 2. Minimise use of natural resources 3. Minimise pollution (include flytipping problems) 4. Minimise the causes and impact of climate change. 5. Reduce the need/desire to travel</p>

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			<p>7. Create conditions to improve health and quality of life 10. Protect and enhance historic buildings, archaeological sites, and landscape. 12. Facilitate a sustainable and growing economy</p> <p>Population (p27-29) Recommend splitting Key Issue 22 into its two component questions as follows: Key Issue 22 a What are likely to be the main implications of the ageing population profile of the Districts?</p> <p>Relevant SA objectives</p> <p>2. Minimise consumption and make sustainable use of natural resources 3. Minimise pollution 4. Minimise the causes and impact of climate change. 5. Reduce the need/desire to travel 7. Create conditions to improve health and quality of life 8. Help make appropriate housing available and affordable 9. Help communities to support social cohesion</p> <p>Key Issue 22b How should we provide for the needs of the elderly population?</p> <p>Relevant SA objectives</p> <p>1. Protect, enhance, expand and link priority habitats: maintain and enhance populations of protected and priority species: protect and enhance ecosystem</p>

Report	Paragraph No.	ID Ref	Comments
			<p>services: avoid damage to geological sites.</p> <ol style="list-style-type: none"> 2. Minimise consumption and make sustainable use of natural resources 3. Minimise pollution 4. Minimise the causes and impact of climate change. 5. Reduce the need/desire to travel 6. Provide a safe and secure environment 7. Create conditions to improve health and quality of life 8. Help make appropriate housing available and affordable 9. Help communities to support social cohesion 10. Protect and enhance historic buildings, archaeological sites, and landscape. 11. Maintain and enhance local distinctiveness 12. Facilitate a sustainable and growing economy <p>Key Issue 23 What should be done to provide the necessary skilled labour supply to sustain the economy and meet the needs of the community?</p> <p>Relevant SA objectives</p> <ol style="list-style-type: none"> 1. Protect, enhance, expand and link priority habitats: maintain and enhance populations of protected and priority species: protect and enhance ecosystem services: avoid damage to geological sites. 2. Minimise consumption and make sustainable use of natural resources

Report	Paragraph No.	ID Ref	Comments
			<p>3. Minimise pollution 4. Minimise the causes and impact of climate change. 5. Reduce the need/desire to travel 6. Provide a safe and secure environment 7. Create conditions to improve health and quality of life 8. Help make appropriate housing available and affordable 9. Help communities to support social cohesion 10. Protect and enhance historic buildings, archaeological sites, and landscape. 11. Maintain and enhance local distinctiveness 12. Facilitate a sustainable and growing economy - All SA objectives should be included to ensure the creation of work/volunteer opportunities to lead to their achievement. Sustainability should encourage more proactive/lateral thinking and not be restricted to “business as usual”.</p> <p>Housing (p29-31) 5.47 Change to read <i>...is atypical of regional and national ... or ..is atypical compared with...</i></p> <p>Key Issue 25 How can we provide housing in the area to meet the needs of all in the local community? 26 Do we need to protect areas for family homes and, if so, where should these be? ETAG considers this is an odd question. What precisely is a family home? Why would we need to protect areas for such a concept as opposed to other types of homes which are much harder to come by eg for starter homes?</p>

Report	Paragraph No.	ID Ref	Comments
			<p>Relevant SA objectives</p> <ol style="list-style-type: none"> 1. Protect, enhance, expand and link priority habitats: maintain and enhance populations of protected and priority species: protect and enhance ecosystem services: avoid damage to geological sites. 2. Minimise consumption and make sustainable use of natural resources 3. Minimise pollution 4. Minimise the causes and impact of climate change. 5. Reduce the need/desire to travel 6. Provide a safe and secure environment 7. Create conditions to improve health and quality of life 8. Help make appropriate housing available and affordable 9. Help communities to support social cohesion 10. Protect and enhance historic buildings, archaeological sites, and landscape. 11. Maintain and enhance local distinctiveness 12. Facilitate a sustainable and growing economy <p>Health (p31-33) Key Issue 27 What is required to ensure suitable care for the elderly?</p> <p>Relevant SA objectives</p> <ol style="list-style-type: none"> 3. Minimise pollution 4. Minimise the causes and impact of climate change. 5. Reduce the need/desire to travel 7. Create conditions to improve health and quality of life

Report	Paragraph No.	ID Ref	Comments
			<p>8. Help make appropriate housing available and affordable 9. Help communities to support social cohesion</p> <p><u>Social Inclusion and Deprivation</u> (p33-34)</p> <p>Key Issue 29 How can access to facilities be maintained and improved?</p> <p>Relevant SA objectives</p> <p>5. Reduce the need/desire to travel 7. Create conditions to improve health and quality of life 9. Help communities to support social cohesion 10. Protect and enhance historic buildings, archaeological sites, and landscape. 11. Maintain and enhance local distinctiveness</p> <p>Key Issue 30 How should deprivation be reduced in identified areas of need?</p> <p>Relevant SA objectives</p> <p>5. Reduce the need/desire to travel 6. Provide a safe and secure environment 7. Create conditions to improve health and quality of life 8. Help make appropriate housing available and affordable 9. Help communities to support social cohesion 11. Maintain and enhance local distinctiveness 12. Facilitate a sustainable and growing economy</p>

Report	Paragraph No.	ID Ref	Comments
			<p><u>Crime</u> (p35-36) Key Issue 31 How can crime levels and fear of crime be maintained at a low level?</p> <p>Relevant SA objectives</p> <ul style="list-style-type: none"> 3. Minimise pollution (include light pollution from excessive security lighting & illegal waste disposal and flytipping) 5. Reduce the need/desire to travel (links to social cohesion) 6. Provide a safe and secure environment 7. Create conditions to improve health and quality of life 9. Help communities to support social cohesion 11. Maintain and enhance local distinctiveness <p><u>Education</u> (p36-37) Key Issue 32 How can we provide for the long term education needs of the population?</p> <p style="padding-left: 40px;">33 What role can school facilities provide for the needs of the wider population and what can be done to enhance this?</p> <p>Relevant SA objectives</p> <ul style="list-style-type: none"> 5. Reduce the need/desire to travel 9. Help communities to support social cohesion 11. Maintain and enhance local distinctiveness <p><u>Culture, Leisure and Recreation</u> (37-38) Key Issue 34 Where and in what form should open space be provided (and in what form) to</p>

Report	Paragraph No.	ID Ref	Comments
			<p style="text-align: center;">act as an alternative to the heathlands for recreation?</p> <p>Relevant SA objectives</p> <ul style="list-style-type: none"> 1. Protect, enhance, expand and link priority habitats: maintain and enhance populations of protected and priority species: protect and enhance ecosystem services: avoid damage to geological sites. 2. Minimise consumption and make sustainable use of natural resources 3. Minimise pollution 4. Minimise the causes and impact of climate change. 5. Reduce the need/desire to travel 7. Create conditions to improve health and quality of life 9. Help communities to support social cohesion 10. Protect and enhance historic buildings, archaeological sites, and landscape. 11. Maintain and enhance local distinctiveness <p>Key Issue 35 Is there a need to plan for more/particular types of community or cultural facilities in the Districts?</p> <p>Relevant SA objectives</p> <ul style="list-style-type: none"> 3. Minimise pollution 5. Reduce the need/desire to travel 7. Create conditions to improve health and quality of life 9. Help communities to support social cohesion

Report	Paragraph No.	ID Ref	Comments
			<p>10. Protect and enhance historic buildings, archaeological sites, and landscape.</p> <p>11. Maintain and enhance local distinctiveness</p> <p>Economy (p39-41) Key Issue 36 What should be done to provide the necessary skilled labour supply to sustain the economy and meet the needs of the community?</p> <p>Relevant SA objectives</p> <p>5. Reduce the need/desire to travel</p> <p>7. Create conditions to improve health and quality of life</p> <p>8. Help make appropriate housing available and affordable</p> <p>9. Help communities to support social cohesion</p> <p>11. Maintain and enhance local distinctiveness</p> <p>12. Facilitate a sustainable and growing economy</p> <p>Key issue 37 How can suitable land and premises be made available to meet the needs of the economy?</p> <p>Relevant SA objectives</p> <p>1. Protect, enhance, expand and link priority habitats: maintain and enhance populations of protected and priority species: protect and enhance ecosystem services: avoid damage to geological sites.</p> <p>2. Minimise consumption and make sustainable use of natural</p>

Report	Paragraph No.	ID Ref	Comments
			<p>resources</p> <ul style="list-style-type: none"> 3. Minimise pollution 4. Minimise the causes and impact of climate change. 5. Reduce the need/desire to travel 11. Maintain and enhance local distinctiveness 12. Facilitate a sustainable and growing economy <p>Key Issue 38 Should the rural economy be diversified to provide more local employment opportunities to reduce commuting?</p> <p>Relevant SA objectives</p> <ul style="list-style-type: none"> 1. Protect, enhance, expand and link priority habitats: maintain and enhance populations of protected and priority species: protect and enhance ecosystem services: avoid damage to geological sites. 2. Minimise consumption and make sustainable use of natural resources 3. Minimise pollution 4. Minimise the causes and impact of climate change. 5. Reduce the need/desire to travel 7. Create conditions to improve health and quality of life 9. Help communities to support social cohesion 10. Protect and enhance historic buildings, archaeological sites, and landscape. 11. Maintain and enhance local distinctiveness 12. Facilitate a sustainable and growing economy

Report	Paragraph No.	ID Ref	Comments
			<p>Key Issue 39 What types of employment development should be located at Bournemouth Airport, and what infrastructure or other safeguards need to be considered?</p> <p>Relevant SA objectives</p> <p>1. Protect, enhance, expand and link priority habitats: maintain and enhance populations of protected and priority species: protect and enhance ecosystem services: avoid damage to geological sites. Note internationally designated land adjacent to site and SNCI within it.</p> <p>2. Minimise consumption and make sustainable use of natural resources</p> <p>3. Minimise pollution</p> <p>4. Minimise the causes and impact of climate change.</p> <p>5. Reduce the need/desire to travel</p> <p>7. Create conditions to improve health and quality of life</p> <p>11. Maintain and enhance local distinctiveness</p> <p>12. Facilitate a sustainable and growing economy</p> <p>Key issue (new) How can the economy adapt to benefit the local environment?</p> <p>Relevant SA objectives</p>

Report	Paragraph No.	ID Ref	Comments
			<p>1. Protect, enhance, expand and link priority habitats: maintain and enhance populations of protected and priority species: protect and enhance ecosystem services: avoid damage to geological sites.</p> <p>2. Minimise consumption and make sustainable use of natural resources</p> <p>3. Minimise pollution</p> <p>4. Minimise the causes and impact of climate change.</p> <p>5. Reduce the need/desire to travel</p> <p>6. Provide a safe and secure environment</p> <p>7. Create conditions to improve health and quality of life</p> <p>9. Help communities to support social cohesion</p> <p>10. Protect and enhance historic buildings, archaeological sites, and landscape.</p> <p>11. Maintain and enhance local distinctiveness</p> <p>12. Facilitate a sustainable and growing economy</p> <p>Key issue (new) How can the environment provide additional support to the local economy?</p> <p>Relevant SA objectives</p> <p>1. Protect, enhance, expand and link priority habitats: maintain and enhance populations of protected and priority species: protect and enhance ecosystem services: avoid damage to geological sites.</p> <p>2. Minimise consumption and make sustainable use of natural resources</p>

Report	Paragraph No.	ID Ref	Comments
			<p>3. Minimise pollution 4. Minimise the causes and impact of climate change. 5. Reduce the need/desire to travel 6. Provide a safe and secure environment 7. Create conditions to improve health and quality of life 9. Help communities to support social cohesion 10. Protect and enhance historic buildings, archaeological sites, and landscape. 11. Maintain and enhance local distinctiveness 12. Facilitate a sustainable and growing economy</p> <p>Shopping (p41-42) 5.93 does not mention where Verwood fits into the Venuescore ranking.</p> <p>Key Issue 39 How can town centres maintain their vitality and viability to provide for the needs of the community? Please note that the numbering has gone awry. 39 was allocated to the Key Issue on employment at the Airport</p> <p>Relevant SA objectives 1. Protect, enhance, expand and link priority habitats: maintain and enhance populations of protected and priority species: protect and enhance ecosystem services: avoid damage to geological sites. 2. Minimise consumption and make sustainable use of natural resources</p>

Report	Paragraph No.	ID Ref	Comments
			<p>3. Minimise pollution 4. Minimise the causes and impact of climate change. 5. Reduce the need/desire to travel 6. Provide a safe and secure environment 7. Create conditions to improve health and quality of life 9. Help communities to support social cohesion 10. Protect and enhance historic buildings, archaeological sites, and landscape. 11. Maintain and enhance local distinctiveness 12. Facilitate a sustainable and growing economy</p> <p>Key Issue 40 How can retail provision be maintained and enhanced within rural areas to meet the basic needs of the community?</p> <p>Relevant SA objectives</p> <p>4. Minimise the causes and impact of climate change. 5. Reduce the need/desire to travel 6. Provide a safe and secure environment 7. Create conditions to improve health and quality of life 9. Help communities to support social cohesion 11. Maintain and enhance local distinctiveness 12. Facilitate a sustainable and growing economy</p> <p><u>Tourism</u> (p 43-44) Key Issue 41 How can tourism be used to help the economy without harming the</p>

Report	Paragraph No.	ID Ref	Comments
			<p style="text-align: center;">environmental assets of the area?</p> <p>Relevant SA objectives</p> <ul style="list-style-type: none"> 1. Protect, enhance, expand and link priority habitats: maintain and enhance populations of protected and priority species: protect and enhance ecosystem services: avoid damage to geological sites. 2. Minimise consumption and make sustainable use of natural resources 3. Minimise pollution 4. Minimise the causes and impact of climate change. 5. Reduce the need/desire to travel 6. Provide a safe and secure environment 7. Create conditions to improve health and quality of life 9. Help communities to support social cohesion 10. Protect and enhance historic buildings, archaeological sites, and landscape. 11. Maintain and enhance local distinctiveness 12. Facilitate a sustainable and growing economy <p>Transport (p45-46) Key Issue 42 How can congestion, journey times and the reliance on the private car be contained and possibly reduced?</p> <p>Relevant SA objectives</p> <ul style="list-style-type: none"> 2. Minimise consumption and make sustainable use of natural

Report	Paragraph No.	ID Ref	Comments
			<p>resources</p> <ul style="list-style-type: none"> 3. Minimise pollution 4. Minimise the causes and impact of climate change. 5. Reduce the need/desire to travel 6. Provide a safe and secure environment 7. Create conditions to improve health and quality of life 9. Help communities to support social cohesion 10. Protect and enhance historic buildings, archaeological sites, and landscape. 11. Maintain and enhance local distinctiveness <p><u>New Key Issue</u> How can the provision of sustainable rural transport be improved?</p> <p>Relevant SA objectives</p> <ul style="list-style-type: none"> 2. Minimise use of natural resources 3. Minimise pollution 4. Minimise the causes and impact of climate change. 5. Reduce the need/desire to travel 6. Provide a safe and secure environment 7. Create conditions to improve health and quality of life 9. Help communities to support social cohesion 11. Maintain and enhance local distinctiveness <p><u>Key Issue 43</u> How can sustainable access to the Airport and the adjacent employment site be improved?</p> <p>Relevant SA objectives</p>

Report	Paragraph No.	ID Ref	Comments
			<p>1. Protect, enhance, expand and link priority habitats: maintain and enhance populations of protected and priority species: protect and enhance ecosystem services: avoid damage to geological sites. Note possible link road to the A338 Spur Road would go through designated sites.</p> <p>2. Minimise consumption and make sustainable use of natural resources</p> <p>3. Minimise pollution</p> <p>4. Minimise the causes and impact of climate change.</p> <p>5. Reduce the need/desire to travel</p> <p>6. Provide a safe and secure environment</p> <p>7. Create conditions to improve health and quality of life</p> <p>12. Facilitate a sustainable and growing economy</p> <p><u>New Key Issue</u> How can the impact of HGVs (on air, noise and light pollution, vibration, quality of life, shopping centres, narrow country lanes) be reduced?</p> <p>A DCC highways officer has advised that because many of Dorset's roads and byways are no longer fit for purpose in relation to the size of vehicles (oversize lorries, vans, etc), verges and natural ancient hedgerows that give Dorset its character are being damaged/destroyed.</p> <p>Relevant SA objectives</p> <p>2. Minimise consumption and make sustainable use of natural resources</p> <p>3. Minimise pollution</p>

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Report	Paragraph No.	ID Ref	Comments
			<p>4. Minimise the causes and impact of climate change.</p> <p>5. Reduce the need/desire to travel</p> <p>6. Provide a safe and secure environment</p> <p>7. Create conditions to improve health and quality of life</p> <p>9. Help communities to support social cohesion</p>
<p>Sustainability Appraisal Scoping Report September 2010</p>	<p>Table 4 (p 49-62)</p>	<p>360302 East Dorset Environment Theme Action Group</p>	<p>The indicators that have been chosen will identify some baseline data and longer term trends during the life of the Core Strategy but in most cases they are not applicable to individual policies/proposals to determine sustainability. We have made some suggestions but it may be helpful to reconsider them when the criteria have been agreed.</p> <p>ETAG recommends that there be at least one indicator for each of the criteria.</p> <p>Recommend table would be clearer by confining the words “Will the policy or proposal” to the heading of each group of criteria – it will produce a shorter document too.</p> <p>To make it easier to assess if everything has been covered, the original criteria and indicators are in black and recommended additional ones are shown in blue. Further indicators will need to be identified once criteria have been agreed. Any suggested deletions are shown in red.</p> <p>Although the list may appear somewhat daunting, at the next stage it will be possible to scope-out some of the criteria where they are not relevant to a particular proposal or policy.</p>

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Report	Paragraph No.	ID Ref	Comments
			<p>SA topics are: Environmental, Social, Economic</p> <p>SEA Directive topics are: 1 Biodiversity, 2 Soil, 3 Air, 4 Water, 5 Climatic factors, 6 Population and human health, 7 Cultural heritage, 8 Landscape, 9 Material Assets</p>
Sustainability Appraisal Scoping Report September 2010	Table 4: SA Topic – ENVIRONMENT AL	360302 East Dorset Environment Theme Action Group	<p>SEA Directive Topic: Biodiversity, fauna and flora. Other relevant SEA topics 2 (soil), 3 (air), 4 (water), 5 (climate), 6 (population), 8 (landscape)</p> <p>SA Objective 1. Protect, enhance, expand and link priority habitats: maintain and enhance populations of protected and priority species: protect and enhance ecosystem services: avoid damage to geological sites</p> <p>The SA must recognise that the environment has capacity constraints. However great the potential economic and/or social benefits may be in the short term, a development that exceeds defined environmental capacities and therefore fails to meet the objectives of the plan should not be permitted. Much environmental loss or damage, such as loss of landscape, aquifer damage/pollution or habitat loss is irreversible, or can only be reversed over the very long term (100 years or more). Few economic activities or developments are likely to benefit in these timescales. This is the crux of sustainability.</p> <p><u>Criteria</u> Will the policy or proposal</p>

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Report	Paragraph No.	ID Ref	Comments
			<ul style="list-style-type: none"> • protect, enhance, expand and link (designated sites) priority habitats? • (Limit) reduce pressures on designated sites arising from recreational and other uses? Suggest we discuss to clarify this point – should other pressures (rather than uses) resulting from development be spelled out? • allow biodiversity to adapt to the effects of climate change? This is now covered by first bullet point • maintain (biodiversity levels) and enhance populations of protected and priority species? • avoid harm to rare and vulnerable species? • avoid damage to geological sites? <p><u>Indicators</u></p> <p>The advice given by DWT at the time of the 2008 consultation on Scoping was that baseline data should be provided to:</p> <ul style="list-style-type: none"> • Allow environmental problems to be identified and addressed • Provide a baseline against which future monitoring can be carried out • Provide a basis for impact prediction. <p>They also recommended the need to assess compatibility of objectives and link to a matrix that evaluates predicted impacts of the proposals including effects that are short term/long term, minor/major, cumulative and synergistic. The advice on what should be measured is based on DERC’s “Biodiversity Indicators for Dorset” which can be applied across Dorset and ensure compatibility in the work of all LAs. A similar set of indicators has been developed for Devon.</p>

Christchurch and East Dorset Core Strategy Options for Consideration Consultation Oct 2010 – Jan 2011:

Report	Paragraph No.	ID Ref	Comments
			<p>What we need to know is if Dorset's biodiversity is getting better or worse and to do that there should be a measure of</p> <ol style="list-style-type: none"> 1. loss of selected BAP habitats. DERC has proposed 8 sub-sets: <ol style="list-style-type: none"> i) Coastal salt marsh ii) Lowland calcareous grassland iii) Lowland dry acid grassland iv) Lowland fens v) Lowland heathland vi) Lowland meadows vii) Lowland mixed deciduous woodland viii) Purple moor grass and rush pasture 2. loss of BAP habitat due to development 3. loss of ancient woodland 4. habitat fragmentation 5. habitat creation and enhancement measured by <ol style="list-style-type: none"> i) EIA development ii) Planning mitigation iii) BAP initiatives iv) Management Scheme incentives (eg government grants) v) Other processes (modernising schools initiatives, DCC Highways) 6. proportion of SNCIs and RIGs where positive management is being achieved 7. proportion of SNCIs in good condition 8. change in extent of designated biodiversity sites 9. proportion of SSSIs in favourable condition 10. number of bat surveys undertaken in support of planning applications OR number of bat mitigation plans received.

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Report	Paragraph No.	ID Ref	Comments
			<p>The Nature Map should be used to extend, buffer and link existing habitats. Green Infrastructure should be included and link with other aims such as recreation and flood defence.</p> <p>The SA should also ensure that links are made between enhancing the natural function of floodplains and biodiversity opportunities, recognising the value of floodplains to act as natural sponges that release excess water more slowly as opposed to canalised rivers which push floodwater downstream all in one hit to the next settlement.</p> <p>While climate change may alter microhabitats it is unlikely that flora and fauna of SSSIs and SNCIs will move to areas that are currently of low wildlife value. So it is essential that sites of high wildlife value should continue to receive protection.</p> <p>The Scoping Document (2010) currently identifies the following indicators</p> <ul style="list-style-type: none"> • No. and total area of SSSI, SAC, SPA and Ramsar. • % of SSSI SAC, SPA and Ramsar in favourable condition • % of SSSI SAC, SPA and Ramsar in unfavourable recovering • % of SSSI, SAC, SPA and Ramsar in unfavourable no change • % of SSSI, SAC, SPA and Ramsar unfavourable declining • % of SSSI SAC, SPA and Ramsar in unfavourable condition by development related reasons • Number, total area and conditions of RIG(G)s • % and spatial distribution of urban/ residential land more than 500m from accessible natural greenspace that is over 2ha in size and is not heathland SSSI

Report	Paragraph No.	ID Ref	Comments
			<ul style="list-style-type: none"> • % of 1km squares containing SSSIs where air quality exceeds the critical level for acidification or eutrophication of the natural vegetation • Number, total area and condition of SNCI; LNR and Conservation Verge. • Total area of Ancient Woodland. <p>We welcome what has been proposed but suggest that most of these are too general to provide any meaningful assessment of the impact of policies or proposals and would ask that this section is completely revisited as indicated above. This will enable data to be quantified rather than relying on subjective assessment. Baseline survey data are required for all potential development sites and adjacent habitats that would be affected (eg water courses).</p> <p>It may be useful to consider other DCC Scoping documents such as that for the Minerals Plan. Topic Paper 2 Biodiversity and Geodiversity http://www.dorsetforyou.com/media.jsp?mediaid=143363&filetype=pdf included the following:</p> <p>Sustainability Objectives <i>A1. To maintain, conserve and enhance biodiversity</i> <i>A2. To maintain, conserve and enhance geodiversity</i></p> <p>Broad indicators (which correspond to ED & C Core Strategy Scoping “criteria” <i>To what extent does the strategic option, objective, strategy or policy</i></p> <ul style="list-style-type: none"> • <i>Conserve, enhance or create natural and semi-natural habitats of recognised ecological value and/or the green corridors that link them?</i> • <i>Directly or indirectly affect internationally or nationally designated or recognised sites or UKBAP habitats?</i>

Report	Paragraph No.	ID Ref	Comments
			<ul style="list-style-type: none"> • <i>Conserve or enhance species diversity and avoid harm to internationally and nationally protected, scarce and rare species (including BAP habitat species)?</i> • <i>Provide for positive management of existing habitats</i> • <i>Assist species to adapt to the anticipated effects of climate change? (ie through connecting habitats and/or providing greenspace?)</i> • <i>Reflect the South West Nature Map?</i> • <i>Expand the spatial extent of BAP priority habitat within Dorset?</i> • <i>Quantify the potential of forthcoming mineral sites to contribute to meeting Dorset’s BAP habitat targets? (This could be adapted to include (i) potential new neighbourhoods and (ii) potential employment sites.</i> • <i>Ensure adequate monitoring is in place to ensure that progress towards meeting local BAP targets on mineral sites is being achieved? (Again other potential development sites could be substituted in the wording).</i> <p>The MCS Scoping also includes indicators that are specific to geological sites.</p> <p>.....</p> <p>.....</p> <p>(Note: Soil, air and water have been linked in the draft to cover sustainable use of resources and pollution)</p> <p>2 SEA Directive Topic Soil</p> <p>Other relevant SEA Topics 1 (Biodiversity) , 3 (Air), 6 (Population), 4 (Water including</p>

Report	Paragraph No.	ID Ref	Comments
			<p>pollution)</p> <p>SA Objective 2 Minimise consumption and make sustainable use of natural resources</p> <p><u>Criteria</u> : Will the policy or proposal</p> <ul style="list-style-type: none"> • ensure that development takes place on brownfield sites? • use land efficiently? Need to clarify what this is asking and how a response can be quantified • protect and enhance the best and most versatile agricultural land? • limit the loss of soil to development? • maintain and enhance the quality of soil? For what? Agriculture/biodiversity? Need to be clear what we seek to measure. • allow for the reuse of old material in new construction? • cause loss of soil carbon? • protect the soil's function as a natural resource containing seed banks of plants of local provenance? <p>3 SEA Directive Topic Air</p> <p>Other relevant SEA Topics 5 (Climatic factors), 6 (Population), 4 (Water), 1 (Biodiversity)</p> <p>For some reason no criteria or indicators have been proposed in the draft document.</p> <p>Criteria should include consideration of :</p> <ul style="list-style-type: none"> • air pollution and its impact on human health, ecosystems, the built environment (particularly historic buildings); particulates from burning biofuels; higher temperatures will exacerbate some impacts of air pollution. Links to traffic

Report	Paragraph No.	ID Ref	Comments
			<p>volume and speed.</p> <ul style="list-style-type: none"> • odour from landfill/sewage treatment • orientation of high rise buildings to reduce air turbulence <p>4 SEA Directive Topic Water</p> <p>Other relevant SEA Topics 5 (Climatic factors), 6 (Population), 1 (Biodiversity)</p> <p><u>Criteria</u> Will the policy or proposal</p> <ul style="list-style-type: none"> • reduce water consumption? • reduce water resources? Moved from SA3 • increase rain water/grey water use? Moved from SA3 • encourage water saving schemes? Moved from SA3 • affect the hydrology of the area? • reduce run-off? • reduce the quality, quantity and natural flow of surface and underground water and the quality of sea water? (as an alternative to some of the above suggestions) <p>SA Objective 3. Minimise pollution (including air, water, soil, noise, vibration, light) to avoid damage to natural systems and human health.</p> <p><u>Criteria</u> Will the policy or proposal</p> <ul style="list-style-type: none"> • result in a site being de-contaminated? • reduce the risk of land being contaminated?

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Report	Paragraph No.	ID Ref	Comments
			<ul style="list-style-type: none"> • limit waste generation? • encourage recycling of waste materials? <p>.....</p> <ul style="list-style-type: none"> • limit the risk of air, noise or light pollution? Suggest this criterion is too general to be meaningful Vibration has been omitted. <p>.....</p> <ul style="list-style-type: none"> • reduce the need to travel or transport goods by car, lorry or air. • restrict any additional traffic to appropriate roads so that quiet or narrow country lanes and residential areas do not become rat runs • reduce traffic congestion <p>.....</p> <ul style="list-style-type: none"> • limit the risk of direct or diffuse water pollution? • maintain the quality of water? (rivers/aquifers?) <p>.....</p> <p>By their very nature, possible urban extensions and proposed new employment sites will be in predominantly rural or semi-rural areas: thus spill light from them and from work-related lighting and security lights will be detrimental to the rural character of the area, to the amenity of any nearby residents, and to the night sky.</p> <ul style="list-style-type: none"> • ensure all artificial night lighting is directed below the horizontal? • locate appropriate luminaires to reduce spill light and glare to a minimum? • ensure the principles of best lighting practice (UK ILP, CPRE and CfDS) are followed? • eliminate polarisation of light particularly near water bodies? • ensure no additional light trespass to the AONB and AGLVs

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Report	Paragraph No.	ID Ref	Comments
			<ul style="list-style-type: none"> • <u>Indicators</u> % of Contaminated land Total waste tonnage arising % of waste recycled % of waste to landfill Reported flytipping incidents Spillage of contaminants Level of CO2 emissions How will this be determined? Should methane also be included? NOx levels PM10 levels (this is likely to be of concern with increased use of biomass for fuel and mineral extraction) % of river length meeting river quality (biological and chemical) River biodiversity Number of applications granted with sustainable drainage system Amount of water abstracted m3 per LA area per year Quality and quantity of groundwater. No. of applications granted with water consumption saving schemes <hr/> <p>5 SEA Directive Topic: Climatic Factors Other relevant SEA topics 1 (Biodiversity), 3 (Air), 4 (Water – including waste and pollution) 6 (Population and human health), 8 (Landscape)</p>

Report	Paragraph No.	ID Ref	Comments
			<p>SA Objective 4. Minimise causes and impact of climate change (as noted this must include local and global)</p> <p><u>Criteria</u> Will the policy or proposal</p> <ul style="list-style-type: none"> • result in the generation of renewable energy? • result in the generation of non-renewable energy? Is this a likely outcome eg shale gas? • encourage energy efficient building construction and layout? • reduce the need to travel by car, lorry or air? • encourage the use of modes of transport other than cars, lorries and aircraft? • reduce the risk of poor air quality? • reduce heat island effects in urban areas? • reduce surface run-off? • reduce flood risk? • reduce the risk of low flows? • result in improvements to a functional floodplain? • result in changes to topography? • increase permanent vegetation cover? • reduce risk of damage from storms? <p><u>Indicators</u></p> <p>CO2 emission level (need to be mindful of national and global levels also)</p> <p>% of energy used from renewable energy sources</p> <p>% of new build and retro-fit homes meeting EcoHomes very good and excellent standards</p>

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Report	Paragraph No.	ID Ref	Comments
			<p>% of commercial buildings meeting BREEAM very good standards</p> <p>% of development to occur within limits of Catchment Flood Management Plan /Strategic Flood Risk Assessment</p> <p>(others to be added once criteria are agreed)</p>
Sustainability Appraisal Scoping Report September 2010	Table 4: SA Topic - SOCIAL	360302 East Dorset Environment Theme Action Group	<p>6 SEA Directive Topic: Population and human health</p> <p>Other relevant SEA topics 1 (Biodiversity), 2 (Soil) , 3 (Air), 4 (Water), 5 Climatic factors, 7 (Cultural heritage), 8 Landscape, 9 (Material Assets)</p> <p>SA Objective 5. Reduce the need /desire to travel by car, lorry, or air by making public transport, cycling and walking easier and more attractive.</p> <p><u>Criteria</u> Will the policy or proposal:</p> <ul style="list-style-type: none"> • promote mixed use(d) development? • provide a pattern of development that allows people to easily access facilities, such as post offices, shops, community facilities? • avoid development that generates further road or air traffic? • encourage more efficient use of car travel (e.g. car sharing etc.)? • provide a development pattern that reduces the need to travel by car, lorry, or air? • ensure that transport infrastructure serves local needs? • improve provision of public transport? • improve provision for cyclists and pedestrians? – for recreation or access to basic services • encourage more walking and cycling? • improve access to meet educational needs?

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Report	Paragraph No.	ID Ref	Comments
			<ul style="list-style-type: none"> • improve access to employment? • improve access to library facilities? • improve access to outdoor and indoor recreation facilities for all? • improve recreational access to the countryside and coast within environmental constraints? • improve access to health care? • improve access to leisure facilities? • improve access to retail needs? <p><u>Indicators</u></p> <p>% of households within 400m of hourly daytime bus service, or better. To comply with SHLAA criteria</p> <p>% of households within 400m of hourly evening/weekend bus service, or better To comply with SHLAA criteria</p> <p>% of households within 800m of convenience store, primary school, and GP surgery To comply with SHLAA criteria</p> <p>No. of applications with mixed development scheme granted</p> <p>Proportion of travel by mode</p> <p>Access to outdoor recreational facilities</p> <p>Access to indoor recreational facilities</p> <p>Access to the countryside and coast</p> <p>No. of and location of outdoor recreational facilities within walkable distance</p> <p>Need to agree acceptable distance - Link to Open Spaces report (ANGST Standards in Section 5). http://www.dorsetforyou.com/index.jsp?articleid=388338</p> <p>Access to library services</p> <p>Access to health care – GP, dentist, hospital, carers</p>

Report	Paragraph No.	ID Ref	Comments
			<p>Access to employment</p> <p>Access to basic retail facilities – define what facilities and distance?</p> <p>Access to public transport. – distance, frequency day, evening and weekend, destination – see top 3</p> <p>Access to leisure facilities</p> <p>Recommend that all access distances should be stated (use current criteria for what is sustainable) and for pedestrian and cyclists use safe routes (footpaths/cycleways).</p> <p>.....</p> <p>SA Objective 6 Provide a safe and secure environment (including protection from major hazards eg blast zones, crime/fear of crime, flooding and, where appropriate, coastal erosion)</p> <p><u>Criteria</u> Will the policy or proposal:</p> <ul style="list-style-type: none"> • (limit) prohibit new development within areas of risk of flooding? (not just the developments that suffer but the ecological damage that is caused by pollutants in run-off) • reduce the risks of flooding? (this should include potential for increased surface water and run-off) • ensure that the design of the proposal (environment) does not encourage crime? • increase risks from major hazards? <p><u>Indicators</u></p> <p>Areas/no. of properties at risk of flooding</p> <p>No of applications refused because of the risk of flooding</p>

Report	Paragraph No.	ID Ref	Comments
			<p>Level of crime</p> <p>Need to identify potential major hazards and what impact policy/proposal will have</p> <p>.....</p> <p>SA Objective 7</p> <p>7. Create conditions to improve health and quality of life, providing green infrastructure and access to high quality open green spaces, and promoting healthy lifestyles including routine daily exercise and reducing health inequalities.</p> <p>Other social inequalities need to be considered either here or under SA 9</p> <p><u>Criteria</u> Will the policy or proposal:</p> <ul style="list-style-type: none"> • improve access to health care? • improve access to leisure facilities? • improve access to open greenspace? • Improve access to the countryside? • encourage walking and cycling for access to basic services? • encourage walking and cycling for access schools? • encourage recreational walking and cycling ? • reduce noise, air, water and ground pollution? • reduce light pollution? • improve the quality and range of health services available? • improve (the environmental) quality of life in deprived areas? • improve access or visual appreciation for the disabled? We are not at all good at providing places for the elderly or disabled to enjoy LOOKING at attractive green space and wider views, without having to leave, or go far from, their mode of transport.

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Report	Paragraph No.	ID Ref	Comments
			<p><u>Indicators</u></p> <p>Life expectancy at birth</p> <p>Percentage of people describing their health as good</p> <p>Access to a GP or primary care profession</p> <p>Access to local green space</p> <p>Access to the countryside</p> <p>Proportion of journeys on foot or by cycle</p> <p>Access and participation in sport and cultural activities</p> <p>.....</p> <p>SA Objective 8. Help make appropriate (suitable) housing available and affordable to meet local need (for everybody).</p> <p><u>Criteria</u> Will the policy or proposal</p> <ul style="list-style-type: none"> • make best use of the existing housing/building stock? • meet identified housing needs? Suggest this is too general We must ensure delivery of really affordable housing without this 'just build more' syndrome. Change to: meet identified local housing needs? • increase range and affordability of housing? (ie different sizes, types and tenure. Must ensure that housing affordability includes running a home as well – fuel, council tax, cost of transport to work because in unsustainable locations all play their part). • increase the proportion of essential affordable housing in relation to executive housing demand? • reduce homelessness? • reduce use of temporary accommodation?

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Report	Paragraph No.	ID Ref	Comments
			<ul style="list-style-type: none"> • reduce the number of unfit homes? • ensure adequate standards of residential accommodation? • provide for special accommodation needs? (elderly / disabled / agricultural and forestry / gypsies / travelling show people / key workers) • achieve high quality self-contained settlements with good public transport, cycleways and footpaths ? • provide a potential local balance between jobs, houses, shops and services? • allow new construction to use/improve existing infrastructure? • encourage self-build/community build? • allow local people to stay near their families and communities? <p><u>Indicators</u></p> <p>No. of housing completions.</p> <p>Number of affordable houses developed.</p> <p>Number of special needs housing provided.</p> <p>Affordable and special needs homes as a proportion of total housing completions</p> <p>% of houses in decent condition</p> <p>Average housing price</p> <p>Average income</p> <p>Ratio of bottom quartile incomes to bottom quartile family housing prices</p> <p>Ratio of annual housing requirement (what will be the components of the ratio?)</p> <p>Market entry housing purchase and rental price</p> <p>.....</p>

Report	Paragraph No.	ID Ref	Comments
			<p>SA Objective 9 Help communities to support social cohesion through the provision of accessible basic services and facilities and a reduction in the fear of crime.</p> <p><u>Criteria</u> Will the policy or proposal</p> <ul style="list-style-type: none"> • provide for adequate educational needs? • provide for adequate library facilities? • increase provision of employment training? • lead to an increase in the fear of crime? • encourage local cultural traditions? One comment made that this should be treated cautiously as it can be divisive: need to be absolutely clear about the intention. • provide new cultural facilities? • improve the quality and provision of sporting facilities and open space? • ensure adequate provision of, and maintenance of outdoor and indoor recreation facilities for all? • improve the quality and quantity of public amenity space? • be phased to encourage integration into existing communities? <p><u>Indicators for each community?</u></p> <p>% of residents defined within a distance of 500m (15 min. walk) from basic services Access to GPs, Schools and Hospitals by public transport (Bournemouth, Poole, Salisbury, St Leonards, Wimborne hospitals)</p> <p>% of working age graduates with NVQ Level 4 and above (graduates or NVQ?)</p> <p>% of 17 to 19 years old enrolling at universities</p>

Report	Paragraph No.	ID Ref	Comments
			<p>No of people suffering from fear of crime No of cultural facilities No of people using cultural facilities No of outdoor and indoor sporting facilities No of good quality outdoor and indoor sporting facilities No. of non sporting recreational facilities</p> <hr/> <p>SEA Directive Topic 7 Cultural Heritage Other relevant SEA topics 1 Biodiversity, 2 Soil, 3 Air, 4 Water, 5 Climatic factors, 6 Population and human health, 8 Landscape, 9 Material Assets</p> <p>SA Objective 10. To protect and enhance the character and appearance of the historic landscape and townscape including designated and undesignated heritage assets, to help maintain and strengthen Christchurch and East Dorset's local distinctiveness and sense of place. (English Heritage suggestion) or Protect and enhance historic buildings, archaeological sites, landscape and other culturally important features (EDDC + ETAG amendment).</p> <p><u>Criteria</u> Will the policy or proposal</p> <ul style="list-style-type: none"> protect, maintain and enhance listed and other historic buildings and their settings, conservation areas, archaeological sites, historic landscapes and other culturally important features? (ETAG recommends extending consideration of all heritage assets (as required in PPS5 Policy HE8) to those that are important to

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			<p>communities even though they may not meet the criteria for formal designation. The absence of designation does not indicate lower significance. PPS 5 Practice Guide should be considered)</p> <p>or, the question could be <i>"Will the Core Strategy satisfy the above objective"?</i> (English Heritage)</p> <p><u>Indicators</u></p> <p>No. of listed and other historic buildings</p> <p>No. of listed and other historic buildings at risk</p> <p>No. of conservation areas and archaeological sites</p> <p>No. of archaeological sites at risk</p> <p>No. of applications refused in conservation areas, because of their adverse effects</p> <p>No of historic landscapes restored</p> <p>No of applications refused because of adverse impact on historic landscape</p> <p>No of additional culturally important features/heritage assets identified.</p> <p>No of additional culturally important features/heritage assets actively protected or restored</p> <p><u>English Heritage suggestion</u></p> <p>There needs to be a baseline from which the impact of the core strategy can be measured and the indicators need to be relevant i.e. what difference did the core strategy make the information you're gathering</p> <p>eg</p>

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Report	Paragraph No.	ID Ref	Comments
			<p>Number and % of conservation areas on the national heritage at risk register</p> <p>The % of conservation areas with an up to date character appraisal</p> <p>Number and % of listed buildings on the national heritage at risk register</p> <p>Number and % of designated historic parks and gardens on the national heritage at risk register</p> <p>Number and % of scheduled monuments on the national heritage at risk register</p> <p>The EH SA Guidance offers several other options for both objectives and indicators http://www.helm.org.uk/upload/pdf/Strat-env-ass.pdf?1318604741)</p> <hr/> <p>SEA Directive Topic 8 Landscape</p> <p>Other relevant SEA topics 1 Biodiversity, 3 Air, 4 Water, 5 Climatic factors, 6 Population and human health, 7 Cultural heritage, 9 Material Assets</p> <p>SA Objective 11. Maintain and enhance local distinctiveness and create places, spaces and buildings that work well, wear well and look well.</p> <p><u>Criteria</u> Will the policy or proposal</p> <ul style="list-style-type: none"> • enhance and contribute to local building traditions? • lead to the merging of settlements? • enable farmers and other land workers to live in the countryside? • protect the countryside from sub-urbanisation? • ensure high design standards? • contribute to an area's recognised design quality?

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Report	Paragraph No.	ID Ref	Comments
			<ul style="list-style-type: none"> • enhance an area's recognised poor design? • conserve and enhance the AONB and Areas of Great Landscape Value? • enhance the quality of poor landscape? <p><u>Indicators</u></p> <p>No. of applications refused because of adverse impact on (effects to) local setting</p> <p>Number of Special Character Areas</p> <p>No. of applications refused because of poor design</p> <p>No of applications refused because of lack of provision of amenities</p> <p>No. of applications refused because of their adverse effects on their setting (this is slightly different wording from the first one – is there a subtle difference in planning terminology or simply duplication?)</p> <p>The extent of AONB areas</p> <p>The extent of Areas of Great Landscape Value</p> <p>No. of applications refused because of adverse effects on the designated landscape areas</p> <p>No. of applications refused because of impact on trees, woodland, hedgerows and verges</p>
Sustainability Appraisal Scoping Report September 2010	Table 4: SA Topic – ECONOMIC	360302 East Dorset Environment Theme Action Group	<p>SEA Directive Topic 9 Material assets</p> <p>Other relevant SEA topics 1 Biodiversity, 2 Soil, 3 Air, 4 Water, 5 Climatic factors, 6 Population and human health, 7 Cultural heritage, 8 Landscape,</p> <p>SA Objective 12. Facilitate a sustainable and growing economy for the</p>

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Report	Paragraph No.	ID Ref	Comments
			<p>District that creates appropriate economic and employment opportunities that meet local needs as well as providing for vital and viable town centres. (Rural and tourist economy, including local produce, should be included when assessing compliance with this objective.)</p> <p><u>Criteria</u> Will the policy or proposal</p> <ul style="list-style-type: none"> • provide for local convenience and comparison shopping? • provide a wide range of diverse shopping facilities • ensure a sufficient supply of land to meet local employment needs? • encourage provision of diverse employment opportunities? • enhance skill levels and provide highly paid jobs? • support employment in the rural areas? • support ecosystem services? • support local extensive farming or horticulture? • support the tourist industry? (Sustainable tourism linked to natural environment and other heritage assets) • provide local recreational facilities to reduce the need to travel? • reduce commuting? • produce goods and services to meet local needs? • encourage repair rather than new purchase? • deliver locally owned and managed businesses? <p><u>Indicators</u></p> <p>Retail floor area/frontages by sector</p>

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Report	Paragraph No.	ID Ref	Comments
			<p>Shop unit vacancy rate Amount of floor space completed retail, office and leisure development in town centres Unemployment Workforce Employment by sector Employment land available by type Lost employment land Average earnings New employment permissions Level of productivity (GVA)</p> <p>Appendix 1 (p 65-74) Relationship with Other Plans and programmes (Stage A1) Because of the numerous changes to Government Policy during the preparation of the Core Strategy, this section of the SA Scoping (which details the implications of each of the plans and programmes identified) has not yet been reviewed. We would ask that when the list is updated it should include the following:</p> <ul style="list-style-type: none"> • Natural Environment White Paper including Lawton's report • National Ecosystem Assessment • Report of The Royal Commission on Environmental Pollution (2009) <i>Artificial Light in the Environment</i>. • Dorset Nature Map/Strategic Nature Areas • The Dorset Minerals Core Strategy(2009) http://www.dorsetforyou.com/media.jsp?mediaid=143371&filetype=

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Report	Paragraph No.	ID Ref	Comments
			<p>pdf which includes the following documents all of which are relevant to the East Dorset & Christchurch Core Strategy:</p> <p><u>P7 Relevant Policy Documents</u></p> <ul style="list-style-type: none"> • EU Thematic Strategy for Soil Protection (2006) • Safeguarding our Soils: A Strategy for England (DEFRA: 2009) • Construction Code of Practice for Sustainable Use of Soils on Constructions Sites (DEFRA:2009) • The First Soil Action Plan for England 2004-2006 (DEFRA: 2004) • The State of Soils in England and Wales (EA: 2004)) • PPS23 and 25. <p>Useful reading: http://www.helm.org.uk/upload/pdf/Strat-env-ass.pdf?1318604741)</p>

Comments received on Background Papers

Report	Paragraph No.	ID Ref	Comments
Key Issue Paper 1 - Vision and Objectives	Document	360302 East Dorset Environment Theme Action Group	ETAG will submit separate comments on the Sustainability Appraisal Scoping document.
Key Issue Paper 2 - Climate Change and Sustainable Development	Document	360302 East Dorset Environment Theme Action Group	<p>The key Core Strategic message that must shine out in the LDF is that is can no longer be “business as usual”. Simply cutting greenhouse gas emissions now will not have any effect for the next 30-40 years due to the time lag in the climate system.</p> <p>We already face some inevitable changes due to past emissions. It is worrying that the Core Strategy Options have failed to recognise this or to take on board what this means in practice. The UK Climate Impacts Programme (UKCIP) must be used as a guide to anticipated impacts of:</p> <ul style="list-style-type: none"> • an increase in the risk of flooding and erosion; • greater pressure on drainage systems; • water supply shortages; • increased water demand; • increased summer cooling demands; • significant changes in weather paths affecting consumption and transport; • international supply chain effects on imports and exports; • loss of many important habitats for wildlife; • summer water shortages and low stream flows;

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			<ul style="list-style-type: none"> • increased risk of subsidence (in areas where subsidence is already a problem); • increased demand for summer cooling; • buildings becoming uncomfortably hot; and • a range of health issues. <p>We strongly recommend the following sources of information:</p> <p>http://www.defra.gov.uk/environment/climate/documents/interim2/report-guidance.pdf DEFRA Adapting to climate change: helping key sectors to adapt to climate change Statutory Guidance to Reporting Authorities 2009.</p> <p>http://publications.environment-agency.gov.uk/pdf/GEHO0111BTJW-e-e.pdf EA Climate Change: Managing the environment in a changing climate Nov 2010</p> <p>http://www.defra.gov.uk/environment/climate/documents/interim2/natural-england-climate-risk-report-1010.pdf Assessing and responding to climate risks to Natural England's objectives Nov 2010.</p>
Key Issue Paper 2 - Climate Change and Sustainable Development	1.2	360302 East Dorset Environment Theme Action Group	As indicated above climate change does not only affect risk of flooding: it will also affect our ecosystems. Different species will be affected in different ways: some will be more sensitive than others to changes in temperature and rainfall patterns. Changes in when herbaceous plants, trees and shrubs are in leaf and flower will have an impact on insects which rely on them for food (at different life stages) including those species on which we depend for pollination and control of those insects we regard as pests. Changes in the time of leaf emergence on our deciduous trees affects the availability of food for many of our moths and some butterflies: without the larvae of these species there will be a significant loss of food available for many of songbirds' nestlings: with reduced adults there will be insufficient food for insectivorous birds

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Report	Paragraph No.	ID Ref	Comments
			species and bats.
Key Issue Paper 2 - Climate Change and Sustainable Development	2.6	360302 East Dorset Environment Theme Action Group	<p>The ecosystem service that the land provides in water storage is not restricted to the flood plain. Holding water further back in the whole of natural land drainage patterns reduces the risk of flood downstream. Heathland soils, especially those on even quite modest slopes, are particularly sensitive to disruptions of natural drainage patterns and excavation can cause localised flooding problems.</p> <p>Core Strategic Messages We recommend that the issues identified above are reflected in the list of Messages perhaps by rewording bullet point 7 to include <i>seasonality</i> and by amending the final sentence to <i>...aspirations for all BAP sites and species</i>.</p> <p>PPS1 Supplement: Planning and Climate Change Although the PPS states that LPAs should not be prescriptive on renewable technologies, it might be helpful to identify what technologies are likely to be achievable in given development proposal areas (or conversely those that are unlikely to be suitable).</p> <p>Hampshire Avon and Dorset Stour Abstraction Management Strategies (CAMs). ETAG members are concerned about the risk to the River Allen in particular if additional abstraction were to result from development in Wimborne. This would affect its ecology throughout its length and impact on a wide area of the AONB.</p>
Key Issue Paper 2 - Climate	4.19	360302 East Dorset Environment	The suitability of on-site renewables and their direct impact on habitats and wildlife will need to be assessed on a site by site basis and will be

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Change and Sustainable Development		Theme Action Group	dependent on the type of RE system proposed. The claim that the SA objective on protection of habitats is met cannot be substantiated for all Options and should be left as an unknown. The same reasoning applies to para 4.24 and 4.30
Key Issue Paper 2 - Climate Change and Sustainable Development	4.34	360302 East Dorset Environment Theme Action Group	Given the responses from Natural England and RSPB about the potential adverse impact of some Renewable Energy Developments on areas of nature conservation interest and protected species, the deduction/assessment that all options have a significant positive impact on the protection of habitats is clearly incorrect.
Key Issue Paper 2 - Climate Change and Sustainable Development	4.43	360302 East Dorset Environment Theme Action Group	Development in the flood plain cannot score positively under the objective of protecting habitats. This is most definitely not so: flood plains are part of river basin ecosystems.
Key Issue Paper 2 - Climate Change and Sustainable Development	4.73	360302 East Dorset Environment Theme Action Group	The preferred Options should include one on Light Pollution. This will be the subject of a separate section of ETAG's response
Key Issue Paper 03 - Natural Environment	2.6	360302 East Dorset Environment Theme Action Group	We welcome the recognition of the interdependence of landscape value and the natural biodiversity: it must be recognised that good biodiversity can also be outside of quality landscape.

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Report	Paragraph No.	ID Ref	Comments
Key Issue Paper 03 - Natural Environment	2.8	360302 East Dorset Environment Theme Action Group	Although light pollution is mentioned here, it has not been included in the assessment criteria for proposed development sites or transport links to them. We recommend that this omission is addressed. We do have some areas that are close to AQM levels in Ferndown and at Ashley Heath roundabout: traffic capacity projections suggest that these could be problematic in the near future and should be taken into account in location of housing and employment sites.
Key Issue Paper 03 - Natural Environment	2.9	360302 East Dorset Environment Theme Action Group	The claim that the demographic has an impact on the recreational uses of sensitive parts of the natural environment (eg heathland) could usefully be examined in relation to the types of damage caused by different age groups: this might help with the development of the Heathland DPD eg use by cyclists, dog walkers, horse riders, damage by arson.
Key Issue Paper 03 - Natural Environment	P11	360302 East Dorset Environment Theme Action Group	Under the heading “International” it should be noted that the Bern Convention also requires expansion of heathlands in Dorset.
Key Issue Paper 03 - Natural Environment	P13	360302 East Dorset Environment Theme Action Group	identifies the BAP habitats and the requirements of this designation. Again this underlines the need for survey before we go further in land use decisions or do anything that might harm the longer term potential of such habitats.
Key Issue Paper 03 - Natural Environment	P15	360302 East Dorset Environment Theme Action Group	recognises that new development within 20km of the New Forest National Park will be likely to generate additional recreational pressures which require mitigation to prevent further harm to protected species. 20 km includes all the potential development sites in East Dorset. Tranquillity has been highlighted as a special characteristic of the New

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Report	Paragraph No.	ID Ref	Comments
			Forest but has not been considered in East Dorset: it is important for quality of life.
Key Issue Paper 03 - Natural Environment	P15 <i>et seq</i>	360302 East Dorset Environment Theme Action Group	We strongly support the local aspects that are underpinned by this analysis of policy framework. However, it should be noted that uniquely amongst local authorities in Dorset, no additions to the Sites of Nature Conservation have been permitted since those identified at the time of the last Local Plan. This has precluded identification of other areas of good habitat that could have provided important linkages. We therefore welcome the proposals to develop a network of habitat expansion and linkages guided by the Dorset Biodiversity Strategy, but stress the urgent need for survey. We cannot protect what we have if we don't know it's there. The proposals for retaining standing or fallen deadwood are fully supported. However, there are proposals for including mature/veteran trees within developments: how such critical ecological resources can be conserved <u>within</u> developments will need careful consideration.
Key Issue Paper 03 - Natural Environment	3.5	360302 East Dorset Environment Theme Action Group	Resurfacing/reconstruction of driveways is not currently covered by the legislation. Significant reduction of surface run-off could be achieved if all replacement surfaces complied with SUDS requirements.
Key Issue Paper 03 - Natural Environment	4.43	360302 East Dorset Environment Theme Action Group	Core Strategy Options have not identified how development proposals will contribute to meeting the Dorset Biodiversity Strategy targets for BAP habitats
Key Issue Paper 03 - Natural Environment	4.48	360302 East Dorset Environment Theme	The contradictory answers suggest that the question (NE3) was not entirely clear.

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		Action Group	
Key Issue Paper 03 - Natural Environment	4.49	360302 East Dorset Environment Theme Action Group	<p>Since the publication of the Core Strategy Options, there has already been an example of a landowner seeking to destroy the ecological interest of his land. Land owners can destroy sites overnight if they do not agree: we have examples in East Dorset where areas about to be designated SSSIs have been ploughed up immediately beforehand.</p> <p>It is recommended that all potential development land should be protected until it has been surveyed. It should also be remembered that much apparent 'destruction' is not necessarily permanent: for example</p> <ul style="list-style-type: none"> • woodlands, provided that they have not been grubbed out, do regrow: witness the many flattened woods after the gales of the 1980s and 1990s; • grasslands ploughed will regain interest: witness pastures that were used for cultivation during the war (some of which are now important neutral grassland sites) and semi-improved grassland that, with appropriate sympathetic management, retains biodiversity interest and carbon storage function.
Key Issue Paper 03 - Natural Environment	4.52	360302 East Dorset Environment Theme Action Group	<p>While the Core Strategy Options has made a commitment to consider habitats outside those already designated for nature conservation importance, the way in which they will be identified and considered as part of integrated land management has not been made clear. This should be addressed in the next stage of the LDF process. It should also establish the level of protection that would be afforded to new sites and clarify how they would compare with current SNCI designation. Please see comments under ME4.</p>
Key Issue Paper 03 -	4.66-4.68	360302 East Dorset	The provisions of these paras are essential and are fully supported. ETAG

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Natural Environment		Environment Theme Action Group	would wish to be included in consultations on defining “satisfactory mitigation”.
Key Issue Paper 03 - Natural Environment	4.91	360302 East Dorset Environment Theme Action Group	ETAG fully supports the SNA approach. Some adjustments need to be made to the boundaries as shown on the current maps. There are some inaccuracies eg Dewlands Common SSSI has been omitted from the Heathland Area. Some opportunities for restoration of habitats could be identified using information on woodlands, heaths and hedgerows on old maps and in documents on the history of our settlements and countryside.
Key Issue Paper 03 - Natural Environment	4.103	360302 East Dorset Environment Theme Action Group	We fully support these proposals but it is essential that any surveys are not simply snapshots at inappropriate times of year. We would recommend survey over a full 12 month period in the absence of inappropriate grazing or other management. Independent surveys which adequately target relevant habitats and species over sufficient time and area must be conducted.
Key Issue Paper 4 – Historic Built Environment	2.14	360302 East Dorset Environment Theme Action Group	Identifies the need to ensure there is no harm to historic built environment or historic landscapes and 2.27 lists those aspects of our heritage that are to be included in baseline mapping. The compilation of a local list is advised in PPS5 Historic Environment and Practice Guide. This is required to take a holistic view embracing buildings, features, landscapes etc. whether or not they are designated or capable of designation.
Key Issue Paper 4 – Historic Built	Table 2.4	360302 East Dorset Environment	Table 2.4 also refers to the importance of the historic environment and both PPS1 and PPS 5 identify that the historic environment is a non-

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Environment		Theme Action Group	renewable resource: its conservation accords with the principles of sustainable development.
Key Issue Paper 4 – Historic Built Environment	4.14- 4.15	360302 East Dorset Environment Theme Action Group	4.14- 4.15 confirm EDDC’s commitment to producing a local list as part of the LDF process. However, the recommendation in this Key Issue Paper is for the local list to be restricted to buildings: this does not comply with PPS5 Practice Guide which, as stated above requires a holistic approach that includes historic landscapes and other features. We advise that Town and Parish Councils, LAGs, local Historical Societies, and ETAG should be consulted during the compilation of this list and that it should inform proposals included in the Core Strategy Options. ETAG supports the principles detailed in para 4.85 but recommends that the wording is amended to reflect the required holistic nature of the local list and that this too is reflected in the wording of Preferred Option HE1 .
Key Issue Paper 9 – Town, Village and Neighbourhood Centres	2.54	522117 (Chittenden)	<p>(2.54) highlights the need for public transport improvement in Verwood and West Moors and states (2.56) that demand management will be addressed in the Core Strategy and include reducing the need to travel and encouraging sustainable modes of transport. As far as Verwood is concerned this has not been achieved in the document.</p> <p>The proposed Town Centre is in fact on the edge of the urban area having been the former village centre. It is close to the open countryside, a characteristic that Verwood residents have said in initial responses to the Town Plan that they value highly. This character should be retained and not urbanised as proposed. It is the furthest possible distance from residents of Three Legged Cross: the Core Strategy should seek to enhance facilities available to them and not increase their isolation and</p>

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Report	Paragraph No.	ID Ref	Comments
			<p>deprivation.</p> <p>The evening and night time economy should be more evenly distributed and new development more centrally placed within the settlement of Verwood and Three Legged Cross so that venues are accessible on foot by the majority of the population, so reducing the need for use of the car. Residents in Three Legged Cross and SE Verwood (Ebblake etc) are unlikely to want to walk all the way to the Ferrets Green area for an evening meal (and back again): there are no evening buses. Additional venues in this part of Verwood would lead to further parking problems: parking provision at the Hub is inadequate and the Potters Wheel car park cannot accommodate further cars when there are events at the Memorial Hall. Verwood has not been developed rationally so new plans must take full account of where people live and not force them to get into their cars. This needs serious consideration otherwise people will drive even further afield for their shopping and leisure: this is unsustainable. As evidenced by the emerging Local Transport Plan, there is little prospect of an adequate daytime bus service and none of an evening one: PPG13 requires a reduction in the reliance on the car.</p> <p>Additional retail units in the historic centre are likely to add to the number and frequency of HGV movements and the safety problems associated with present traffic flows.</p>
Key Issue Paper 9 –	P32-33 (and p 73)	522117 (Chittenden)	The Joint Retail Assessment by Nathaniel Lichfield and Partners identifies

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Town, Village and Neighbourhood Centres			<p>problems of high numbers of service units eg hairdressers, beauty salons and estate agents and the low proportion of comparison retail units (about half the national average). Under the heading Hierarchy of Centres, the consultants recommend that <i>Verwood becomes a District Centre, rather than a town centre due to its size, function and number of units</i> and that a <i>primary shopping area should be identified</i>. They compare the retail function unfavourably with that at West Moors which they also recommend should be a District Centre. It should be recognised that neither of these settlements will ever have the range of retail units or vibrancy of Wimborne or Ferndown because of the way they have evolved. In the case of Verwood, those responsible for planning have repeatedly changed their minds about how and where shops should be provided.</p> <p>Given the lack of parking in the historic centre, and the fact that 51 per cent of residents use Morrisons for their main shopping, it would appear logical that this should continue to be the primary shopping area for Verwood and Three Legged Cross. Redevelopment of the site is planned and provides an unrivalled opportunity to get it right at long last for all residents. A petrol filling station here is not the best use of this prime central location and adds to the HGV movements. Efficient land use on the site should be a primary consideration with reduction in opportunities for vandalism, anti-social behaviour and accumulation of litter and the provision of adequate parking to meet local need. The site was originally developed so that it was within easy walking distance of homes built at that time. The raised bed shrubberies are a waste of space and are of no value to wildlife.</p> <p>A notable omission in this Key Issue paper is reference to Ringwood as an expenditure leakage for convenience and comparison shopping.</p>

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			<p>Over two thirds of the units in the historic centre of Verwood are service units, more than double the national norm. Of the 11 comparison retail units at the time of the study, 1 has been a charity shop for many years. Of the 5 new units that have been built only 2 are retail and one of these (the Spar) has just closed for the second time since it was built. The units being built are generally too small for national multiples or for items such as clothing, books, furniture etc identified in the study as lacking. Some of the offices above the retail units at Ferrets Green have still not been let two or three years after being built. No justification is offered (4.258) for the suggestion that office space should be provided over shop units. This is contrary to proposals in Issue Paper 13 that the Core Strategy should seek to provide live/work units.</p> <p>There is no recognition of the inadequacy of parking provision in the historic centre.</p>
Key Issue Paper 9 – Town, Village and Neighbourhood Centres	4.250 & 4.258	522117 (Chittenden)	<p>Paras 4.250 & 4.258 refer to “Improvements” to the Recreation Ground. This land is not under the control of EDDC and residents of Verwood have been embroiled for decades in lengthy and costly battles to preserve what is theirs and to prevent a takeover by EDDC. Feelings of residents run high on this issue. The Town Council are Trustees of this Charitable Trust.</p>
Key Issue Paper 10 Sustainable Economic Growth	2.37	360302 East Dorset Environment Theme Action Group	<p>2.37 identifies</p> <ul style="list-style-type: none"> • the problem of unsustainable travel patterns caused by those commuting to urban areas for employment, • the need to consider appropriate levels of growth of employment in

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			<p>rural areas, and</p> <ul style="list-style-type: none"> the nature of rural diversification.
Key Issue Paper 10 Sustainable Economic Growth	2.41	360302 East Dorset Environment Theme Action Group	2.41 The Core Strategic Messages identify a general need for transport infrastructure improvements but have not specifically identified the issues related to the more rural areas of East Dorset nor the commuting problems and impacts from areas north of the A31. Travel to work distances and mode of transport impact on fuel consumption and, during periods of darkness, add to light pollution.
Key Issue Paper 10 Sustainable Economic Growth	Table 2.7	360302 East Dorset Environment Theme Action Group	Table 2.7 We welcome the commitment in the Core Strategic Messages that <i>Future employment development should be achieved within environmental limits which avoids or minimises factors which contribute to climate change and adverse impacts on sensitive habitats</i> . It is essential that proposals for each employment site demonstrate how this is to be achieved. Clearly restricting B8 use class and maximising the available job opportunities at each of the employment sites will make a significant contribution to this.
Key Issue Paper 10 Sustainable Economic Growth	Table 2.10	360302 East Dorset Environment Theme Action Group	Table 2.10 should also include consideration of the light pollution potential of development sites because of the sensitivity of adjacent habitats and species. Pollutants that potentially can be waterborne when discharged into surface water by flooding or other accident should be added to the site specific considerations. This also applies to Table 2.12 . (Detailed comments on site specific proposals are made elsewhere in our response.)
Key Issue Paper 10 Sustainable	Table 2.13	360302 East Dorset Environment	Table 2.13 The provisions of the Multi Area Agreement should be carried forward into use classes to reflect both environmental protection (threat of

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Economic Growth		Theme Action Group	surface water pollution) and employment opportunity land consumption ratio.
Key Issue Paper 10 Sustainable Economic Growth	Table 2.17	360302 East Dorset Environment Theme Action Group	Table 2.17 highlights East Dorset's under representation in the knowledge based industry. This should be addressed to ensure maximum employment opportunities within the district, encourage higher wage employment and reduce the earnings:housing affordability gap. Employment opportunities for higher wage earners in the District could reduce much of their longer distance commuting.
Key Issue Paper 10 Sustainable Economic Growth	2.21	522117 (Chittenden)	The Travel to Work Areas (TWA) do not take into account the fact that Southampton, Salisbury, London, Ringwood are employment areas for many Verwood residents. Is there any way of using this information to identify employment opportunity requirements more accurately?
Key Issue Paper 10 Sustainable Economic Growth	2.37	522117 (Chittenden)	No proposals have been included for rural diversification in the Verwood area. With the exception of possibly extending the Woolsbridge site (which cannot be supported because of damaging ecological impact)) there are no additional employment opportunities. Employment to support the provision of green infrastructure and healthy outdoor activities could be linked to the GI Strategy. I strongly support the proposal (p19) to recognise the scope for tourist and leisure related development and the Core Strategic messages that <i>Future employment development should be achieved within environmental limits which avoids or minimises factors which contribute to climate change and adverse impacts on sensitive habitats</i> . The key issues that need to be considered in relation to the Woolsbridge site are discussed in the ETAG response.

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Key Issue Paper 11 – Employment Land	2.20	360302 East Dorset Environment Theme Action Group	2.20 Road capacity issues should also consider wear and tear and the problems that will arise from lack of funding for maintenance, including potential for additional tyre damage and traffic accidents and resultant direct and indirect financial and sustainability costs.
Key Issue Paper 11 – Employment Land	2.21	360302 East Dorset Environment Theme Action Group	2.21 It is not only emission of pollutants that should be considered but the risk of accidental spillages. It can take many years for river systems to recover from spillages of substances that are toxic to aquatic organisms. Restrictions should be placed on substances that can be brought onto existing employment land that is adjacent to sensitive habitats. There should be no new or extensions of employment land in the catchment of the important and vulnerable Moors River system. Please see recommendations and comments under discussion of Core Strategy Options Section 15.
Key Issue Paper 11 – Employment Land	Table 2.1	360302 East Dorset Environment Theme Action Group	Table 2.1 It is encouraging that the analysis of PPS1 identifies the need for biodiversity to be conserved and enhanced. It is essential that this is taken into account in the selection of potential employment sites and the way in which they are subsequently planned and managed. ETAG supports this Core Strategic Message.
Key Issue Paper 11 –	Table 2.4	360302 East Dorset	Table 2.4 For the reasons summarised under Key Issue Paper 10, ETAG

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Employment Land		Environment Theme Action Group	supports this Core Strategic Message
Key Issue Paper 11 – Employment Land	Table 2.5	360302 East Dorset Environment Theme Action Group	ETAG supports this Core Strategic Message but would add that employment activities are particularly problematic where there is flood risk, as pollutants may be washed into the drainage system during flood. (see comments on Woolsbridge above). Even those such as St. Leonards, which are not currently recorded as being at risk, may be in the future (please see flood risk map for this site Core Strategy Options document p331).
Key Issue Paper 11 – Employment Land	Table 2.6	360302 East Dorset Environment Theme Action Group	As discussed above, ETAG considers that the provisions of Existing Local Plan Policy FWP3 to prevent accidental pollution of Uddens Water is likely to prove inadequate and does not take account of impacts of climate change.
Key Issue Paper 11 – Employment Land	3.14	360302 East Dorset Environment Theme Action Group	ETAG strongly supports the proposals for holistic/cross border approach in infrastructure planning.
Key Issue Paper 11 – Employment Land	4. Site analysis and formation of options	360302 East Dorset Environment Theme Action Group	The constraints mapping has not identified the risks to pollution of the Moors River system at Blunts Farm which, in itself, renders this site inappropriate for most forms of employment use. Notwithstanding this overall objection, it should be noted that much of the site has recently been put on the market by the Forestry Commission.

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			<p>The known biodiversity interest of this site coupled with its proximity to Slop Bog, Uddens Heath SSSI and the Moors River SSSI indicates that any development proposals MUST be preceded by full 12 month ecological survey and in absence of grazing of the fields. It is essential that the latest Forestry Commission design concept and felling plans are considered as a part of the overall strategy for this site. 18 ha is not due to be felled until 2047 and beyond (FC plans dated 30.3.09) and rhododendron clearance was planned along Uddens Drive to address flytipping problems. Planned heathland restoration on some parts of the site to extend habitat linkages should be included in the design of any development</p> <p>8.5ha east of Cobham Road (Site 7) has recently been given planning consent for employment (B1, B2 and B8) – this should be taken into account in determining the total additional employment land requirement for East Dorset and its phasing.</p>
Key Issue Paper 11 – Employment Land	P5/6	522117 (Chittenden)	<p>Road capacity issues should also consider wear and tear and the problems that will arise from lack of funding for maintenance, including potential for additional tyre damage and traffic accidents and resultant direct and indirect costs. The Ashley Heath to Horton road is showing signs of wear through the heavy use by HGVs and Hampshire County Council are faced with large bills (not claims) for compensation. The link through to the Salisbury/Blandford road (A354) is in places too narrow to accommodate passing cars and there is considerable damage to the banks either side of the road. Such damage is unacceptable particularly in the AONB. Can developer contributions be used to fund road</p>

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			maintenance associated with new employment sites?
Key Issue Paper 11 – Employment Land	Table 2.5	522117 (Chittenden)	<p>In view of the flood risk at Woolsbridge, employment activities should be restricted to those in which there is no risk of water quality of the Moors River system being adversely affected. Were the proposal to be carried forward to the next stage of the consultation it is essential to plan for the installation of oil interceptors and control measures to ensure water soluble pollutants do not reach aquatic ecosystems. A planned and routinely monitored maintenance schedule for such protective mechanisms is essential and should be funded through developer contributions.</p> <p>There are likely to be significant light pollution problems with this site that would adversely affect the aquatic ecosystem and the N2K heathland.</p> <p>Land use proposals for all employment sites, including Woolsbridge, should seek to maximise employment potential and limit further B8 use</p> <ul style="list-style-type: none"> • To restrict growth in HGV movement; • Encourage sustainable transport choices of employees; • Create more jobs for existing local people; • Support commitment to knowledge based economy; and • Reduce noise impact on neighbouring properties
Key Issue Paper 13 - Housing	2.8	360302 East Dorset Environment Theme Action Group	2.8 identifies the requirement for housing development to cause no harm in relation to air, noise and light pollution but the Core Strategy Options have not taken light pollution into account.
Key Issue	2.21	360302	2.21 confirms that new housing development should seek to avoid

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Paper 13 - Housing		East Dorset Environment Theme Action Group	adverse impact on landscape character. This does not appear to have been addressed in selecting the sites.
Key Issue Paper 13 - Housing	Table 2.9 – PPS4 Core Strategic Messages	360302 East Dorset Environment Theme Action Group	Although highlighted as being important, the potential for live/work premises (including retail and home working) has not been explored in the Core Strategy and could make a substantial contribution to sustainability, reducing the need to travel to work. EDHA was trying to encourage this approach several years ago.
Key Issue Paper 13 - Housing	Table 2.14	360302 East Dorset Environment Theme Action Group	CLG Code for Sustainable Homes. A mandatory element of assessment is the management of surface water run-off from developments. This is applicable to all sites and the feasibility of complying with this requirement should be assessed prior to sites being taken forward to the next stage. Areas where we are aware that this could be an issue are identified in ETAG's comments on environmental and sustainability of specific sites.
Key Issue Paper 13 - Housing	Preferred Option LN6	360302 East Dorset Environment Theme Action Group	<p>We recommend that the wording is amended to ensure that no damage to the environment could result from high density or size of development. It is not just local character though this is partly shaped by the environment. The high density proposals for urban extensions/new neighbourhoods could be considered inappropriate due to the sharp distinction between them and the rural area that surrounds them: in most cases densities would be higher than in the adjoining urban area.</p> <p>The wording of this Option could be interpreted as meaning that high density development will be acceptable across the whole of East Dorset and permitting development irrespective of other considerations. Is this in fact intended to impose high density development everywhere across the</p>

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			District or are needs within individual settlements identified separately? This would not appear to comply with the requirement in PPS1 for good design to be integrated into the existing urban form and the natural and built environments. It is understood that the problem of people putting their names on numerous housing waiting lists has not been resolved so housing need could well be distorted in particular areas.
Key Issue Paper 13 - Housing	2.8	522117 (Chittenden)	2.8 makes a commitment to not causing harm in relation to air, noise and light pollution from housing development. As discussed in comments on the Masterplan, the new housing proposed for options VMW1, and 2 and supporting road infrastructure would create significant light pollution problems for which effective mitigation would not be possible. This would affect the AGLV (particularly nearby SSSIs and SNCIs) and the AONB, bat corridors and nocturnal/crepuscular species. At VMW 4 there would be light pollution impact on bats and aquatic/wetland ecosystems, including the fishing lakes.
	2.21		Identifies the need to avoid adverse impacts on the landscape character. This could not be achieved at VMW1 and 2 which are within the AGLV.
Key Issue Paper 13 - Housing	2.56 and table 2.11	522117 (Chittenden)	The Sustainable Communities Plan and PPG13 require housing to be linked to jobs, services and transport. Verwood does not have employment opportunities and lacks both good transport links and an adequate public transport service.
Key Issue Paper 13 - Housing	Table 2.9	522117 (Chittenden)	Although highlighted as being important (and a requirement of PPS4), the potential for live/work premises (including retail and home working) has not been explored in the Core Strategy. Office premises above retail units

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			at Ferrets Green are still vacant.
Key Issue Paper 13 - Housing	Table 2.14	522117 (Chittenden)	A mandatory element of assessment is the management of surface water run-off from developments. The feasibility of complying with this requirement should be assessed prior to sites being taken forward to the next stage. As discussed in the comments on the Masterplan, there are very real concerns about the impact on the R Crane SSSI and its tributaries through additional volume of water and pollution. (Please see also the ETAG response).
Key Issue Paper 14 Community Issues	2.16	360302 East Dorset Environment Theme Action Group	2.16 Potterne & Woolsbridge and the Allen Valley are identified as falling within the 25% most deprived areas (super output areas).
Key Issue Paper 14 Community	Table 2.2	360302 East Dorset Environment Theme Action Group	<p>Table 2.2 includes rural exclusion and difficulties accessing facilities in the list of Core Strategic messages. Suggestions are listed in para 4.71 for</p> <ul style="list-style-type: none"> • Adult education outreach facilities • Increased youth provision • Good level of community facilities supported by community development initiatives <p>The way in which these ideas will be translated into meaningful support for these more rural deprived areas is not made clear in Preferred Option LN18. No-one will dispute the intent of the broad policy framework but these communities need support <u>now</u>. There are significant sustainability issues if we fail them. By definition our rural areas have fewer people than</p>

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			areas proposed for development: as a minority group their needs (which are very different from those who live in urban areas) tend to be misunderstood and overlooked in favour of the majority. It is in the main our rural communities who shape what is so highly valued by us all – our landscape, wildlife and tranquillity.
Key Issue Paper 14 Community	2.16	522117 (Chittenden)	Deprivation at Potterne and Three Legged Cross has not been addressed in the Core Strategy despite the listed suggestions in para 4.71 for <ul style="list-style-type: none"> • Adult education outreach facilities • Increased youth provision • Good level of community facilities supported by community development initiatives Proposals for further “Centre” development in Verwood should consider the needs not only of those in North Verwood but those in the south east of the settlement particularly the Ebblake area and Three Legged Cross.
Key Issue Paper 15 – Sports & Leisure Facilities	4.118	360302 East Dorset Environment Theme Action Group	The close relationship between open space and heathland policy is acknowledged here. However, some confusion has arisen through using the term SANGs as a catch-all for natural greenspace that does not meet SANGs’ criteria or may indeed not be required as part of heathland mitigation.
Key Issue Paper 15 – Sports & Leisure Facilities	Document	360302 East Dorset Environment Theme Action Group	We support the principle of enhancing biodiversity in all open green space and ensuring that the Green Infrastructure Network is designed to do this but suggest that Preferred Options HE 13 may require some refinement. When considering the criteria for SANGs it is essential to address the

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			<p>problems of what replacement open green space could be made available if proposed SANGs are temporarily flooded, particularly those truly designed to take the pressures of the heathlands.</p> <p>Some of our open green spaces are unofficially used as SANGs now and divert people off our heaths. In some cases footpaths already cross such land: in others, although strictly people may be trespassing, they may well have used it for a long time. So loss of this land for development would increase pressure on the heaths: similarly, simply designating it formally as a SANG adds nothing to the sum of open green space though proper nature conservation management could enhance biodiversity.</p> <p>It should be remembered that the effectiveness of SANGs in ensuring there is no further damage to heathlands has not been proved: and this is the acid test that must be passed for development to proceed.</p> <p>The ANGSt Plus approach (LUC for Natural England, 2008. <i>Understanding the relevance and application of the Access to Natural Greenspace Standard</i>) was developed after the East Dorset InSpace report was completed in 2007. Issues that should probably be addressed in updating EDDC's approach include recognition of the need for open green space to contribute far more than simply meeting technical planning standards and should take into consideration</p> <ul style="list-style-type: none"> • quality and “naturalness” (LUC’s terminology), and • accessibility and <i>connectivity</i> (in its social rather than ecological sense): this includes both the physical ability of local residents to access natural greenspace and the emotional connections that may not exist now but should be encouraged and facilitated (along the

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			<p>lines that that EDCMS does with its work with local schools and the volunteering opportunities offered by DWT and ETAG projects). This should be picked up in the emerging Green Infrastructure proposals but should be recognised in the Core Strategy Options as well as it has implications for Green Belt issues</p> <p>http://www.naturalengland.org.uk/Images/Greenspace%20-%20ANGSt%20report%20%202008_tcm6-7737.pdf</p>
Key Issue Paper 16 – Tourism	Table 2.1	360302 East Dorset Environment Theme Action Group	<p>The vehicle movements to Kingston Lacy and Moors Valley are particularly important in the context of additional traffic, road maintenance, potential for improved bus services, potential for non-motorised transport and enhancement of trailways. The most recent information from the National Trust is that there were 205,000 visitors for the year 2010/11: they are obtaining updated projections for future years that will also take into account visitors to their allotment scheme. MVCP visitor numbers by car are:</p> <p>2009 - total vehicles in 235,000 at 3.4 per car = 800,000 visitors. 2010 - slightly down on this figure with 226,000 vehicles = 770,000 visitors.</p> <p>An estimated 50,000 access Moors Valley on foot annually.</p>
Key Issue Paper 16 – Tourism	Preferred Option PC17	360302 East Dorset Environment Theme Action Group	<p>Preferred Option PC17 should be reworded to <i>Tourist related development will be designed to</i></p> <p>Assuming that the recommendation is supported, the ideas outlined above might also be included in PC17.</p>

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Key Issue Paper 16 – Tourism	5.1	360302 East Dorset Environment Theme Action Group	5.1 highlights need to promote new visitor attractions. This does not need to (and indeed should not) be achieved through development but through enhanced environmental assets that meet some of the characteristics of SANGS and dilute visitor pressure so reducing damage but making our wildlife accessible to all.
Key Issue Paper 16 – Tourism	Table 2.12	360302 East Dorset Environment Theme Action Group	Table 2.12 could perhaps make reference to volunteer work parties, visiting wildlife enthusiasts etc who will not want the “honeypot” sites but seek wilder less well known areas for eg botanising, observing birds & insects, photography etc. Such activities require a diversity of habitats and locations linked by greenways (and country pubs). Something to this effect could be included in the 7 th bullet point under the heading Core Strategic Messages on p 21.
Key Issue Paper 17 - Affordable Housing	Table 2.4	522117 (Chittenden)	Core Strategic Messages It should be noted that LAAs no longer exist so the reward element is not relevant.
Key Issue Paper 17 - Affordable Housing	Table 2.12	522117 (Chittenden)	I strongly support the recommendation in the final bullet point for a policy to cover circumstances where a shared equity unit may not be taken up and could be lost to the open market.
Key Issue Paper 17 - Affordable Housing	2.43	522117 (Chittenden)	I strongly support a lower threshold policy as well as other methods of delivery of affordable homes. This should include purchase of market homes in all East Dorset settlements even if it requires reconsideration of non-essential criteria such as width of corridors. That really is irrelevant to someone who is homeless or in overcrowded accommodation.

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Key Issue Paper 18 – Design & Landscape	2.13	522117 (Chittenden)	<p>2.13 Describes AGLVs as <i>high value unspoiled countryside, with a strong historical dimension, containing many traditional cottages and farm buildings and forming attractive and richly varied human and natural landscapes</i>. This applies to the AGLV to the north of Verwood which should continue to be protected by saved Local Plan Policy LSCON2, where any development must be sensitive to the surrounding character and quality of the landscape. It is adjacent to the West Wilts and Cranborne Chase AONB and adverse impacts of light pollution, additional traffic and recreational pressure should be taken into consideration. See comments on landscape under Masterplan report above.</p> <p>The Local Plan Policy CSIDE2 d) states, <i>the development will not generate traffic likely to either damage rural roads or result in a significant change in character of the road or its use.</i> The C104 to Alderholt would suffer substantial increase in use and hence damage (as discussed under comments on the Masterplan).</p>
Key Issue Paper 18 – Design & Landscape	2.25	522117 (Chittenden)	<p>The ecosystem services provided by the land that drains towards the River Crane in holding back water are a key function of our local green infrastructure. It is essential that none of the proposed development within Verwood or Woolsbridge exacerbates flooding further downstream. (Please see Natural England Research Report NERR035 <i>An evidence base for setting flow targets to protect river habitat</i>).</p>
Key Issue Paper 18 – Design & Landscape	Table 2.13	522117 (Chittenden)	<p>Table 2.13 references the Natural England report <i>NE85 The State of the Natural Environment (2008)</i> and emphasises the vulnerability of landscapes and ecosystems. The wording of the summary of this is a little</p>

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Report	Paragraph No.	ID Ref	Comments
			odd and does not adequately reflect the connectivity between landscape, habitats and ecosystem services that the NE report discusses. An understanding of this is important in assessing the value of our AGLVs.
Key Issue Paper 18 – Design & Landscape	Table 2.15	522117 (Chittenden)	<p>The summary of LSCON2 does not reflect its content particularly in the context of proposed development in Verwood. Proposals for VWM 1 and 2 do not meet the requirements of this Policy.</p> <ul style="list-style-type: none"> i) The siting and scale of both proposals are NOT sympathetic with the landscape. ii) There would be unacceptable damage to those built and natural features that contribute positively to the landscape quality and character of the area. <p>This is explained in detail in comments on the Masterplan.</p>

Comments received on Evidence Reports

Report	Paragraph No.	ID Ref	Comments
Broadway Malyan North Christchurch Urban Extension 01 Masterplan Context Report Sept 2010	Section 04: Spatial Policy & Research Analysis	359615 K Burridge	<p>The Broadway Malyan Report quotes many other local reports but fails to point out that much of the land mentioned in Chapter 6 of the Core Strategy 'The Christchurch Urban Extension' for allotments and a SANG is not available as the area north of the railway line is subject to the minerals extraction plan of Hampshire section C10 and also the minerals extraction plan of Dorset section AS13.</p> <p>Also it does not mention reprovision of Green Belt that the 'Christchurch Urban Extension' will displace.</p>
Broadway Malyan North Christchurch Urban Extension 01 Masterplan Context Report Sept 2010	Section 07 Transportation Analysis	359615 K Burridge	<p>Sainsburys and the associated shops also provide the only bus stop / public transport to the new development and yet the Broadway Malyon Report suggests that there is / are plenty of bus/public transport points of connection.</p> <p>The Raeph Cumming report in respect of the excessive amount of traffic, done at the request of CBC seems not to be referenced and is probably not considered n the Broadway Malyan Report.</p> <p>Para 5.26 of the Core Strategy state that" There is relatively good access to leisure, entertainment and cultural facilities outside of the borough". This may be true for Christchurch, but only for Highcliffe during Monday to Saturday daytime. For Highcliffe there are few buses on a Sunday. No buses to the local railway (Hinton Admiral) station and only two buses each way through Highcliffe after 19.00 hours on a weekday evening. This lack of public transport to Highcliffe includes lack of access to the facilities in Christchurch let alone to those outside of the Borough.</p>

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			<p>The cost of public travel makes the use of private vehicles highly attractive and yet the Broadway / Malyon report gives no credence to any of these points.</p> <p>The Broadway Malyan report re airport transport appears to be full of glib political correctness</p>
Broadway Malyan North Christchurch Urban Extension 01 Masterplan Context Report Sept 2010	Page 166 Retail / commercial centres	359615 K Burridge	<p>The Broadway Malyan Report fails to point out that the extra shops suggested could be unsustainable, as was the shopping area in the Hoburne development. The shop is no longer there.</p> <p>Sainsburys and the associated shops also provide the only bus stop / public transport to the new development and yet the Broadway Malyan report suggests that there is / are plenty of bus/public transport points of connection.</p> <p>The two shops in Highcliffe are graded 'convenience' by the Co-op and Tesco and sell high end cost products. This problem is not highlighted in the Broadway Malyan Report. Indeed the report appears to praise the expensive convenience operation.</p>
Broadway Malyan North Christchurch Urban Extension 01 Masterplan Context Report Sept 2010	Page 167 Education	359615 K Burridge	<p>There is no school provision in the urban extension. The available schools are across the busy A35 Lyndhurst Road and across the busy Christchurch bypass. There are only 2 bridges both across the Christchurch Bypass and the school entrances are not close to either bridge. This will result in increased traffic dependant on the estate point of access; another item not specifically referred to in the report.</p>

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Report	Paragraph No.	ID Ref	Comments
Broadway Malyan North Christchurch Urban Extension 01 Masterplan Context Report Sept 2010	Whole report	359615 K Burridge	The Broadway Malyan Report has looked at only some of the other reports available to it, extracted items which help BM make a good case and ignores reports which are contrary to its conclusions. It gives the impression of a contrived or possibly mis-directed report done at arms length with no actual knowledge of its population or of the area in which they live. The report appears to be designed to give the report's commissioners that which they wanted to hear.
East Dorset Housing Options Masterplan Report, Verwood by Broadway Malyan	Page 24	538739 Mr and Mrs Abernethie	Southern area: says 'there is a good network of public footpaths' – where are they? They do not appear on OS maps!
East Dorset Housing Options Masterplan Report, Verwood by Broadway Malyan	Executive Summary	522117 (Chittenden)	<p>P4 The mid-year population estimate for Verwood in 2009 was 14,820. It is currently estimated to be over 15,000. The unsustainability and low self containment of the settlement is demonstrated by less than 20% of the work force being employed in Verwood.</p> <p>P5 There are four (not three) SSSI sites within 1km for the Verwood North area of search – Stephens Castle, Dewlands Common, Bugdens Copse and Meadows, and the R Crane. The heathlands are also designated Ramsar sites. The report has not identified the route of the R Crane or its tributaries but assumed that it only runs to the south of Option VMW4.</p> <p>The extent of existing development and its damaging impact on nature</p>

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			<p>conservation interest should be noted.</p> <p>In this document, as in the report covering other settlements in East Dorset, the authors have failed to recognise that East Dorset has a three-tier school system and have made no reference to Middle Schools in the area.</p>
East Dorset Housing Options Masterplan Report	Section 2 Background Context	522117 (Chittenden)	<p>P14 The provision of affordable housing has resulted from wasting land on building large and executive homes coupled with a failure of central government to permit a threshold lower than 15 units. The unique range of habitats found in this part of Dorset suffered significant fragmentation and isolation at the time of the last Local Plan. The Core Strategy should recognise the extent of existing development and the damaging impact it has had on nature conservation interest. Development resulting from the last Local Plan largely enclosed the Northern section of Dewlands Common and, had it not been for Ministerial and international intervention, would have resulted in further ecological damage to Stephens Castle. Ecosystem services across the District have been compromised and it was noted in the SA of RSS that we are exceeding the carrying capacity of our environment by a factor of more than 3.</p> <p>P15 The analysis of housing need in this section is somewhat short on facts and does not cross refer to the report by Fordham. In particular it should be noted that Table 5.5 of that document shows that 67.8% of owner occupier (no mortgage) moves are older person in-migrants and 8.9% of owner occupier (with mortgage) are older person in-migrants. Assuming that this typifies occupancy of new market housing, we are looking at 2/3 to 3/4 of all new homes being occupied by residents who, because of their age, are likely to add to the burden on social services</p>

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			<p>(including medical and personal care, police, transport, infrastructure) and not contribute to the local workforce or raise children in the District. To maintain the <i>status quo</i> of the ratio of work force to older people there should be no more older person households than younger person households. It is understood that The Core Strategy actually seeks to reverse this trend. However, the Fordham report indicates that the building large numbers of market homes to fund affordable homes will exacerbate the problems we have now rather than reducing them.</p> <p>P15 The problem of commuting long distances for employment opportunities (Bournemouth, Poole, Southampton, Salisbury, London) is largely a reflection of the career choices of the people who have moved house, but not necessarily their jobs, to live in the large and luxury homes in Verwood: it also reflects the lack of work opportunities. Distances travelled to work will be determined in the Verwood Town Plan Survey but the data presented (p20) show that more than 80% of Verwood's workforce out commutes. Shopping provision will never be comparable with Wimborne and Ferndown. This is discussed in more detail under the Core Strategy Options KS16 (above).</p>
East Dorset Housing Options Masterplan Report	Section 3 The Sites and Their Context	522117 (Chittenden)	<p>P20 Verwood's population is currently estimated to be over 15,000 (2009 mid year estimate was 14,820).</p> <p>P21 Map 2 Dewlands Common is not continuous accessible open green space as shown on the map: a large block in centre of this area is in private ownership and not managed for Nature Conservation.</p>

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			<p>P22/23 The top photograph shows rough pasture in the area proposed as site VWM1. This is known to be a regular hunting ground for Barn Owl. The statement that there is a good network of public footpaths across the site is incorrect. The footpath shown (FP32) is the only designated one that crosses VWM1 though others are shown on historic maps and are known to have been used by local residents within the last 10 years at least. The network of apparent footpaths indicates the use to which this area is used for informal recreation and currently provides a SANG function. There are no designated footpaths crossing the proposed site VWM2.</p> <p>The road adjoining both sites is the C104 to Alderholt not the B3081: it has not been constructed to modern standards, is narrow and has inadequate foundations. It has had a history of flooding problems both before it was adopted and surfaced and since. In December 2010 a brick culvert collapsed resulting in road closure.</p> <p>P24 The SNCI to the east of the area of search is a small heathland Local Nature Reserve (Potterne Hill) under ownership and management of the East Dorset Countryside Management Service. The B3072 that runs along the eastern side of the area of search links to the Horton to Ashley Heath C road and not directly to the A31 as stated.</p>
East Dorset Housing Options Masterplan Report	Section 4 Spatial Policy and Research Analysis	522117 (Chittenden)	P31 It is essential that <i>ad hoc</i> development is not allowed to take place and that environmental and infrastructure requirements inform District-wide development proposals. I fully support this approach.
East Dorset Housing Options	Section 5 Existing Development	522117 (Chittenden)	P34 The proposals advocate a housing density of 30dph : this is at variance with p6 which advocates 20dph.

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Report	Paragraph No.	ID Ref	Comments
Masterplan Report	Proposals and Promotions		
East Dorset Housing Options Masterplan Report	Section 6 Constraints and Opportunities Analysis Green Belt Review	522117 (Chittenden)	<p>P40 – Should we not consider all 5 purposes of the Green Belt? ie</p> <ul style="list-style-type: none"> • <i>To check unrestricted sprawl of large built-up areas;</i> • <i>To prevent neighbouring towns from merging into one another;</i> • <i>To assist in safeguarding the countryside from encroachment;</i> • <i>To preserve the setting and special character of historic towns; and</i> • <i>To assist in urban regeneration, buy encouraging the recycling of derelict and other urban land.</i>
East Dorset Housing Options Masterplan Report	Landscape Appraisal	522117 (Chittenden)	<p>P44 The report identifies the lack of any District site based landscape assessments for Verwood although this exists for other large settlements in East Dorset. It notes that the <i>great variety of landscapes within (the) small compass of the AGLV reflects the variety in the underlying geology and gives rise to the wide range of habitats in this area, ranging from heath, acid and neutral grassland, ancient and species rich hedgerows, native woodlands.</i> This AGLV borders Cranborne Chase. The West Wilts and Cranborne Chase AONB is the darkest place in Central Southern England and the proposals for development here could have a serious impact on this unique area. Light travels: areas 20 miles away can be adversely affected by light pollution. The views across the AGLV both looking from the north and north west towards Verwood and also outwards in the opposite direction are spectacular. The land is gently undulating with a mix of large open spaces and smaller more intimate fields bounded by ancient and species rich hedgerows.</p> <p>The consultants undertook their assessment in August/September 2010 and consequently did not consider the landscape in the months when</p>

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			<p>deciduous trees are not in leaf. The East Dorset Landscape Character Assessment (2008) was also carried out mainly in the summer months though that document notes that <i>seasonal variation in landscape is another factor in determining how and when the landscape is best assessed. Ideally photos should be taken at different times of the year to indicate the seasonal variations in each character area.</i> Clearly this is essential when determining the impact of light pollution: there will be more hours of light from houses, cars and street lamps during autumn, winter and early spring and the light spill across the wider countryside will be greatest when it cannot be screened by foliage. However, nowhere in the Masterplan is light pollution considered.</p> <p>The report (p46) refers to “isolated parcels of acidic grassland”. This is the rarest habitat that we have in Dorset and all efforts should be made to identify its location through survey and to retain it.</p> <p>In considering landscape, the report confuses native woodland and alien coniferous plantation. The pines in Ringwood Forest, like any other crop, are harvested: clear felling of large areas of the Forest are scheduled in the Forest Design Plans. The extent to which these areas will then be included in the Open Habitats restoration programme is still uncertain. Landscapes that include coniferous plantations will never remain as they are: any screening they may offer now is of limited duration.</p> <p>Trinity First School (Local Plan saved policy V8) was designed <i>to take into account the open and important location.</i> The buildings replicated low lying agricultural (chicken) sheds so that they would not have an adverse impact on the AGLV: this objective was achieved very successfully. The open and long distance views outwards from the general area of VMW1</p>

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			<p>are visible from Burrows Lane, Coopers Lane (both adopted and unadopted sections), Edmondsham Road and parts of Eastworth Road.</p> <p><i>The local and strategic views</i> identified in the report (p47) focus only on how residents of the proposed development would be affected and not its impact on the existing landscape.</p> <p>The description of option VMW2 is also inward looking. The land slopes towards the former railway line that borders the NW edge but has uninterrupted views across the AGLV to the NW, N and NE. Not all of the land shown on the maps is actually available for development. It was intended in the last Local Plan that Eastworth Road would be <i>retained as a rural lane bounded by hedges and trees</i>: they were identified as being important to retain the character of the lane and to ensure a good screen to the edge of the built up area. The site adjacent to Eastworth Lane was developed prior to approval of the Local Plan (without local residents being aware of the risk to the lane) and much of the character was lost. EDDC has not been forgiven by many Verwoodians for what they consider as a breach of faith.</p> <p>The AGLV is visible from the houses in Eastworth Road albeit from upper storey windows in some cases. The view from the lane itself and through gaps in the hedgerows across the wider expanse of the AGLV are stunning: veteran and mature oaks in the lane at VMW2 provide ecological corridors to the woodlands to the SW and link to the north towards Stephens Castle where the boundary oaks provide feeding areas for Nightjars. The trees throughout VWM1 and 2 are known to support several species of bats. This will be discussed in more detail in the next section on Ecology.</p>

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			<p>The oak trees along the disused railway line are considerably younger and will not provide visual screening for decades. Because of the traffic management of Eastworth Road, it still retains an element of its rural charm and is a popular dog walking route diverting people away from the heathland at Dewlands Common. Were development to proceed, it is doubtful that the proposed SANG would be adequate to enable it to achieve its purpose because of the need to compensate for loss of currently used open green space and change of character. (See discussion on ecology below).</p> <p>The description of vegetation for both sites is extremely limited and adds nothing to the knowledge base required for site assessment. It is totally unacceptable that there has been no biodiversity audit of land that has reached this stage of the Core Strategy process.</p> <p>No attempt has been made to identify how the proposed developments could be accommodated within this high quality landscape and no consideration has been given to the damaging impact of light trespass across the AGLV and to Stephens Castle or light pollution impacts on statutorily protected or other species.</p> <p>The hedgerows and tree lines shown on the 6 inch 2nd edition maps of the proposed sites indicate that many of these have been retained and, as long standing ecological corridors, are likely to be of significant interest. Opportunities should be taken to enhance and extend these linear features and where possible reinstate former habitats such as woodland and unimproved grassland. The report identifies some protected hedgerows, mature trees and “vegetation” in the Verwood South areas.</p>

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			<p>Being low lying and within the corridor of the River Crane, Verwood South is a more intimate landscape. Light trespass to the wider countryside is unlikely to be a major risk at VMW3 or VMW4 but light pollution will have an adverse impact on aquatic habitats including R Crane SSSI, ponds and the fishing lake and on protected and other species.</p> <p>Rather than a housing density of 20 dph as proposed in the earlier part of the report, the authors are now (p52) proposing a density of 30-35 dph with houses of 2-3 storeys. This is not appropriate for those areas where countryside meets old settlement patterns (VMW1,2 and 4) and would destroy all sense of place.</p> <p>From the point of view of whether new development can be accommodated, landscape appraisal needs to consider the <u>use</u> of the local countryside - not just whether it can be seen from a few windows of the new houses. For example, if the development goes ahead what would be the impact on existing dog walkers, horse riders, health walks, buggy walks both while construction is underway and afterwards? Would they still get the exercise that contributes to their health? Would they be diverted to the heaths? If people cannot find what they want from their local open green spaces and countryside they will drive elsewhere to find it and that has sustainability implications in terms of transport and wear and tear on roads, and threatens other sensitive habitats.</p> <p>P54-55. The Landscape Appraisal should be reconsidered once full habitat surveys have been carried out and BAP habitats have been identified.</p>

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			<p>I suggest that with present knowledge the appraisal should be re-scored as follows. I have taken into consideration the impact of light pollution and the impact of development on the wider landscape rather than its acceptability within the proposed sites.</p> <p><u>Landscape Sensitivity</u></p> <table border="1"> <thead> <tr> <th></th> <th>Natural Landscape Factors Sensitivity</th> <th>Cultural BM Factors Scoring</th> <th>Landscape Quality</th> <th>Aesthetic</th> <th>Visual Factors</th> <th>Total Sensitivity</th> </tr> </thead> <tbody> <tr> <td>VMW1 16</td> <td>4</td> <td>3</td> <td>4</td> <td>4</td> <td>5</td> <td>20</td> </tr> <tr> <td>VMW2 15</td> <td>4</td> <td>3</td> <td>3</td> <td>4</td> <td>5</td> <td>19</td> </tr> <tr> <td>VMW3 13</td> <td>4</td> <td>2</td> <td>3</td> <td>2</td> <td>2</td> <td>13</td> </tr> <tr> <td>VMW4 15</td> <td>4</td> <td>3</td> <td>3</td> <td>4</td> <td>3</td> <td>17</td> </tr> </tbody> </table> <p>Note: VMW2 is woodland edge habitat. Landscape is not <u>contained</u> by railway line: it forms one boundary of the site VMW4 The report has ignored River Crane SSSI</p> <hr/> <p><u>Landscape Value</u></p> <table border="1"> <thead> <tr> <th></th> <th>Landscape Total Designation Landscape Scoring</th> <th>Other BM designations</th> <th>Other value NC etc</th> <th>Other (cultural/</th> <th>Other Conservation historic)</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>		Natural Landscape Factors Sensitivity	Cultural BM Factors Scoring	Landscape Quality	Aesthetic	Visual Factors	Total Sensitivity	VMW1 16	4	3	4	4	5	20	VMW2 15	4	3	3	4	5	19	VMW3 13	4	2	3	2	2	13	VMW4 15	4	3	3	4	3	17		Landscape Total Designation Landscape Scoring	Other BM designations	Other value NC etc	Other (cultural/	Other Conservation historic)						
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			<p>Value</p> <table border="1"> <tr> <td>VMW1</td> <td>4.5</td> <td>2</td> <td>4.5</td> <td>3</td> <td>5</td> </tr> <tr> <td>19</td> <td>12</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>VMW2</td> <td>4.5</td> <td>3</td> <td>3</td> <td>2</td> <td>3</td> </tr> <tr> <td>15.5</td> <td>13</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>VMW3</td> <td>0</td> <td>0</td> <td>2</td> <td>1</td> <td>3</td> </tr> <tr> <td>6</td> <td>10</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>VMW4</td> <td>0</td> <td>4</td> <td>5</td> <td>3</td> <td>4</td> </tr> <tr> <td>16</td> <td>11</td> <td></td> <td></td> <td></td> <td></td> </tr> </table> <p>Note: All sites include permanent grassland so potentially high biodiversity in soil ecosystems and seed bank VMW1 adjacent to Eastworth Farm – not listed but important historical interest. VMW1 and 2 include old and veteran trees. VMW3 will have less impact on wider landscape and R Crane than VMW4. Of local importance to neighbouring community. TPO trees, bat roosts. VMW4 Major contribution to ecosystem services through water retention capacity of land. Protected hedgerows, TPO trees. (NB The note in report on SSSI should refer to Site 4 not Site 3)</p> <p>[Please note that the advice and assessment of light pollution on each of the proposed sites has been obtained from the British Astronomical Association]</p>	VMW1	4.5	2	4.5	3	5	19	12					VMW2	4.5	3	3	2	3	15.5	13					VMW3	0	0	2	1	3	6	10					VMW4	0	4	5	3	4	16	11				
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East Dorset Housing Options Masterplan Report	Ecology	522117 (Chittenden)	<p>This chapter is disappointing as it is basic and theoretical: unfortunately it adds nothing to existing knowledge. Although mention is made that LUC have carried out a Habitats Regulations Assessment (for N2K sites), the results of their preliminary work are not included. The limitations of this section of the Masterplan report are acknowledged by the authors.</p> <p>As the land is in private ownership it has not been possible to do more than observe from the boundaries. The late issuing of the Masterplan</p>																																																

Report	Paragraph No.	ID Ref	Comments
			<p>Report (December 2010) which was erroneously understood to contain detailed ecological information has also precluded examination of DERC records at this stage. It is essential that no site is short listed for development without a full 12 month ecological survey in the absence of land management or grazing in at least formally agreed representative areas of the sites.</p> <p>All four sites have been identified in the Habitats Regulations Assessment as Amber indicating that their impact on the Dorset Heaths SAC and Dorset Heathlands SPA/Ramsar is uncertain but appears most likely due to their location in relation to the fragmented heathland sites in the Verwood and Three Legged Cross area. No mention is made in the Masterplan of the potential impact on the New Forest of further development in Verwood.</p> <p>Verwood North Although mapped, Coopers Lane SNCI (neutral grassland) is not mentioned.</p> <p>It is misleading (p57) to refer to arable fields and improved grassland. Both areas are permanent pasture.</p> <p>VMW1 includes semi-improved grassland and it is believed not to have been cultivated for over 40 years: lack of haymaking in 2010 and low level grazing has provided evidence of reversion to acid/neutral lowland meadow particularly on the soils with high sand content. VMW2 has not been cultivated in living memory. Unimproved or semi-improved grasslands are biodiverse comprising a wide range of well loved wild flowers and grasses they support numerous invertebrates (most obviously butterflies) and</p>

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			<p>tussocky grassland, such as that at VMW1, is suitable habitat for small mammals. Lowland meadows have suffered huge (97%) losses over the last 50 years. Dorset is one of only a few nationally important areas of acid grassland. The Biodiversity targets agreed by local authorities at both County and District level (through the Dorset Biodiversity Partnership) aim to reverse these losses, not only by conserving what remains now, but by helping projects that aim to restore further areas back to a good condition for wildlife. As BAP habitat these meadows should be protected and enhanced and should not be dismissed as <i>less important habitats that development should be focussed on</i>.</p> <p>The threats posed by climate change are becoming increasingly understood as is the need to minimise those of man's activities that exacerbate the problems through greenhouse gas emission. It is not widely recognised that most terrestrial carbon is held in soils, more than twice as much as in vegetation and the atmosphere combined. Soil disturbance results in oxidation of the captured carbon so releasing it to the atmosphere. Changing land use from an intensively managed system (arable or intensive grasslands) to a semi-natural habitat can significantly increase soil carbon levels. Maintenance of semi-natural habitats is important as reversion to more intensive system will result in the loss of carbon to the atmosphere and establishment of a new lower soil carbon content. The loss of soil carbon through development of these permanent grassland sites would not be offset by the proposed SANG.</p> <p>There is a badger sett within VMW2 and it is understood that another is present in the SNCI woodland to the southwest. Badger trails cross VMW1 and the open land adjacent to it. Badgers have already been relocated from Bakers Farm: it is a process that cannot continue</p>

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			<p>indefinitely. It is know that the search area supports Dorset Notable plant species and significant populations of several species of bat. Large numbers of birds of prey throughout the area of search and the presence of Barn Owls hunting over the rough pasture in VMW1 indicate a good supply of food sources and good biodiversity. (Barn Owls are a specially protected species under the Wildlife and Countryside Act(1981) Schedule One) [see Ramsden, D & Twiggs, M (2009) <i>Barn Owls and Rural Planning Applications "What needs to happen" – A Guide for Planners</i>. ISBN 978-09525578. Natural England and Barn Owl Trust. The publication can be downloaded at http://www.barnowltrust.org.uk/]</p> <p>A tributary of the River Crane SSSI borders VMW1: this should be protected to ensure no adverse impact on the SSSI.</p> <p>Many local residents currently use Eastworth Road and the footpath (FP 32) that borders VWM1 for informal recreation because of their relative tranquillity. Development (both during the construction phase and afterwards) could result in these residents being diverted to the quieter more expansive tranquil areas of Dewlands Common and Stephens Castle both heathland SSSIs – this is the opposite of what is required. In assessing what additional green infrastructure is required it should be noted that much of the area proposed for development and a SANG has been used for informal recreation for many years so there would be no gain in space in real terms.</p> <p>Verwood South <u>Statutory Designations</u> Lower Common SSSI (heathland) has been omitted. Dewlands Common is part of the Verwood Heaths.</p>

Report	Paragraph No.	ID Ref	Comments
			<p><u>Local Non-statutory Designations</u> Potterne Hill SNCI is a small but important heathland LNR which has been carefully managed by the East Dorset Countryside Management Service for many years. Any additional informal recreational pressure on this could well destroy its ecological integrity.</p> <p><u>Protected species</u> Local residents report bat roosts in some of the larger trees and there are anecdotal observations of foraging. There are records of otter in the R Crane. Barn owls are reported in this area though I have not verified this information.</p> <p><u>Important features</u> Maps of the area show a large number of drains, local residents report high water table with surface flooding and numerous springs and seasonal wet flushes. Fishing lakes lie to the SW of the area of search.</p> <p>No reference is made to the importance of this land in holding water back and reducing potential flood risk further downstream. Further, the land is permanent pasture with no record of cultivation: as discussed above, the carbon capture role of the soil is important. The proposed SANG would not add to the ecosystem services already provided by this land. It is understood that it surface floods frequently, so it would only be available to be used for the dry periods of the year. There is a risk that additional land drains would compromise the roots of the mature trees: arboricultural advice on appropriate root protection zones would be necessary. Residents would then be faced with a choice of Potterne Hill (heathland SNCI), Potterne Park, or the heathland SSSIs at Dewlands Common,</p>

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			<p>Lower Common or Horton Common for their nearest informal recreation. As permanent unimproved/semi-improved pasture, there is potential for good biodiversity on the site. The high water table here will have resulted in reduced fertility, a prerequisite for many of our native plant species.</p> <p>Comparison of the 6 inch 2nd edition map with current aerial photographs show that the boundary trees and hedgerows across the area of search have been in existence for many years. Many of the trees have TPOs and the report indicates that there are also protected hedgerows.</p> <p><u>Summary and implications for the Masterplan</u> All four sites have been identified in the Habitats Regulations Assessment as Amber <i>indicating that their potential impact on the Dorset Heaths SAC and Dorset Heathlands SPA/Ramsar is uncertain but appears most likely due to their location in relation to the fragmented heathland sites in the Verwood and Three Legged Cross area and to the risk of additional pressure on the New Forest.</i> (LUC, 2010, Habitats Regulations Assessment Report)</p> <p>Currently there are no projects in the emerging GI Strategy that would provide mitigation for any previous overdevelopment in Verwood or which are designed to address additional pressures that new development would bring.</p> <p>The report lists the principle characteristics required of a SANG. Throughout the Masterplan report there appears to be some confusion between those new sites that are designed to deflect pressure of informal recreation on the heathlands and those sites which will provide more general natural greenspace. There has been no attempt to identify how</p>

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			<p>any of the proposed SANGs fulfil the requirements.</p> <p>As noted above in the general discussion of ecology of the option areas, there is very real risk that development in the North Verwood area would divert people away from their established relatively tranquil routes along Eastworth Road and Footpath 32 and use Stephens Castle and Dewlands Common instead. This would be most likely during the construction phase but once people have established patterns for their walks (particularly those who are dog walkers) many are reluctant to change: for this reason it is unlikely they would eventually resume their old walks and also because the whole character of the local area would have changed and become more urbanised.</p> <p>The SANG proposed for VMW4 is reported to be frequently surface flooded so other options for informal recreation would be required. Those that are currently available are Potterne Hill (heathland SNCI), Potterne Park, or the heathland SSSIs at Dewlands Common, Lower Common or Horton Common. All these are unsuitable.</p> <p>P62 suggests that loss of important ecological features should be compensated at a ratio of 1:2. It is assumed that this is meant to imply that the replacement new habitat should be double what is lost: the wording is slightly ambiguous. Without ecological survey for a full year year the proposal lacks validity: if what is there is unknown the compensation required is also unknown.</p> <p>P63 recommends compensation for loss of habitat at VMW2 could be provided by linkages between the two woodland SNCIs to the west and southwest. Although linkage of woodland habitat is welcome, it would not</p>

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			<p>compensate for loss of lowland meadow or the release of soil carbon from permanent grassland. Woodland does not fulfil the requirement of wide open spaces required to substitute for the “heathland experience”.</p> <p>The discussion of SUDS appears to be little more than window dressing as it is clear the authors had no understanding of the hydrology of the land in South Verwood. The repetition of standard phraseology that is not specific to the sites does not inspire confidence in their technical expertise. The Environment Agency and Natural England will need to advise on</p> <ul style="list-style-type: none"> • water retention capacity of the land, • potential adverse impact on increased volume of water draining to the Crane and flood risk further downstream, and • potential adverse impact on the river ecosystem and priority aquatic species. As noted above there are otters present in the River Crane. <p>In North Verwood, existing development to the south of Champtoceaux Avenue is drained to a swale alongside the main road. It is probable that land drainage of VMW2 would be taken towards the lower areas to the west/southwest and thence to the R Crane. Land drainage of VMW1 would be taken to the tributary of the Crane.</p>
East Dorset Housing Options Masterplan Report	Archaeology and Cultural Heritage	522117 (Chittenden)	It should be noted that deep disturbance of heathland soils will be likely to disrupt drainage patterns: excavation for archaeological remains should take this into account. There is strong evidence of this in North Verwood with localised flooding when services have been put underground. Further details of this can be provided if required. Other problems have included

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			<p>running sand when Trinity First School was built and subsidence of a newly built 2 storey house in Coopers Lane in 2009.</p> <p>The report has made no reference to SPG 21 (1999) Countryside Design Summary: this document states that there are relatively few indigenous buildings remaining within the Heaths, Conifer Plantation and Oakwood Zone of East Dorset but that most are located at Verwood. The SPG highlights the importance of the distinctive character of countryside and rural areas and the need to refrain from diluting further their local distinctiveness. Development should ensure that it relates to its neighbours and its landscape setting.</p> <p>Verwood's history is described in <i>Verwood Village to Town</i> (Coulthard, J (2007) and describes in some detail (p92-3) the historical significance of Eastworth Farm. It was originally Heathpoult Inn. Its nucleus is late 18th century: it has been a dairy farm, the Heathpoult Inn, and a marking point for Census enumerators when it lay within the county boundary of Wiltshire. It is believed to have transferred to the Somerley Estate in 1845 and then sold in 1919. Heathpoult Inn lay on the smuggling route inland from the then deserted coves around Bournemouth and Christchurch with tea, silk, brandy and tobacco being carried by packhorse. It continued as a farm into the late 20th century.</p> <p>With this fascinating history, the present owners (who already contribute much to the local economy through their other work) have converted the house and some of the outbuildings into holiday homes. They have followed current planning guidance by diversifying disused farm buildings and were required to comply with many planning regulations because of the location of the property within the Green Belt and the AGLV. The</p>

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			<p>proposal to build adjacent to and opposite their property would have a marked impact on their holiday letting business which contributes to East Dorset's tourist industry. Were the vehicular access to VWM1 to be located to the northwest of Eastworth Farm (as is suggested in the Core Strategy Options), their home and holiday lets would be stuck in the middle of a traffic island. The Key Issue Paper on Tourism (16) shows that there are only 47 self catering units such as these in East Dorset.</p> <p>This building and its setting in the now East Dorset countryside is an important part of Verwood's history. It should not be subsumed into an urban landscape.</p>
East Dorset Housing Options Masterplan Report	Noise and Vibration	522117 (Chittenden)	<p>As with the Ecology section, it is apparent that this part of the report has been taken from a standard format with occasional references to Verwood (many incorrect or inadequate) slotted in.</p> <p>The S tip of Verwood North site VWM 1 lies close to the C104 not the B3081. Similarly the NE edge of site VMW2 lies alongside the C104. The B3072 DOES NOT cut through VMW 4 but borders its NE edge.</p> <p>For such important strategic land use planning the lack of real data and estimation of traffic flows is unacceptable. Further, no comment has been made on</p> <ul style="list-style-type: none"> • the speed of traffic using Champtoceaux Avenue, • the problems that would be posed in both North and South Verwood by additional HGVs and the damage to our rural lanes, • slamming car doors and parking near the schools.

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			<p>The traffic through Verwood is currently legally restricted to 30mph NOT 40mph .</p> <p>The comments on road noise have been related to impact on the new development rather than on the existing population. It will not of course be possible to screen existing homes from additional noise.</p> <p>P72 has omitted Verwood 1st School. No reference has been made to the problems caused by the school run and the lack of capacity of roads for such traffic.</p> <p>The photograph on p73 does not appear to be Manor Road and it is doubtful if it was taken in Verwood. Because of lens width, some other photographs that appear in the report do not reflect the true characteristics of what it is assumed they are intended to depict. They should not be taken at face value.</p>
East Dorset Housing Options Masterplan Report	Flood risk and drainage	522117 (Chittenden)	<p>A tributary of the R Crane runs along the eastern edge of VMW1. Flows are variable but likely to increase with planned felling in Ringwood Forest and proposed land drainage of Halsdon (a 6 acre property in Burrows Lane). The Environment Agency would need to advise on the capacity for additional surface water to be taken to this stream and potential adverse impact on the R Crane SSSI. The report confirms that discharge to the local watercourse would be required at VMW2: this would also be taken to the R Crane SSSI.</p> <p>Given the high water table and the extent of <u>current</u> seasonal surface flooding in Verwood South it is unclear how additional run-off can be</p>

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			<p>accommodated without adverse impact on the R Crane SSSI. Design will need to allow for increases due to Climate Change.</p> <p>The report highlights that the tanked systems proposed are the least sustainable method of dealing with run-off.</p>
East Dorset Housing Options Masterplan Report	Infrastructure	522117 (Chittenden)	<p>The problems with putting services underground in north Verwood has been mentioned above (see comments under Archaeology and Cultural Heritage) In the documentation for RSS, it was established by DCC that Verwood, West Moors, St Leonards & St Ives could not cope with additional sewage loading without substantial upgrading at a cost (2005 prices) of £3.6 million.</p>
East Dorset Housing Options Masterplan Report	Section 7 Transportation Analysis	522117 (Chittenden)	<p>The Masterplan report identifies particular problems regarding further growth of Verwood:</p> <p><u>i) Strategic junctions, notably problems at Ashley Heath & Blackwater, are at or near capacity</u> and are forecasted to exceed them by 2016 (5 years' time!) with Ashley Heath interchange reaching 125-150% of capacity. This is compounded by lack of funds for major highway infrastructure and DCC has also advised that there are no funds for the work required for the A338 Spur Road. The knock on effect of this could well be to move the area of the Ashley Heath roundabout and A31/B3018 junction into an AQM zone – it has approached this several times but may appear on Hampshire's records rather than Dorset's.</p> <p><u>ii) Verwood is not on one of the Prime Transport Corridors.</u> Most of the roads in East Dorset are only cart tracks, although consolidated over hundreds of years of use, they are not wide enough for the modern</p>

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			<p>vehicles now using them : these include HGVs , very large agricultural machinery (generally of USA origin), overweight delivery vehicles and some of the larger 4x4s. The main problems are caused by vehicles over-running the road edges because of vehicle width: this leaves a rut that fills with water that then penetrates the sub-strata of the road. Poor ditch maintenance compounds the problem. Species rich verges and ancient hedgerows are put at risk on these narrow lanes.</p> <p>From its junction with the B3078 the B3081 includes sections that can only be described as a country lane where the road edges and verges are being eroded by HGVs and other vehicles too wide and heavy for the very basic construction techniques that were used when it was built.</p> <p>The C104 to Alderholt is in poor condition and in 2006 is reported to have carried in excess of 3000 vehicles per day. In the last two years, infrastructure upgrading for mains utility services has disrupted further the poor construction of this road. In mid December 2010 it had to be closed again because a brick arch culvert collapsed and had to be replaced.</p> <p>iii) <u>Journey time</u> is critical in persuading people out of their own cars and on to public transport. High frequency and reliability of service are also essential. The loss of free bus passes is likely to reduce use of public transport by Verwoodians. Bus companies have advised that they are unable to take routes closer to people’s homes because that would add to journey time. Consequently many bus users leave their cars all day in the Potters Wheel or Bakers Farm carparks making them unavailable to other users. The emerging Local Transport Plan and SE Dorset Transport Strategy identify no bus showcase corridors further north than Ferndown. The prospects for sustainable travel options in Verwood are poor.</p>

Report	Paragraph No.	ID Ref	Comments
			<p>iv) <u>Impact of traffic on the Strategic Road Network</u> The Masterplan report concludes that because of the <i>impact of traffic from Verwood towards the conurbation and New Forest, Verwood may be less favourable than development elsewhere. Travel to work distances for those that out-commute from Verwood can be expected to be longer than those from sites in other potential new neighbourhood settlements elsewhere in the District.</i> This has significant consequences for carbon emissions and other air pollutants and the need to conserve both energy and our road surfaces.</p> <p>The Atkins Report (SEDMMTS) recommended</p> <ul style="list-style-type: none"> • <i>In the shorter term, within East Dorset only sites to the south of the A31, such as Ferndown and Corfe Mullen, should be considered in the first phase of development as these have stronger travel demand links with the conurbation;</i> • <i>Given the uncertainty surrounding capacity enhancements on the A31, it is proposed that the sites to the north of the A31 are considered for longer term provision: and not until such a time as capacity issues are addressed on the A31</i> <p>The emerging South East Dorset Transport Strategy indicates that there will be no road improvements north of the A31 even beyond 2020.</p> <p>It has also been confirmed that that the West Moors Moors Bypass will not be constructed. Some of the additional traffic resulting from further expansion of Verwood would impact on this centre.</p> <p>The 2001 census data contribute little to assessing current road usage in</p>

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			Verwood as many of the newer houses were occupied after that time and the population was two thirds of its current level. With the exception of Champtoceaux Avenue and Home Farm Way, no major road improvements have been carried out.
East Dorset Housing Options Masterplan Report	Public Transport	522117 (Chittenden)	<p>Of the regular and higher frequency bus services, the 36 service only runs to Bournemouth until 1706: the 1806 and 1906 only go to Ringwood. The last bus from Bournemouth departs 1820 arriving at Verwood at 1918.</p> <p>The 36A is Sunday/Bank Holiday service only and the route does not cater for shoppers at Castlepoint.</p> <p>There are no evening services so all access to major entertainment requires the use of a car: most cinema, theatre, concerts and sports events not adequately catered for in Verwood.</p> <p>The cycleway improvements planned are most welcome but the extent to which they will replace the car in enabling people to get to work is doubtful given the distances people travel to work (even using the 2001 data). They will provide an excellent means of access to nature and healthy outdoor exercise. It is understood from DCC that these are now on hold and work is unlikely to start for at least 3 years.</p>
East Dorset Housing Options Masterplan Report	Sustainability of Verwood as a development location	522117 (Chittenden)	In his report on the Last Local Plan (October 2000), the Inspector stated, ...I do not consider Verwood as offering a particularly sustainable location for significant new growth. He was scathing in his remarks about the development that had already taken place.

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			<p>The first two paragraphs of this section of the Masterplan report are accurate. However, those referring to schools are misleading as they have overlooked the fact that East Dorset has a 3 tier education system.</p> <p>The Town Plan survey will provide data on travel to school patterns.</p> <p>p88 2nd column – the final paragraph is pure speculation. Evidence shows how few people are prepared to spend time walking to day to day services and if car parks are full they will either park in roads in residential areas or return later and try again. Apart from convenience, lack of time drives many people’s transport choices.</p> <p>Given the growth of executive homes in Verwood, as a result of the last Local Plan and since the 2001 Census, it is premature to assume that travel to work patterns are as they were in 2001. Data from the Town Plan survey should provide much of the information required.</p> <p>The penultimate two paragraphs of this section summarise the crux of the sustainability problem with Verwood. Because of long journeys to work (distance and time) it is unlikely that modes of transport other than the car will be either possible or, if available, used. Additional development will reduce the level of self containment. Woolsbridge is unlikely to attract the “knowledge based economy” planned for SE Dorset given the present focus on more industrial employment opportunities at that site. The land has significant environmental constraints and is accessed by a C road.</p>
East Dorset Housing Options	Transport issues for potential development	522117 (Chittenden)	VMW1 <u>Vehicular access</u>

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Masterplan Report	sites		<p>It would be totally immoral to isolate Eastworth Farm by constructing an entrance to the northwest of this property. It would destroy the holiday letting business of owners and put their home in a traffic island. The importance of the property is covered in detail under the heading of Archaeology and Cultural Heritage above. Access would create additional hard surfacing and require further street lighting with major light pollution problems for the AGLV.</p> <p>The bridge over the former railway line has limited visibility and traffic continues to speed on this section of road in both directions. Bends to the north are also unsafe for traffic travelling at speed. A friend was killed here many years ago when there was far less traffic. Bends to the north are also unsafe for traffic travelling at speed. Speed restrictions alone are useless and would need to be enforced.</p> <p>Speeding is also a major problem near the roundabout at the junction with Champtoceaux Avenue and Coopers Lane creating dangerous crossing points for young children attending Trinity First School. It will be exacerbated by the new housing development adjacent to Trinity. Vehicles travelling out of Verwood along Champtoceaux Avenue accelerate towards the roundabout reaching speeds probably in excess of 45 mph then turn sharply to the left while watching for traffic from the right. This speeding traffic not only endangers children crossing here, it is also dangerous for pedestrians, horseriders and traffic wishing to exit from the northern section of Eastworth Road.</p> <p><u>Public transport access</u> The report notes that DCC's public transport officer is concerned about achieving satisfactory public transport access to North Verwood. The</p>

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			<p>Masterplan report on the other settlements (p170) states that <i>the majority of each neighbourhood should be within 400m walk of a bus stop for a regular (eg daily and ideally half hourly or better) bus service.</i> The distances quoted in the report are for the nearest site access point. So for VMW1 although the access point to the site is 540m from the bus stop at the Fire Station (ie using a pavement), the furthest house is 723m. The bus stop at the former crossroads is closer but would entail using a road that has no pavements and now suffers from rat run school traffic as well as all other local traffic to Edmondsham Road, Moorlands Road, Coronation Road and, because of the speed humps by the school, to many of the properties in Coopers Lane. Bus companies have advised that they cannot consider more circuitous routes in Verwood because it adds to journey times.</p> <p>The summary of distances to a number of day to day services is tabulated in the report. The middle schools at Emmanuel and Cranborne have been omitted. There is no indication if the dentists or GPs can accommodate additional patients or which of the dentists take NHS as well as private patients. Distances to the post office and banks have been omitted and there is no information about how far it is to sports facilities at Potterne or any proposals for providing safe and sustainable access to Potterne (eg additional cycleways).</p> <p>It should be noted that there are no cycleways to Blackhill or Ebblake and the roads are too narrow to accommodate cyclists safely as well as cars and HGVs. Construction of the cycleway from Verwood to Ringwood is being delayed (Local Transport Plan) and there is local concern that it is not sufficiently direct and is only likely to be used for recreation not travel to work.</p>

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			<p>VMW2 <u>Vehicular access</u> The access issues from the Edmondsham Road have been discussed above in relation to VWM1. In practical terms, the extension of the 30mph limit is irrelevant to actually <u>controlling</u> traffic speed. It should be noted that the land available for this proposed development site does not include the field that forms part of the curtilage of The Old Granary, the house that has a frontage on Eastworth Road and Edmondsham Road. This further restricts the location of the entrance to VMW2 from Edmondsham Road. Traffic speed and poor visibility make the potentially available frontage on Edmondsham road unsuitable for any access to VMW2.</p> <p>For the reasons outlined under VMW1, access from Edmondsham Road via Eastworth Road would also be unsafe. Realistically, only emergency access should be considered : mandatory control measures to prevent other use would be required (eg lockable barrier). The Masterplan notes that the existing national speed limit would not achieve adequate visibility. Design must take into account the irresponsible behaviour of speeding motorists and the time it takes to alter established driving behaviour in certain locations. It took people a long time to get used to the reduction of the speed limit from 40mph to 30mph along the further sections of the Ringwood Road: it had been 40mph for decades. Vegetation clearance of a species rich ancient hedgerow is unacceptable.</p> <p>The suggestion of access via the residential area is also unacceptable in terms of safety of existing residents. Access via Station Road also appears impracticable because of poor visibility onto the B3081. Now that the speed cameras are no longer working there is no incentive for vehicles</p>

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			<p>to slow down on this open stretch of road.</p> <p>As noted above, reliability and frequency of bus services are important factors in encouraging people to use sustainable transport options. Bus stops need to be more comfortable – people come out of centrally heated homes and then have to wait in wind, rain etc and, with few exceptions, no shelter or seating.</p> <p>As with VMW1, the summary table of distances to a number of day to day services has omitted the middle schools at Emmanuel and Cranborne; there is no indication if the dentists or GPs can accommodate additional patients or which of the dentists take NHS as well as private? Distances to the post office and banks have also been omitted and there is no information about how far it is to sports facilities at Potterne. Safety of road crossings to all these facilities is of paramount importance. With the loss of “lollipop people”, additional traffic calming measures are essential. The speed of traffic crossing and exiting the roundabout at the junction of Champtoceaux Avenue, Station Road and Home Farm Way must be addressed.</p> <p>For both VMW1 and VMW2 the distance to the convenience stores in Ringwood Road is too great for weekly shopping on foot or cycle and residents will inevitably use cars.</p> <p>No parking for bicycles has been proposed anywhere in Verwood. The cycling network is likely to be primarily for convenience shopping and recreation.</p> <p>I have not commented in this section on VMW3 and 4, Howe Lane or St</p>

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			<p>Michael's Road as I am not sufficiently familiar with traffic issues there and assume that local residents there will be doing so.</p>
<p>East Dorset Housing Options Masterplan Report</p>	<p>Section 8 Urban Character Study</p>	<p>522117 (Chittenden)</p>	<p><u>Introduction</u> Verwood lies to the east (as well as the north) of the R Crane. Since 1981, the population has grown by a factor of 2.5 to nearly 15,000 (2009).</p> <p>Although some Verwoodians are employed at the Ebblake Industrial Estate, observation of traffic flow during peak travel to and from work shows a substantial inflow of traffic from the A31 in the mornings.</p> <p>The assumptions made in para 4 show the risk of employing consultants who know nothing of Verwood or its history and spend too little time doing their research. We now have fewer shops in Verwood than we did in the 1960s. Parking is wholly unsatisfactory and is now causing problems on our residential roads near Ringwood Road. The Potters Wheel Car Park is inadequate and shoppers frequently have to give up and return later. There are few disabled parking places. Parking at the Hub and Medical centre is also inadequate. At the time that the supermarket site was developed it was intended to develop that as the centre of Verwood both geographically and in terms of services.</p> <p><u>Site 2 Coronation Road and Edmondsham Road</u> In considering the planning application for the small (7 dwellings) residential development next to Trinity School, it is understood that</p> <ul style="list-style-type: none"> the Environment Agency also advised on how best to reduce risk to damage to the tributary of the R Crane;

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			<ul style="list-style-type: none"> • Technical Services at EDDC recommended raising the house thresholds by 6 inches for WHEN (not IF) it floods; and • the architects panel advised on how best to reduce ensure minimal intrusion into the AGLV. <p>Trinity First School (Local Plan saved policy V8) was designed <i>to take into account the open and important location</i>. The buildings replicated low lying agricultural (chicken) sheds so that they would not have an adverse impact on the AGLV: this objective was achieved very successfully.</p> <p>Traffic at the school and nursery school is presenting a major problem with parents dropping off and collecting children throughout the day. Because of the history of problems at Emmanuel, on site parking provision was made when Trinity was built but parents are no longer allowed to use the area (on grounds of safety!) – it is deemed safer for them to park on roads, verges and roundabouts and cross a roundabout and uncontrolled roads with speeding traffic. Parking on the mini-roundabout at the junction with Coronation Road obscures visibility. The species rich/ancient hedgerow in the adopted part of Coopers Lane is protected but the verge at its base is being destroyed by parked cars.</p> <p>This area is one of the more rural parts of Verwood and has retained its village character and charm. Until the recent substantial growth of Verwood, Coronation Road was designated as a Play Street. Edmondsham Road is also part of old Verwood. Recent closure of the crossroads has eliminated through traffic but it now attracts traffic</p> <ul style="list-style-type: none"> - as a rat run for cars wishing to avoid the speed bumps in the adopted part of Coopers Lane near the school; - all traffic (including HGVs) to Moorlands Road including that to

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			<p>private homes and the Bowls Club, the British Legion (update name) and the Band Hall;</p> <ul style="list-style-type: none"> - cars unable to find spaces in the car parks. <p>The lack of pavements in Edmondsham Road was one of the main reasons for preventing through traffic to the crossroads. This would be the shortest route to shops and buses from VWM1 and VWM2 but, given the volume of traffic that still uses it, it would clearly be unsafe.</p> <p><u>Site 3 Purbeck Drive</u> This was designed as part of the development to create a town centre around the supermarket. The high density of the starter homes reflects size of the properties. However it should be noted that land in this area, including the supermarket car park was neutral/acid lowland meadow with large numbers of wild orchids.</p> <p><u>Site 4 Manor Road and Firs Glen Road</u> Manor Road, Firs Glen Road and St Michaels Road were identified as a Special Character Area in 2005 with clearly defined development criteria (EDDC SPG 27).</p> <p><u>Table and Summary of Density and Townscape Analysis</u> Site 2 – The built form reflects a combination of old council bungalows and privately built farm workers’ cottages and starter homes with plots large enough for most owners to be self sufficient in home grown produce.</p> <p>Site 5 is not on the Northern urban edge but almost at the SE extremity of Verwood.</p> <p>Even on the basis of underestimating the population, the report highlights</p>

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			<p>the need for strengthening services and infrastructure though it focuses on the provision of an Upper School without recognising the existence of a three tier education system.</p> <p>Retaining the village character of the settlement and its relationship with its rural setting and very special range of natural habitats are crucial to the continuing success of our community. The substantial risks have been mentioned in the report.</p> <p><u>Section 9 Identified Land for Consideration</u> Please note the following inaccuracies in the Masterplan summary information:</p> <p><u>Verwood North</u></p> <ul style="list-style-type: none"> • There is no vehicular access to the Ringwood Road/Station Road via Edmondsham Road. The route is via Champtoceaux Avenue. • A tributary of the R Crane runs across the Eastern sub-area. • The urban fringe and AGLV have NOT been compromised by the development of Trinity First School which was specifically designed to ensure that there was no risk of this. • The nearest dentist is in Vicarage Road. The others in Verwood are at Hillside Road and Lake Road. • Pedestrian access to Trinity First School from the south side of Champtoceaux Avenue is dangerous and results in parents driving their children even a short distance to avoid crossing the road. • The AGLV in the Central sub-area is not <u>constrained</u> by the disused railway track – that merely serves as a boundary to the land being offered for development.

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			<ul style="list-style-type: none"> • Although not within the area, the R Crane SSSI is 300m from the SW boundary and would receive drainage from the site. <p>There is no mention of road safety issues nor of poor public transport.</p> <p>The impact of light pollution on the natural habitats (including a number of SNCIs and Stephens Castle SSSI) and statutorily protected species that are known to exist in this location has been completely ignored.</p> <p>The impact of light pollution across the whole AGLV and beyond to the AONB has been ignored.</p> <p>The tree line does not afford visual screening in winter and is of limited value when the trees are in leaf. Were the entrance to VMW1 to be to the NW of Eastworth Farm there would be no screening at all from the AGLV and AONB.</p> <p>Experience shows that putting the electricity cable underground is likely to create drainage problems.</p> <p>There is no evidence that tree root protection zones have been taken into account in determining housing density.</p> <p>The suitability of the location of land to the north and the extent to which it complies with Natural England's recommendations for a SANG have not been evaluated.</p> <p>In addition, it should be noted that there is a record of problems of running sand in this area. There were major construction difficulties at Trinity School and subsidence of a rebuilt 2 storey house in Coopers Lane in 2009 (it was originally a bungalow). Environment Agency maps of the subsurface and bedrock geology show that approximately half of the area proposed as VMW1 shares the same geology as that where the school is sited. The remainder of VMW 1 and most of VMW2 is the same sand as that at Stephens Castle. We need to be mindful of why our forebears</p>

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			<p>built where they did, why they did not build out further into the countryside and why they limited the height (and hence loading) of their buildings.</p> <p><u>Verwood South</u> Road safety issues have not been addressed No mention of poor public transport service, merely a reference to where bus stops are. Heathland SSSIs are Dewlands Common, Lower Common and Horton Common. Potterne Hill LNR is an important heathland SNCI. The area includes Manor Road Special Character Area. GP and Dental surgeries are at the junction of Lake Road and Newtown Road. In addition to the R Crane, there are numerous drainage ditches marked on OS maps, ponds and fishing lakes The seasonal flooding of the area, including that proposed for use as a SANG has not been identified in the report. The suitability of the proposed SANG has not been assessed.</p>
East Dorset Housing Options Masterplan Report	Section 10 Land Use and Infrastructure Requirements	522117 (Chittenden)	<p><u>Site capacities</u> The gross residential density must take into account the need to allow adequate clearance around trees. Where there are substantial groups of mature or veteran specimens this should not be measured simply as the root protection zone for its current size but should take account its long term growth potential and the need to conserve soil mycorrhizae under the eventual canopy. Typically, 80-90% of tree roots, notably the feeding roots, are found in the top 60cm of soil, so their protection is of paramount importance. The main function of the larger roots including tap roots is structural [Crow (2005) The influence of Soils and Species on Tree Roots http://www.forestresearch.gov.uk/PDF/fcin078.pdf/\$FILE/fcin078.pdf]. To ensure that</p>

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			<p>there is no inappropriate treatment of the soil including soil compaction by machinery or construction of patios or decking, individually owned gardens should not encroach on the root protection zones. This too will avoid the problem of residents complaining about falling leaves and loss of daylight.</p> <p><u>Additional community infrastructure</u> The section on local shops is ill informed and does not include any reference to the work of Nathaniel Lichfield and Partners. Further comment on shops and town centre provision are made elsewhere in my response. The problem with parking at the “Hub” and inadequacy of disabled parking spaces has not been considered. Availability of employment for additional residents has not been investigated: apart from home workers most would have to travel outside of Verwood for employment. The safety of access to open green space is of paramount importance. Crossing roads where there is speeding traffic is unsafe. The proposed SANGs have not been assessed against any criteria. There is repeated reference to a secondary school when it is an upper school that is proposed</p>
East Dorset Housing Options Masterplan Report, Wimborne Minster, Corfe Mullen,	Landscape Appraisal	360302 East Dorset Environment Theme Action Group	<p>Landscape Appraisal No information has been given on the hedgerows, trees or woodlands and it is now understood that no survey work has been done. The assessments have been made primarily on the basis of desktop work and throughout have simply referred to herbaceous and woody species as “vegetation”: there is no information on the age or species of trees. In all</p>

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<p>Ferndown & West Parley by Broadway Malyan</p>			<p>cases it would appear from the photographs that the relatively superficial observations were carried out in late summer. The photographs show little detail.</p> <p>The consultants did not consider the landscape in the months when deciduous trees are not in leaf. The East Dorset Landscape Character Assessment (2008) was also carried out mainly in the summer months though that document notes that <i>seasonal variation in landscape is another factor in determining how and when the landscape is best assessed. Ideally photos should be taken at different times of the year to indicate the seasonal variations in each character area.</i> Clearly this is essential when determining the impact of light pollution: there will be more hours of artificial light from houses, cars and street lamps during autumn, winter and early spring and the light spill across the wider countryside will be greatest when it cannot be screened by foliage. However, nowhere in BroadwayMalyan’s report is light pollution considered. From the point of view of landscape, this is particularly important when considering locations that are within or adjacent to the West Wilts and Cranborne Chase AONB and the AGLVs as the impact of light trespass can adversely affect areas 20 miles away.</p> <p>For this reason, ETAG has not undertaken detailed reassessment of all the sites but it is our view that this is essential. It should be noted that landscape, geology and ecology are inextricably linked. Please see below for detailed recommendations on the need for full habitat surveys over a 12 month period and identification of BAP and species.</p> <p>The European Landscape Convention (ELC) sets out a broad definition of landscape:</p>

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			<p><i>Landscape means an area, as perceived by people, whose character is the result of the action and interaction of natural and /or human factors.</i></p> <p>Each of these words is carefully measured. As identified in the LUC report for Natural England (2009) on implementing the ELC, landscape links culture with nature, and past and present. Not all values of landscape are tangible: it matters to and is valued by people and provides a context for people's lives.</p> <p>The Core Strategy Options identify the importance of Landscape to residents. We therefore strongly support Preferred Options HE15 and 16 and formally request that ETAG is consulted at an early stage in this work so that all aspects of the local landscape are considered including those aspects identified above. Please see also comments under Historic Environment.</p> <p>High quality design is always important. With the housing density that is being proposed for new development it will be even more critical than ever both from the point of view of those who will live in the new neighbourhoods and also for existing communities many of whom will consider their homes will be blighted by the proposals. Commitments made in EDDC SPG 21, Countryside Design Summary, have not been honoured. Instead, developers appear to have used standard designs that they use anywhere in the UK with the result that many housing developments are individual scars on the townscape and all sense of place and clear identity are being eroded. Villages have expanded to become District Centres or Towns because of total population size and not because of the way in which they function: they lack coherent</p>

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			<p>infrastructure and defined central facilities. Analysis of the present structure and function in the Broadway Malyan reports and that by Nathaniel Lichfield & Partners highlight the functional inadequacies of our settlements but fail to show any understanding of the communities, their needs and what they perceive as the problems: they also fail to identify how the new neighbourhood proposals will do anything more than exacerbate the problems.</p> <p>References cited: Atkins (May 2010) <i>South East Dorset Multi-Modal Transport Study Phase 1 DaSTS Report</i> EDDC (1999) <i>SPG 21 Countryside Design Summary</i> EDDC (2008) <i>The East Dorset Landscape Character Assessment</i> LUC (2009) <i>Guidelines for implementing the European Landscape Convention</i>. Prepared for Natural England</p>
<p>East Dorset Housing Options Masterplan Report, Wimborne Minster, Corfe Mullen, Ferndown & West Parley by Broadway Malyan</p>	<p>Ecology</p>	<p>360302 East Dorset Environment Theme Action Group</p>	<p>ETAG is very concerned and objects most strongly to the fact that there has been no biodiversity audit. We had been assured that ecological survey was to be included in the Masterplan reports but it was not. Surely if one is looking at land use planning the first consideration must be the land? That is the ultimate non-renewable resource and any loss to development is by definition unsustainable. It is essential that all sites that may be taken forward to the next stage of the Core Strategy are subject to full survey over a full 12 month period. As with cultivated garden plants, our herbaceous native species are not all evident at the same time of year and nor are the animal species that depend on them. So, survey results in spring will produce very different results from those in summer, autumn and winter. Migratory species that are dependent on particular habitats will only be evident at appropriate times and this includes habitats</p>

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			<p>that support important populations of over wintering birds not just those that breed here.</p> <p>It is incorrect to claim that there <u>will</u> be biodiversity gain (p80): the <u>potential</u> for biodiversity gain will need to be assessed according to agreed criteria. It cannot possibly be valid to claim that there will be gain if there is no evidence of what is there and what may be lost.</p> <p>This whole chapter is disappointing: it is basic and theoretical and even County records of protected species have not been consulted. Although it is mentioned that LUC have carried out a Habitats Regulations Assessment (for N2K sites), the results of their preliminary work are not included or discussed.</p> <p>As much of the proposed development land is in private ownership, it has not been possible for ETAG members to do more than observe from the boundaries. The late issuing of the Masterplan Report in December 2010 (which was erroneously understood to contain detailed ecological information) has also precluded examination of DERC records at this stage. The combined knowledge of ETAG members on the ecological interest and other constraints on all potential development sites is discussed above under comments on the Core Strategy Options. However, this cannot be regarded as comprehensive as it is based only on chance knowledge or informed views of individuals. It is essential that no site is short listed for development without a full 12 month ecological survey in the absence of inappropriate land management or grazing.</p> <p>The wording of the sentence on compensation for loss of habitat features</p>

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			<p>(p88) at a ratio of 1:2 is unclear. Is it intended to compensate by providing double what has been lost? How is that to be determined when there are no base line data?</p> <p>There are otters in the Stour, Allen and Crane/Moors River system (p88) so the buffer zone is likely to apply. Has this been taken into consideration in the calculations to determine housing that can be accommodated?</p> <p>ETAG recommends that all SANGS should be permanent and key to their success will be the transfer of land ownership to the Local Planning Authority so that management is appropriate to wider ecological needs and can be adapted as climate change impact dictates. Financial provision should be made for resources including the staffing required their long term management.</p> <p>Any attempt to disrupt habitat to secure planning/financial advantage during the development of the Local Development Framework should be met with severest penalties. Please see our comments on Key Issue Paper 03 para 4.49 below.</p> <p>References cited: Atkins (May 2010) <i>South East Dorset Multi-Modal Transport Study Phase 1 DaSTS Report</i> EDDC (1999) <i>SPG 21 Countryside Design Summary</i> EDDC (2008) <i>The East Dorset Landscape Character Assessment</i> LUC (2009) <i>Guidelines for implementing the European Landscape Convention</i>. Prepared for Natural England</p>
East Dorset Housing	Historic Environment	360302 East Dorset	This section has only considered the historic built environment and not

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Options Masterplan Report, Wimborne Minster, Corfe Mullen, Ferndown & West Parley by Broadway Malyan		Environment Theme Action Group	<p>historic landscapes and townscapes which can be restored or enhanced through appropriate land use planning. Indeed one of the five criteria of PPG2 is <i>To preserve the setting and special character of historic towns</i>. ETAG recommends that other historic landscapes should be taken into consideration and include an assessment of how development would affect views in both directions – into and out of the development area.</p> <p>References cited: Atkins (May 2010) <i>South East Dorset Multi-Modal Transport Study Phase 1 DaSTS Report</i> EDDC (1999) <i>SPG 21 Countryside Design Summary</i> EDDC (2008) <i>The East Dorset Landscape Character Assessment</i> LUC (2009) <i>Guidelines for implementing the European Landscape Convention</i>. Prepared for Natural England</p>
East Dorset Housing Options Masterplan Report, Wimborne Minster, Corfe Mullen, Ferndown & West Parley by Broadway Malyan	Noise and Vibration	360302 East Dorset Environment Theme Action Group	<p>Again this has been a desk top exercise with no site visits made or any consideration of where traffic “rat runs” might develop both during and after the development phases and what procedures need to be put in place to ensure this does not happen.</p> <p>Road surfacing materials that reduce traffic noise should be used.</p> <p>It is also important, particularly in areas of higher sensitivity, to reduce reflective surfaces to a minimum. Black tarmac on roads and pavements, particularly when wet, reflects lights from vehicles, houses and street lights: lighter coloured or roughened materials reflect far less.</p> <p>References cited: Atkins (May 2010) <i>South East Dorset Multi-Modal Transport Study Phase 1 DaSTS</i></p>

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			<p><i>Report</i> EDDC (1999) <i>SPG 21 Countryside Design Summary</i> EDDC (2008) <i>The East Dorset Landscape Character Assessment</i> LUC (2009) <i>Guidelines for implementing the European Landscape Convention</i>. Prepared for Natural England</p>
East Dorset Housing Options Masterplan Report, Wimborne Minster, Corfe Mullen, Ferndown & West Parley by Broadway Malyan	Odour	360302 East Dorset Environment Theme Action Group	<p>The impact of odour on open green space proposals should be taken into consideration particularly where they are intended to be SANGs. If odour is likely to be a problem at the primary areas of open green space, alternative and additional areas will be required for periods when, because of changes in wind speed/direction or operational difficulties at the odour source, odour is unacceptable for informal recreation.</p> <p>References cited: Atkins (May 2010) <i>South East Dorset Multi-Modal Transport Study Phase 1 DaSTS Report</i> EDDC (1999) <i>SPG 21 Countryside Design Summary</i> EDDC (2008) <i>The East Dorset Landscape Character Assessment</i> LUC (2009) <i>Guidelines for implementing the European Landscape Convention</i>. Prepared for Natural England</p>
East Dorset Housing Options Masterplan Report, Wimborne Minster, Corfe Mullen, Ferndown & West Parley by Broadway	Flood Risk and Drainage	360302 East Dorset Environment Theme Action Group	<p>The potential for surface water attenuation must take into consideration the impact of potential pollutants not only on the ultimate watercourse but also on the habitats where that attenuation takes place. For example, P 75 of the supplementary BM report (on Verwood) identifies that Tanked Systems are the least sustainable of the SUDS measures and should only be considered where there is a need to ensure that seepage to groundwater is not possible or other constraints prevent the adoption of the more sustainable features. Were this to be used for the FWP3 site at West Parley a tank of over 10,000 cu m would be required: this would</p>

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Malyan			<p>represent a considerable loss of land over and above that required for housebuilding and “normal” infrastructure.</p> <p>Sites at WMC4 and WMC5 have also been identified as having large water attenuation needs. Further comments on observed drainage at West Parley sites are included in the site specific comments.</p> <p>The amount of existing surface water flooding, let alone the likely increased risk of flooding associated with climate change, does not appear to have been taken into consideration at any of the sites nor have other ecosystem services provided by the land. The Environment Agency will need to advise on</p> <ul style="list-style-type: none"> • water retention capacity of the land, • potential adverse impact of increased volume of water draining to our rivers and flood risk further downstream, and • potential adverse impact on the river ecosystem and priority aquatic species. <p>As noted above, there are otters present in all of our rivers.</p> <p>We note that several of the sites are on potentially wet clay areas so are likely to be structured on ‘piled’ foundations. Those on more freely draining soils may also experience problems such as running sand. In many areas there are already inadequate drainage systems within existing housing areas. These should be identified at this land use planning stage so that they can be dealt with simultaneously.</p> <p>As with odour, if flooding is likely to be a problem at the primary areas of open green space, alternative and additional areas will be required for</p>

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			<p>periods when, because of high rainfall, the areas are inaccessible or unsuitable for informal recreation. This should not result in additional informal recreational pressure on sensitive habitats including heathlands.</p> <p>References cited: Atkins (May 2010) <i>South East Dorset Multi-Modal Transport Study Phase 1 DaSTS Report</i> EDDC (1999) <i>SPG 21 Countryside Design Summary</i> EDDC (2008) <i>The East Dorset Landscape Character Assessment</i> LUC (2009) <i>Guidelines for implementing the European Landscape Convention</i>. Prepared for Natural England</p>
<p>East Dorset Housing Options Masterplan Report, Wimborne Minster, Corfe Mullen, Ferndown & West Parley by Broadway Malyan</p>	<p>Infrastructure</p>	<p>360302 East Dorset Environment Theme Action Group</p>	<p>Because of the nature of the soils and bedrock geology of the area, disturbance can lead to localised flooding. Consequently all services and access to them for maintenance should be carefully planned with shared ducting. Backfilling for repairs and temporary local road resurfacing have a limited life: subsequent costs will fall to DCC.</p> <p><u>Foul drainage</u> It was established by DCC, in evidence submitted to RSS, that Verwood, West Moors, St Leonards & St Ives could not cope with additional sewage loading without substantial upgrading at a cost (2005 prices) of £3.6 million.</p> <p><u>Water Supply</u>. The large increases in water extraction that will result from the proposals must be taken into consideration well in advance and including potential impact on our rivers and riverside habitats of additional abstraction as well as changes in seasonal flows due to climate change. ETAG questions the degree of reliance upon river water abstraction and seeks reassurance on aquifer supply and impact on the N2K sites.</p>

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			<p>Power, Telephone and Broadband Provision. It was reported in 2010 (http://www.personneltoday.com/articles/2010/11/11/56906/growth-of-homeworking-cuts-average-commute-time-to-10-year-low.html) that there is significant growth in home working among larger companies and that this is increasing. However, fewer small and medium sized enterprises (SMEs) allow staff to work from home. This is relevant to East Dorset where the local economy includes a large proportion of SMEs. Other research shows that those who work from home may have additional “pin money” jobs so the need for adequate sustainable transport remains high. (http://www.flexibility.co.uk/flexwork/location/Homeworkers2005.htm)</p> <p>Plans should include the potential for new occupants to be ‘home working’, and encourage reduction in their need to travel. However, this will add to peak demands on services. Provision of charging points for electric vehicles should also be considered both in new developments and in areas where houses have no easy access to a garage or driveway.</p> <p>References cited: Atkins (May 2010) <i>South East Dorset Multi-Modal Transport Study Phase 1 DaSTS Report</i> EDDC (1999) <i>SPG 21 Countryside Design Summary</i> EDDC (2008) <i>The East Dorset Landscape Character Assessment</i> LUC (2009) <i>Guidelines for implementing the European Landscape Convention</i>. Prepared for Natural England</p>
East Dorset Housing Options Masterplan Report, Wimborne	Transport	360302 East Dorset Environment Theme Action Group	A vast amount of development in East Dorset over the last 50 years has allowed building to take place without prior consideration of the infrastructure, particularly in terms of schooling, retail outlets, transport and medical facilities. Any new development must allocate for this in advance and be put in place with the building process: promises of some

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<p>Minster, Corfe Mullen, Ferndown & West Parley by Broadway Malyan</p>			<p>time in the future are unacceptable and lead to unsustainable transport patterns. Transport considerations must include road development to avoid bottlenecks and rat-runs. Road development must avoid serious incursion into strictly rural networks which could adversely impact upon communities and lifestyles.</p> <p>The report notes (p130) that, prior to the abolition of RSS, DCC and the Highways Agency jointly opposed the development of “new neighbourhoods” proposed for East Dorset unless key strategic infrastructure improvements would be made in a timely fashion to help mitigate their impacts. The Masterplan indicates that these authorities are now reviewing this in the light of increased funding uncertainty.</p> <p>The result of this would be totally unacceptable to residents across East Dorset, affecting not only the proposed new neighbourhoods but everyone who lives or works in the area or who visits for holidays and other recreation. It would cause further damaging traffic gridlock and cause major harm to our environment and economy. ETAG objects to this and recommends that no new neighbourhood should be developed until the delivery of ALL essential infrastructure for that development is assured and, ideally, in place.</p> <p>Highway improvements and on site residential car parking will need to be reviewed in the light of the emerging Transport Plan for the area and should be allied to the proximity, reliability and frequency of public transport provision and the sustainability of the location. Many of those in most need of affordable housing are unlikely to have anything other than sustainable transport available to them particularly with increased costs of fuel. This is an important consideration in terms of equality legislation.</p>

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			<p>In most areas, significant improvements in bus services would be needed to avoid additional car use for shopping, the school run, visits to GP and dentist, and leisure especially in the evenings. In some proposed West Parley sites, cross boundary PCT agreements for GP surgeries may be necessary (NB: drafted before the announcement that PCTs may go). It should be noted that distances to services are shown as a radius: it is further by road.</p> <p>No information has been presented on whether the doctors' surgeries lists are full and what their potential is for increasing patient numbers: there is no information on the availability of NHS dentists. Middle schools have been completely overlooked and it has been assumed that East Dorset has a two tier system.</p> <p>The principles for pedestrian access (p170) have concentrated on safety within the new neighbourhood developments. Access to public transport should also be via safe and direct routes. People need to make the most of what time they have and while a pretty but longer route may be acceptable on the way home from work, first thing in the morning with deadlines to meet it is the quickest and easiest that will be used. There appears to be a slight mismatch in two of the principles: <i>The majority of each new neighbourhood should be within 400m walk of a bus stop for a regular (eg daily and ideally half hourly or better) bus service: and</i> <i>All development should fall within 1km of a bus stop on a regular bus route.</i></p> <p>To encourage people to use public transport, frequency is essential. A 1km walk is unlikely to encourage bus use although it may have done 30</p>

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			<p>years ago. Cycle access (p172) should take into account the conflict that can arise between cyclists and pedestrians and ensure the safety of both.</p> <p>Full details of travel to work transport plans and restricted on-site parking at employment sites should be made available or issued as standard to ensure potential occupants of new homes are able to take an informed decision.</p> <p>References cited: Atkins (May 2010) <i>South East Dorset Multi-Modal Transport Study Phase 1 DaSTS Report</i> EDDC (1999) <i>SPG 21 Countryside Design Summary</i> EDDC (2008) <i>The East Dorset Landscape Character Assessment</i> LUC (2009) <i>Guidelines for implementing the European Landscape Convention</i>. Prepared for Natural England</p>
<p>Fordham Research – Dorset Survey of Housing Need and Demand (2008)</p>	<p>Document</p>	<p>360302 East Dorset Environment Theme Action Group</p>	<p>There are some aspects of the work that raise doubts about the validity of the conclusions that have been drawn:</p> <ul style="list-style-type: none"> • A weighting system was used to complete survey data where they were incomplete. The impact of this weighting on the conclusions is unknown. • The housing need data for the District have been combined with a notional housing demand based on historic patterns of house purchase – “Balancing Housing Markets”. No evidence is presented to demonstrate that historic trends are appropriate predictors. or that socio-economics of the future will mirror those of the past. • No reference is made to the fact that the historic demand from in-

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			<p>migrants for owner occupied housing and some private rented will be a result of the high level of housebuilding in the late 1990s / early 2000s at the time of the last Local Plan. (At that time Verwood was reported to be the fastest growing town in Europe). Across the District, the level of building was unsustainable and caused considerable ecological damage, with little if any mitigation, and from which we are unable to recover.</p>
<p>Fordham Research – Dorset Survey of Housing Need and Demand (2008)</p>	<p>Population and household mobility</p>	<p>360302 East Dorset Environment Theme Action Group</p>	<p>Table S1 – S2 The lack of data on one bedroom properties in East Dorset would suggest that such properties do not exist: this is clearly not so and reflects poor or inadequate selection of data sources.</p> <p>S7- 9 It is unfortunate that we have in use two different definitions of self containment. The Fordham report uses it to indicate the movement of households within an area. SED documents submitted to RSS and the emerging SEDMMS and Local Transport Plan use the term it to denote travel to work patterns.</p> <ul style="list-style-type: none"> • In terms of sustainability assessment of the Core Strategy this confusion should be removed. <p>S10 states that <i>in migrants are more likely to be retired and out-migrants more likely to be in employment.</i></p> <ul style="list-style-type: none"> • This suggests a need to restrict (or at least not encourage in-migrants) and simultaneously find a way of retaining out-migrants to ensure a viable age structure in the District. <p>S15 <i>Over 1/3 of all householders in social rented accommodation have no use of car or van.</i></p>

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			<ul style="list-style-type: none"> This suggests it is critical that they should be well placed to use public transport for work, shopping and leisure activities. With increasing fuel costs this could escalate making accessibility to frequent and reliable public transport a priority for new developments.
Fordham Research – Dorset Survey of Housing Need and Demand (2008)	Future need	360302 East Dorset Environment Theme Action Group	<p>S29-31 There are undoubtedly problems in assessing housing need based on aspirations from a survey such as this. The Housing Register is a totally unreliable source of data as the system currently allows anyone to add their name to every housing list in the Country. The Housing TAG identified this as a major flaw 8 years ago. While it is fully acknowledged that East Dorset does have a need for affordable housing, without robust data the extent to which the Green Belt should be rolled back and where this should be to meet truly local need cannot be established.</p>
Fordham Research – Dorset Survey of Housing Need and Demand (2008)	Balancing Housing Markets and Housing Tenure Outcomes	360302 East Dorset Environment Theme Action Group	<p>S32-35 The housing need data for the District has been combined with a notional housing demand based on historic patterns of house purchase.</p> <ul style="list-style-type: none"> No evidence is presented to demonstrate that historic trends are appropriate predictors. <p>S40-42 (see also comments on 13.15 -16) The majority of the shortfall identified in each category is: Owner occupied: 2 bed with demand for 3 and 4 Private rented: 1 bed (over-supply of other sizes) Intermediate: 2 bed (though this may be aspirational and not reflect ability to pay) Social rented: all sizes needed.</p> <ul style="list-style-type: none"> These results should be reflected in all new housing developments: a fully integrated mix of size and tenure is essential to build

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			<p>cohesive and sustainable communities. Developers should not be permitted to group all social rented homes in one area on the premise of increasing viability.</p> <ul style="list-style-type: none"> Discussions around the District during the Core Strategy Options consultation process provide anecdotal evidence of a much higher demand for and public acceptability of Intermediate Housing than is suggested here. There appears to be a widely held view that this is one of the best ways of enabling our younger adults to get into the housing market, to stay within easy reach of their families and communities they understand and to contribute to the local economy ie building and retaining sustainable communities.
Fordham Research – Dorset Survey of Housing Need and Demand (2008)	The Local Housing Market	360302 East Dorset Environment Theme Action Group	<p>4.8 – 4.9 Verwood is described as a <i>mixed housing market area generally containing professionals with people relocating from Southampton, Poole and Salisbury</i> while Ferndown comprises <i>mainly retired/semi-retired who commute to Reading/London</i>.</p> <ul style="list-style-type: none"> In both cases there is clearly a mismatch of where people live and where they want to go resulting in unsustainable travel to work choices.
Fordham Research – Dorset Survey of Housing Need and Demand (2008)	Key survey findings	360302 East Dorset Environment Theme Action Group	<p>5.2 – 5.3. states that <i>1067 dwellings in East Dorset are mobile homes (2.8%) of the housing stock</i>.</p> <ul style="list-style-type: none"> Given that many of these are likely to be owned/rented by lower income groups and those with some form of special need, the logic for subsuming them into “detached houses and bungalows ” for the purpose of analysis is to say the least questionable. Detached homes, particularly bungalows, are generally at the top of the

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			<p>market: most mobile homes are not. Indeed it could be argued that since tenure is leasehold it would be more appropriate to group them with flats/private rented accommodation.</p> <p>5.7 highlights the large proportion of older persons in the social sector. This does not appear to have been translated into any recommendations for additional provision or assessment of potential for homes becoming vacant.</p> <p>5.8 Again Fordham appear to have overlooked the rapid growth in development in the period prior to their survey. Many people moving to a new area rent before they buy and there is anecdotal evidence of a buoyant buy to let market shortly before and soon after the adoption of the last Local Plan.</p> <p>5.13 and Table 5.4 The minimal level of detail here does not give a clear picture of who is being housed and why. The data indicate that 195 newly formed households are being accommodated in social rented housing. While understandable if this reflects a family that has split, it is of concern if these are newly formed couples. For them, it would appear that intermediate housing might be more appropriate. If the proportion of non-East Dorset residents (Fig 5.4) applies equally across all tenures it would appear that 110 of these households are from outside of East Dorset.</p> <p>5.14-5.15 29.5% of people moving into East Dorset in 2006-7 were from outside of Dorset/UK. Of those in social rented tenure, 55.8% of in-migrants were older persons.</p>

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			<ul style="list-style-type: none"> • This evidence gives cause for residents’ concerns that a considerable proportion of new social housing would <u>not</u> be for local people. So, in terms of meeting a local affordable housing need, the proposed growth would in fact exacerbate the current problem. This is unsustainable and unacceptable. <p>Table 5.5 shows that: 67.8% of owner occupier (no Mortgage) moves are older person in-migrants 8.9% of owner occupier (with mortgage) are older person in-migrants.</p> <ul style="list-style-type: none"> • Assuming that this typifies occupancy of new market housing, we are looking at 2/3 to ¾ of all new homes being occupied by residents who, because of their age, are likely to add to the burden on social services (including medical and personal care, police, transport, infrastructure) and not contribute to the local workforce or raise children in the District. To maintain the <i>status quo</i> of the ratio of work force to older people there should be no more older person households than younger person households. It is understood that The Core Strategy actually seeks to reverse this trend. However, the Fordham report indicates that building large numbers of market homes to fund affordable homes will exacerbate the problems we have now rather than reducing them.
Fordham Research – Dorset Survey of Housing Need and Demand (2008)	Current need	360302 East Dorset Environment Theme Action Group	<p>7.5 -7.7 Unsuitable housing</p> <ul style="list-style-type: none"> • It is not apparent how owner-occupied “unsuitable housing” can be dealt with by the Core Strategy. Examples of reasons for unsuitability of owner-occupied homes where problems cannot be dealt with <i>in situ</i> are not given and it may be that this has been

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			<p>over-estimated.</p> <p>Table 7.2 Housing need and tenure</p> <ul style="list-style-type: none"> Do tenants all fall within the “social housing market category” or are some waiting to buy having moved to the area? Clarification is needed on why owner-occupied (with mortgage) consider themselves “in need” – is this because of changed circumstances? As in the previous para, it is unclear how the Core Strategy can play a part here.
<p>Fordham Research – Dorset Survey of Housing Need and Demand (2008)</p>	<p>Future Need</p>	<p>360302 East Dorset Environment Theme Action Group</p>	<p>8.6-8.9 Existing households falling into need</p> <ul style="list-style-type: none"> The logic of estimating numbers of future households falling into the “need” category is unclear and has not been supported by evidence to demonstrate that the past is an adequate indicator of future trends and that it is realistic to annualise the assumptions for the duration of the Plan period. <p>Fig 8.1 Typical levels of need for new affordable housing</p> <ul style="list-style-type: none"> Even with what may be an over-estimate of affordable housing need, it is encouraging that East Dorset’s level of need is better than others cited in much of England. <p>8.22 – 8.23 Private rented sector</p> <ul style="list-style-type: none"> To avoid over-supply of dwellings (and unsustainable levels of construction on greenfield sites) the arguments re the private rented sector suggest that there is a need to address how these properties may better serve the needs (and economy) of the community through, for example, security of tenure.

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Fordham Research – Dorset Survey of Housing Need and Demand (2008)	Household mobility	360302 East Dorset Environment Theme Action Group	<p>9.12 Future moves – newly forming households</p> <ul style="list-style-type: none"> Is it unacceptable for newly forming households to move to the more urban areas in order to secure affordable accommodation? Surely this is something that we have all had to do in our youth?
Fordham Research – Dorset Survey of Housing Need and Demand (2008)	Balancing Housing Markets	360302 East Dorset Environment Theme Action Group	<p>11.4 Stage 1 It would have been more appropriate to use local mortality rates rather than national ones.</p> <p>11.13 The admitted lack of transparency using a novel approach suggests that the conclusions are not robust.</p> <p>11.20</p> <ul style="list-style-type: none"> The study concludes that the main shortfall is for 2 bedroom properties though the emphasis in the Core Strategy Options is the provision of family homes. It is absolutely essential that this difference be reconciled in order for the Core Strategy to have validity of purpose.
Fordham Research – Dorset Survey of Housing Need and Demand (2008)	The needs of particular groups	360302 East Dorset Environment Theme Action Group	<p>Table 12.1 Special Needs Categories</p> <ul style="list-style-type: none"> It is unclear which of the special needs categories have been double counted. Clearly some people will have more than one problem but the total comes to 179.1%.
Fordham Research – Dorset Survey	Housing market gaps and how to fill them	360302 East Dorset Environment	<p>13.15 The conclusion that the greatest requirement is for housing in the gap between the top and bottom of the ladder is at variance with that in Paras S40-41 in which</p>

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of Housing Need and Demand (2008)		Theme Action Group	<p>the majority of the shortfall identified in each category is: Owner occupied: 2 bed with demand for 3 and 4 Private rented: 1 bed (over-supply of other sizes) Intermediate: 2 bed (though this may be aspirational and not reflect ability to pay) Social rented: all sizes needed.</p> <ul style="list-style-type: none"> • These results should be reflected in all new housing developments: a fully integrated mix of size and tenure is essential to build cohesive and sustainable communities. Developers should not be permitted to group all social rented homes in one area on the premise of increasing viability. <p>13.16 Discussions around the District during the Core Strategy Options consultation process provide anecdotal evidence of a much higher demand for and public acceptability of Intermediate Housing than is suggested here. There appears to be a widely held view that this is one of the best ways of enabling our younger adults to get into the housing market, to stay within easy reach of their families and communities they understand and to contribute to the local economy ie building and retaining sustainable communities.</p> <p>13.26 iii)</p> <ul style="list-style-type: none"> • The notional % discount has been omitted. <p>13.38-13.39, 13.47 Recent performance</p> <ul style="list-style-type: none"> • Although the RSS building target is cited it should be set against the fact that EDDC had prepared a legal challenge to that target. The data and arguments used in that draft challenge should inform

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			<p>the Core Strategy proposals.</p> <ul style="list-style-type: none"> • How is the higher level of housebuilding (and low affordable housing completions) to be reconciled with Core Strategy and the targets that it will set? • The Audit Commission's report (2009) highlighted the poor provision of rural affordable housing and the failure to bring empty properties back into use. Although the potential for rural exception sites is included in the Core Strategy, this suggests there may be a need to strengthen the Empty Homes Policy and its implementation.