

**Core Strategy Pre-Submission – Chapter 13 Managing the Natural Environment**

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360245	Mr Richard Burden	Cranborne Chase & West Wiltshire Downs AONB	<a href="#">CSPS1566</a>	13							<p>Thank you for consulting the AONB on this important policy document. As the ANOB considers there are some quite fundamental matters for discussion this letter is being sent simultaneously to Judith Plumley and yourself.</p> <p>The Cranborne Chase and West Wiltshire Downs AONB has been established under the 1949 National Parks and Access to the Countryside Act to conserve and enhance the outstanding natural beauty of this area which straddles three County, one Unitary and five District councils. It is clear from the Act, subsequent government sponsored reports, and the Countryside and Rights of Way Act 2000 that natural beauty includes wildlife, scientific, and cultural heritage. It is also recognised that in relation to their landscape characteristics and quality, National Parks and Areas of Outstanding Natural Beauty are equally important aspects of the nation's heritage and environmental capital. The AONB Management Plan (2009 – 2014) is a statutory document that has been approved by the Secretary of State and was adopted by your Council early in 2009.</p> <p>The AONB has looked with considerable interest at your Core Strategy Pre-Submission Document. We are acutely aware, with the production of the National Planning Policy Framework (NPPF), the revocation of the Regional Spatial Strategy (RSS), and the removal of the whole suite of Planning Policy Statements and Planning Policy Guidance that all Core Strategy documents are in real danger of being insufficiently detailed to provide adequate policy guidance through to 2028.</p> <p>It is, however, clear from the NPPF that Government envisages the re-emergence of Local Plans with considerable detail within them to cover policy and decision making needs. It is noticeable that the NPPF puts equal weight on achieving economic, social and environmental gains jointly and simultaneously through sustainable development. There is a clear implication that solely economic proposals are not automatically sustainable.</p> <p>Crucially Paragraph 14, in association with Footnote 9, clearly indicates that there should be special policies in these emerging Local Plans to cover special situations. Those special situations include designated landscapes such as AONBs. Paragraph 218 also indicates that it would be in order for Local Plans to take on board those policies that have been lost in the revocation of the RSS.</p> <p>The thrust, therefore, of the AONB's comments relate to matters that we feel should be included in the Core Strategy to overcome the policy vacuum created by the loss of the higher level strategies and policies on which the whole concept of Core Strategies was predicted. Whilst there is much to be supported in the pre-submission Core Strategy the AONB is of the view that without the additional policies to fill the gaps created by the loss of the higher level strategies and policies it will not be fully fit for purpose through to 2028 and therefore would have to be regarded as less than sound.</p> <p>In particular the AONB would wish to see clear policies that indicate the special character of the AONB, and proposed developments within it, would be handled in ways different from other, undesignated, areas of</p>					606	<a href="#">2239336_0_1.pdf</a> <a href="#">2239337_0_1.pdf</a>

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											<p>countryside within the District. Similarly we would commend the RSS suite of policies ENV1, 2, 3, 4, 5, and in particular ENV3 which relates to the setting of AONBs. We would wish to see priority given to conserving and enhancing natural beauty within the AONB and to priority being given to conserving and enhancing natural beauty where there is conflict with proposed development.</p> <p>We note that the Section 13, Managing the Natural Environment, focuses entirely and in some considerable detail on wildlife matters. Whilst we support the attention given to wildlife we note that many of the sites are not nationally designated. The AONB advises that concentrating on just these limited aspects of landscape, rather than the more holistic concept in the standard landscape character assessment guidance works and the AONB Management Plan, unbalances the Core Strategy. We would, therefore urge the Planning Authorities to include policies in relation to landscape and the AONB and natural environment.</p>					
359571	Mr Renny Henderson	Royal Society for the Protection of Birds	<a href="#">CSPS3745</a>	13							<p>We would recommend this chapter be titled “managing and enhancing the natural environment”, which would better demonstrate the Councils’ environmental commitments made in the Core Vision and strategic objective 1.</p>		Yes, I wish to participate at the oral examination	<p>we would like to confirm that we wish to reserve the right to appear at the Examination into the Core Strategy, on the grounds the Core Strategy raises significant issues relating to the protection of internationally important wildlife sites (as highlighted in the HRA) and that there remains uncertainty over the delivery of appropriate and effective mitigation measures.</p>	606	
654660	Ms Anne Mason	Transition Town Christchurch	<a href="#">CSPS947</a>	13.1			No				<p>This omits the important function of the natural environment in stabilising climate, acting as a carbon store, providing pollinators, cycling of water and nutrients and other Nature Services upon which</p>				607	<a href="#">2259130_0_1.pdf</a>

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											human and economic life is dependent.					
656626	Mr Michael Madgwick		<a href="#">CSPS1282</a>	13.1							We are generally supportive of the document and would comment that, in general, it is 'legally compliant' and 'sound', We welcome the recognition of the areas' special and rare natural environment and the need to protect it, particularly with respect to the Dorset Heathlands.				607	
654660	Ms Anne Mason	Transition Town Christchurch	<a href="#">CSPS948</a>	13.2		Yes	Yes	Yes	Yes	Yes	"The impact of climate change also affects all areas of planning and presents one of the biggest challenges for the Core Strategy. Dwindling global reserves of natural resources mean that policies must encourage the use of renewable resources, and make development more sustainable and efficient. " This is concern is crucial and this note should have been emphasised as one the Challenges Visions and Strategic Objectives listed on p 19. Climate change is referred to there but the emphasis is on the risk of flooding...				608	<a href="#">2259130_0_1.pdf</a>
474462	Mrs Sheila Bourton		<a href="#">CSPS186</a>	13.4	Yes	Yes	No	No	No	No	Not only should the new development be protected from the risk of flooding but it is equally important that the new developments do not contribute to the risk of flooding to the EXISTING developments. Runoff can cause severe flooding problems		No, I do not wish to participate at the oral examination		610	
360082	Mr and Mrs K Healy		<a href="#">CSPS2506</a>	13.7	Yes	Yes					<ul style="list-style-type: none"> <li>It is in paragraph 13.7 that the protection of ecosystem services should have been mentioned. This document will be on file till 2028 and this term is now being more widely used. We feel its omission is regrettable. An explanation of the term could have been put in an appendix. Even the NPPF in paragraph 109, (the 2nd bullet point) recognises 'the wider benefits of ecosystem services.'</li> <li>Otherwise ME1 is highly commendable, though we believe there may be sites of Nature Conservation Interest (SNCI) that have failed to be designated as such over the last ten years. Proposed sites for SANGS will require some careful surveys and assessments.</li> </ul>	Please include a reference to ecosystem services. A simple explanation could make reference to the importance of ecosystem services to both humans and flora and fauna in protecting the ability of the ecosystem to regulate healthy soils, clean air and water	No, I do not wish to participate at the oral examination		613	
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	<a href="#">CSPS3336</a>	13.7		No				No	The para fails to recognise the requirement for the Core Strategy to include all three strands of sustainability (social, economic and environmental) and to be proactive in protecting and enhancing the natural, built and historic environment (NPPF para 7- 9).	The key role of the Core Strategy is to ensure that development is truly sustainable and provides mutually dependent economic, social and environmental gain.	No, I do not wish to participate at the oral examination		613	
359571	Mr Renny Hendersen	Royal Society for the Protection of Birds	<a href="#">CSPS3748</a>	13.7		Yes					We support paragraph 13.7 which states that the key role for the Core Strategy is to ensure that "future growth ... can take place without damaging the very high quality environment that attracts growth in the first place".		Yes, I wish to participate at the oral examination	We would like to confirm that we wish to reserve the right to appear at the Examination into the Core Strategy, on the grounds the Core Strategy raises significant	613	

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														issues relating to the protection of internationally important wildlife sites (as highlighted in the HRA) and that there remains uncertainty over the delivery of appropriate and effective mitigation measures.		
654660	Ms Anne Mason	Transition Town Christchurch	<a href="#">CSPS94</a>	13.8			Yes	Yes	Yes	Yes	ADD to Relevant Evidence the DEFRA Biodiversity Offsetting guidance <a href="http://www.defra.gov.uk/environment/natural/biodiversity/uk/offsetting/">http://www.defra.gov.uk/environment/natural/biodiversity/uk/offsetting/</a>				614	<a href="#">2259130_0_1.pdf</a>
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	<a href="#">CSPS33</a>	13.8		No				No	Where impacts are unavoidable, mitigation should be put in place to minimise the harm caused. There should be an overall net increase in biodiversity (NPPF para 9 and 109).	If impacts are unavoidable, mitigation should be put in place to minimise the harm caused and achieve a net increase in biodiversity.	No, I do not wish to participate at the oral examination		614	
359571	Mr Renny Henderson	Royal Society for the Protection of Birds	<a href="#">CSPS37</a>	13.8							We also support paragraph 13.8 which recognises and supports the role of SANG in larger developments as appropriate. We would suggest the addition of the Dorset Heathlands Interim Planning Framework and forthcoming SPD/DPD within the 'Relevant evidence' section on page 152.		Yes, I wish to participate at the oral examination	we would like to confirm that we wish to reserve the right to appear at the Examination into the Core Strategy, on the grounds the Core Strategy raises significant issues relating to the protection of internationally important wildlife sites (as highlighted in the HRA) and that there	614	

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														remains uncertainty over the delivery of appropriate and effective mitigation measures.		
359461	Mrs Nicola Brunt	Dorset Wildlife Trust	<a href="#">CSPS15 03</a>	13.10	No					No	<p>Dorset Wildlife Trust supports the inclusion of policy safeguarding biodiversity and geodiversity but considers that this policy requires amendment to meet the requirements of NPPF.</p> <p>1. List of nature conservation sites and habitats to be protected:</p> <ul style="list-style-type: none"> <li>• Whilst welcoming the protection given to SNCIs in this policy, NPPF (113) requires that distinctions should be made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status. We are concerned that that this policy does not make this distinction and therefore may not be sound.</li> <li>• Bullet 3 - Strategic Nature Areas should not be included in the list of sites to be protected, maintained and enhanced. These are not formal environmental designations but indicate large scale areas of opportunity. SNAs may comprise a number of formally designated sites as well as land which has no designation for biodiversity conservation. The need to plan positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure is set out in para 114 of the NPPF. It is suggested that Strategic Nature Areas are removed from this list in policy ME1, and instead fuller reference given within the supporting text with an amendment referring to their purpose within ME1 (see South West Nature Map – a Planner’s Guide p 15).</li> <li>• Bullet 6 - All priority species and habitats should be given protection – the use of ‘identified’ is uncertain here and we would suggest deleting this word.</li> </ul> <p>2. DWT support the inclusion of wording relating to the Dorset Biodiversity Protocol.</p> <p>3. Criteria:</p> <ul style="list-style-type: none"> <li>• Bullet 1 – we consider that this should be avoidance of harm to habitats and species and ‘sensitive’ habitats does not give sufficient guidance on the type of habitat being referred to.</li> <li>• Bullet 4 - we do not consider that this wording follows the guidance in NPPF (118) and seek amendment to reflect this paragraph in NPPF.</li> </ul>	<p>Suggested changes:</p> <p>1. Distinctions should be made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status. It may be appropriate to have separate policies, as in the Local Plan and Core Strategy Options consultation.</p> <p>2. Additional changes are indicated in the suggested amended text below:</p> <p>Safeguarding biodiversity and geodiversity The Core Strategy aims to protect, maintain and enhance the condition of all types of nature conservation sites, habitats and species including:</p> <ul style="list-style-type: none"> <li>• Internationally designated sites (SPA, SAC, Ramsar)</li> <li>• Sites of Special Scientific Interest (SSSI)</li> <li>• Strategic Nature Areas.</li> <li>• Sites of Nature Conservation Interest (SNCI)</li> <li>• Local Nature Reserves.</li> <li>• Identified Priority species and habitats.</li> <li>• Important geological and geomorphological sites.</li> <li>• Suitable Alternative Natural Greenspace.</li> </ul> <p>Within Strategic Nature Areas identified on Map 13.2, specific action will be taken towards meeting targets for the maintenance, restoration and recreation of priority habitats and species, and to linking habitats to create more coherent units that are more resilient to climate change.</p>	Yes, I wish to participate at the oral examination	Dorset Wildlife Trust is a voluntary nature conservation organisation which has specialist knowledge of the wildlife of Dorset and can offer local expertise. We manage the Sites of Nature Conservation Interest scheme for the county, are members of the East Dorset Environment Action Theme Group, the Dorset Biodiversity Officers Group and Dorset Biodiversity Partnership.	617	

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												<p>Where development is considered likely to impact upon particular sites, habitats or species as set out within the Dorset Biodiversity Protocol, it will need to be demonstrated that the development will not result in adverse impacts. To determine the likelihood of harm occurring, there should be an assessment of effects on any existing habitats, species and/or features of nature conservation importance, and the results of this assessment documented. The method of survey and level of detail will vary according to the size and type of development and whether any priority species and habitats exist on site. The survey should involve consultation and advice from Natural England, the Dorset Wildlife Trust, and Dorset County Council.</p> <p>Based on this assessment, the following criteria should be addressed when development is proposed:</p> <ul style="list-style-type: none"> <li>• Avoidance of harm to existing sensitive priority habitats and species through careful site selection, development design and phasing of construction and the use of good practice construction techniques.</li> <li>• Retention of existing habitats and features of interest, and provision of buffer zones around any sensitive areas.</li> <li>• Enhancement of biodiversity where possible through improving the condition of existing habitats or creation of new ones. Particular attention should be paid to priority habitats referred to in the Dorset Biodiversity Strategy, and the Strategic Nature Areas identified on the Dorset Nature Map.</li> <li>• Where harm is identified as likely to result, provision of measures to adequately avoid or adequately mitigate that harm should be set out. Development may will be</li> </ul>				

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												<p>refused if adequate mitigation or, as a last resort, compensation cannot be provided.</p> <ul style="list-style-type: none"> <li>• Provision of adequate management of the retained and new features.</li> <li>• Monitoring of habitats and species for a suitable period of time after completion of the development to indicate any changes in habitat quality or species numbers, and put in place corrective measures to halt or reverse any decline.</li> </ul> <p>In addition, and in recognition of the function of the New Forest National Park, the Core Strategy will carefully consider any adverse impacts on the New Forest as a result of development.</p> <p>3. Suggested addition to para 13.10: Protection of habitats and species will be undertaken through the Council's own work programmes, working with partners and the local community, and through implementing the initiatives and proposals within the Dorset Biodiversity Strategy, South East Dorset Green Infrastructure Strategy and the emerging Local Nature Partnerships and Nature Improvement Areas. This will also provide an approach that looks to create an expanded and more connected ecological network giving greater resilience to the natural environment against the pressures from climate change and development. Strategic Nature Areas, identified on the Dorset Nature Map (Map 13.2), are a positive tool for coordinating activities that secure the retention and enhancement of features of interest as well as activities for the benefit of locally important species.</p>				
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	<a href="#">CSPS3338</a>	13.10		No				No	Support in part We welcome the general intention of the para. but reference to the Dorset Nature Map here would put Map 13.2 into context.	Add reference to Dorset Nature Map. We support DWT's advice on revised wording			617	
359571	Mr	Royal	<a href="#">CSPS37</a>	13.10							We welcome the statements made in paragraph 13.10 which highlight		Yes, I wish	we would like	617	

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	Renny Henderson	Society for the Protection of Birds	<a href="#">51</a>								the Councils' support of the Dorset Biodiversity Strategy, South East Dorset Green Infrastructure Strategy, emerging Local Nature Partnerships and Nature Improvement Areas.		to participate at the oral examination	to confirm that we wish to reserve the right to appear at the Examination into the Core Strategy, on the grounds the Core Strategy raises significant issues relating to the protection of internationally important wildlife sites (as highlighted in the HRA) and that there remains uncertainty over the delivery of appropriate and effective mitigation measures.		
474462	Mrs Sheila Bourton		<a href="#">CSPS187</a>	Policy ME1	Yes	Yes					The aims of the Core Strategy in protecting and enhancing conservation sites are to be applauded however, if habitats and species are to be monitored for a "suitable period" after the completion of a development, it is debateable as to just what could be done if there are found to be adverse affects. Once houses are built, there is no going back; the houses cannot be demolished and the land returned to its natural state.		No, I do not wish to participate at the oral examination		618	
474490	Mrs Sheila Bourton	Keep Wimborne Green	<a href="#">CSPS217</a>	Policy ME1	Yes	Yes					We note that habitats and species are to be monitored for a "Suitable period" after completion of a development but one has to wonder just what could be done if it were to be found that there were adverse effects from any new development? Land cannot be returned to its previous natural state once houses have been built.		No, I do not wish to participate at the oral examination		618	
360271	Cllr Paul Timberlake		<a href="#">CSPS488</a>	Policy ME1	Yes			Yes	Yes	Yes	Reference first sentence of ME1 - "Where development is considered likely to impact upon particular sites, habitats or species as set out within the Dorset Biodiversity Protocol, it will need to be demonstrated that the development will not result in adverse impacts." I believe wording needs to be stronger in order to protect natural environment, in particular areas with special designations.	Change wording to - Where development is considered likely to adversely impact upon particular sites, habitats or species as set out within the Dorset Biodiversity Protocol, other than very minimally, development of an	No, I do not wish to participate at the oral examination		618	



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												alternative site/area should be the preferred option unless no site exists within the locale.				
652710	Mr Gary Balmer		<a href="#">CSPS478</a>	Policy ME1	No	No	No	Yes	Yes	Yes	How can the strategy seek to protect, maintain and enhance habitats and species when it proposes to build on VTSW5 which has supported a large number of species for many years and because VTSW5 was added to the strategy late, no assessments of the wildlife has even been carried out yet. This assessment needs to be done for a period of 12 months and the land owner restrained from ploughing/disc harrowing to scare off the wildlife, then we could record a picture of everything that thrives in this location. see DERC records for wildlife in the location.	The land needs to be closely monitored for a period of 12 months and the owner forbidden from disturbing the sight and scaring the wildlife.	No, I do not wish to participate at the oral examination		618	
652994	Mrs Kathleen Leader		<a href="#">CSPS54Z</a>	Policy ME1	No	No	Yes	Yes	Yes	Yes	VTSW5 is nearby a section of the Dorset Heathlands Special Protection Area (or SPA ie an internationally important wildlife site), also near a section of Dorset Heaths Special Area of Conservation (SAC another international designation) and Ebblake Bog Site of Special Scientific Interest (SSSI). Wildlife from all of these sites regularly use the open land of VTSW5. This should be closely monitor and the land from VTSW5 should also be protected as a feeding ground	the Land on VTSW5 should be listed as a Special Protection Area, this would stop the owner ploughing the land and stop any wildlife being harm or frightened away.	No, I do not wish to participate at the oral examination		618	
549174	Mr Justin Milward	Woodland Trust	<a href="#">CSPS799</a>	Policy ME1	Yes	No	No			No	<p>Policy ME1 – Safeguarding biodiversity and geodiversity</p> <p>Whilst we are pleased to see the reference to ancient woodland in the 'Key facts' box, we are objecting because Policy ME1 has not followed the national policy lead of the new National Planning Policy Framework (NPPF) and specifically highlighted the need for protection of the irreplaceable semi natural habitat of ancient woodland. We raised this in our earlier response to the Strategy Options consultation in January 2011, and are disappointed that this has been ignored.</p> <p>Ancient woodland, together with ancient/veteran trees, represents an irreplaceable semi natural habitat that still does not benefit from full statutory protection: for instance 86% of ancient woodland in the South West has no statutory protection. With 4.76% of East Dorset (0.07% in Christchurch) comprised of ancient woodland compared to an average for Great Britain of 2.40%, it is vital that the Council does all it can to protect this above average resource.</p> <ul style="list-style-type: none"> <li>The new National Policy Planning Framework clearly states: "...planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss " (DCLG, March 2012, para 118).</li> <li>The Government's Natural Environment White Paper – The Natural Choice: securing the value of nature (HM Government, July 2011, para 2.56) states that: 'The Government is committed to providing appropriate protection to ancient woodlands....'</li> <li>The new Biodiversity Strategy for England (Biodiversity 2020: A Strategy for England's Wildlife &amp; Ecosystem Services, Defra 2011, see 'Forestry' para 2.16) states that – 'We are committed to providing appropriate protection to ancient woodlands and to more restoration of plantations on ancient woodland site'.</li> </ul>	We would therefore like to see Policy ME1 contain an additional 9th bullet point to make it clear that national policy is being followed with ancient woodland to be protected, maintained and enhanced. Suggested bullet point wording – 'ancient and semi-natural woodland'.	No, I do not wish to participate at the oral examination		618	

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											<ul style="list-style-type: none"> <li>The SW Forestry Framework (Forestry Commission, 2005) contains a key objective to 'Protect, improve and manage Ancient Semi-Natural Woodland...'</li> </ul>					
359461	Mrs Nicola Brunt	Dorset Wildlife Trust	<a href="#">CSPS15 02</a>	Policy ME1		No				No	<p>Dorset Wildlife Trust supports the inclusion of policy safeguarding biodiversity and geodiversity but considers that this policy requires amendment to meet the requirements of NPPF.</p> <p>1. List of nature conservation sites and habitats to be protected:</p> <ul style="list-style-type: none"> <li>Whilst welcoming the protection given to SNCIs in this policy, NPPF (113) requires that distinctions should be made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status. We are concerned that that this policy does not make this distinction and therefore may not be sound.</li> <li>Bullet 3 - Strategic Nature Areas should not be included in the list of sites to be protected, maintained and enhanced. These are not formal environmental designations but indicate large scale areas of opportunity. SNAs may comprise a number of formally designated sites as well as land which has no designation for biodiversity conservation. The need to plan positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure is set out in para 114 of the NPPF. It is suggested that Strategic Nature Areas are removed from this list in policy ME1, and instead fuller reference given within the supporting text with an amendment referring to their purpose within ME1 (see South West Nature Map – a Planner’s Guide p 15).</li> <li>Bullet 6 - All priority species and habitats should be given protection – the use of ‘identified’ is uncertain here and we would suggest deleting this word.</li> </ul> <p>2. DWT support the inclusion of wording relating to the Dorset Biodiversity Protocol.</p> <p>3. Criteria:</p> <ul style="list-style-type: none"> <li>Bullet 1 – we consider that this should be avoidance of harm to habitats and species and ‘sensitive’ habitats does not give sufficient guidance on the type of habitat being referred to.</li> <li>Bullet 4 - we do not consider that this wording follows the guidance in NPPF (118) and seek amendment to reflect this paragraph in NPPF.</li> </ul>	<p>Suggested changes:</p> <p>1. Distinctions should be made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status. It may be appropriate to have separate policies, as in the Local Plan and Core Strategy Options consultation.</p> <p>2. Additional changes are indicated in the suggested amended text below:</p> <p>Safeguarding biodiversity and geodiversity</p> <p>The Core Strategy aims to protect, maintain and enhance the condition of all types of nature conservation sites, habitats and species including:</p> <ul style="list-style-type: none"> <li>Internationally designated sites (SPA, SAC, Ramsar)</li> <li>Sites of Special Scientific Interest (SSSI)</li> <li>Strategic Nature Areas.</li> <li>Sites of Nature Conservation Interest (SNCI)</li> <li>Local Nature Reserves.</li> <li>Identified Priority species and habitats.</li> <li>Important geological and geomorphological sites.</li> <li>Suitable Alternative Natural Greenspace.</li> </ul> <p>Within Strategic Nature Areas identified on Map 13.2, specific action will be taken towards meeting targets for the maintenance, restoration and recreation of priority habitats and species, and to linking habitats to create more coherent units that are more resilient to climate change. Where development is considered likely to impact upon particular sites, habitats or species as set out within the Dorset Biodiversity Protocol, it will need to be</p>	Yes, I wish to participate at the oral examination	Dorset Wildlife Trust is a voluntary nature conservation organisation which has specialist knowledge of the wildlife of Dorset and can offer local expertise. We manage the Sites of Nature Conservation Interest scheme for the county, are members of the East Dorset Environment Action Theme Group, the Dorset Biodiversity Officers Group and Dorset Biodiversity Partnership.	618	

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												<p>demonstrated that the development will not result in adverse impacts. To determine the likelihood of harm occurring, there should be an assessment of effects on any existing habitats, species and/or features of nature conservation importance, and the results of this assessment documented. The method of survey and level of detail will vary according to the size and type of development and whether any priority species and habitats exist on site. The survey should involve consultation and advice from Natural England, the Dorset Wildlife Trust, and Dorset County Council.</p> <p>Based on this assessment, the following criteria should be addressed when development is proposed:</p> <ul style="list-style-type: none"> <li>• Avoidance of harm to existing sensitive priority habitats and species through careful site selection, development design and phasing of construction and the use of good practice construction techniques.</li> <li>• Retention of existing habitats and features of interest, and provision of buffer zones around any sensitive areas.</li> <li>• Enhancement of biodiversity where possible through improving the condition of existing habitats or creation of new ones. Particular attention should be paid to priority habitats referred to in the Dorset Biodiversity Strategy, and the Strategic Nature Areas identified on the Dorset Nature Map.</li> <li>• Where harm is identified as likely to result, provision of measures to adequately avoid or adequately mitigate that harm should be set out. Development may will be refused if adequate mitigation or, as a last resort, compensation cannot be provided.</li> <li>• Provision of adequate management of the retained and</li> </ul>				

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												<p>new features.</p> <ul style="list-style-type: none"> <li>Monitoring of habitats and species for a suitable period of time after completion of the development to indicate any changes in habitat quality or species numbers, and put in place corrective measures to halt or reverse any decline.</li> </ul> <p>In addition, and in recognition of the function of the New Forest National Park, the Core Strategy will carefully consider any adverse impacts on the New Forest as a result of development.</p> <p>3. Suggested addition to para 13.10:                      Protection of habitats and species will be undertaken through the Council's own work programmes, working with partners and the local community, and through implementing the initiatives and proposals within the Dorset Biodiversity Strategy, South East Dorset Green Infrastructure Strategy and the emerging Local Nature Partnerships and Nature Improvement Areas. This will also provide an approach that looks to create an expanded and more connected ecological network giving greater resilience to the natural environment against the pressures from climate change and development. Strategic Nature Areas, identified on the Dorset Nature Map (Map 13.2), are a positive tool for coordinating activities that secure the retention and enhancement of features of interest as well as activities for the benefit of locally important species.</p>				
524723	Mr John Worth	Wimborne Civic Society	<a href="#">CSPS19 31</a>	Policy ME1							We feel that these two policies should provide adequate safeguards for heritage protection and historic buildings.				618	
612430	Mr Nick Squirrell	Natural England, Dorset and Somerset Team	<a href="#">CSPS20 69</a>	Policy ME1	No	No	Yes	No	No	No	<p>Policy ME1                      This policy is neither legally compliant nor sound:                      NPPF paragraph 113 (see also para 14) gives clear guidance concerning the need for authorities to set distinctions between the protection afforded sites with different designations. Therefore this policy should probably be split into one or two covering the various levels of biodiversity. The policies should also cover principle habitats</p>	<p>Natural England have raised a number of considerations, however we consider that the incorporation of modifications may best be achieved through discussion with the LPA.                      The proposed text modifications</p>	Yes, I wish to participate at the oral examination	<p>Natural England may be able to offer advice and reassurance to the</p>	618	

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											and species and the need to conserve wider ecological networks as set out across para 114-118. Paragraph 118 provides an good policy starting point for site protection. Paragraph 119 removes the presumption in favour of sustainable development on European and internationally protected sites, an important policy distinction which should be set out in the appropriate policy. Natural England advise that there is much advice in the last paragraphs of the policy which could usefully become supporting paragraphs. In addition to 13.10 Natural England would encourage the authority to make reference to the Dorset Biodiversity Protocol an important mitigation and enhancement tool.	made by the Dorset Wildlife Trust are supported by Natural England.		Inspector about the reliance he may have on the effectiveness of the policy and any modification proposed.			
359261	Mr Doug Cramond	DC Planning Ltd	<a href="#">CSPS2095</a>	Policy ME1		Yes							Yes, I wish to participate at the oral examination	In connection with comments on WMC3	618		
360082	Mr and Mrs K Healy		<a href="#">CSPS2503</a>	Policy ME1	Yes	Yes					<ul style="list-style-type: none"> <li>It is in paragraph 13.7 that the protection of ecosystem services should have been mentioned. This document will be on file till 2028 and this term is now being more widely used. We feel its omission is regrettable. An explanation of the term could have been put in an appendix. Even the NPPF in paragraph 109, (the 2nd bullet point) recognises 'the wider benefits of ecosystem services.'</li> <li>Otherwise ME1 is highly commendable, though we believe there may be sites of Nature Conservation Interest (SNCI) that have failed to be designated as such over the last ten years. Proposed sites for SANGS will require some careful surveys and assessments.</li> </ul>	Please include a reference to ecosystem services. A simple explanation could make reference to the importance of ecosystem services to both humans and flora and fauna in protecting the ability of the ecosystem to regulate healthy soils, clean air and water	No, I do not wish to participate at the oral examination		618		
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	<a href="#">CSPS3339</a>	Policy ME1		No				No	<p>By seeking to simplify the policy through combining those in the Core Strategy Options document the Policy ME1 is in fact less clear and less effective. Development should add to biodiversity not simply minimise impact: opportunities for increasing biodiversity should be realised. The Policy is not compliant with the overall thrust of NPPF in terms of biodiversity gain. In particular, the following points should be addressed within the policy:</p> <ul style="list-style-type: none"> <li>The first sentence should include reference to NPPF para 109 – establishing coherent ecological networks ....</li> <li>NPPF (para 113) requires criteria based policies and a distinction between the hierarchy of sites so that appropriate weight is given to their importance and the contribution they make to wider ecological networks. The policy appears to give equal weight to all sites</li> <li>The requirements of NPPF para 114 are not entirely satisfied by inclusion of Nature Map: in the absence of ecological survey potential linkages that could be achieved eg by SANGs or viewed from long term perspective cannot be identified.</li> <li>In the absence of survey, detailed identification and mapping of local ecological networks (including BAP habitats and species) has not informed site selection adequately eg native woodland and lowland meadow so the policy does not comply with NPPF para 117. Criteria (bullet point 1) should seek to avoid loss or damage to habitats and species.</li> </ul>	<p>Ensure compliance with NPPF particularly paras 109, 113, 114, 117.</p> <p>Amend Criteria (bullet point 1) so that it seeks to avoid loss or damage to habitats and species. Amend Criteria (bullet point 3) Delete the words where possible. Put in place a mechanism for both adequate funding and clear responsibility for monitoring (either in Policy or under para 13.12.) ETAG supports changes recommended by DWT</p>	Yes, I wish to participate at the oral examination		618		

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											Criteria (bullet point 3) should be amended: it is a requirement of NPPF to improve biodiversity. The words where possible should be deleted. Adequate funding and clear responsibility for monitoring should be put in place. This should either be covered in Policy or under para 13.12. Sustainability Appraisal SA Objective 1 Protect, enhance and expand habitats and protected species The emphasis has been on protecting habitats and protected species rather than enhancing and expanding biodiversity. Score negative					
521508	Ms Lisa Jackson	Jackson Planning Ltd	<a href="#">CSPS3649</a>	Policy ME1	Yes	No	Yes	Yes	Yes	Yes	<p>The Core Strategy does not join up the key biodiversity assets and is not positively prepared. The opportunities afforded by Chewton Common, links to the coast through the river valleys – Avon, Mude are not positively reflected in the plan. Neither is the need to manage access to the New Forest addressed in policy. Policy ME1 is a negative development management policy that has no geographic relevance to the area. This policy is not positively prepared and is therefore not sound. The policy fails to comply with the requirements of the NPPF at paragraph 117. The Core Strategy for Christchurch needs to be explicit about the role of SANG and other relief for potential impact on important nature designations that are affected by development within the Borough. The plan is lacking coherence with the Dorset Green Infrastructure (GI) Strategy and fails to positively plan for the integrated delivery of GI. The Dorset GI strategy has recently been revised and supported by CBC, yet it is not reflected sufficiently in the spatial strategy for the area. The concept of GI is left to a single sentence, which refers to the use of the Community Infrastructure Levy (CIL). Green Infrastructure Strategy must be expressed spatially and shown on the key diagram. It should also take the opportunity to link to wider GI strategy within the New Forest, and Avon and Stour Valleys, and coastal strategy. The same representation was made at the consultation options stage and no improvement to the Core Strategy is evident.</p> <p>There is a very good evidence base from the work of Footprint Ecology in 2008 regarding the use of Green Space across Dorset. This evidence has not been effectively used to inform landscape scale biodiversity, there is a lack of spatial direction with regard to biodiversity. The map at 13.3 is inadequate and is at too small a scale to show how the policy would deliver landscape scale biodiversity benefits.</p> <p>Please note this representation is substantiated by additional evidence in a supporting statement submitted with the representations by MEM Ltd.</p>	<p>The impact and pressures of the Dorset Urban Heathlands are to be addressed in the forthcoming Heathland DPD, however, it must be for the Core Strategy to properly reflect this thinking in terms of SANGS, making use of less pressured green assets (the coast) and acknowledgment of current patterns of use. Both the coast and the New Forest have significant influence on the urban population of Christchurch and the Core Strategy must acknowledge this and plan for this spatially. The policy should reflect the Dorset GI strategy. The GI network must be shown on the key diagram and be supported by narrative text. The policy must also address cross boundary issues in relation to mitigation for potential impact on the New Forest and the requirement for buffering from the urban population.</p>	Yes, I wish to participate at the oral examination	MEM Ltd represent the key landowner who can help deliver GI and SANG . The landowner controls Chewton Common and land to the north of the Railway at Roeshot. The representations by MEM made at the consultation stage with regard to this issue have not been reflected in the pre submission draft and the landowner wishes to bring this to the attention of the Inspector. The plan lacks ambition, a joined up spatial programme and is not positively prepared in	618	<a href="#">2267120_01.pdf</a>

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														relation to GI. It needs to better reflect the Lawton report findings, the Dorset GI Strategy and the Heathland mitigation programme.		
359571	Mr Renny Henderson	Royal Society for the Protection of Birds	<a href="#">CSPS3752</a>	Policy ME1							We support this policy.		Yes, I wish to participate at the oral examination	We would like to confirm that we wish to reserve the right to appear at the Examination into the Core Strategy, on the grounds the Core Strategy raises significant issues relating to the protection of internationally important wildlife sites (as highlighted in the HRA) and that there remains uncertainty over the delivery of appropriate and effective mitigation measures.	618	
361028	Ms Helen Patton	New Forest National Park Authority	<a href="#">CSPS3789</a>	Policy ME1							Statutory duty to have regard to the statutory National Park purposes The Authority is disappointed that despite our previous consultation response (Options for Consideration, January 2011), a clear concise reference to the Councils' legal obligation under Section 62(2) of the Environment Act 1995 to have regard to the National Park has not been included in the Submission draft Core Strategy. This statutory duty requires all relevant authorities (including neighbouring planning authorities) to have regard to the two National Park purposes when				618	

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											<p>considering proposals for development which might affect them, including where this is outside the boundary of the National Park. The two National Park purposes are:</p> <p>To conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park; and♣</p> <p>To promote opportunities for the public understanding and enjoyment of the special qualities of the National Park.♣</p> <p>This duty emphasises that the delivery of the statutory Park purposes does not fall solely on the National Park Authority. As the New Forest National Park lies on the borders of both Districts (and immediately adjacent to some significant development proposals), the Authority remains of the opinion that the Core Strategy should include a succinct reference to this important statutory requirement as a material planning consideration. Whilst it is recognised that Policy ME1 Safeguarding Biodiversity and Geodiversity states that, "...in recognition of the function of the New Forest National Park, the Core Strategy will carefully consider any adverse impacts on the New Forest as a result of development..." the Authority would welcome a more comprehensive outline of the statutory duty. Other Core Strategies prepared locally have included reference to the duty and in some instances (for example Core Policy 15 of the South Wiltshire Core Strategy adopted February 2012) have included a specific policy which only permits development where it does not have a negative impact on the National Park purposes. This more detailed approach is commended.</p> <p>The Core Strategy should be amended to include a clear, succinct reference to the Section 62(2) duty to have regard to the♣ two statutory Park purposes in making decisions that could affect the National Park. This is an important material planning consideration in considering proposals in Christchurch and East Dorset.</p>					
359483	Ms Ellie Challans	Environment Agency	<a href="#">CSPS3934</a>	Policy ME1							<p>Page 153 – Policy ME1</p> <p>This policy implies that conservation and enhancement of biodiversity will only apply to species and habitats that have some kind of official designation attached to them.</p> <p>We would encourage you to make it clear within the policy that all established natural habitats should be protected and enhanced. Protecting and enhancing only existing designated areas limits the potential for the future creation of new designations and the general protection of the natural environment for its own sake. It is also important that natural habitats are woven into the fabric of new development, for species and residents alike.</p> <p>We would like to see reference to riverine and coastal habitats within this policy. The 'blue' corridors within the East Dorset/Christchurch area are a valuable asset and should be acknowledged as such, with a view to improving them and extending them. You should aim to improve the quality of them and also make them accessible to the public where feasible. Public access to natural aquatic areas can improve health and quality of life for residents. It may also help to take pressure off the Dorset Heathlands.</p> <p>The European Water Framework Directive should be referred to within the policy. This is an important Directive as it specifies a certain level of improvement for rivers within a set time frame.</p>				618	



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663588	Mr Roger Street	Christchurch Conservation Trust	<a href="#">CSPS3747</a>	Policy ME1							<p>6. COMMENT/ COMPARISON OF POLICIES IN TOWN PLAN AND CORE STRATEGY</p> <p>CCT expresses concern regarding the combining of existing Town Plan policies into a new Core Strategy policy which fails to specifically include some of these existing policies. For example, Core Strategy policy PC5 is stated to include existing town plan policies ET1 (loss of tourism accommodation), L17 (development of undeveloped rivers and harboursides) and L19 (development of indoor/outdoor recreation facilities). However, Core Strategy PC5 fails to embody the detailed local conditions described in L17 where the development of currently undeveloped riversides and harboursides is conditioned. Core Strategy policy HE1 is stated to replace Town Plan policies BE19 and BE 20. These latter two policies relate to Ancient Monuments and local archaeology, along with Policy BE21 which is stated to have been deleted and not incorporated into HE1. Policy BE21 is crucial in planning matters as it details the procedure for dealing with sites of potential archaeological significance. CCT requests that BE21 be incorporated into Core strategy HE1 and that further detail from policies BE19, and BE20 be included. Currently the section on Protection of Buildings of Local Historic and Architectural Interest contains the word "archaeological" just once! A similar section in the Town Plan, entitled " Buildings of local architectural or historic interest" contains the word "Archaeological" eighteen times and "Archaeology" twice. CCT asks why the importance of archaeology has been downgraded in this new policy HE1.</p> <p>Christchurch is renowned for its conservation areas and it is difficult to understand why Town Plan Policy BE1 has been deleted. It is a key policy for development/alteration or extension in a conservation area. Policies BE2 and BE3 follow from this initial policy so CTT would have expected BE1 to remain as a saved policy, especially as BE2 and BE3 have been saved. CCT requests that BE1 remains as a saved policy. In similar vein, CCT asks why Town Plan policy BE13, which relates to demolition of listed buildings, has been deleted while Policies BE14 (Alterations to listed buildings), BE15 (Setting of listed buildings) and BE16 (Maintenance of views from important buildings) remain as saved policies. CCT also asks why policy BE17 (Control of advertisements on listed buildings) has also been deleted.</p> <p>CCT notes that Town Plan policy ENV15, concerned with wildlife corridors, has been incorporated into Core strategy ME1. Turning to policy ME1 (at pages 153/155) there is no mention of wildlife corridors. The Town Plan at pages 21/22 devotes nearly a page to this subject, which although described as non-designated sites are increasingly seen as vital to nature conservation.</p>					618	
359461	Mrs Nicola Brunt	Dorset Wildlife Trust	<a href="#">CSPS1505</a>	Map 13.2		No				No	<p>Strategic Nature Areas (SNAs) are designated for a particular habitat but will comprise a given area of that habitat in a mosaic with other semi-natural habitats and other land uses. We therefore consider it would be more appropriate within the Core Strategy to define the SNAs as areas for landscape scale maintenance and expansion of biodiversity without giving a habitat definition. In the longer term it is considered that local work should build on the Nature Map to further define local priorities for individual SNAs, and ideally a study should be</p>	<p>We suggest map 13.2 is amended to show the Dorset Nature Map SNAs, but without the individual habitat codes, and also overlays the Wild Purbeck Nature Improvement Area (a GIS layer is available from the Dorset AONB). Ideally we would like to see a more detailed study</p>	No, I do not wish to participate at the oral examination			620	

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											undertaken across East Dorset and Christchurch, incorporating Green Infrastructure work, to provide a better level of detail	carried out across the area of the Core Strategy to map priorities at a more detailed level.				
359571	Mr Renny Henderson	Royal Society for the Protection of Birds	<a href="#">CSPS3753</a>	13.12							In paragraph 13.12 we suggest inclusion of the RSPB in this 'monitoring' group. The RSPB occupies a key role in monitoring bird populations on the Dorset heathlands (under contract from the IPF executive) which will assist in demonstrating whether the mitigation approach advocated by the IPF is effective.		Yes, I wish to participate at the oral examination	we would like to confirm that we wish to reserve the right to appear at the Examination into the Core Strategy, on the grounds the Core Strategy raises significant issues relating to the protection of internationally important wildlife sites (as highlighted in the HRA) and that there remains uncertainty over the delivery of appropriate and effective mitigation measures.	623	
359571	Mr Renny Henderson	Royal Society for the Protection of Birds	<a href="#">CSPS3754</a>	13.13							We support the text presented in paragraphs 13.13 – 13.19 on the Dorset heathlands.		Yes, I wish to participate at the oral examination	we would like to confirm that we wish to reserve the right to appear at the Examination into the Core Strategy, on the grounds the Core Strategy raises significant issues relating to the	624	

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														protection of internationally important wildlife sites (as highlighted in the HRA) and that there remains uncertainty over the delivery of appropriate and effective mitigation measures.		
359571	Mr Renny Henderson	Royal Society for the Protection of Birds	<a href="#">CSPS3755</a>	13.14							We support the text presented in paragraphs 13.13 – 13.19 on the Dorset heathlands.		Yes, I wish to participate at the oral examination	we would like to confirm that we wish to reserve the right to appear at the Examination into the Core Strategy, on the grounds the Core Strategy raises significant issues relating to the protection of internationally important wildlife sites (as highlighted in the HRA) and that there remains uncertainty over the delivery of appropriate and effective mitigation measures.	625	
474462	Mrs Sheila Bourton		<a href="#">CSPS188</a>	Policy ME2	Yes	Yes					"SANGS" in my opinion, are untested and do not compensate for the loss of natural fields to development and the subsequent loss of habitat for both flora and fauna. SANGS are just a "sticking plaster" to		No, I do not wish to participate at the oral examination		626	

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											endeavour to lure people away from protected Heathland. No one knows whether SANGS will be an effective mitigation.		n			
474490	Mrs Sheila Bourton	Keep Wimborne Green	<a href="#">CSPS218</a>	Policy ME2	Yes	No			Yes		SANGS are untested and we do not know if they will compensate for the proposed loss of greenbelt and rise in the local population from development.		No, I do not wish to participate at the oral examination		626	
524338	Mr Kenneth Brooks		<a href="#">CSPS251</a>	Policy ME2							<p>Policy ME2 states:- 'In accordance with the advice from Natural England, no residential development will be permitted within 400 metres of protected heathland'. The Dorset Heathland Interim Planning Framework was adopted in January 2007 and is slowly progressing through a Supplementary Planning Document to a Joint Development Plan Document. To date, we have not seen any evidence regarding the effectiveness of the current heathland protection policy over the 5 year period of operation. Clearly, the 400 metre distance from heathland is a purely arbitrary limit. Natural England refers to 'about 400 metres' and the Draft Supplementary Planning Document refers to 400 metres 'measured as a straight line'.</p> <p>However, in St Leonards and St Ives the 400 metre limit has been based on Natural England's Drawing ref. rz399990005 with extremely irregular boundaries, which has rendered sites on opposite sides of relatively narrow residential roads as either totally acceptable for unlimited development or totally unacceptable for absolutely any development. Obviously, categorising residential sites opposite each other under a totally different jurisdiction is absolutely unacceptable and meaningless in achieving realistic protection for Dorset Heathlands.</p>	I propose the arbitrary 400 metre limit should now be increased to a more realistic 1 kilometre limit and based on a wider and more individual criteria, supported by the Local Planning Authority being statutorily committed to approving a detailed written assessment of adverse effects before approving any increased residential occupancy.			626	
649505	Miss Dawn Leader		<a href="#">CSPS293</a>	Policy ME2	Yes	No	Yes	No	No	No	<p>I believe that SANGs have not been around long enough to show that they work as a way of taking people away from the heathland and building a new development of houses such as VTSW5 so close to land that the forestry commission will be returning to heathland is unsound.</p> <p>Further mention of cycle paths/pedestrian walkway through the forest passing close by already protected heathland is surely funneling people towards the heathland rather than a SANG.</p> <p>Natural England say that a SANG must be provided if a development is within 5kms of protected heathland. The proposed SANG at VTSW 5 is not big enough to meet the criteria.</p>	new development must be put further away from the heathland sites.	No, I do not wish to participate at the oral examination		626	
360271	Cllr Paul Timberlake		<a href="#">CSPS490</a>	Policy ME2	Yes		Yes	Yes	Yes	Yes	General support for ME2 but query " On development proposals of up to 50 dwellings," Why 50 dwellings?				626	
549174	Mr Justin Milward	Woodland Trust	<a href="#">CSPS800</a>	Policy ME2	Yes	No	No			No	<p>Policy ME2– Protection of the Dorset Heathlands</p> <p>Whilst we are pleased to see the first mitigation bullet point in Policy ME2, namely 'Provision of on-site alternative natural greenspace. (also see Policy ME3 below)', we are objecting because this does not follow national or local planning policy on supporting woodland creation specifically.</p> <p>The NPPF states that: 'Local planning authorities should: set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of</p>	In order to comply with national and local planning policy, we would like to see the first mitigation bullet point of Policy ME2 amended (upper case) to read: Provision of on-site alternative natural greenspace INCLUDING NATIVE WOODLAND. (also see Policy ME3 below)'.	No, I do not wish to participate at the oral examination		626	

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											<p>biodiversity and green infrastructure', (DCLG, March 2012, para 114). Also para 117 states that: 'To minimise impacts on biodiversity and geodiversity, planning policies should:....promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan'.</p> <p>The new England Biodiversity Strategy which makes it clear that expansion of priority habitats like native woodland remains a key aim – 'Priority action: Bring a greater proportion of our existing woodlands into sustainable management and expand the area of woodland in England', (Biodiversity 2020: A strategy for England's wildlife and ecosystems services, DEFRA 2011, p.26).</p> <p>A reading of these new policies in the National Planning Policy Framework together with the England Biodiversity Strategy indicates national policy that native woodland creation should form a high priority for this Core Strategy. We therefore reiterate our suggested Proposed Changes wording proposal above.</p> <p>In addition, the draft South East Dorset Green Infrastructure Strategy states that: "New development should be planned and designed to include semi-natural and multifunctional green infrastructure features. Also, where an opportunity arises, existing urban areas should be enhanced. Such features include: developing small scale green infrastructure elements such as: planting street trees and creating urban woods, promoting green roofs, walls and bridges;" (Theme 4: Greening the urban environment).</p>					
359461	Mrs Nicola Brunt	Dorset Wildlife Trust	<a href="#">CSPS1507</a>	Policy ME2		Yes					Dorset Wildlife Trust supports this policy, subject to continued alignment with the forthcoming Dorset Heathlands Joint Development Plan Document.				626	
612430	Mr Nick Squirrell	Natural England, Dorset and Somerset Team	<a href="#">CSPS2070</a>	Policy ME2	Yes	No	Yes	Yes	No	No	<p>Policy ME2</p> <p>Natural England advise that this policy is not sound. The policy seeks to set out the position of the authorities in south east Dorset in relation to avoiding urban related adverse effects on the Dorset heaths European and internationally designated sites. The policy as currently worded is not legally sound. The policy should state the "protected European and internationally designated heathlands".</p> <p>The policy proposes the provision of a financial contribution, this allows applicants to rely on delivery of avoidance or mitigation measures through a partnership overseen by the authorities and needs to be clear on this matter in order to be compliant with regulations relating to legal agreements and CIL.</p> <p>The policy should make it clear that measures are delivered in advance of the developments being occupied and must provide for mitigation in perpetuity.</p> <p>Natural England have not advised that contributions may be made to manage heathlands. This approach is not compliant with the Habitats Regulations for reasons of certainty and the requirement to provide mitigation in perpetuity. It should be deleted following consultation with Natural England.</p> <p>The policy should reference the advice in the Dorset Heathlands SPD as well as the DPD which will set out guidance in the intervening</p>	<p>Natural England may be able to offer advice and reassurance to the Inspector about the reliance he may have on the effectiveness of the policy and any modification proposed.</p>	<p>Yes, I wish to participate at the oral examination</p>	<p>Natural England may be able to offer advice and reassurance to the Inspector about the reliance he may have on the effectiveness of the policy and any modification proposed.</p>	626	

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											<p>period. The final sentence could be re-worded to indicate “visitor management” and “appropriate avoidance measures”</p> <p>This policy forms an important part of the avoidance and mitigation measures approach in south east Dorset. Reference should be made in the supporting paragraphs to the role it plays in enabling development (in the 400m – 5km area) and in supporting the specific policy protection for European and international sites which we have advised is required in ME1. The avoidance of residential development within 400m is the critical measure which allows the contributions mechanism to deliver mitigation effectively in the area beyond 400m.</p>					
359261	Mr Doug Cramond	DC Planning Ltd	<a href="#">CSPS20 96</a>	Policy ME2		Yes							Yes, I wish to participate at the oral examination	In connection with comments on WMC3	626	
523531	Mr Tim Hoskinson	Savills	<a href="#">CSPS21 25</a>	Policy ME2		No		No			<p>Object: the policy is unsound as it is not justified. It does not represent the most appropriate strategy when considered against the reasonable alternative, based on the evidence available.</p> <p>The need to provide mitigation to ensure that residential development does not have an adverse impact on the Dorset Heathlands is recognised and supported. However policy ME2 would benefit from greater flexibility in relation to requirements for on-site or off-site mitigation and financial contributions, which should be sought at a level sufficient to address the impact arising from the proposed development. A cross-reference to guidance on SANGS should also be included.</p>	<p>Changes required: Amend the second paragraph of Policy ME2 as follows: In accordance with the advice from Natural England, no residential development (Use Class C3: Dwelling Houses) will be permitted within 400m of protected heathland. Any residential development within 400m and 5km of these areas will provide mitigation through a range of measures as set out in the Dorset Heathlands Joint Development Plan Document, including which may include one or more of the following, to a level which is sufficient to address the impact arising from the proposed development:</p> <ul style="list-style-type: none"> <li>• Provision of on-site or off-site alternative natural greenspace. (also see Policy ME3 below Appendix 1: Guidance on SANG provision).</li> <li>• Contributions to off-site greenspace or recreation projects.</li> <li>• Contributions to Heathland management projects.</li> </ul> <p>The Dorset Heathlands Joint Development Plan Document will set out the type of development circumstances, a list of projects which will be funded by developer contributions and the calculated contribution amounts as they apply to different types of development. Projects</p>	Yes, I wish to participate at the oral examination	Savills are acting on behalf of the Canford Estate and Harry J Palmer Ltd in relation to their landholdings on the edge of Corfe Mullen that form part of the CM1 allocation in the Pre-submission Draft Core Strategy. We are seeking participation at the oral part of the examination in order to help ensure that the plan is sound and deliverable	626	

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												delivered through the Development Plan Document will include Suitable Alternative Natural Greenspace (SANG), heathland access and management, wardening, education, habitat re-creation and other appropriate measures.				
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	<a href="#">CSPS33 40</a>	Policy ME2		Yes					ETAG supports this policy but we would wish to review our position if there are fundamental changes to the evidence and recommendations in the emerging Dorset Heathlands Joint Development Plan.		No, I do not wish to participate at the oral examination		626	
523531	Mr Tim Hoskinson	Savills	<a href="#">CSPS32 03</a>	Policy ME2		No		No			The need to provide mitigation to ensure that residential development does not have an adverse impact on the Dorset Heathlands is recognised and supported. However policy ME2 would benefit from greater flexibility in relation to requirements for on-site or off-site mitigation and financial contributions, which should be sought at a level sufficient to address the impact arising from the proposed development. A cross-reference to guidance on SANGS should also be included.	Amend the second paragraph of Policy ME2 as follows: In accordance with the advice from Natural England, no residential development (Use Class C3: Dwelling Houses) will be permitted within 400m of protected heathland. Any residential development within 400m and 5km of these areas will provide mitigation through a range of measures as set out in the Dorset Heathlands Joint Development Plan Document, which may include one or more of the following, to a level which is sufficient to address the impact arising from the proposed development: <ul style="list-style-type: none"> <li>• Provision of on-site or off-site alternative natural greenspace. (also see Appendix 1: Guidance on SANG provision).</li> <li>• Contributions to off-site greenspace or recreation projects.</li> <li>• Contributions to Heathland management projects..</li> </ul> The Dorset Heathlands Joint Development Plan Document will set out the type of development circumstances, a list of projects which will be funded by developer contributions and the calculated contribution amounts as they apply to different types of development. Projects delivered through the Development Plan Document will include Suitable Alternative Natural Greenspace (SANG), heathland access and management,	Yes, I wish to participate at the oral examination	Savills are acting on behalf of Barratt David Wilson Homes in relation to land to the north of Christchurch Road, West Parley that forms the FWP4 allocation in the Pre-submission Draft Core Strategy. We are seeking participation at the oral part of the examination in order to help ensure that the plan is sound and deliverable.	626	<a href="#">2249912_0_1.pdf</a> <a href="#">2249910_0_1.pdf</a> <a href="#">2249911_0_1.pdf</a>

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												wardening, education, habitat re-creation and other appropriate measures.				
496919	Mrs Nicola Shaw	Hurn Parish Council	<a href="#">CSPS3656</a>	Policy ME2							Policy ME2 – Protection of the Dorset Heathlands This Policy is incomplete and does not meet the “Test of Soundness”. It needs to be “Effective” and in order to achieve effectiveness, it needs to include the promotion of “Robust Areas” for use by the general public as an alternative to heathland. Whilst new neighbourhood developments will include SANGs, other smaller urban developments and extensions will not, which will increase pressure on heathland areas. The following wording should be included in the last paragraph of the Policy – “identifying and encouraging greater access to more robust areas”.				626	
359571	Mr Renny Henderson	Royal Society for the Protection of Birds	<a href="#">CSPS3761</a>	Policy ME2							We support this policy. We would however comment that it would be advantageous if policies on SANG across south east Dorset authorities are similarly drawn. We are aware from our involvement with the Purbeck Core Strategy that some differences exist. Standardisation of approach would be highly beneficial both for the Councils’ officers in implementing the policy and for developers. With respect to policies ME1-ME3 above, we note that these have been excluded from the HRA process (page 18) on the basis they are being promoted to safeguard biodiversity. We are concerned that this potentially overlooks impacts associated with the implementation of these policies on European sites, for example, possible adverse impacts on hydrology, traffic and pollution associated with the development of a substantial SANG in proximity to an European site. We would wish to discuss this with Natural England, but have not been able to during the consultation period. The same general point may also apply to the remainder of policies within Chapter 13, namely ME4-ME7.		Yes, I wish to participate at the oral examination	we would like to confirm that we wish to reserve the right to appear at the Examination into the Core Strategy, on the grounds the Core Strategy raises significant issues relating to the protection of internationally important wildlife sites (as highlighted in the HRA) and that there remains uncertainty over the delivery of appropriate and effective mitigation measures.	626	
619967		Home Builders Federation (South West)	<a href="#">CSPS3679</a>	Policy ME2		No		Yes			The policy is unsound as it is unjustified. We note that the policy requires that developments will provide mitigation through a range of measures set out in the Dorset Heathlands Joint Development Plan Document. The Councils have not taken these costs into account for its impact upon development viability		Yes, I wish to participate at the oral examination	The HBF would like to appear at the examination to debate	626	



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											<p>and hence the deliverability of the plan as required by the Framework. Paragraphs 173 and 174 require plans to be deliverable and this means ensuring that development is not subject to a scale of obligations and policy burdens that jeopardises delivery. To ensure viability, the costs of any local requirements, policies and standards to be applied to development must be assessed. The affordable housing viability assessments carried out for both districts have not taken these costs into account.</p> <p>The policy specifies that for developments of up to 50 dwellings, where adequate mitigation measures cannot be provided, these are required to make a financial contribution to the Councils. The policy does not specify what this is, and this cost has not been reflected in a viability assessment that meets the requirements of the Framework.</p> <p>The core strategy is unsound as it has not taken these costs into account. In combination with other policies of the plan this could render the plan undeliverable.</p>			these matters further.		
523319	Mr Ryan Johnson	Turley Associates	<a href="#">CSPS3778</a>	Policy ME2		No			Yes		<p><b>Policy ME2 – Protection of Dorset Heathlands</b>                      Thank you for the invitation to comment on the Pre-Submission Core Strategy DPD. I write on behalf of our client, Burry &amp; Knight Ltd, who are the owners and developers of Hoburne Farm Estate, which includes land east of phase 8 of the Hoburne Farm Estate (SHLAA reference 8/11/0525); and are the owners and operators of Hoburne Caravan Park (SHLAA reference 8/11/0287).                      Our clients support the Council in their objective to progress and adopt a Local Plan for the area as quickly as possible. This will provide clarity and certainty for the development industry and all those who interact with the planning system. More importantly it will assist the Council in its efforts to address the significant housing land supply shortages in the borough, particularly over the next five years.                      We have reviewed the plan and its evidence base and conclude that revisions are needed if the Council are to satisfy the tests of soundness in the NPPF. The following paragraph/policy specific comments are therefore made to assist the Council in finalising the plan before it is formally submitted to the Secretary of State.                      We would wish to participate at the Examination in Public to elaborate on these comments, particularly in the context of the lands controlled by our client.                      Comment                      The policy is insufficiently flexible to be effective in its current form. A requirement that all developments over 50 units provide on-site SANG is unrealistic and insufficiently flexible to endure the plan period. It would also potentially undermine the Council’s housing delivery objectives, as provision on site may render some urban sites unviable, reducing the Council’s housing yield expectations from the urban areas and placing greater reliance on green belt sources of supply. This approach may well contradict the plans wider objectives for achieving sustainable development. For example, there may well be instances where an off-site contribution towards the provision of a consolidated SANG is preferred by the Council and Natural England, as it would generate greater net benefits for both the SPA and surrounding residential communities. The 50 unit threshold was removed from</p>	<p>Suggested Change Revise text to better reflect the Draft Dorset Heathlands SPD (Feb 2012), particularly paragraph 3.3.</p>	<p>Yes, I wish to participate at the oral examination</p>	<p>We would wish to participate at the Examination in Public to elaborate on these comments, particularly in the context of the lands controlled by our client.</p>	626	

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											earlier versions of the Draft Dorset Heathlands SPD for that very reason, allowing the flexibility for negotiations on a site by site basis. Referencing the SPD also avoids the need for the Core Strategy to be revised each and every time the SPD is updated.					
359571	Mr Renny Henderson	Royal Society for the Protection of Birds	<a href="#">CSPS3756</a>	13.15							We support the text presented in paragraphs 13.13 – 13.19 on the Dorset heathlands.		Yes, I wish to participate at the oral examination	we would like to confirm that we wish to reserve the right to appear at the Examination into the Core Strategy, on the grounds the Core Strategy raises significant issues relating to the protection of internationally important wildlife sites (as highlighted in the HRA) and that there remains uncertainty over the delivery of appropriate and effective mitigation measures.	628	
359571	Mr Renny Henderson	Royal Society for the Protection of Birds	<a href="#">CSPS3757</a>	13.16							We support the text presented in paragraphs 13.13 – 13.19 on the Dorset heathlands.		Yes, I wish to participate at the oral examination	we would like to confirm that we wish to reserve the right to appear at the Examination into the Core Strategy, on the grounds the Core Strategy raises significant issues relating	629	

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														to the protection of internationally important wildlife sites (as highlighted in the HRA) and that there remains uncertainty over the delivery of appropriate and effective mitigation measures.		
654660	Ms Anne Mason	Transition Town Christchurch	<a href="#">CSPS963</a>	Policy ME3		Yes	Yes	Yes	Yes	Yes	The value of SANGs in providing alternative areas for leisure use near new developments is as yet unproven. Moreover, SANGs should themselves have bio-diversity measures to increase natural habitats.				630	<a href="#">2259130_0_1.pdf</a>
656249	Ms Gemma Care	Barton Willmore LLP	<a href="#">CSPS1092</a>	Policy ME3	No	No	No	No	No	No	<p>Thank you for the opportunity to provide comments on the Christchurch and East Dorset Core Strategy (JCS) Pre-Submission document. On behalf of our client, Stour Valley Properties (Dorset) Ltd., we are pleased to provide the following response, which should be read in conjunction with the accompanying Consultation Response Forms.</p> <p><b>Background</b>                      Barton Willmore LLP has been instructed to make representations to this document, on behalf of Stour Valley Properties (Dorset) Ltd. ('SVP')</p> <p>SVP have land interests within East Dorset and welcome the opportunity to contribute to the emerging Core Strategy (JCS). SVP are currently promoting the release of their land to the south of Wimborne for housing.</p> <p>Fundamentally, SVP have serious concerns over the level of overall housing provision identified within the draft JCS and the degree to which that which is proposed is sufficient to meet identified needs within the East Dorset and Christchurch locality. We submit, having regard to the evidence base material available that the level of housing proposed for East Dorset within the draft JCS is inappropriate and inconsistent with national planning policy, which states that each local planning authority should ensure that the Local Plan is based on adequate up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local planning authorities are expected to ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals.</p> <p>Consideration is given within the submitted representations to the strategic site allocations for Wimborne and Colehill identified within the JCS and the extent to which the proposed allocations fulfil the overall</p>		Yes, I wish to participate at the oral examination	To ensure our case is presented in full and to be party to discussions.	630	

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											<p>objectives and spatial vision for East Dorset and Christchurch. On the premise that insufficient housing requirements are identified in the Pre-Submission JCS we submit that additional strategic allocations or an increase in the specified number of required new dwellings are required in order to plan positively for the further housing growth we consider necessary in light of our appraisal of the Council's published JCS evidence base.</p> <p>In accordance with section 20 of the Planning and Compulsory Purchase Act 2004 (as amended) local plans must be 'sound': i.e. they must be positively prepared, justified, effective and consistent with national policy. We suggest that the housing strategy adopted within the JCS as it stands is (a) not the most appropriate (on the basis that it is not considered fully justified) and (b) it is not 'positively prepared' – i.e. it is not based on a strategy which in our view genuinely seeks to meet objectively assessed needs.</p> <p>Within these representations we do not comment on every aspect of the JCS; our intention is to comment on those sections where non-compliance with tests of soundness is apparent, or where we are particularly supportive. To be clear, our primary concern in this instance is the content and justification of Policy KS4 and the proposed housing allocations for Wimborne and Colehill – specifically Policy WMC6.</p> <p>An alternative proposal for housing to the south of Wimborne is considered with specific reference to the SVP land shown on the concept plan attached at Appendix 1 to these submissions.</p> <p>Comments are also provided on a number of other policies within the JCS, on individual response forms, as requested. The full list of policies to which these representations respond are:</p> <p>Policy KS1, KS4, KS5, KS10                      Policy WMC3, WMC6                      Policy FWP3, FWP4, FWP6, FWP7, FWP8                      Policy ME3                      Policy HE4</p> <p>Copies of all Core Strategy Response Forms relating to each policy addressed within these representations are contained at Appendix 4. Appendices 1 – 3 to this cover letter are those referred to in the various consultation forms.</p> <p>I trust that all of the enclosed is clear and in order and we look forward to engaging with you further in the consultation process.</p> <p>We support inclusion within the policy of a requirement for bespoke SANG of at least 8ha per 1,000 new population, in addition to any other measures that are required to satisfy the Habitats Regulations.</p> <p>However, we do not agree that a financial contribution toward Strategic Access Management and Monitoring should be required without a case-by-case examination, in light of the Habitats Regulations, of the efficacy of the SANG and other mitigation measures provided in securing avoidance of likely significant effects on the SPA.</p> <p>We object to the requirement for SAMM contributions for all schemes, including those with bespoke SANG provision, on the basis that a project-specific assessment should be made as to the reasonable likelihood that a scheme will generate a net increase in future users of the SPA.</p> <p>We agree that SAMM contributions may be warranted in those</p>					

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											<p>instances where there is still residual doubt as to whether a project may contribute towards future increases in users of the SPA and thus a likely significant effect on the SPA, despite the provision of impact avoidance measures such as SANG. However, if it can be demonstrated, though 'objective evidence' (please refer to Circular 06/05), that a bespoke SANG scheme (or any other package of impact avoidance measures put forward by a project proponent) is likely to be so effective that it eliminates the likelihood of that project contributing any likely significant effect on the SPA, then contributions towards the SANG Project would neither be justified, nor proportionate, and would therefore not meet the essential prerequisites set out by the NPPF and the CIL Regulations (in particular Regulation 122).</p> <p>The requirement under European law is for it to be demonstrated that the project is not likely to significantly affect the SPA either alone or in combination with other plans and projects; it is not to comply with a scheme of managing or monitoring access on other parts of the European site, some of which cannot be significantly affected (or even affected by all) by a project.</p> <p>There are a number of cases where schemes have been consented on exactly this premise, including the landmark Dilly Lane decision which was upheld in the High Court which did not consider SANG contributions as an avoidance measure within the bespoke mitigation package (Judgement of J Sullivan in Hart DC v SoS for Communities and Local Government (2008)).</p> <p>A Public Inquiry considering three planning applications at Shinfield, South of the M4 SDL at Reading (within Wokingham Borough), recently examined the wholesale requirement for SANG contributions in detail and a decision will be forthcoming in the near future from the Secretary of State (expected July 2012); we anticipate this decision will add weight to the representation being made here on this matter. Natural England has accepted in evidence at that Inquiry that it is possible that scheme may be able to demonstrate impact avoidance using a package of measures (such as SANG) that does not include SANG.</p>					
359461	Mrs Nicola Brunt	Dorset Wildlife Trust	<a href="#">CSPS1519</a>	Policy ME3						No	<p>Dorset Wildlife Trust consider that the policy is partly sound and partly unsound.</p> <p>Dorset Wildlife Trust strongly supports the intention of this policy to mitigate the impact of developments of over 50 dwellings on the Dorset Heathlands.</p> <p>However we have concerns that this policy is over prescriptive and needs further development, allowing each site to be designed on its own merits and with existing natural features and rights of way incorporated and enhanced. It may be more appropriate to refer to guidance given in the Dorset Heathlands Joint Development Plan Document rather than repeat/create criteria here.</p> <p>Of these criteria, in particular we are concerned:</p> <p>(i) That phasing is not clear. SANGs should be set up to operate effectively prior to development and closely monitored.</p> <p>(ii) That "SANGs should have circular walks". Whilst this is an ideal, it may still be possible to design attractive routes that are not fully circular.</p> <p>(iii) That "SANGs must be designed so that they are perceived to be</p>	<p>Suitable Alternative Natural Greenspace (SANG) is required to mitigate the impact of developments of over 50 dwellings. The provision of SANG must meet the following standards which have been agreed by Natural England:</p> <ul style="list-style-type: none"> <li>• 8 to 16 ha of SANG land or any standard within an adopted Heathlands Development Plan Document shall be provided in perpetuity per 1,000 new occupants through direct provision as an element of the development. SANG shall be put in place prior to development and the area of SANG must provide the key features set out in this policy to ensure it</li> </ul>	No, I do not wish to participate at the oral examination		630	

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											<p>safe by users by not having trees and scrub covering parts of the route". Whilst people must feel safe, a variety of routes which include some open routes, and some that have tree cover eg a few mature trees or widened rides may be acceptable on larger sites, allowing a diversity of habitats.</p> <p>(iv) That "all SANGs larger than 12 ha must aim to provide a variety of habitats for users to experience (eg some areas of woodland, scrub, grassland, heathland, wetland and open water)". More preferable would be the aim to provide a natural experience of varied habitats based on the existing features of the site and the most suitable habitat management, restoration or re-creation to compliment the surrounding area.</p> <p>(v) That "access must be largely unrestricted with plenty of space provided where it is possible to exercise dogs freely off lead". Whilst desirable for the purposes of attracting dog walkers away from heaths, there may be occasion when due to local demand or wildlife issues, such as presence of protected species, some restrictions are necessary.</p> <p>We support the need for SANGs to be compatible with other planning policy.</p>	<p>performs the function of attracting people away from the heaths.</p> <ul style="list-style-type: none"> <li>Where the planning authority is satisfied that direct provision as an element of the development is not reasonable, the planning authority will require contributions towards the provision of SANGs identified through the Heathland Supplementary Planning Document, or a replacement Heathlands Development Plan Document.</li> <li>Contributions will be required towards strategic access management and monitoring measures.</li> <li>During the phasing of development the effectiveness of SANGs will be monitored and enhancements will be required if the SANGs are not functional according to the criteria set out in this policy. SANGs must have the features described below without their functionality being compromised by unsuitable size, shape, location, topography or other inherent characteristics and SANGs must be compatible with other planning policy.</li> </ul> <p>For all sites there must be adequate parking for visitors, unless the site is intended for local pedestrian use only, i.e. within easy walking distance (400m) of the developments linked to it. The amount of car parking space should be determined by the anticipated numbers using the site and arriving by car. If the site is intended for local pedestrian use only, then there must be excellent access for people arriving by foot, with a range of access points directly linking housing and the SANG.</p> <ul style="list-style-type: none"> <li>SANGs should provide routes of sufficient length and attractiveness for mitigation purposes and all those .All SANGs with car parks should aim to must have a circular walk which starts and finishes at the car park.</li> </ul>				

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												<ul style="list-style-type: none"> <li>• It should be possible to complete a circular walk of 2.3 – 2.5km around the SANG, and for larger SANGs a variety of circular walks.</li> <li>• Car parks must be easily and safely accessible by car and should be clearly sign posted.</li> <li>• The accessibility of the site must include access points appropriate for the particular visitor use the SANG is intended to cater for.</li> <li>• Access points should have signage outlining the layout of the SANG and the routes available to visitors.</li> <li>• The SANG must have a safe route of access on foot from the nearest car park and / or footpath/s.</li> <li>• SANGs must be designed so that they are perceived to be safe by users; they must not have trees and scrub covering parts of the walking routes. offering at least some routes through relatively open terrain.</li> <li>• Paths must be easily used and well maintained but most should remain unsurfaced to avoid becoming too urban in feel. A majority of paths should be suitable for use in all weathers.</li> <li>• SANGs must be perceived as semi natural spaces without intrusive artificial structures, except in the immediate vicinity of car parks. Visually sensitive way-markers and some benches are acceptable.</li> <li>• All SANGs larger than 12ha must aim to provide a semi-natural landscape which incorporates and enhances existing features of biodiversity interest and provides a variety of habitats for users to experience (e.g. some areas of woodland, scrub, grassland, heathland, wetland, open water). appropriate to the site and surrounding area.</li> <li>• Wherever appropriate and possible, access within the SANG must be largely unrestricted with plenty of space provided where it is</li> </ul>				

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												possible for dogs to exercise freely and safely off lead. • SANGs must be free from unpleasant visual, auditory or olfactory intrusions (e.g. derelict buildings, intrusive adjoining buildings, dumped materials, loud intermittent or continuous noise from traffic, industry, flood lighting, sewage treatment works, waste disposal facilities). • SANGs should be clearly sign-posted or advertised in some way. • SANGs should have leaflets and or websites advertising their location to potential users. It would be desirable for leaflets to be distributed to new homes in the area and to be made available at entrance points to car parks. The establishment of a SANG should be accompanied by legal agreements to secure the future protection and management of the site.				
359553	Mrs Linda Leeding	West Parley Parish Council	<a href="#">CSPS1646</a>	Policy ME3		No					This policy is Unsound. This is an admirable and well conceived policy, fundamental to the implementation of policies FWP6 and FWP7 (as well as housing plans elsewhere in the District). It has not however been shown that it is deliverable. In West Parley's case it is understood that the SANGs have got no further than initial discussions. Owners of the proposed SANGs will be in a strong position. Funding costs are very sketchy, at the least. There can be little confidence – until and unless costs are identified – that developers will be able to bear the whole burden of affordable housing, roads, community facilities and SANGs. This is an important policy and should be shown to be deliverable before the Core Strategy is adopted. Otherwise there is a clear danger of young families in being put in high density housing but the SANGs not materialising – with consequences that are all too well known nationally.		Yes, I wish to participate at the oral examination		630	
359553	Mrs Linda Leeding	West Parley Parish Council	<a href="#">CSPS2011</a>	Policy ME3		No					This policy is Unsound. This is an admirable and well conceived policy, fundamental to the implementation of policies FWP6 and FWP7 (as well as housing plans elsewhere in the District) It has not however been shown that it is deliverable. In West Parley's case it is understood that the SANGs have got no further than initial discussions. Owners of the proposed SANGs will be in a strong position. Funding costs are very sketchy, at the least. There can be little confidence – until and unless costs are identified – that developers will be able to bear the whole burden of affordable housing, roads, community		Yes, I wish to participate at the oral examination		630	



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											facilities and SANGs This is an important policy and should be shown to be deliverable before the Core Strategy is adopted. Otherwise there is a clear danger of young families in being put in high density housing but the SANGs not materialising – with consequences that are all too well known nationally.					
523893	Miss Lindsay Thompson	Terence O'Rourke Ltd	<a href="#">CSPS2048</a>	Policy ME3	Yes	No		Yes	Yes		We note that Purbeck District Council has recently considered amendments to the Dorset Heathlands Supplementary Planning Document that all Council's within South East Dorset will eventually adopt. The document considered by Purbeck Council refers to standards for SANG which are about to be published for public consultation through their Core Strategy. These standards are different from those proposed in policy ME3. An independent inspector has recently held hearing sessions as part of the examination of Purbeck District Council's Core Strategy. The latest changes are being published for consultation following that hearing process. This has all happened since the Christchurch and East Dorset Core Strategy was published and therefore it is understandable that the two plans and the Supplementary Planning Document do not now correspond on this issue. A joint approach should be adopted by Natural England and the South East Dorset Authorities to ensure the provision of consistent design criteria. Prior to adoption these design criteria should be consulted upon.	Consistency between Local Planning Authorities in their approach to detail of SANG policies relating to the Dorset Heathlands to meet tests of 'justified' and 'effective'.	Yes, I wish to participate at the oral examination	Our client has a significant interest in land at North Wimborne (Cranborne Road new neighbourhood) which require the provision of SANG and we therefore consider it to be important that we are able to participate orally at the examination to expand on the comments we have made within this document.	630	
524723	Mr John Worth	Wimborne Civic Society	<a href="#">CSPS1929</a>	Policy ME3							We are in favour of the creation of SANGs, under Policy ME3, and a review, with possible expansion, of Special Character Areas and Areas of Great Landscape Value in East Dorset.				630	
612430	Mr Nick Squirrell	Natural England, Dorset and Somerset Team	<a href="#">CSPS2073</a>	Policy ME3	Yes	No	Yes	No	No	No	Policy ME 2 SANGs Natural England does not consider that this policy is sound as the authorities have recently consulted about a Dorset Heathland SPD which has been adopted by some of the authorities. The SANG guidance in that document has been submitted to the Purbeck Core Strategy EIP and should be used by these authorities. The Dorset Heaths SPD includes detailed SANG criteria as well as other guidance. Natural England advise that this policy be re-written so that whilst the scale of developments required to produce SANGs etc is set out the policy refers to the SPD guidance to avoid confusion. Natural England further advise that the policy indicate that the SPD guidance will be superseded by the Joint DPD following a further public consultation and democratic approval (as in para 16.23).	Natural England have raised a number of considerations, however we consider that the incorporation of modifications may best be achieved through discussion with the LPA.	Yes, I wish to participate at the oral examination	Natural England may be able to offer advice and reassurance to the Inspector about the reliance he may have on the effectiveness of the policy and any	630	

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														modification proposed.		
359261	Mr Doug Cramond	DC Planning Ltd	<a href="#">CSPS2097</a>	Policy ME3		Yes							Yes, I wish to participate at the oral examination	In connection with comments on WMC3	630	
523531	Mr Tim Hoskinson	Savills	<a href="#">CSPS2130</a>	Policy ME3		No		No			Object: the policy is unsound as it is not justified. It does not represent the most appropriate strategy when considered against the reasonable alternative, based on the evidence available. The need to provide mitigation to ensure that residential development does not have an adverse impact on the Dorset Heathlands is recognised and supported. Further guidance on SANG provision is welcomed, however it is important to ensure consistency of approach across the local authorities in dealing with the cross-boundary issues that arise in relation to the Dorset Heathlands. As currently drafted Policy ME3 does not provide sufficient flexibility, and the relationship with the planned Heathlands Development Document is unclear. Much of the detail included in the policy would be better expressed as guidance rather than a firm requirement, and would be more appropriately provided as supporting text or in an appendix. It should be noted that in many cases the provision of SANGS associated with new neighbourhoods will bring benefits to the wider area, and it may be appropriate to use contributions from other sites secured via the Heathland SPD for ongoing management and monitoring.	Remove Policy ME3 and replace as SANG guidance in an appendix to the plan.	Yes, I wish to participate at the oral examination	Savills are acting on behalf of the Canford Estate and Harry J Palmer Ltd in relation to their landholdings on the edge of Corfe Mullen that form part of the CM1 allocation in the Pre-submission Draft Core Strategy. We are seeking participation at the oral part of the examination in order to help ensure that the plan is sound and deliverable	630	
360082	Mr and Mrs K Healy		<a href="#">CSPS2507</a>	Policy ME3	Yes	No	No	No	Yes	Yes	We are in general agreement with this policy. However, we do have some reservations. The SANGS are designed to take the pressure off heathland when additional development takes place within 5 km. One of the main pressures on heathland is the accumulative effect of dog walkers, particularly dogs not on leads. For this reason SANGS have to be of a certain size and variety of scenery to offer a good alternative to the heaths where dogs can be safely exercised off the lead. • All SANGS should offer tranquillity. They should be peaceful places offering the tranquillity one would experience on heathland. • One concern is that SANGS do not become a uniform type of parkland. They should be handled on a site by site basis, also that they should reflect what habitats exist. For example at Dudsbury (FWP7) there are acid grasslands, these should be encouraged. • Another concern is that SANGS with special habitats may be targeted	<ul style="list-style-type: none"> <li>• Tranquillity and protection from light pollution should be mentioned.</li> <li>• The need to develop SANGS on a site by site basis to take advantage of what localised ecology exists and to encourage its development.</li> <li>• There is a solution to some dog walking problems (and the need of weekend cyclists). On your doorstep are Cannon Hill and Uddens woodlands. It is Forestry Commission land, mainly coniferous plantations though some deciduous trees do grow. This area is widely used and is more robust than many</li> </ul>	No, I do not wish to participate at the oral examination		630	

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											as areas where dogs should be kept on a lead, if not all the time, at least for some parts of the year. This would not be acceptable to a large section of dog walkers, as dogs need mental as well as physical exercise. They would be forced to go elsewhere.	habitats. It is well able to take the pressure of residents, and their dogs, recreational needs. • It should never take the place of SANGS, but a mini Moors Valley Park would act as a robust buffer between more localised SANGS and the heathlands.				
503395	Mr Ian Davis		<a href="#">CSPS23 24</a>	Policy ME3		No					Policy ME3 Suitable Alternative Naural Greenspace (SANG). This policy is Unsound. This is an important policy and should be shown to be deliverable BEFORE the core strategy is adopted. Otherwise there is a clear danger of young families being put into high density housing but the SANGS not materialising – with consequences that are all to well known nationally. Owners of the proposed SANGS will be in a very strong position. Funding costs are very sketchy. There is very little confidence (until and unless ALL costs are identified) that developers will be able to bear the very heavy burden of affordable housing, link roads and new junctions, utilities, community facilities, landscaping and the purchase of the SANGS.				630	
512459	Sandra Davis		<a href="#">CSPS23 63</a>	Policy ME3		No					Policy ME3 Suitable Alternative Naural Greenspace (SANG). This policy is Unsound. This is an important policy and should be shown to be deliverable BEFORE the core strategy is adopted. Otherwise there is a clear danger of young families being put into high density housing but the SANGS not materialising – with consequences that are all to well known nationally. Owners of the proposed SANGS will be in a very strong position. Funding costs are very sketchy. There is very little confidence (until and unless ALL costs are identified) that developers will be able to bear the very heavy burden of affordable housing, link roads and new junctions, utilities, community facilities, landscaping and the purchase of the SANGS				630	
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	<a href="#">CSPS33 41</a>	Policy ME3		Yes					Support in part We support the principle of SANGs and their requirement for developments over 50 dwellings. However, the effectiveness of the mitigation of the impacts of development on the heaths depends on the SANGs delivering sites that offer truly alternative natural greenspace, meet people’s expectations and needs in terms of wide open spaces, and do not compromise existing tranquillity. While we are in broad agreement with the overall approach (Bullet points 1-3) in some respects the policy is overly prescriptive and in others does not quite achieve what is necessary. (PI see 2nd response).		Yes, I wish to participate at the oral examination		630	
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	<a href="#">CSPS33 42</a>	Policy ME3		No		No			The policy lacks flexibility. The Heathland SPD is in preparation. Its effectiveness will inform the DPD. In the meantime, our concerns are: • Bullet point 4 should be more explicit and identify who would monitor	Criteria for SANGs should be less prescriptive but take on board the issues outlined above to ensure flexibility and coherence of	Yes, I wish to participate at the oral examination	As part of the East Dorset Community Partnership,	630	

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											<p>effectiveness of the SANGs and how enhancements will be achieved. Given the extent of the new development that is taking place and that new homes are intended to have a lifespan of 60-100 years, the area of the SANG should be based on the maximum occupancy of the new homes or at least safeguard sufficient land that can be included at a further date if population increases or if the strategy for any particular development is found to be unsuccessful in mitigating impact on the heaths.</p> <ul style="list-style-type: none"> <li>• The policy focuses on people and funding and implies that the SANG has no wildlife function. One of the key functions is to recreate the heathland type experience of wide open spaces that have significant wildlife and landscape interest. Rather than working to a set formula each SANG should be bespoke, capitalising on and enhancing its existing biodiversity and the management that is necessary to achieve an identifiable contribution to coherent and resilient ecological networks. It is essential that we do not end up with SANGs that are created to a set pattern that would resemble city parks and have as much individuality as a modern High Street.</li> <li>• The legal agreement to secure the future protection and management should also provide for funding of the SANG creation and its management.</li> <li>• While the requirement for a circular walk of 2.3-2.5km may help provide developers with an idea of the area required, circular walks on smaller sites could destroy important habitat at the edges of SANGs or, to be achievable, cut through and damage existing important habitat such as ponds, ditches or hedgerows. They can become repetitive and boring for the walkers. This criterion fails to recognise the value of SANGs that include linear areas such as that proposed in the Allen valley to the west of Cranborne Road.</li> <li>• Existing natural features such as boundary banks, ditches, copses, ponds, wet grassland or woodland should be retained and enhanced. Some additional tree cover may be appropriate if the SANG links to and buffers existing woodland: with higher summer temperatures there may well be a need for shade on some walks.</li> <li>• New planting should have a specified function and not compromise existing habitat or management of the SANG.</li> <li>• We support the proposal for most pathways to be unsurfaced. Any hard surfaced pathways (to ensure DDA compliance) should be laid on Terram so that it can be removed without damage to the underlying soil if necessary at some future point: such hard surfacing should be porous.</li> <li>• Where any SANG is liable to flooding the total area provided should allow for this.</li> <li>• It is not just people that need to be attracted away from the heaths but their pets too.</li> <li>• Where possible SANGs should include links to nearby footpaths, trailways and bridleways.</li> <li>• Bespoke management plans should consider grazing stock, mowing and haymaking, and the needs of ground nesting birds and other potentially sensitive wildlife.</li> <li>• SANGs should be compatible with other policies in the Core Strategy.</li> </ul>	ecological networks.		ETAG's remit on biological sciences and sustainability is wider than that of Natural England or Dorset Wildlife Trust. Membership includes highly qualified natural scientists and town & parish representatives.		

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523531	Mr Tim Hoskinson	Savills	<a href="#">CSPS3204</a>	Policy ME3		No		No			<p>The need to provide mitigation to ensure that residential development does not have an adverse impact on the Dorset Heathlands is recognised and supported. Further guidance on SANG provision is welcomed, however it is important to ensure consistency of approach across the local authorities in dealing with the cross-boundary issues that arise in relation to the Dorset Heathlands. As currently drafted Policy ME3 does not provide sufficient flexibility, and the relationship with the planned Heathlands Development Document is unclear. Much of the detail included in the policy would be better expressed as guidance rather than a firm requirement, and would be more appropriately provided as supporting text or in an appendix. It should be noted that in many cases the provision of SANGS associated with new neighbourhoods will bring benefits to the wider area, and it may be appropriate to use contributions from other sites secured via the Heathland SPD for ongoing management and monitoring.</p>	Remove Policy ME3 and replace as SANG guidance in an appendix to the plan.	Yes, I wish to participate at the oral examination	Savills are acting on behalf of Barratt David Wilson Homes in relation to land to the north of Christchurch Road, West Parley that forms the FWP4 allocation in the Pre-submission Draft Core Strategy. We are seeking participation at the oral part of the examination in order to help ensure that the plan is sound and deliverable	630	<a href="#">2249911_0_1.pdf</a> <a href="#">2249910_0_1.pdf</a> <a href="#">2249912_0_1.pdf</a>
359571	Mr Renny Henderson	Royal Society for the Protection of Birds	<a href="#">CSPS3762</a>	Policy ME3							<p>We support this policy. We would however comment that it would be advantageous if policies on SANG across south east Dorset authorities are similarly drawn. We are aware from our involvement with the Purbeck Core Strategy that some differences exist. Standardisation of approach would be highly beneficial both for the Councils' officers in implementing the policy and for developers. With respect to policies ME1-ME3 above, we note that these have been excluded from the HRA process (page 18) on the basis they are being promoted to safeguard biodiversity. We are concerned that this potentially overlooks impacts associated with the implementation of these policies on European sites, for example, possible adverse impacts on hydrology, traffic and pollution associated with the development of a substantial SANG in proximity to an European site. We would wish to discuss this with Natural England, but have not been able to during the consultation period. The same general point may also apply to the remainder of policies within Chapter 13, namely ME4-ME7.</p>		Yes, I wish to participate at the oral examination	we would like to confirm that we wish to reserve the right to appear at the Examination into the Core Strategy, on the grounds the Core Strategy raises significant issues relating to the protection of internationally important wildlife sites (as highlighted in	630	

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														the HRA) and that there remains uncertainty over the delivery of appropriate and effective mitigation measures.		
619967		Home Builders Federation (South West)	<a href="#">CSPS36 81</a>	Policy ME3		No		Yes			The policy is unsound as it is unjustified. Similarly to policy ME2 we have been unable to detect any assessment of the likely impact of this policy on viability and the deliverability of the plan. We are particularly concerned since it would appear that many of the proposed allocations for housing fall within the buffer zones (for example: West Moors, St Leonards and St Ives, Ferndown, Alderholt, Verwood, Hurn, West Parley). It is unclear how the costs of this policy will impact upon development viability or whether it is feasible for sites allocated in these locations to provide alternative green space. The two viability assessments have not reflected the costs of this policy. Paragraph 174 requires that local authorities assess the likely cumulative impacts on development in their area of all existing and proposed local standards to ensure that the pace of housebuilding is not impeded. Since the submitted plan has not done so to the best of our knowledge the core strategy is unsound.		Yes, I wish to participate at the oral examination	The HBF would like to appear at the examination to debate these matters further	630	
521508	Ms Lisa Jackson	Jackson Planning Ltd	<a href="#">CSPS36 40</a>	Policy ME3	Yes	No	Yes	Yes	Yes	Yes	Policy ME3 in the Core Strategy is a development management policy and does not consider the strategic and spatial role of SANG in relation to the impacts of built development within the Borough. This is inconsistent with national policy and does not meet the requirements of paragraph 114 of the NPPF. The Core Strategy is not positively prepared in this respect. There is very good evidence base from the work of Footprint Ecology in 2008 relation to use of Green Space across Dorset. This evidence has not been used to inform how SANG can create links with landscape scale biodiversity as there is a lack of spatial direction with regard to heathland mitigation and biodiversity, and this means the plan is not effective. The role of the coast as highlighted by Footprint Ecology is not recognised in the Core Strategy as a potential diverter of heathland trips. This is inconsistent with national policy, in particular paragraph 114 of the NPPF which seeks to improve public access and enjoyment of the coast.	The impact and pressures of the Dorset Urban Heathlands are to be addressed in the forthcoming Heathland DPD, however, it must be for the Core Strategy to properly reflect this thinking in terms of SANGS, making use of less pressured green assets (the coast) and acknowledgment of current patterns of use and proposed use through planned built development. Both the coast and the New Forest have significant influence on the urban population of Christchurch and the Core Strategy must acknowledge this and plan for this spatially. The policy must also address cross boundary issues in relation to mitigation for potential impact on the New Forest.	Yes, I wish to participate at the oral examination	Bodorgan Environmental Management Ltd have indepth experience of local conditions, SANG criteria and SANG design following development of the SANG strategy for Roeshot Hill with Natural England and have based the strategy on evidence from the research work by Footprint Ecology.	630	

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523319	Mr Ryan Johnson	Turley Associates	<a href="#">CSPS3780</a>	Policy ME3		No			Yes		<p>Thank you for the invitation to comment on the Pre-Submission Core Strategy DPD. I write on behalf of our client, Burry &amp; Knight Ltd, who are the owners and developers of Hoburne Farm Estate, which includes land east of phase 8 of the Hoburne Farm Estate (SHLAA reference 8/11/0525); and are the owners and operators of Hoburne Caravan Park (SHLAA reference 8/11/0287).</p> <p>Our clients support the Council in their objective to progress and adopt a Local Plan for the area as quickly as possible. This will provide clarity and certainty for the development industry and all those who interact with the planning system. More importantly it will assist the Council in its efforts to address the significant housing land supply shortages in the borough, particularly over the next five years.</p> <p>We have reviewed the plan and its evidence base and conclude that revisions are needed if the Council are to satisfy the tests of soundness in the NPPF. The following paragraph/policy specific comments are therefore made to assist the Council in finalising the plan before it is formally submitted to the Secretary of State.</p> <p>We would wish to participate at the Examination in Public to elaborate on these comments, particularly in the context of the lands controlled by our client.</p> <p>Policy ME3 - SANG</p> <p>Comment Inclusion of second bullet point is welcomed as it provides flexibility for negotiation on a site by site basis without compromising the overall objective of SPA mitigation.</p> <p>As with our comments to Policy ME2, we question the use of specific development thresholds contrary to the Draft Dorset Heathlands SPD. Greater reference to the SPD will avoid the need to revise this Core Strategy policy if the content of the SPD changes prior to adoption, or on a rolling basis over the plan period as anticipated. The Council will need to provide compelling evidence in our view if they are to include development thresholds contrary to the joint Council's own SPD</p>	Suggested Change Remove specific thresholds for consistency with the Draft Dorset Heathlands SPD.	Yes, I wish to participate at the oral examination	We would wish to participate at the Examination in Public to elaborate on these comments, particularly in the context of the lands controlled by our client.	630	
359571	Mr Renny Henderson	Royal Society for the Protection of Birds	<a href="#">CSPS3758</a>	13.17							We support the text presented in paragraphs 13.13 – 13.19 on the Dorset heathlands.		Yes, I wish to participate at the oral examination	we would like to confirm that we wish to reserve the right to appear at the Examination into the Core Strategy, on the grounds the Core Strategy raises significant issues relating to the protection of internationally important wildlife sites	631	

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														(as highlighted in the HRA) and that there remains uncertainty over the delivery of appropriate and effective mitigation measures.		
359571	Mr Renny Henderson	Royal Society for the Protection of Birds	<a href="#">CSPS37 59</a>	13.18							We support the text presented in paragraphs 13.13 – 13.19 on the Dorset heathlands.		Yes, I wish to participate at the oral examination	we would like to confirm that we wish to reserve the right to appear at the Examination into the Core Strategy, on the grounds the Core Strategy raises significant issues relating to the protection of internationally important wildlife sites (as highlighted in the HRA) and that there remains uncertainty over the delivery of appropriate and effective mitigation measures.	632	
359571	Mr Renny Henderson	Royal Society for the Protection of Birds	<a href="#">CSPS37 60</a>	13.19							We support the text presented in paragraphs 13.13 – 13.19 on the Dorset heathlands.		Yes, I wish to participate at the oral examination	we would like to confirm that we wish to reserve the right to appear at the Examination	633	



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														into the Core Strategy, on the grounds the Core Strategy raises significant issues relating to the protection of internationally important wildlife sites (as highlighted in the HRA) and that there remains uncertainty over the delivery of appropriate and effective mitigation measures.		
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	<a href="#">CSPS3347</a>	13.20		No				No	<p>To avoid or mitigate the impact of climate change it is essential that its causes are understood and addressed. Within the Core Strategy consideration has been limited to the use of fossil fuels. As part of our response to Core Strategy Options we submitted a technical advice note, Carbon issues relevant to the Core Strategy (5.6.11). This has not been acknowledged in the background papers, put into the public domain or taken into consideration in the development of policy. The most serious omission is the failure to consider soil carbon losses due to changes in land management.</p> <p>Most terrestrial carbon is held in soils, more than twice as much as in vegetation or the atmosphere. The paper discusses how soil carbon is formed, why it is so essential, what causes losses and what can be done to enhance it. A copy is appended for ease of reference</p> <p>Our worst soil carbon losses occur when permanent vegetative cover is disturbed and the carbon is oxidised to CO2. The greatest potential for increasing soil carbon comes from appropriate land use change by moving from intensive to non-intensive cultivation and restoring semi-natural habitats.</p> <p>Land use Soil carbon tonnes/ha                      Arable 153                      Improved pasture 170                      Woodland 217                      Semi-natural vegetation 487 (including pasture and heathland)                      Uncultivated and semi-natural grassland (and heathland) with a wide range of plant species and deeper rooting systems stores more soil</p>	<p>Add to text:                      All development proposals should identify and take into account the ecosystem services provided by natural and semi-natural habitats. Where soil carbon losses cannot be avoided, mitigation should seek to ensure minimal soil disturbance and restore permanent semi-natural habitat.</p>	Yes, I wish to participate at the oral examination	As part of the East Dorset Community Partnership, ETAG's remit on biological sciences and sustainability is wider than that of Natural England or Dorset Wildlife Trust. Membership includes highly qualified natural scientists and town & parish representatives.	634	

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											<p>carbon than any other land use in England. Disturbance of the soil in such habitats results in rapid oxidation of soil organic matter and CO2 emissions.</p> <p>Although some of the Core Strategy development proposals are for arable land, most would be on uncultivated semi-natural grassland. Such land provides ecosystem services that may not be apparent to the casual observer but are essential to our wider environment and well being and should be taken into account by the Core Strategy. Carbon losses can be reduced by reducing soil disturbance particularly of those soils that have high levels of carbon.</p> <p>Government policy (DEFRA 2009 Soil Strategy for England) is to maintain levels of soil organic matter and where appropriate to increase it. Protecting existing carbon stock is a matter of priority: future sequestering of carbon should be additional to this. NPPF para 109 requires the protection of soils and recognition of the wider benefits of ecosystem services.</p> <p>Appendix to ETAG response on para 13.20 Carbon issues relevant to the Core Strategy</p> <p>1. Introduction</p> <p>1.1 As part of its approach to determining the sustainability of proposals, the Core Strategy needs to take into consideration ways in which their impact on climate change can be minimised.</p> <p>1.2 Reduction of carbon emissions due to development will need to take into account:</p> <ul style="list-style-type: none"> <li>• Site location and design to reduce the cooling effect of strong wind in cold weather and enhance insolation – aspect, layout of buildings and green infrastructure.</li> <li>• Site location to reduce the need to travel                         <ul style="list-style-type: none"> <li>– proximity to essential services for homes - schools, shopping needs (not simply convenience shops), medical services (GP, hospital, dentist), PO, bank etc;</li> <li>– proximity of employment sites to sustainable transport.</li> </ul> </li> <li>• Site location to ensure essential travel is sustainable – frequent, reliable public transport at times people want to travel and to places where they want to go: there should be enough people wanting to travel to make provision of public transport economically viable.</li> <li>• Building design, construction techniques, orientation, construction materials.</li> <li>• Total carbon budget of all projects. Renewable energy and transport initiatives must be truly carbon efficient when all energy inputs and outputs are taken into consideration.</li> <li>• Carbon losses from clearance of above ground vegetation.</li> <li>• Soil carbon losses due to change in land management.</li> </ul> <p>1.3 It is the latter issue that is not generally appreciated or understood and ETAG offers the following information as guidance.</p> <p>2. Soil carbon – basic facts and policy context</p> <p>2.1 Most terrestrial carbon is held in soils, more than twice as much as in vegetation or the atmosphere (Bellamy, 2005). 95% of the UK land carbon stock is in soil: 5% or less is accounted for in above ground vegetation (Ostle, 2009).</p> <p>2.2 Loss of soil carbon is detrimental to soil functions and contributes to greenhouse gas (GHG) emissions and climate change. The effects of</p>					

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											<p>land use change on soil carbon stocks are of concern in the context of international policy agenda on the mitigation of global greenhouse gas emissions. The UK commitment to the Kyoto Protocol for 80% reduction in Greenhouse Gas (GHG) emissions by 2050 includes emission from soils (DEFRA 2009).</p> <p>2.3 Current Government policy is to maintain levels of soil organic matter (SOM) and where appropriate to increase levels. There are three main approaches to sequestering carbon in soil:</p> <ul style="list-style-type: none"> <li>• increasing carbon inputs,</li> <li>• reducing carbon losses, and</li> <li>• reducing soil disturbance.</li> </ul> <p>2.4 At the Food Climate Research Network Soil Carbon Sequestration Workshop (2010), the central point that emerged was the need to focus on protecting the carbon stocks that we already have against carbon losses, as much as increasing the carbon we sequester in future. For example, more carbon cannot be sequestered in existing permanent grassland (assuming they are kept as grasslands) but it can be lost rapidly.</p> <p>3. What is soil carbon ? Where does it come from? Why is it important?</p> <p>3.1 Soil organic matter (SOM) also referred to as soil organic carbon (SOC) is derived from inputs of leaf, stem and root tissues to the soils that decompose over tens and hundreds of years (thousands in the case of peatlands) and also from soil microflora and invertebrates. Key to building the soil carbon store is good soil structure and the process of soil aggregation - clustering the soil's mineral particles into aggregates that encapsulate the humus so protecting it from degradation. The particles are held together by polysaccharide gums produced by micro-organisms, by networks of fungal hyphae and by the activity of earthworms. As well as providing soil carbon from their biomass, plant roots supply further soil carbon from root exudates, root hair turnover and root cell sloughing.</p> <p>3.2 Soil organic matter</p> <ul style="list-style-type: none"> <li>• provides structural integrity,</li> <li>• acts as a source of nutrients for crops,</li> <li>• is a regulator of hydrology, and</li> <li>• is a habitat for a vast diversity of soil organisms which also in turn drive a range of biogeochemical processes.</li> </ul> <p>Through these functions, soil carbon buffers short-term environmental change and provides a platform for much of human society.</p> <p>3.3 Soils play an important role in buffering and transforming chemicals that could otherwise cause water or air pollution and/or contaminate our food. One hectare of soil has the potential to store and filter enough water for 1000 people for one year. Soil biota perform a major role in soil processes by decomposing organic residues, recycling nutrients and contributing to soil structure through their living tissue, waste products and remains. Decomposition by soil organisms is a central process for the delivery of most ecosystem services. A wide range of soil organisms is necessary to enable ecosystems to respond to environmental perturbations such as different pollutants. A decline in below ground biodiversity will reduce the ability of a soil to withstand such events. It is estimated that 1-5% of all our biota have been named and classified. Of those that are unknown, a large proportion are soil</p>					

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											<p>organisms including 1.5 million species of fungi, 300,000 species of bacteria, 400,000 species of nematodes and 40,000 species of protozoa. The microbial biomass from a hectare of arable soil has the same mass as 300 sheep.</p> <p>3.4 It takes decades to centuries to accumulate soil organic matter. The amount of carbon that is stored depends on land use, soil type and climate. Carbon losses resulting from land use changes that accelerate biotic (decomposition) and abiotic (disturbance, erosion) carbon cycling can occur rapidly and cannot be reversed in the short term. Soil carbon losses occur when permanent vegetative cover is converted to arable, when former conifer plantations are deep cultivated, and when land is developed: ie when the soil is disturbed and organic matter oxidises to CO<sub>2</sub>. Soil carbon is lost far more rapidly than it accumulates (DEFRA, 2009a).</p> <p>3.5 Changes in land use or management practice will increase or decrease soil organic carbon (SOC) towards an equilibrium value after more than 100 years. The greatest potential for increasing soil carbon comes from appropriate land use change by moving from intensive to non-intensive cultivation and restoring semi-natural habitats.</p> <p>Land use Soil carbon tonnes/ha                      Arable 153                      Improved pasture 170                      Woodland 217                      Semi-natural vegetation 487                      (including pasture and heathland)</p> <p>4. Grasslands</p> <p>4.1 Grasslands store more carbon than any other land use in England. Changing land use from an intensively managed system (either as arable or intensive grasslands) to a semi-natural habitat can significantly increase soil carbon levels. DEFRA research has demonstrated that habitat creation options on arable and/or intensive grasslands produces some of the highest carbon benefits. Habitat maintenance options do not have a similar impact to habitat creation and restoration, as carbon storage is likely to be close to maximum. Reversion to a more intensive system will result in the loss of carbon to the atmosphere and the establishment of a new lower soil carbon content. (Thompson, 2008).</p> <p>4.2 Intensively farmed grassland is generally short rooted while a permanent semi-natural meadow can include a range of deep and short rooted species of both grasses and other herbaceous species. The deeper roots increase the depth of the soil organic matter and hence the carbon storage capacity of the land. Research on grassland species richness and soil carbon sequestration indicated that "higher biodiversity might lead to higher soil carbon sequestration in the long-term," and, therefore, that "the conservation of biodiversity might play a role in greenhouse gas mitigation (Steinbess, 2008).</p> <p>4.3 Natural England (2006) defines land as uncultivated if it has not been subject to physical or chemical cultivation in the last 15 years. ... Semi-natural areas are defined largely by the plants and wildlife they support. However, they may in the last 15 years have been subject to (i) low levels of physical cultivation (eg chain harrowing may have caused some disturbance of the soil, but there will not normally have</p>					

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											<p>been any sub-surface cultivation such as ploughing, discing or heavy harrowing); or (ii) low levels of chemical cultivation (eg to replace nutrients lost through hay-cutting or water-leaching, as often happens in the traditional management of semi-natural meadows and wetland). The types of land considered to be semi-natural (restricted to those that may be affected by Core Strategy proposals in the 2010 consultation document) are:</p> <ul style="list-style-type: none"> <li>• species rich hay meadow</li> <li>• unimproved grassland (including calcareous, acid and neutral grassland)</li> <li>• coastal and floodplain grazing marsh</li> <li>• scrub consisting of self-seeded wild shrubs and trees</li> <li>• dwarf shrub heath</li> <li>• bracken</li> <li>• standing water.</li> </ul> <p>4. Arable land</p> <p>4.1 In temperate climates the amount of carbon stored in arable soils is in part dependent on management practices, which may either enhance inputs of carbon (eg from adding crop remains, manure and compost) or exacerbate losses (eg from frequent cultivation and drainage) (Thompson, 2008). As noted above, intensively managed grassland cultivars are relatively shallow rooting.</p> <p>4.2 Introducing zero tillage, reduced tillage or regular organic material addition to arable land will increase soil organic carbon to an approximately 100 year equilibrium that is characteristic of the soil type, land use and climate. Typically about half of this is achieved within the first 20 years of the management change: maintaining SOC at the new equilibrium level then depends on continuing the new management policy indefinitely. (Bhogal et al, 2007). Bhogal's study concludes that land use change (eg from arable cropping to willow/poplar biomass crops, permanent grassland or woodland) probably offer the greatest potential for soil carbon storage and overall carbon savings. However, maintaining existing SOC levels is just as important, particularly avoiding ploughing out of permanent grasslands.</p> <p>5. Plantation Forest and Native Woodland</p> <p>5.1 As yet, soil carbon in forest soils is not considered in accounting for carbon emissions associated with woodfuel but amounts to, on average, around one third of carbon in forests. Studies of the carbon of High Weald woodlands in Sussex (Greig, 2010) showed</p> <p>Carbon stored in above ground tree biomass 1,836,733 tonnes                      Carbon stored in below ground tree biomass 551,020 tonnes                      Carbon stored in woodland soils 5,189,800 tonnes</p> <p>5.2 Recent studies from the USA indicate that soil carbon losses from clearfelling and highly disturbing forest management, such as stump harvesting can be high, and that some forests may be net emitters of carbon for several decades following harvesting (Everett, 2011)</p> <p>5.3 Land availability and the challenge to maintain or increase food production means carbon sequestration through woodland creation can only make a limited contribution to reducing the UK's GHG budget. (Thompson, 2008).</p> <p>5.4 ETAG remains very concerned that the general public is being</p>					

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											<p>misled into believing that coniferous plantations in Dorset are making a significant contribution to carbon sequestration and will comment on this in more detail as part of the responses to the Forests and Woods in England and the forthcoming DCC consultation on Renewable Energy.</p> <p>6. Unknown and future research needs</p> <p>6.1 Most data on soil carbon are for the top layer only with very little knowledge of the soil carbon content at depths below 25cm. This is to form the subject of further UK based research.</p> <p>6.2 The effects of future warming on soil carbon are uncertain: it will be affected by the two opposing processes of increased rate of net primary productivity (plant growth) and increased rate of decomposition.</p> <p>7. Conclusions</p> <p>7.1 95% of UK land carbon is held in soil.</p> <p>7.2 Government policy is to maintain levels of soil organic matter and where appropriate to increase it. Protecting existing carbon stock is a matter of priority: future sequestering of carbon should be additional to this.</p> <p>7.3 Carbon losses can be reduced by reducing soil disturbance particularly of those soils that have high levels of carbon.</p> <p>7.4 Uncultivated and semi-natural grassland (and heathland) with a wide range of plant species and deeper rooting systems stores more soil carbon than any other land use in England. Disturbance of the soil in such habitats results in rapid oxidation of soil organic matter and CO2 emissions</p> <p>7.5 Natural England defines uncultivated land as that which has not been cultivated for 15 years. Such land provides ecosystem services that are not apparent to the general observer but are essential to our wider environment and well being.</p> <p>7.6 Management change of arable land can achieve about 50% of soil carbon capacity within 20 years but for this to be maintained and enhanced to its eventual equilibrium level the new management regime must be continued indefinitely.</p> <p>8. Recommendations</p> <p>8.1 The findings underline ETAG's recommendation in our response to the Core Strategy consultation for detailed survey (preferably over a 12 month period) of any area that is proposed for development.</p> <p>8.2 Uncultivated and semi-natural grassland (as defined by Natural England) provides a resource that extends far beyond the clearly visible above ground biodiversity and landscape benefits and should not be used for development.</p> <p>8.3 Where possible opportunities should be sought for changes in land management of intensively managed areas to re-create semi-natural habitats that will increase carbon sequestration.</p> <p>8.4 Land allocated for allotments should have been cultivated previously. Management plans for the sites should be designed to enhance soil carbon.</p> <p>References                      Bellamy, PH et al (2005) Carbon losses from all soils across England and Wales 1978-2003                      Nature 437 p245-8.  <a href="https://dspace.lib.cranfield.ac.uk/bitstream/1826/3326/1/Carbon%2520I">https://dspace.lib.cranfield.ac.uk/bitstream/1826/3326/1/Carbon%2520I</a></p>					

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											<p>osses%2520from%2520all%2520soils%2520across%2520England%2520and%2520Wales%25201978-2003.%25202005.pdf                      Bhogal, A et al (2007) DEFRA Research project SP0561 The effects of reduced tillage practices and organic material additions on the carbon content of arable soils  <a href="http://randd.defra.gov.uk/Document.aspx?Document=SP0561_6893_ABS.doc">http://randd.defra.gov.uk/Document.aspx?Document=SP0561_6893_ABS.doc</a>                      DEFRA 2007 Research into the current and potential climate change mitigation impacts of environmental stewardship (Project BD302)  <a href="http://randd.defra.gov.uk/Document.aspx?Document=BD2302_7559_FRP.pdf">http://randd.defra.gov.uk/Document.aspx?Document=BD2302_7559_FRP.pdf</a>                      DEFRA (2009) Safeguarding our Soils – Soil Strategy for England  <a href="http://archive.defra.gov.uk/environment/quality/land/soil/documents/soil-strategy.pdf">http://archive.defra.gov.uk/environment/quality/land/soil/documents/soil-strategy.pdf</a>                      DEFRA (2009a) Soil Strategy for England – Supporting Evidence Paper  <a href="http://archive.defra.gov.uk/environment/quality/land/soil/documents/evidence-paper.pdf">http://archive.defra.gov.uk/environment/quality/land/soil/documents/evidence-paper.pdf</a>                      Everett, S (2011) Wood – fuel for thought. Conservation News. 294-5, April 2011.                      Food Climate Research Network Soil Carbon Sequestration Workshop: Summary of discussion. 21.1.2010. (FCFRN and DEFRA)  <a href="http://www.fcrn.org.uk/sites/default/files/FCRN_SoilCarbon_summary_0.pdf">http://www.fcrn.org.uk/sites/default/files/FCRN_SoilCarbon_summary_0.pdf</a>                      Forest Research (2011) Stump Harvesting  <a href="http://www.forestresearch.gov.uk/stumpharvesting">http://www.forestresearch.gov.uk/stumpharvesting</a>                      Greig, S (2010) High Weald Woodlands Carbon Report  <a href="http://www.highweald.org/downloads/publications/cat_view/390-publications/129-research-/432-woodland.html">http://www.highweald.org/downloads/publications/cat_view/390-publications/129-research-/432-woodland.html</a>                      Natural England (2006) (EIA (Agriculture) England No 2 Regulations 2006  <a href="http://www.naturalengland.org.uk/Images/eiafaq_tcm6-6271.pdf">http://www.naturalengland.org.uk/Images/eiafaq_tcm6-6271.pdf</a>                      Ostle, NJ et al (2009) UK Land use and soil carbon sequestration Land Use Policy 265 (2009) S274-S283  <a href="http://www.bis.gov.uk/assets/bispartners/foresight/docs/landuse/jlup/31_uk_land_use_and_soil_carbon_sequestration.pdf">http://www.bis.gov.uk/assets/bispartners/foresight/docs/landuse/jlup/31_uk_land_use_and_soil_carbon_sequestration.pdf</a>                      Steinbess, S et al (2008) Plant diversity positively affects short-term soil carbon storage in experimental grasslands. Global Change Biology 14: 2937-2949  <a href="http://www.nipccreport.org/articles/2011/jan/19jan2011a2.html">http://www.nipccreport.org/articles/2011/jan/19jan2011a2.html</a>                      Thompson, D (2008) Carbon Management by Land and Marine Managers. Natural England Research Report NERR026</p>					
649505	Miss Dawn Leader		<a href="#">CSPS296</a>	13.21	Yes	Yes	Yes	No	No	No	<p>The statement is unsound in respect of VTSW5, developing house here is going to increase carbon emissions as family living there will need to have not 1 but 2 cars, one for work and the other for taking the children too and from school, going to the town centre, to the shops, going to the park, to the doctors and dentists</p>	<p>Housing development needs to be build near to amenities to encourage carbon friendly forms of transport such as cycling or on foot.</p>	<p>Yes, I wish to participate at the oral examination</p>	<p>Living close to VTSW5 I know how difficult it is to go anywhere or do anything without getting into a car as there is</p>	635	

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														no other choice given to us by the council.		
360271	Cllr Paul Timberlake		<a href="#">CSPS491</a>	Policy ME4	Yes	Yes	Yes	Yes	Yes	Yes	ME4 - bullet points - <ul style="list-style-type: none"> <li>• Water and energy efficiency.</li> <li>• Orientation and solar gain (natural lighting and heating).</li> <li>• Use of renewable and low impact materials.</li> <li>• Minimising waste, pollution and water run-off, incorporating Sustainable Drainage where possible.</li> </ul>	I believe all measures listed should be compulsory in order to meet sustainable and energy requirements of the future.	No, I do not wish to participate at the oral examination		640	
654660	Ms Anne Mason	Transition Town Christchurch	<a href="#">CSPS964</a>	Policy ME4		Yes	Yes	Yes	Yes	Yes	Good, but insulation should be added.				640	<a href="#">2259130_01.pdf</a>
524723	Mr John Worth	Wimborne Civic Society	<a href="#">CSPS1932</a>	Policy ME4							We feel that these two policies should provide adequate safeguards for heritage protection and historic buildings.				640	
359261	Mr Doug Cramond	DC Planning Ltd	<a href="#">CSPS2098</a>	Policy ME4		Yes							Yes, I wish to participate at the oral examination	In connection with comments on WMC3	640	
523531	Mr Tim Hoskinson	Savills	<a href="#">CSPS2131</a>	Policy ME4		No				No	Object: the policy is not consistent with national policy The second sentence of Policy ME4 is unclear and inconsistent with the guidance in the National Planning Policy Framework.	Delete the second sentence of Policy ME4.	Yes, I wish to participate at the oral examination	Savills are acting on behalf of the Canford Estate and Harry J Palmer Ltd in relation to their landholdings on the edge of Corfe Mullen that form part of the CM1 allocation in the Pre-submission Draft Core Strategy. We are seeking participation at the oral part of the examination in order to help ensure that the plan is sound and deliverable	640	



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360949	Mr Stuart Goodwill	Barratt David Wilson Ltd	<a href="#">CSPS2709</a>	Policy ME4	Yes	No	No	Yes	No	Yes	The second sentence of Policy ME4 is unclear and inconsistent with the guidance in the National Planning Policy Framework.	Amend Policy ME4 to delete the second sentence.	No, I do not wish to participate at the oral examination		640	
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	<a href="#">CSPS3357</a>	Policy ME4		Yes					Support in part We support most of what is already in this policy but are concerned about wording. (PI see 2nd response)				640	
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	<a href="#">CSPS3358</a>	Policy ME4		No	No			No	While supporting most of the policy, we are concerned that the wording of bullet point 4 appears to imply that if SUDs cannot be incorporated development may be allowed. The policy does not recognise the importance of soils (NPPF para 109).	. Redraft to ensure no ambiguity on the provision of SUDs 2. Add, All development proposals should identify and take into account the ecosystem services provided by natural and semi-natural habitats. Where soil carbon losses cannot be avoided, mitigation should seek to ensure minimal soil disturbance and restore permanent semi-natural habitat.	No, I do not wish to participate at the oral examination		640	
523531	Mr Tim Hoskinson	Savills	<a href="#">CSPS3205</a>	Policy ME4		No				No	The second sentence of Policy ME4 is unclear and inconsistent with the guidance in the National Planning Policy Framework.	Delete the second sentence of Policy ME4.	Yes, I wish to participate at the oral examination	Savills are acting on behalf of Barratt David Wilson Homes in relation to land to the north of Christchurch Road, West Parley that forms the FWP4 allocation in the Pre-submission Draft Core Strategy. We are seeking participation at the oral part of the examination in order to help ensure that the plan is sound and deliverable.	640	<a href="#">2249912_0_1.pdf</a> <a href="#">2249910_0_1.pdf</a> <a href="#">2249911_0_1.pdf</a>
626711	Mr Chris Cousins	BREEAM	<a href="#">CSPS3519</a>	Policy ME4							Thank you for the opportunity to respond to the consultation on your core strategy. As you may be aware, many local planning authorities include policies				640	

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											in their local plans which require particular standards of sustainable construction; as of March this year, some 55% of local planning authorities in England had such policies (requiring standards set out in the Code for Sustainable Homes and/or BREEAM) in adopted plans or those at an advanced stage compared with 44% 10 months earlier. The National Planning Policy Framework's emphasis on achieving sustainable development may well see this trend accelerate. You may be interested in the information on our website (particularly the section on policy development) which gives examples of the approaches which local planning authorities have taken. Please contact me if you would like any further information.							
619967		Home Builders Federation (South West)	<a href="#">CSPS3683</a>	Policy ME4							We welcome the decision to adhere to the Building Regulations and not to introduce local standards that exceed those set nationally. It is, nevertheless, unclear what is implied by the statement that follows that schemes that meet higher standards will be considered more favourably. This implication is that schemes that meet the Building Regulations may be considered less favourable than schemes that achieve higher levels. We are not sure that this would be appropriate.		Yes, I wish to participate at the oral examination	The HBF would like to appear at the examination to debate these matters further.	640			
359483	Ms Ellie Challans	Environment Agency	<a href="#">CSPS3935</a>	Policy ME4							Page 160 – Policy ME4 We would encourage you to specify which Code for Sustainable Homes categories you will require within new residential development. You should at least refer to water use. This is particularly important in this area as you state that 80% of water supply is from rivers. Much of this will be from the Hampshire Avon River catchment. This river is water stressed, meaning the river environment suffers from the abstraction it receives. The Hampshire Avon is a designated SSSI, SPA and Ramsar site. Specifying a water usage level for new developments will also support Policy ME1. Core Policy 19 within the adopted Core Strategy for South Wiltshire specifies a particular Code level for water use. We would encourage this approach within your Policy ME4. There is also no consideration of commercial development. This is covered by the BREEAM standards, and you should consider also being specific about what you expect within commercial developments, in terms of sustainability performance.				640			
650810	Ms Fiona Astin	Synergy Housing	<a href="#">CSPS392</a>	Policy ME5	Yes	No			Yes		We believe that the emphasis of this policy is flawed. Overall carbon reduction can be achieved by having highly energy efficient buildings rather than purely through the inclusion of renewable energy technologies such as heat pumps, solar thermal, solar PV, etc. Such technological solutions remain relatively expensive and are not always easy to use or understand by dwelling occupants.	Consider changing the emphasis of this policy to reflect a dwelling emissions target rather than concentrating on renewable energy technologies. Then there is a choice of whether to reach the target with a 'fabric first' approach or including technology solutions (or indeed a combination of the two).	Yes, I wish to participate at the oral examination	It is not necessary for us to speak at the oral examination. However, if our views and experience would be useful we would be more than happy to attend.	641			

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654618	Tanner & Tilley	Pennyfarthing Homes	<a href="#">CSPS884</a>	Policy ME5	No	No			Yes	Yes	The proposed policy indicates that energy provision should normally be provided on-site, particularly on larger developments, or if not viable, through the Community Infrastructure Levy (CIL). However, where local authorities adopt to apply CIL it will operate as a non-negotiable fixed charge. Therefore, if the local authority intend to include for energy provision as part of the CIL non-negotiable fixed charge it would not be reasonable to require developers to make energy provision on-site, unless such provision is to be funded through CIL.	It is considered that the Local Authority should clarify the policy and confirm that if the LA include energy provision within CIL, where energy provision is to be provided on-site this will be funded through CIL rather than the developer being faced with what would otherwise be a 'double-charge'.	No, I do not wish to participate at the oral examination		641	
654660	Ms Anne Mason	Transition Town Christchurch	<a href="#">CSPS965</a>	Policy ME5		Yes	Yes	Yes		Yes	Sustainability should be a material consideration in all planning decisions. ADD this.				641	<a href="#">2259130_01.pdf</a>
359261	Mr Doug Cramond	DC Planning Ltd	<a href="#">CSPS2105</a>	Policy ME5		Yes					Improvement of the Plan would arise if some amendment were made to Policies LN3 (Provision of Affordable Housing) and ME5 (Renewable Energy Provision).	On the issue of ME5 the Councils' stance on Renewable Energy is set in too rigid a framework and to a degree reflects past rather than current thinking. The increasing consensus is that reducing energy consumption by in-built fabric means is more appropriate and effective in the reduction of carbon emissions than bolt on or even integral renewable energy devices. These could effectively just be meeting a % of energy from a wasteful home. The policy should acknowledge that there is 'another way of doing things' through enhanced specification for the built fabric.	Yes, I wish to participate at the oral examination	In connection with comments for WMC3	641	
523531	Mr Tim Hoskinson	Savills	<a href="#">CSPS2132</a>	Policy ME5		No				No	Object: the policy is not consistent with national policy Policy ME5 is inconsistent with paragraph 95 of the National Planning Policy Framework, which advises that any local requirement should be consistent with national standards.	Delete the second and third paragraphs of Policy ME5.	Yes, I wish to participate at the oral examination	Savills are acting on behalf of the Canford Estate and Harry J Palmer Ltd in relation to their landholdings on the edge of Corfe Mullen that form part of the CM1 allocation in the Pre-submission Draft Core Strategy. We are seeking	641	

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														participation at the oral part of the examination in order to help ensure that the plan is sound and deliverable		
360082	Mr and Mrs K Healy		<a href="#">CSPS25 08</a>	Policy ME5	Yes	Yes					•We fully support this policy for the provision of small scale localised renewable energy		No, I do not wish to participate at the oral examination		641	
527744	Mr Alan Hannify	Alliance Planning	<a href="#">CSPS23 06</a>	Policy ME5	Yes	No	No	No	No	No	<p>The Pre-Submission Core Strategy outlines the potential implications of climate change for Christchurch and East Dorset:</p> <p>“Climate change has the potential to not only affect the environment, but also the social and economic aspects of life in Christchurch and East Dorset. Although the precise nature of environmental changes is not fully understood, changes to rainfall levels (and river flow) and rising sea levels have significant implications particularly for Christchurch in terms of flood risk as mentioned above. Conversely, predicted hot and dry summers will cause problems of low flows for some of the chalk downland rivers in the area. Additionally, climate change could have a significant impact on agriculture and wildlife.”</p> <p>Further to this, the ‘Vision’ outlined in the Core Strategy Vision is as follows:</p> <p>“The area will adapt to the emerging demands of climate change through clear strategies to reduce risk of flooding, and through encouraging high standards of building design and construction.”</p> <p>Thus, the Pre-Submission Core Strategy recognises the need to adapt to the challenges of climate change. However, the strategy for dealing with climate change in the Boroughs appears to be restricted to a reduction in carbon emissions through reduced transport and sustainable patterns of development, as well as the incorporation of carbon reduction, water and energy efficiency measures in new developments.</p> <p>Policy ME5 states that the provision of renewable, decentralised, and low carbon energy will be encouraged in residential development of 10 or more dwellings (or sites of 0.5 hectares or greater), and non-residential development of 1,000 sq m of gross floorspace (or 1 hectare or greater). The expectation will be that 15% of the total energy used in these types of development will be from such energy sources.</p> <p>However, it is our contention that these measures, in the absence of renewable energy proposals, are not sufficient to address the issue of climate change.</p> <p>Whilst we welcome the acknowledgement of the importance of tackling climate change, it is considered that the Core Strategy does not deal sufficiently with the requirement to tackle the causes of climate change, in accordance with national planning policy.</p> <p>The Core Strategy does not present a sound, credible or deliverable approach to the development of renewable energy facilities and hence</p>	<p>It is submitted that the Core Strategy should set out the scale of the requirement derived from national policy to deliver decentralised renewable energy sources that reduce carbon emissions and reliance on traditional sources.</p> <p>There should also be a clear strategy for the development of renewable energy generating capacity that will enable or support the acknowledged need to tackle climate change, including the identification of potential sites and renewable energy sources.</p> <p>We would propose the inclusion of a specific policy stating as follows: “The development of low carbon, decentralised, renewable energy proposals will be supported including combined heat and power, wind and solar proposals.”</p> <p>Supporting text should reference the commitment outlined in the NPPF to increase the supply of renewable and low carbon energy. These changes will give substance to the statements pertaining to climate change and ensure that the Core Strategy is positively prepared, justified, effective and consistent with national policy.</p>	Yes, I wish to participate at the oral examination	<p>We wish to participate at the oral part of the examination, in order to outline and expand on the evidence provide during this current consultation.</p> <p>Our client, Eco Sustainable Solutions Ltd is involved in the development of sustainable waste management and renewable energy at its site at Chapel Lane, Parley, Christchurch.</p>	641	<a href="#">2249181_01.pdf</a>

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											<p>fails to demonstrate how the Strategy will deliver the requisite step change in the generation of power from renewable sources.</p> <p>The National Planning Policy Framework (NPPF) came into force on 27 March 2012 and outlines the importance of securing radical reductions in greenhouse gas emissions and minimising vulnerability to climate change. It is stated that local planning authorities should adopt proactive strategies to mitigate and adapt to climate change, as well as helping to increase the supply of renewable and low carbon energy. More specifically, Paragraph 97 of the NPPF states as follows: "To help increase the use and supply of renewable and low carbon energy, local planning authorities should recognise the responsibility on all communities to contribute to energy generation from renewable or low carbon sources. They should:</p> <ul style="list-style-type: none"> <li>• have a positive strategy to promote energy from renewable and low carbon sources;</li> <li>• design their policies to maximise renewable and low carbon energy development while ensuring that adverse impacts are addressed satisfactorily, including cumulative landscape and visual impacts;</li> <li>• consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources;</li> <li>• support community-led initiatives for renewable and low carbon energy, including developments outside such areas being taken forward through neighbourhood planning; and</li> <li>• identify opportunities where development can draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating heat customers and suppliers." <p>In addition to the NPPF, the earlier Government publication 'Meeting the Energy Challenge – A White Paper for Energy' (May 2007) sets out a vision for a cleaner, smarter energy system and it makes reducing carbon emissions a central plank of energy policy.</p> <p>With reference to renewable energy, the Energy White Paper states that "renewables are key to our strategy to reduce climate change and deploy cleaner sources of energy". In particular, the Energy White Paper reconfirms the energy target that 20% of electricity production should be produced from renewable energy sources by 2020.</p> <p>Having regard to the provisions set out in the NPPF and Energy White Paper, it is our contention that the Core Strategy does not accord with national planning policy. In this regard, we cannot identify in the Core Strategy a specific assessment of the current performance of the Boroughs in terms of renewable energy targets; or a proposed strategy for increasing the level of contribution sought from low carbon, renewable sources; or for monitoring the performance of the Core Strategy in achieving these targets.</p> <p>It is understood that the current level of renewable energy achieved in Dorset lags well below the levels achieved for the UK as a whole. According to the Bournemouth, Dorset and Poole Renewable Energy Strategy, current generation in Dorset is estimated at 146GWh, or only 0.95% of total energy demand, a third of the UK national average of 3% in 2010. For the area to play its part in meeting national renewable energy targets, a significant step change is required, with generation needing to increase by over 15 times in just 8 years.</p> </li></ul>					

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											At the Christchurch level, it is recognised that there are clear implications of climate change for the Borough in terms of flood risk. However, the Core Strategy does not tackle the causes of climate change in terms of the reliance of existing development on fossil fuels and traditional energy sources. Moreover, it does not include policy provisions or allocations for renewable energy facilities. The statements relating to climate change in the Core Strategy do not adequately set out the scale of the requirement derived from national policy to deliver decentralised renewable energy sources that reduce carbon emissions and reliance on traditional sources. There is no clear strategy for the development of the renewable energy generating capacity that will enable or support the acknowledged need to tackle climate change, with the exception of very small scale schemes. It is our contention that there is a lack of cohesion and substance in the Core Strategy's respective policies pertaining to climate change and renewable energy. It is therefore submitted that the Core Strategy is not positively prepared, justified, effective, or consistent with national policy, thereby meaning that it is 'unsound'.					
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	<a href="#">CSPS33 59</a>	Policy ME5		Yes					Supported subject to minor changes. (PI see 2nd response)				641	
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	<a href="#">CSPS33 60</a>	Policy ME5		No				No	Proposals should demonstrate that they will achieve a net reduction in carbon emissions (NPPF para 95).	Add Proposals should demonstrate that they will achieve a net reduction in carbon emissions.	No, I do not wish to participate at the oral examination		641	
523531	Mr Tim Hoskinson	Savills	<a href="#">CSPS32 06</a>	Policy ME5		No				No	Policy ME5 is inconsistent with paragraph 95 of the National Planning Policy Framework, which advises that any local requirement should be consistent with national standards.	Delete the second and third paragraphs of Policy ME5.	Yes, I wish to participate at the oral examination	Savills are acting on behalf of Barratt David Wilson Homes in relation to land to the north of Christchurch Road, West Parley that forms the FWP4 allocation in the Pre-submission Draft Core Strategy. We are seeking participation at the oral part of the examination in order to help ensure	641	<a href="#">2249911_0_1.pdf</a> <a href="#">2249910_0_1.pdf</a> <a href="#">2249912_0_1.pdf</a>

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														that the plan is sound and deliverable.		
523319	Mr Ryan Johnson	Turley Associates	<a href="#">CSPS3297</a>	Policy ME5		No			Yes	Yes	<p>Our client objects to Policy ME5 on the grounds that the 15% renewable energy target would add a very significant and inappropriate financial burden to new development. In addition, we believe that the approach proposed by this policy is not supporting current best practice.</p> <p>Paragraphs 95 and 96 of the National Planning Policy Framework (NPPF) state that local authorities should adopt the Government's Zero Carbon policy as the standard for energy efficiency and carbon reductions. Given that such a policy is being implemented through successive and ambitious changes to the Building Regulations, we request that the Council acknowledge that the Building Regulations should be adopted as the local standard for energy and carbon reductions. Given the significant energy and carbon reduction targets required by the Building Regulations and the technical and financial challenges these entail, we do not agree that the council should seek to exceed these targets.</p> <p>In addition, we do not agree with the wording of Policy ME5 in that it appears to be requiring a 15% renewable energy generation based on the total energy requirement of the building. Paragraph 96 of the NPPF does allow Local Authorities the ability to set local decentralised energy targets, provided that they are supported by a robust evidence base which considers the policy from a technical and viability perspective. We do not agree that the Council have such an evidence base in place, one which has considered this target in the context of recent changes to the Government's Zero carbon Policy and also best practice guidance.</p>	<p>We strongly request that the council remove the 15% target within Policy ME5 and apply Building Regulations as the local standard for energy and carbon reductions. We request that the Council amend this wording to include only regulated energy which is in accordance with Government Policy on Zero carbon homes. Finally, we request the Council apply the recommendations of the Zero Carbon Hub's research into the development of low and Zero Carbon Homes. This work strongly recommends that a 'Fabric First' approach be adopted which requires homes to focus on energy and carbon reductions through the use of a more insulated fabric prior to the use of renewable technologies.</p>	Yes, I wish to participate at the oral examination	We would wish to participate at the Examination in Public to elaborate on these comments, particularly in the context of the lands controlled by our client.	641	<a href="#">2255452_01.pdf</a> <a href="#">2255451_01.pdf</a>
521508	Ms Lisa Jackson	Jackson Planning Ltd	<a href="#">CSPS3652</a>	Policy ME5	Yes	No	Yes	Yes	Yes	Yes	<p>The core strategy is not sound as policy ME5 fails to deal with the strategic issue of renewable energy development. The NPPF is clear that local planning authorities should have a positive strategy to promote energy from renewable and low carbon sources, including identifying suitable areas for such proposals. The suggested policy wording for an additional Policy to deal with this strategic requirement is below. This reflects MEM's suggestions for a policy in NFDC. The policy is phrased positively in line with the NPPF and National Energy Policy EN-1.</p> <p>Please note this representation is substantiated by additional evidence in a supporting statement submitted with the representations by MEM Ltd.</p>	<p>Addition to Policy ME5 (or separate policy): Proposals for renewable energy production and ancillary infrastructure, including distributed generation will be supported in order to reach the Government's target of 15% renewable energy production by 2020. Proposals should demonstrate that they do not have a negative impact on:</p> <ul style="list-style-type: none"> <li>i. Adjoining land uses</li> <li>ii. Nature conservation designations</li> <li>iii. Heritage assets</li> <li>iv. The wider landscape, in particular New Forest National Park</li> <li>v. Residential amenity both during construction and operation</li> <li>vi. The road network</li> </ul>	Yes, I wish to participate at the oral examination	MEM Ltd are involved development and supply of renewable energy and have local knowledge and experience of this industry.	641	<a href="#">2267120_01.pdf</a>
619967		Home Builders Federatio	<a href="#">CSPS3684</a>	Policy ME5		No		Yes		Yes	<p>The policy is unsound as it is unjustified and contrary to national policy. It is not appropriate to specify how the carbon reduction targets (of Part</p>		Yes, I wish to participate	The HBF would like to	641	

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		n (South West)									L of the Building Regulations) are achieved by developers, such as 15% of total energy used to be from on-site or off-site renewable energy as specified in this policy. It is a matter for developers alone how they achieve the Part L requirements and how they achieve this will depend of the specific circumstances of each site. It would assist the industry better if the Councils identified through the plan suitable areas for renewable energy plant to be constructed and existing low carbon energy sources and supporting infrastructure (paragraph 97 of the Framework).		at the oral examination	appear at the examination to debate these matters further.		
523319	Mr Ryan Johnson	Turley Associates	<a href="#">CSPS3782</a>	Policy ME5		No			Yes	Yes	<p>CHRISTCHURCH AND EAST DORSET PRE-SUBMISSION CORE STRATEGY (APRIL 2012)</p> <p>Thank you for the invitation to comment on the Pre-Submission Core Strategy DPD. I write on behalf of our client, Burry &amp; Knight Ltd, who are the owners and developers of Hoburne Farm Estate, which includes land east of phase 8 of the Hoburne Farm Estate (SHLAA reference 8/11/0525); and are the owners and operators of Hoburne Caravan Park (SHLAA reference 8/11/0287).</p> <p>Our clients support the Council in their objective to progress and adopt a Local Plan for the area as quickly as possible. This will provide clarity and certainty for the development industry and all those who interact with the planning system. More importantly it will assist the Council in its efforts to address the significant housing land supply shortages in the borough, particularly over the next five years.</p> <p>We have reviewed the plan and its evidence base and conclude that revisions are needed if the Council are to satisfy the tests of soundness in the NPPF. The following paragraph/policy specific comments are therefore made to assist the Council in finalising the plan before it is formally submitted to the Secretary of State.</p> <p>We would wish to participate at the Examination in Public to elaborate on these comments, particularly in the context of the lands controlled by our client.</p> <p>Policy ME5 – Renewable Energy provision for residential and non-residential developments</p> <p>Comment</p> <p>Our client objects to Policy ME5 on the grounds that the 15% renewable energy target would add a very significant and inappropriate financial burden to new development. In addition, we believe that the approach proposed by this policy is not supporting current best practice.</p> <p>Paragraphs 95 and 96 of the National Planning Policy Framework (NPPF) state that local authorities should adopt the Government’s Zero Carbon policy as the standard for energy efficiency and carbon reductions. Given that such a policy is being implemented through successive and ambitious changes to the Building Regulations, we request that the Council acknowledge that the Building Regulations should be adopted as the local standard for energy and carbon reductions. Given the significant energy and carbon reduction targets required by the Building Regulations and the technical and financial challenges these entail, we do not agree that the council should seek to exceed these targets.</p> <p>In addition, we do not agree with the wording of Policy ME5 in that it</p>	<p>We strongly request that the council remove the 15% target within Policy ME5 and apply Building Regulations as the local standard for energy and carbon reductions. We request that the Council amend this wording to include only regulated energy which is in accordance with Government Policy on Zero carbon homes. Finally, we request the Council apply the recommendations of the Zero Carbon Hub’s research into the development of low and Zero Carbon Homes.</p> <p>This work strongly recommends that a ‘Fabric First’ approach be adopted which requires homes to focus on energy and carbon reductions through the use of a more insulated fabric prior to the use of renewable technologies.</p>	Yes, I wish to participate at the oral examination	We would wish to participate at the Examination in Public to elaborate on these comments, particularly in the context of the lands controlled by our client.	641	



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											appears to be requiring a 15% renewable energy generation based on the total energy requirement of the building. Paragraph 96 of the NPPF does allow Local Authorities the ability to set local decentralised energy targets, provided that they are supported by a robust evidence base which considers the policy from a technical and viability perspective. We do not agree that the Council have such an evidence base in place, one which has considered this target in the context of recent changes to the Government's Zero carbon Policy and also best practice guidance.						
359483	Ms Ellie Challans	Environment Agency	<a href="#">CSPS3933</a>	13.27							Please replace any reference to PPS25 with NPPF, e.g. page 162.				644		
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	<a href="#">CSPS3361</a>	13.28		No				No	There is no mention of surface flooding or the pollution risks it poses particularly at employment sites. (NPPF para 110)	The paragraphs should include reference to the surface flooding at employment sites and the very real risk this poses for pollution of the Moors River system and River Stour.	No, I do not wish to participate at the oral examination		645		
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	<a href="#">CSPS3362</a>	13.29		No				No	There is no mention of surface flooding or the pollution risks it poses particularly at employment sites. (NPPF para 110)	The paragraphs should include reference to the surface flooding at employment sites and the very real risk this poses for pollution of the Moors River system and River Stour.	No, I do not wish to participate at the oral examination		646		
359437	Ms Gill Smith	Dorset County Council	<a href="#">CSPS2028</a>	13.30	Yes						As the Lead Local Flood Authority, Dorset County Council has responsibility to develop a strategy to tackle local flood risks and to ensure that other plans and policies accord with it. A number of references in the Core Strategy need updating and new ones included to ensure that it reflects the County Council's responsibilities in respect of flood risk management.	"The National Planning Policy Framework (NPPF), when supported by the Christchurch and East Dorset Strategic Flood Risk Assessments (SFRA), Dorset Surface Water Management Plan 20011 and Flood Map for Surface Water (Environment Agency), will inform decisions regarding the suitability of all forms of development within flood zones."	No, I do not wish to participate at the oral examination		648		
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	<a href="#">CSPS3364</a>	13.30		Yes					Support in part Risk of flooding and resultant harm to the built, historic and natural environment is one of the main concerns of local residents. We welcome proposals to "future proof" against the effects of climate change. (PI see 2nd response)		No, I do not wish to participate at the oral examination		648		
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	<a href="#">CSPS3387</a>	13.30		No				No	The ecosystem function, in terms of water storage capacity, of proposed development sites has not been taken into consideration. (NPPF para 109) We assume that habitat issues are covered by policies ME1 and ME2. If they are not, additional safeguards should be included in the Policy.	Para 13.33 will need to be amended to be consistent with NPPF. As part of that change, reference should be made to the water storage capacity of the land and the need for that to be enhanced to reduce the risk of flooding.	No, I do not wish to participate at the oral examination		648		
360302	Mrs Hilary	Environment TAG	<a href="#">CSPS3365</a>	13.31		Yes					Support in part		No, I do not wish to		649		

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	Chittenden	(East Dorset)									Risk of flooding and resultant harm to the built, historic and natural environment is one of the main concerns of local residents. We welcome proposals to "future proof" against the effects of climate change. (PI see 2nd response)		participate at the oral examination			
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	<a href="#">CSPS3388</a>	13.31		No				No	The ecosystem function, in terms of water storage capacity, of proposed development sites has not been taken into consideration . (NPPF para 109) We assume that habitat issues are covered by policies ME1 and ME2. If they are not, additional safeguards should be included in the Policy.	Para 13.33 will need to be amended to be consistent with NPPF. As part of that change, reference should be made to the water storage capacity of the land and the need for that to be enhanced to reduce the risk of flooding.	No, I do not wish to participate at the oral examination		649	
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	<a href="#">CSPS3366</a>	13.32		Yes					Support in part Risk of flooding and resultant harm to the built, historic and natural environment is one of the main concerns of local residents. We welcome proposals to "future proof" against the effects of climate change. (PI see 2nd response)		No, I do not wish to participate at the oral examination		650	
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	<a href="#">CSPS3389</a>	13.32		No				No	The ecosystem function, in terms of water storage capacity, of proposed development sites has not been taken into consideration . (NPPF para 109) We assume that habitat issues are covered by policies ME1 and ME2. If they are not, additional safeguards should be included in the Policy.	Para 13.33 will need to be amended to be consistent with NPPF. As part of that change, reference should be made to the water storage capacity of the land and the need for that to be enhanced to reduce the risk of flooding.	No, I do not wish to participate at the oral examination		650	
649505	Miss Dawn Leader		<a href="#">CSPS297</a>	13.33	Yes	No	Yes	Yes	No	No	in the core strategy review in 2008 the sight as VTSW5 was given a level 1 flood risk assessment. further to that there are already drainage systems in the corner of the field to help with excess water on the field. I believe because VTSW5 was added into the strategic plan late, this was not considered and a full review should have been done before inclusion	drainage will have to be put in all over the sight in order to keep the site drained and to stop excess water going into Ebblake stream and on into Ebblake Bog SSSI.	No, I do not wish to participate at the oral examination		651	
359437	Ms Gill Smith	Dorset County Council	<a href="#">CSPS2029</a>	13.33	Yes						As the Lead Local Flood Authority, Dorset County Council has responsibility to develop a strategy to tackle local flood risks and to ensure that other plans and policies accord with it. A number of references in the Core Strategy need updating and new ones included to ensure that it reflects the County Council's responsibilities in respect of flood risk management.	Remove reference to "Urban" in Sustainable Urban Drainage Systems and SUDS.	No, I do not wish to participate at the oral examination		651	
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	<a href="#">CSPS3367</a>	13.33		Yes					Support in part Risk of flooding and resultant harm to the built, historic and natural environment is one of the main concerns of local residents. We welcome proposals to "future proof" against the effects of climate change. (PI see 2nd response)		No, I do not wish to participate at the oral examination		651	
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	<a href="#">CSPS3390</a>	13.33		No				No	The ecosystem function, in terms of water storage capacity, of proposed development sites has not been taken into consideration . (NPPF para 109) We assume that habitat issues are covered by policies ME1 and ME2. If they are not, additional safeguards should be included in the Policy.	Para 13.33 will need to be amended to be consistent with NPPF. As part of that change, reference should be made to the water storage capacity of the land and the need for that to be enhanced to reduce the risk of flooding.	No, I do not wish to participate at the oral examination		651	

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360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	<a href="#">CSPS3368</a>	13.34		Yes					Support in part Risk of flooding and resultant harm to the built, historic and natural environment is one of the main concerns of local residents. We welcome proposals to "future proof" against the effects of climate change. (PI see 2nd response)		No, I do not wish to participate at the oral examination		652	
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	<a href="#">CSPS3391</a>	13.34		No				No	The ecosystem function, in terms of water storage capacity, of proposed development sites has not been taken into consideration . (NPPF para 109) We assume that habitat issues are covered by policies ME1 and ME2. If they are not, additional safeguards should be included in the Policy.	Para 13.33 will need to be amended to be consistent with NPPF. As part of that change, reference should be made to the water storage capacity of the land and the need for that to be enhanced to reduce the risk of flooding.	No, I do not wish to participate at the oral examination		652	
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	<a href="#">CSPS3369</a>	13.35		Yes					Support in part Risk of flooding and resultant harm to the built, historic and natural environment is one of the main concerns of local residents. We welcome proposals to "future proof" against the effects of climate change. (PI see 2nd response)		No, I do not wish to participate at the oral examination		653	
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	<a href="#">CSPS3392</a>	13.35		No				No	The ecosystem function, in terms of water storage capacity, of proposed development sites has not been taken into consideration . (NPPF para 109) We assume that habitat issues are covered by policies ME1 and ME2. If they are not, additional safeguards should be included in the Policy.	Para 13.33 will need to be amended to be consistent with NPPF. As part of that change, reference should be made to the water storage capacity of the land and the need for that to be enhanced to reduce the risk of flooding.	No, I do not wish to participate at the oral examination		653	
474462	Mrs Sheila Bourton		<a href="#">CSPS189</a>	Policy ME6	Yes	Yes					I agree that all developments must demonstrate that flood risk does not increase as a result of the proposed development. Run off could be a big problem especially at the proposed sites to the north of Wimborne, Existing houses must be protected.		No, I do not wish to participate at the oral examination		654	
474490	Mrs Sheila Bourton	Keep Wimborne Green	<a href="#">CSPS219</a>	Policy ME6	Yes	Yes					The importance of protecting both new and EXISTING properties from flood risk cannot be over emphasised. Particular area at risk is the proposed WMC5 Cranborne Road where run off could seriously affect existing properties south of this new proposed development		No, I do not wish to participate at the oral examination		654	
524338	Mr Kenneth Brooks		<a href="#">CSPS243</a>	Policy ME6							Many recent developments in East Dorset have exacerbated the already marginal drainage systems which were never designed to deal with the number of dwellings they now have to service. Although the former PPS35 recommended sustainable drainage systems should be a requirement of planning approvals on sites with drainage issues, in many cases conditions attached to planning permissions have not even mentioned 'drainage'. I note that Policy ME6 requires all new developments to demonstrate that flood risk does not increase as a result of the proposed development and that the sequential tests set out in PPS25 have been carried forward in assessing the design of the sustainable drainage system to be incorporated.				654	
360271	Cllr Paul Timberlake		<a href="#">CSPS495</a>	Policy ME6	Yes	No				Yes	I'm not entirely happy with parts of ME6, in particular: * Allowing development on flood plains - especially in view of the possible effects of global warming and rising water levels, and	Not allow any residential development in flood plains where there is a more than 100 year to	No, I do not wish to participate at the oral examination		654	

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											* If development is allowed, is it better to allow historic (listed) properties to take their chance with nature, rather than take some protective action, even if this does affect the building's integrity to some degree.	one likelihood of flooding taking place.	n			
654660	Ms Anne Mason	Transition Town Christchurch	<a href="#">CSPS966</a>	Policy ME6			Yes	Yes	Yes	Yes		GOOD but should include rainwater harvesters to control surface run-off and protect storm flooding from overwhelming sewers and polluting nearby sea. These also can supplement garden water requirements during times of drought.			654	<a href="#">2259130_0_1.pdf</a>
656493	Cllr Tony Gibb	Eastern Area DAPTC	<a href="#">CSPS1482</a>	Policy ME6		No	No	No	No	No	<p><b>RURAL RESPONSE TO EAST DORSET AND CHRISTCHURCH CORE STRATEGY</b></p> <p>This response is made to supplement those made by individual parishes. Some of the points made are general to all some are specific to a few. This response does not concern itself with Christchurch Borough.</p> <p>Area Covered by Response including the parishes and grouped parishes of Aderholt, Cranborne, Knowlton, Gussages, Vale of Allen, Holt, Pamphill &amp; Shapwick, Sixpenny Handley with Pentridge, Sturminster Marshall. It does not include the conurbations along the A31 or Verwood and Three Legged Cross.</p> <p>Despite previous comments, the Core Strategy remains urban centric, focussing on the conurbations along the A31 and ignoring the largest part of the District. The size of the rural community (as covered by this response) is 25597 hectares or 72.21% of the East Dorset Area (source Dorset Data Book 2011). The rural population is 12950 or 14.74% of the East Dorset population. These communities deserve better recognition within the Core Strategy before it can be fully supported.</p> <p>The Defra Local Authority dataset post 2009 classified East Dorset with a rural population of 73.29% and a classification of R50. <a href="http://webarchive.nationalarchives.gov.uk/20110215111010/http://archive.defra.gov.uk/evidence/statistics/rural/rural-definition.htm">http://webarchive.nationalarchives.gov.uk/20110215111010/http://archive.defra.gov.uk/evidence/statistics/rural/rural-definition.htm</a> . The DEFRA maps classify the majority of East Dorset as "Less Sparse and Less Sparse Dispersed.</p> <p>A recent report by Prof Mark Shucksmith OBE, of Newcastle University who has conducted several studies for the Commission for Rural Communities (CRC) indicated that "It should be no surprise to us that powerful groups prevail in designing rural policy and planning, and that less powerful groups are generally excluded from decisions. Average house prices in rural areas exceed those in urban areas of England by around 25%, with higher prices in some villages costing nearly 11 times the average income.</p> <p>"Rural communities are often proclaimed by those who live there as inclusive and neighbourly, but it seems they often prevent the new housing which would enable poorer and middle income groups to share the rural idyll. People's housing opportunities are crushed and their life-chances diminished by the failure to build sufficient houses in rural Britain."</p>	The East Dorset and Christchurch Core Strategy needs to be enhanced in a number of areas before it can be said to reflect the majority of the East Dorset area. It cannot be endorsed in its current state.			654	

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											<p>All the points made in the latest CRC State of the Countryside Report 2010 are valid in East Dorset  <a href="http://www.defra.gov.uk/crc/documents.state-of-the-countryside-report/sotc2010/">http://www.defra.gov.uk/crc/documents.state-of-the-countryside-report/sotc2010/</a> . The key points from Section 2 are replicated at Annex A. Since the CRC is not due to be abolished until Mar 2013, it recommended that they be consulted to enhance the credibility of the District Strategy.</p> <p>Estates. There is no reference in the Strategy to the fact that much of the rural area of the district is made up of private estates – Cranborne, Shaftesbury, Crichele, Kingston Lacy (NT), Edmondsham, Rushmore (part of). All have a part to play and are involved in various ways in the life and economy of East Dorset; this has to be recognised.</p> <p>The Core Strategy. There is a lack of a clearly defined Aim for the document. If there is to be a Vision it should lead to an Aim “To produce a Strategy For the Development of East Dorset during the period 2013 to 2028”. Para 4.1 of the Key Strategy is therefore limiting in that it says that the strategy is only concerned with identifying the locations for development; it is putting the cart before the horse. The objectives should cover the key areas of the strategy: economy, housing, welfare, environment, communications. The policies should be specific within each key objective.</p> <p>Core Strategy Objectives. Either all the objectives cover the partnership area or all need to specify which parts they pertain to. (Obj 1 and 4). Too many of the objectives start to discuss particular aspects, which limit their application. An objective should be an achievable target from which the policy statements are derived.</p> <p>Whilst the majority of the rural economy is based on agriculture, there are also a wide variety of home workers who need stronger recognition in the strategy. Both need firm policies to support their continued existence; the national evidence would suggest that home working will increase dramatically during coming years as the price of travelling continues to rise and central government supports the improvements of the communications infrastructure.</p> <p>Generic policy statements are not sufficient to embrace them.</p> <p>Market Towns. The lack of any partnership working within East Dorset reduces the role of the market towns as a focus for their area. The location of the market towns in the south of the district does not help.</p> <p>There is confusion of terminology within the document between Rural Service Centres and Key Settlements.</p> <p>Communications – Broadband will play an essential part of the future of East Dorset. It is an essential requirement for farmers, home workers and the service sector. 100% coverage of mobile communications is required to ensure connection with the emergency services at all times and to make up for the poor broadband coverage. A firm policy to support enhanced communications across the rural community is essential.</p> <p>Highways. Rural roads must be maintained to support the local economy and tourist traffic which will only increase. The A354 is classified as a strategic route yet there is no strategy or policy to support this. The B3081 / B3078 / B3082 roads are all secondary and local distributor roads; within the rural community these roads are as important as the streets in the towns yet they are not recognised within</p>					

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											<p>the strategy or policies.</p> <p>Environmental Issues – surface water drainage. The chalk landscape produces particular problems with flooding in certain areas which can lead to paralysis of the economy and infrastructure with an allied impact on foul water drainages. It is essential that the District recognises their liability to work with the county council to mitigate the effects of surface water flooding which are now more common than 25 years ago.</p> <p>Population shift. The increase in elderly population can only continue as efforts are made to sustain the rural centres. These will attract retired people who will not necessarily contribute to the local economy except through volunteering.</p> <p>Housing. A policy is required to encourage major landowners to build Affordable Housing within their estates to make up for the properties that have been sold off and are used as second homes. A policy of 100% taxation of second homes is required to support the infrastructure costs of the district.</p> <p>Growth potential. – Whilst mention is made of diversification, there need to be strong policies to encourage small business units and Home Working within the rural area. Limiting this will be to stifle the rural economy.</p> <p>Annex A to Eastern Area DAPTC Response to EDDC Core Strategy Submission Extract From CRC State of the Countryside Report 2010 Key summary points on social issues:</p> <ul style="list-style-type: none"> <li>• Between 2001 and 2008 the population of rural England rose faster than in urban areas. The fastest growth was in Village, hamlet and isolated dwellings – Less sparse areas which grew by 6.1%.</li> <li>• 23.5% of people in rural areas are over state retirement age compared with 18.1% in urban areas.</li> <li>• Whilst over 98% of urban residents have the following services within 4km, for rural residents 51% have a bank or building society, 85% have cashpoints, 80% a GP surgery, 62% a supermarket, 57% an NHS dentist, 67% a pharmacy and 48% a secondary school.</li> <li>• Approximately 5% of rural households were using dial-up internet connections in 2009 compared with 2% in urban areas.</li> <li>• People in villages and hamlets with the lowest incomes spend an average of £50 per week on travel compared with £32 in rural towns and £28 in urban areas.</li> <li>• In rural areas the cheapest housing is six times the annual income of the lowest income households, compared to five times in urban areas. Despite house price falls during the recession in hamlets in sparse areas of the country the multiple is nine times annual household incomes.</li> <li>• 28% of those households not on the mains gas network in villages and hamlets are in fuel poverty compared with 13% who are on the mains gas network. The comparative figures for urban areas are 18% and 12%.</li> <li>• 87% of people living in the most rural districts are satisfied with their area as a place to live compared with 76% living in the most urban authorities.</li> </ul>					

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											<p>• 29% of people living in the most rural districts have given unpaid voluntary help at least monthly over the last year compared with 21% of people living in the most urban authorities. The lack of surface water drainage systems impinges on foul water.</p>						
359437	Ms Gill Smith	Dorset County Council	<a href="#">CSPS2030</a>	Policy ME6	Yes						As the Lead Local Flood Authority, Dorset County Council has responsibility to develop a strategy to tackle local flood risks and to ensure that other plans and policies accord with it. A number of references in the Core Strategy need updating and new ones included to ensure that it reflects the County Council's responsibilities in respect of flood risk management.	Remove reference to "Urban" in Sustainable Urban Drainage Systems and SUDS.	No, I do not wish to participate at the oral examination		654		
359529	Mrs Lisa Goodwin	Sixpenny Handley with Pentridge Parish Council	<a href="#">CSPS2482</a>	Policy ME6							Surface water drainage in Sixpenny Handley is inadequate in that it cannot cope with flash flooding/winterbourne ground water with the result that it impinges on the foul water (sewerage) system and thus be the cause of serious environmental health problems.				654	<a href="#">2248941_01.pdf</a> <a href="#">2248860_01.pdf</a> <a href="#">2248948_01.pdf</a>	
360082	Mr and Mrs K Healy		<a href="#">CSPS2509</a>	Policy ME6	Yes						We fully support this policy. It is particularly important in Wimborne as the old town is so susceptible to flash floods in storm conditions and these are, and will be, further exacerbated by the development of the valley hillsides.				654		
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	<a href="#">CSPS3374</a>	Policy ME6		Yes					Support in part Risk of flooding and resultant harm to the built, historic and natural environment is one of the main concerns of local residents. We welcome proposals to "future proof" against the effects of climate change. (PI see 2nd response)		No, I do not wish to participate at the oral examination		654		
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	<a href="#">CSPS3386</a>	Policy ME6		No				No	The ecosystem function, in terms of water storage capacity, of proposed development sites has not been taken into consideration . (NPPF para 109) We assume that habitat issues are covered by policies ME1 and ME2. If they are not, additional safeguards should be included in the Policy.	Para 13.33 will need to be amended to be consistent with NPPF. As part of that change, reference should be made to the water storage capacity of the land and the need for that to be enhanced to reduce the risk of flooding.	No, I do not wish to participate at the oral examination		654		
359483	Ms Ellie Challans	Environment Agency	<a href="#">CSPS3936</a>	Policy ME6							<p>Page 162 – Policy ME6 Please amend the second sentence to read: 'Where, exceptionally, All development (including redevelopments and extensions which require planning permission) can be permitted within areas at risk of flooding, they will be required to incorporate.....'. This reflects the potential result of the Sequential and Exception Tests, which all new development proposed within flood zones 2 and 3 are subject to. It is important to make it clear in the policy that development allowed within flood risk areas is the exception rather than the rule. Previously in the Core Strategy 'Options for consideration' October 2010 there was a Policy ME18 - 'Development within areas at risk of coastal erosion'. This appears to have been removed from the pre-submission document. We would encourage you to allow this policy to remain as coastal erosion poses a real threat to existing and new communities within the Christchurch borough. We note within the New Neighbourhood Sections, some New Neighbourhood policies have specifically mentioned FRAs, surface</p>					654	

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											water management etc. and some have not. Core Policy ME6 will cover the main flood risk issues to be addressed by all future planning applications, however it would also be worth adopting a consistent approach for all new neighbourhoods within their individual policies.					
474462	Mrs Sheila Bourton		<a href="#">CSPS190</a>	Policy ME7	Yes	Yes					I agree that assessments should be made PRIOR to the construction of any development. Groundwater Protection Zones should not be compromised.		No, I do not wish to participate at the oral examination		655	
474490	Mrs Sheila Bourton	Keep Wimborne Green	<a href="#">CSPS220</a>	Policy ME7	Yes	Yes					Groundwater Protection Zones should NOT be compromised and adequate assessments should be made before any development takes place. This is particularly important when this Country is experiencing drought conditions on ever more frequent occasions.		No, I do not wish to participate at the oral examination		655	
360271	Cllr Paul Timberlake		<a href="#">CSPS496</a>	Policy ME7	Yes	Yes	Yes	Yes	Yes	Yes	Support ME7.		No, I do not wish to participate at the oral examination		655	
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	<a href="#">CSPS3370</a>	13.36		Yes					Support in part Risk of flooding and resultant harm to the built, historic and natural environment is one of the main concerns of local residents. We welcome proposals to "future proof" against the effects of climate change. (PI see 2nd response)		No, I do not wish to participate at the oral examination		656	
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	<a href="#">CSPS3393</a>	13.36		No				No	The ecosystem function, in terms of water storage capacity, of proposed development sites has not been taken into consideration . (NPPF para 109) We assume that habitat issues are covered by policies ME1 and ME2. If they are not, additional safeguards should be included in the Policy.	Para 13.33 will need to be amended to be consistent with NPPF. As part of that change, reference should be made to the water storage capacity of the land and the need for that to be enhanced to reduce the risk of flooding.	No, I do not wish to participate at the oral examination		656	
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	<a href="#">CSPS3395</a>	13.37		No				No	The ecosystem function, in terms of water storage capacity, of proposed development sites has not been taken into consideration . (NPPF para 109) We assume that habitat issues are covered by policies ME1 and ME2. If they are not, additional safeguards should be included in the Policy.	Para 13.33 will need to be amended to be consistent with NPPF. As part of that change, reference should be made to the water storage capacity of the land and the need for that to be enhanced to reduce the risk of flooding.	No, I do not wish to participate at the oral examination		657	
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	<a href="#">CSPS3372</a>	13.37		Yes					Support in part Risk of flooding and resultant harm to the built, historic and natural environment is one of the main concerns of local residents. We welcome proposals to "future proof" against the effects of climate change. (PI see 2nd response)		No, I do not wish to participate at the oral examination		657	