

Events: Core Strategy Pre-Submission – Chapter 4 The Key Strategy

Contact Person ID	Contact Full Name	Contact Company / Organisation	ID	Number	Question 1 - Legally compliant	Question 2 - Sound	Question 3 - Positively Prepared	Question 3 - Justified	Question 3 - Effective	Question 3 - Consistent with national policy	Question 4	Question 5	Question 6	Question 7	Order	Filename
360692	Mrs Wendy Britton		CSPS680	4	Yes	No	Yes	Yes	Yes	Yes	<p>This objection relates to the Pre-Submission Core Strategy (PSCS) and the 'soundness' of the policies regarding the potential development of land at Arch Ground, Station Road, Sturminster Marshall as a New Neighbourhood and Area of Public Open Space with recreational and community facilities. References are made (but not exclusively) to the PSCS and the following policies:-</p> <ol style="list-style-type: none"> 1. KS1 (settlement hierarchy) 2. KS4 (housing provision and provision of land) 3. HE4 (open space provision) 4. Chapter 4 (the broad location and scale of housing) 5. Chapter 12 (strategic allocations) 6. Chapter 14 (creating high quality and distinctive environments) 7. Chapter 15 (meeting local needs) 8. RA1 (Baillie Gate) <p>BACKGROUND This objection is in respect of policies and the text of the PSCS which would if implemented deny the development of about 7.2 hectares (ha.) of land known as Arch Ground (as shown edged red on the map attached to the hard copy submission). The promotion of the land for development has a long planning history which is available from the files held by East Dorset District Council and the owners. However, to date planning permission has not been secured due to policy restrictions resulting from the site being within the Green Belt.</p> <p>The current use of the land is agricultural. It is enclosed by Station Road and by the housing opposite fronting that road. It is also enclosed by the hedge-row, trees and the industrial buildings situated on or near the adjacent boundary of the Baillie Gate industrial estate. The other two boundaries are bounded by natural high hedge-rows etc. The south-east boundary is also clearly defined by an existing access track. The land is not within the conservation area, nor is it subject to flooding. Access to the site is from Station Road. The land is in private ownership and does not provide any public amenity. Views to the distant open countryside are restricted by the boundaries as previously described. The land is flat and constrained and is visually uninspiring. The site is situated on the main road through the existing built-up area. It is close to existing local amenities, facilities and services including public service vehicle routes to nearby Wimbourne Minster (5m), Poole(7m) and Blandford(7m). It is also close to the shops, post-office, school, 3 pubs, church, pharmacy, garage, hairdresser, community hall, golf course and is immediately proximate to the site of a large industrial employment estate.</p> <p>THE PROPOSAL It is clear from the above information that the land meets all the requirements necessary (see Note.1) for the development of a New Neighbourhood as defined in policy KS4 and referred to in Chapter 4.21. The area proposed for residential development</p>	<p>The following alterations are required to be made:-</p> <ol style="list-style-type: none"> 1. Generally – Amend the Pre-Submission Core Strategy to include a Strategic Policy regarding, The development of a 'New Neighbourhood' and area of Public Open Space etc. at Station Road Sturminster Marshall. This policy should be drawn for the sake of clarity in a similar form as to Policy RA1. 2. Pol.HE4 - amend table to incorporate the above. 3. Pol.KS1. - amend to incorporate 1 above. 4. Pol. KS4. - Ditto 5. Chapter 4 – Ditto 6. Chapter12 – Ditto 7. Chapter 14 – Ditto 8. Chapter 15 – Ditto 	Yes, I wish to participate at the oral examination	To support my proposal	118	2252889_01.pdf

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											<p>would require the redefinition of the Green Belt boundaries to allow the removal of about 3.7ha. from the total site area of 7.2ha. currently in the Green Belt.</p> <p>Economically viable and highly sustainable low density residential development of the site would be phased in line with demand and the need to make good, the substantial housing short-fall which has accrued over the last decade or so.</p> <p>In addition the Proposal incorporates the provision of the 3.5 ha. of retained Green Belt land as Public Open Space with recreational and community facilities, similar to that described in the 'saved policy SM2 and SM3' of the 2002 local plan.</p> <p>It is to be noted that the removal of above 3.7ha. of land from the from Green Belt replicates the similar removal of 3.3he. from the Green Belt in order for the highly successful and adjacent Bailie Gate industrial estate to be expanded as set out in Policy RA1.</p> <p>It is also to be noted that as an indirect result of the expansion of the Bailie Gate industrial estate the New Neighbourhood would meet the potential need for additional housing in the Sturminster Marshall area, over and above that required to meet future household growth and the making good of the current substantial short-fall.</p> <p>The Proposal would also provide additional support and enable the growth of existing services etc. currently available in Sturminster Marshall area of East Dorset.</p> <p>Note1.</p> <p>'New Neighbourhoods' are residential led schemes around settlements with good access to key services, facilities and employment. They are designed to produce high quality sustainable developments, that are able to be integrated into the local character of the area without having a detrimental impact on the surrounding countryside They will require the re-drawing of the Green Belt boundaries to accommodate them. The difficulty in meeting housing need, will provide the exceptional circumstances to enable the provision of New Neighbourhoods.</p>						
524338	Mr Kenneth Brooks		CSPS238	4.2							I strongly agree with paragraph 4.2 of the Key Strategy which states:- 'The high quality natural and built environment of Christchurch and East Dorset is what makes the area an attractive place to live and work, and it is important that the strategy maintains and enhances these assets while meeting local needs.'				120		
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS328	4.2		No	No			No	<p>Support in part We welcome the general intent but advise that it needs strengthening.</p> <p>The wording should be strengthened to emphasise the economic importance of the natural and built environment and to ensure recognition of all three dimensions of sustainable development (NPPF para 7). The statement Additionally, the Green Belt limits growth opportunities is probably not essential: it is not an absolute constraint as it can be moved at the time Local Plans are reviewed.</p>	<p>Amend to: The high quality natural and built environment of Christchurch & East Dorset are what make the area an attractive place in which to live and work and make a significant contribution to the local economy, particularly tourism. It is essential that the strategy maintains and enhances these assets while meeting local needs and supporting economic growth sustainably. Opportunities for new development are constrained, in particular by the importance of the natural environment and floodplains.</p>	No, I do not wish to participate at the oral examination			120	

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652710	Mr Gary Balmer		CSPS471	4.3	No	No	No	No	Yes	No	if this statement is true, why has VTSW5 been added tot he proposal ? This site will only add to carbon emissions which accelerate climate change. The land already floods with no building, what will happen with a development on it and more flooding from cliamte change in years to come	all develoments must be submitted of the basis that they are carbon neutral to build and will not increase fossil fuel consumption.	No, I do not wish to participate at the oral examination		121	
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS3234	4.4		No	No	No		No	For development to be sustainable it must be located in accessible areas that reduce the need to travel by unsustainable modes. (NPPF para 35)	Amend 2nd sentence : Future development, particularly New Neighbourhoods, will be located in accessible areas....	No, I do not wish to participate at the oral examination		122	
359437	Ms Gill Smith	Dorset County Council	CSPS2014	4.5	Yes	No					<p>The Core Strategy contains several references to the use of developer contributions and CIL to help pay for infrastructure. Transport policies KS10 and KS11 refer to the CIL and “contributions towards local and strategic transport improvements in line with the authorities’ contributions policy” respectively. Reference to the collection of financial contributions is also made in the community facilities and services policy LN6 and in the Draft IDP.</p> <p>However, despite the frequent references to CIL and contributions policy, there is not a specific policy in the Core Strategy which requires development to meet its infrastructure needs or to mitigate adverse impacts, including the potential use of CIL to contribute towards the full range of community benefits required over the next 15 years. This is a concern as CIL will be an important source of funding towards the provision of County Council and other services. For instance it will be necessary to use CIL to collect payments from individual development towards educational needs, community and cultural facilities over the course of the plan period. A policy in the Core Strategy would provide a clear policy hook for the future creation of a joint CIL document and charging schedule for Christchurch and East Dorset.</p>	<p>Include a new policy and text in section 4 Key Strategy as follows: It is important that new development makes provision, where necessary for infrastructure needed to serve it, or to mitigate potential impacts it is likely to cause. Planning obligations, also known as section 106 agreements, have played an important role in providing the infrastructure necessary to support new development. The Government has introduced provisions for the Community Infrastructure Levy (CIL). The overall purpose of the CIL is to ensure that development contributes fairly to infrastructure it creates a need for and thus can be delivered in a sustainable way.Meeting infrastructure needs will also require other vehicles and joint working with a range of partners to ensure that common areas and priorities are coordinated. The establishment of the CIL will however transform the current method of collecting and distributing developer contributions, as from April 2014 there will be a limit on the pooling and use of section 106 contributions. Policy KS xx Infrastructure Delivery “Development proposals will be required to provide, or meet the reasonable costs of providing, the on-site and off-site infrastructure, facilities and/or mitigation necessary to make a development acceptable in planning terms, including the mitigation of the effect of cumulative developments. Delivery and monitoring The council will implement the policies and proposals of the Core Strategy and seek to ensure that the necessary infrastructure is secured to support development by:</p> <ul style="list-style-type: none"> • Working with stakeholders and partner organisations through a variety of fora and 	Yes, I wish to participate at the oral examination	Dorset County Council wishes to partake in any oral hearing on this matter in order to fulfill its duty to cooperate and ensure that its interests are considered in the emerging Core Strategy.	123	

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												other arrangements, including the LEP; • preparing regeneration area and other supplementary planning documents as required, and supplementing the Core Strategy and Development Management Policies DPD with development briefs, master plans and best practice guidance if this is necessary; • undertaking pre-application discussions with developers and involving partner organisations where appropriate, and through development management powers, including negotiating S106 obligations; • allocating council funding to projects and bidding for other monies to support core strategy initiatives; • developing a charging schedule in response to Community Infrastructure Levy (CIL) regulations or successor levy regimes that support the implementation of infrastructure projects necessary to deliver the Core Strategy; and • preparing annual monitoring reports to review the effectiveness of policies and identify alterations where necessary.”				
360289	Mr Kevin Hodder	East Boro Housing Trust	CSPS2357	4.5							Community Infrastructure Levy Effectively a tax on development. Key that this is set at the right level, being mindful of neighbouring Authorities, otherwise you will not attract inward investment.				123	
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS3237	4.5		Yes	Yes	Yes	Yes	Yes	Support particularly recognition of and commitment to protection and enhancement of the natural and built environment.		No, I do not wish to participate at the oral examination		123	
521383	Mr Graham Paisley	Scottish and Southern Energy	CSPS38	Policy KS1							There are no comments that I wish to make at present.				127	
360692	Mrs Wendy Britton		CSPS677	Policy KS1	Yes	No	Yes	Yes	Yes	Yes	This objection relates to the Pre-Submission Core Strategy (PSCS) and the 'soundness' of the policies regarding the potential development of land at Arch Ground, Station Road, Sturminster Marshall as a New Neighbourhood and Area of Public Open Space with recreational and community facilities. References are made (but not exclusively) to the PSCS and the following policies:- 1. KS1 (settlement hierarchy) 2. KS4 (housing provision and provision of land) 3. HE4 (open space provision) 4. Chapter 4 (the broad location and scale of housing) 5. Chapter 12 (strategic allocations) 6. Chapter 14 (creating high quality and distinctive environments) 7. Chapter 15 (meeting local needs)	The following alterations are required to be made:- 1. Generally – Amend the Pre-Submission Core Strategy to include a Strategic Policy regarding, The development of a 'New Neighbourhood' and area of Public Open Space etc. at Station Road Sturminster Marshall. This policy should be drawn for the sake of clarity in a similar form as to Policy RA1. 2. Pol.HE4 - amend table to incorporate the above. 3. Pol.KS1. - amend to incorporate 1 above. 4. Pol. KS4. - Ditto	Yes, I wish to participate at the oral examination	To support my proposal	127	2252889_01.pdf

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

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											<p>meet the potential need for additional housing in the Sturminster Marshall area, over and above that required to meet future household growth and the making good of the current substantial short-fall.</p> <p>The Proposal would also provide additional support and enable the growth of existing services etc. currently available in Sturminster Marshall area of East Dorset.</p> <p>Note1.</p> <p>'New Neighbourhoods' are residential led schemes around settlements with good access to key services, facilities and employment. They are designed to produce high quality sustainable developments, that are able to be integrated into the local character of the area without having a detrimental impact on the surrounding countryside They will require the re-drawing of the Green Belt boundaries to accommodate them. The difficulty in meeting housing need, will provide the exceptional circumstances to enable the provision of New Neighbourhoods.</p>					
654392	Mr Geoffrey Chopping		CSPS671	Policy KS1	No		No				<p>I object to the classification of the settlement of Furzehill as a Village, as it is neither sound nor justified and the "Core Strategy" document gives no justification either.</p> <p>Furzehill is a hamlet, it is not a village, as it has neither a church nor its own parish.</p> <p>Apart from Furzehill, all the other Settlements listed as Villages seem to already either have their own Parish Councils or are one of a group of Parishes forming a council.</p> <p>Currently the SW part of Furzehill is included within Colehill parish council, as there is no parish of Furzehill. The Core Strategy is for Colehill to become a "suburban centre". No mention is made as to how the residents of the SW part of Furzehill (or Dogdean) would then be represented.</p> <p>The NE part of Furzehill is lumped in with the large area covered by Holt Parish Council. Again no mention is made as to how the residents of the NE part of Furzehill would then be represented.</p> <p>Furzehill is small, it has a shop with a post office (in the Colehill Parish) and less than 100 metres away a public house (in the Holt Parish). It has no formal parish identity; it does not operate as a village. It should therefore be classified as a Hamlet as it is clearly not a village</p> <p>Restrictions on development should correspond to those stated for a Hamlet. Consequently the very narrow existing greenbelt between Furzehill and Wimborne should be respected. (750 metres to Furzehill and 525 metres to Dogdean.)</p> <p>However if the Greenbelt were to be torn up between Furzehill and Wimborne, as proposed, then presumably Furzehill might become a ward of Wimborne.</p> <p>Alternatively as nearly all the houses in WMC5 are on land within the Colehill parish, Furzehill "Village" could have its own parish council and look after the new houses in WMC5.</p> <p>The "Core Strategy" document is completely lacking in justification for the classification of Furzehill as a Village. Including one might help explain the real strategy.</p>	<p>To classify Furzehill as a Hamlet, by deleting Furzehill from the list of Villages.</p>	No, I do not wish to participate at the oral examination		127	

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											I strongly object to any reduction of the width of the greenbelt to Wimborne from Furzehill and Dogdean and the inevitable integration of Furzehill into Wimborne.					
220620	Miss S Thorpe	Gleeson Developments Ltd	CSPS903	Policy KS1	Yes	Yes	Yes	Yes	Yes	Yes		Policy KS1 – settlement hierarchy Gleeson supports the identification of the main settlements across the joint Districts within Policy KS1 and we are in agreement that the settlements identified should deliver housing growth to support the communities of the joint authorities. Accordingly we support the identification of Wimborne as a main settlement, where the Council has identified that the settlement has the capacity to provide some infill development and green field development which has the ability to provide social, utility, leisure, cultural and employment benefits.	Yes, I wish to participate at the oral examination		127	
654506	Mr John Showell		CSPS808	Policy KS1		No		Yes	Yes		As the whole plan is based on providing dwellings to meet external demand driven by "it's a nice place to move to" I do not understand why development will not be allowed in Hamlets. These are after all the places where most second homers and inward wealthy and retired migrants will want to live. The proposal is inconsistent with the overall stated objective of meeting external demand.	If growth is the objective then Hamlets should be included in the package. That or go for a New Town approach to meet external demand and use this provision of new supply as the reason why people have to compete for the existing hamlet properties.	No, I do not wish to participate at the oral examination		127	
654660	Anne Mason	Transition Town Christchurch	CSPS935	Policy KS1		No	No	No	No	No	Main Settlement-- Function "This will include infill development as well as options for some greenfield development" Avoid Greenfield as this may be needed for food production. Brownfield should be used should be used in older parts of the Town Centre as this will also reduce transport needs.				127	2259130_01.pdf
656249	Ms Gemma Care	Barton Willmore LLP	CSPS1086	Policy KS1	Yes	No	Yes	No	Yes	Yes	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. Background Barton Willmore LLP has been instructed to make representations to this document, on behalf of Stour Valley Properties (Dorset) Std. ('SVP') 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. 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	As comments above, move Colehill to Main Settlement.	Yes, I wish to participate at the oral examination	To ensure our case is presented in full and to be party to discussions.	127	

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											<p>that the level of housing proposed for East Dorset within the draft JCS is inappropriate and inconsistent with national planning policy, which states that each local planning authority should ensure that the Local Plan is based on adequate up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local planning authorities are expected to ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals.</p> <p>Consideration is given within the submitted representations to the strategic site allocations for Wimborne and Colehill identified within the JCS and the extent to which the proposed allocations fulfil the overall objectives and spatial vision for East Dorset and 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. Within these representations we do not comment on every aspect of the JCS; our intention is to comment on those sections where we non-compliance with tests of soundness is apparent, or where we are particularly supportive. To be clear, our primary concern in this instance is the content and justification of Policy KS4 and the proposed housing allocations for Wimborne and Colehill – specifically Policy WMC6.</p> <p>An alternative proposal for housing to the south of Wimborne is considered with specific reference to the SVP land shown on the concept plan attached at Appendix 1 to these submissions. Comments are also provided on a number of other policies within the JCS, on individual response forms, as requested. The full list of policies to which these representations respond are: Policy KS1, KS4, KS5, KS10 Policy WMC3, WMC6 Policy FWP3, FWP4, FWP6, FWP7, FWP8 Policy ME3 Policy HE4</p> <p>Copies of all Core Strategy Response Forms relating to each policy addressed within these representations are contained at Appendix 4. Appendices 1 – 3 to this cover letter are those referred to in the various consultation forms.</p>					

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											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. We consider this policy broadly sound but question the settlement hierarchy in respect of Wimborne Minster and Colehill. We contend that Colehill be included as a Main Settlement given its close functioning relationship to Wimborne.						
360245	Mr Richard Burden	Cranborne Chase & West Wiltshire Downs AONB	CSPS1560	Policy KS1							<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 ANOB 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-</p>					127	2239337_01.pdf 2239336_01.pdf

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											<p>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 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 Cranborne and Sixpenny Handley are two of five rural service centres proposed and half of the villages where there will be limited development are also within the AONB. We welcome and support the view that the AONB is an absolute constraint when it comes to strategic scale housing development.</p>					
656493	Cllr Tony Gibb	Eastern Area DAPTC	CSPS1470	Policy KS1	No	No	No	No	No	No	<p>RURAL RESPONSE TO EAST DORSET AND CHRISTCHURCH CORE STRATEGY</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 & Shapwick, Sixpenny Handley with Pentridge, Sturminster Marshall. It does not include the conurbations along the A31 or Verwood and Three Legged Cross. 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. http://webarchive.nationalarchives.gov.uk/20110215111010/http://archive.defra.gov.uk/evidence/statistics/rural/rural-definition.htm .</p> <p>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</p>	<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.</p>			127	

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											<p>in urban areas of England by around 25%, with higher prices in some villages costing nearly 11 times the average income. "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> <p>All the points made in the latest CRC State of the Countryside Report 2010 are valid in East Dorset http://www.defra.gov.uk/crc/documents.state-of-the-countryside-report/sotc2010/ . 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, Criche, 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. 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. 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. 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</p>					

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											<p>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 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"> • 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%. • 23.5% of people in rural areas are over state retirement age compared with 18.1% in urban areas. • 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. • Approximately 5% of rural households were using dial-up internet connections in 2009 compared with 2% in urban areas. • 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. 					

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											<ul style="list-style-type: none"> • 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. • 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%. • 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. • 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. <p>Must include economy of rural area. The definitions do not match with LN6. Rural communities must not be constrained if there is a need for limited diversification.</p>					
523627	David Lowin	WYG Planning & Design	CSPS1576	Policy KS1							<p>We write concerning your recently published Christchurch and East Dorset Core Strategy Pre-Submission document.</p> <p>As you are aware, Sainsbury's Supermarkets Ltd are taking an active interest in the formulation of the LDF and accompanying documents. On behalf of our client, we have considered in detail the policies set out in the Core Strategy and wish to make the following representations.</p> <p>Policy KS1 – Settlement Hierarchy</p> <p>We support your Policy KS1 relating to the overall spatial strategy for development in Christchurch and East Dorset and in particular the major focus for development within the identified main settlements of Christchurch, Wimborne Minster, Ferndown and West Parley, Verwood and Corfe Mullen.</p>				127	
359261	Mr Doug Cramond	DC Planning Ltd	CSPS2092	Policy KS1	Yes								Yes, I wish to participate at the oral examination	In connection with comments on WMC3	127	
523531	Mr Tim Hoskinson	Savills	CSPS2117	Policy KS1	Yes		Yes	Yes			<p>Support</p> <p>The inclusion of Corfe Mullen as a main settlement in Policy KS1 is supported. Corfe Mullen has wide range of services and facilities including schools, shops, supermarket, sports facilities, library, doctors surgery, dental practice, bus services and employment opportunities, hence a sustainable location for new housing development.</p>				127	
359529	Mrs Lisa Goodwin	Sixpenny Handley with Pentridge Parish Council	CSPS2418	Policy KS1							<p>Under the proposed new settlement hierarchy we welcome the intention for Sixpenny Handley to be designated a Rural Service Centre (RSC). Such a designation reinforces the village's already established role as a provider of community leisure; cultural; retail; educational; health and recreational as well as other service facilities providing support for both the village and adjacent communities within the parish and beyond. However, that said,</p>				127	2248860_0_1.pdf 2248941_0_1.pdf 2248948_0_1.pdf

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											there is nothing of significance within the rest of the document as to how this role is to be maintained let alone developed reinforcing the impression that it is merely a token gesture (from Annex to comments) The concept of a settlement hierarchy is agreed. However, the functions or development policies require definition and for the rural communities should not be constrained if there is a need for limited diversification, development and expansion.					
499596	Sir Roger Palin		CSPS2517	Policy KS1	No		Yes				Under the Hierarchy of Settlements Colehill is designated, along with St Leonards and St Ives, as a Suburban Centre, defined as "settlements with no existing centres that will provide for some residential development along with community, leisure and retail facilities to meet day to day needs within the existing urban areas". WMC5 – the proposal to build a New Neighbourhood of 600 dwellings, with retail and community facilities, and a new school – is currently sited to the east and west of the Cranborne Road just north of Wimborne, albeit it lies within the Colehill Parish boundary. The development would require the release of 40 acres of Green Belt land, currently agricultural, and would extend the boundary of the Wimborne conurbation into the Colehill Parish, thus reducing the Green Belt buffer between the two conurbations. In the Sub area Assessment for potential development sites in Wimborne Minster North, the "eastern area" which lies on the northern boundary of Colehill was dismissed from consideration for further development solely on the grounds of its remoteness from Wimborne's town centre. There were no environmental, hydrological, nor coalescence issues; furthermore, primary, first and middle schools exist within the parish, transport links are good and, concerning employment, Colehill lies closer to the Uddens, Ferndown and Bournemouth Airport Industrial estates than does Wimborne. Although Colehill's population is similar to Wimborne's, it is short of retail facilities and has no defined centre. A New Neighbourhood suitably designed and sited could be a more attractive, more sustainable and less costly option (no new school required) than the current WMC5, would enable Colehill to develop into a more rounded community with greater retail provision, would preserve the Green Belt buffer and save Wimborne from over development.	EDDC should give serious consideration to siting a New Neighbourhood of appropriate size and composition elsewhere within the Colehill Parish closer to the existing urban area.	Yes, I wish to participate at the oral examination	Inadequate consideration of potentially suitable alternative sites for developments	127	
499596	Sir Roger Palin		CSPS2518	Policy KS1	No		Yes				Under the Hierarchy of Settlements Wimborne is designated as one of 5 Main Settlements, long with Christchurch, Ferndown and West Parley, Verwood and Corfe Mullen; however, Wimborne will bear the major burden of the District's development proposals for non urban housing (1300/2500). Although some of the proposed new neighbourhoods lie within the Colehill parish boundary, they adjoin the Wimborne conurbation where they have been sited deliberately to take advantage of Wimborne's facilities. To all intents and purposes, therefore they will be part of the Wimborne parish. For one town to bear over 50% of the district's future non urban residential housing development is not only grossly disproportionate but also excessive for a small market town with a population of less than 6800.	The proposed development for Wimborne should be scaled back to a level which is sustainable without impacting adversely on the nature, rural aspect, social cohesion, capacity of available facilities, and traffic flows in and around this historic market town.	Yes, I wish to participate at the oral examination	To Expose: Inadequate consideration of Alternative sites. Inadequacy of related evidence. False analysis of consultation responses.	127	

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											<p>The proposals in aggregate imply an increase in Wimborne's current population of nearly 50% over the planning period. This would put enormous strain on existing facilities. The additional 1900 or so cars would add to existing road congestion, which transport modelling shows would result in many of the key road junctions becoming choked, with further detrimental environmental effects. Furthermore, the Core Strategy contains no proposals for increasing employment opportunities in the town for this increased population; indeed the reverse is the case given the proposed change of use from commercial to residential for the Stone Lane Industrial Estate and Long Close Farm. Also, Wimborne would be required to release a significant acreage of greenfield Green Belt land, without compensating changes to green belt boundaries as elsewhere in the District; the proposed development would scar the rural landscape to the north of the town. Finally, given that a very high proportion of the developments would comprise social rented housing, 2/3rds of which according to the evidence would have no employed head of household, the social fabric of the town would be distorted.</p> <p>The effect of the proposals in aggregate would be for Wimborne to become ever more over time a dormitory town with retail, with an ever increasing proportion of its working population travelling to employment sites elsewhere, most probably by car, while in parallel the number of unemployed households would increase significantly. This would fundamentally change the nature and character of this historic market town.</p> <p>Core Strategy Objective no 5 states: " The size of dwellings, both open market and affordable, will reflect current and proposed local need through the Strategic Housing Market Assessment." The SHMA contains no assessment of Wimborne's or its immediate surrounding area's actual need; indeed there is no evidence in the public domain that any attempt has been made to match the numbers of houses to be built in Wimborne to local need. The inescapable conclusion is that Wimborne is being required to accept the totality of the District's housing requirement that cannot be sited elsewhere, with scant regard for the long term impact on the town.</p>					
359503	Mrs Lisa Goodwin	Knowlton Parish Council	CSPS2939	Policy KS1	No	Yes	Yes	No	No	No	<p>Executive Summary This version of the Pre-submission Core Strategy falls short of meeting the tests of soundness in several respects. The over-concentration on urban concerns and needs has marginalised the rural issues and effectively stifled meaningful sustainable development in the villages and hamlets of East Dorset. This suggests a lack of positivity in preparation. The unwillingness to recognise and address the issues of rural community decline, evidenced in the general case by the work of Prof Mark Shucksmith, and in the particular in East Dorset, cannot support a suggestion that the Strategy is adequately justified. The Strategy must be re-balanced to ensure that the needs of rural communities over the next 15 years are properly researched and addressed before it can be accepted as sound.</p>		No, I do not wish to participate at the oral examination		127	

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											<p>Discussion</p> <p>Given the provenance of this document, it is unsurprising that it concentrates the bulk of its effort on the areas of population density in the south of the district. It is disappointing, however, to see the extent to which the remaining areas – mainly the rural north of the district – are consigned to a section of ‘and the rest’ near the back. This apparent declaration of either ‘too difficult’ or ‘no change is easiest’ for rural East Dorset is both worrying and representative of a missed opportunity. As a declaration of current needs it is disappointing; as a plan for the next 15 years it is dispiriting. The constituent wards of the rural north and their parishes are anxious that this balance should be redressed before the paper is presented to the SoS.</p> <p>The group parish of Knowlton is as representative of a rural parish as can be described in the area. An administrative agglomeration of communities, it contains both similarities and differences, not only within its own boundaries, but also with adjacent parishes. It covers from the far north chalk downland boundary with Wiltshire in Wimborne St. Giles, through the sand ridge of Chalbury to the edges of the heathlands in Horton and Woodlands. The settlement patterns are as different as the soil they sit on, and this impacts on the effectiveness of the pattern of hierarchical settlements outlined in the paper.</p> <p>The model upon which this paper appears to rely is predicated on neatly-nucleated settlements arranged equally neatly around higher order settlements from which they receive their low order services via neatly arranged communications links. Few of these conditions, if any, can be seen to exist in north rural East Dorset. Within Knowlton, we have only one settlement – Horton – which could in any respect be described as ‘nucleated’. The rest are sparse groups of hamlets, sometimes joined by later infill to form ribbon-development villages, such as Woodlands. These reflect settlement patterns which can be recognised back to at least the bronze age, modified in later centuries by estate enclosure and by modern population change. Because they rarely have an identifiable nucleus, these settlements can be difficult to place within models of the threshold values for sustainable services. Equally, the generally poor communications, particularly by public services between low and higher order settlements, make the range over which residents are prepared to travel to obtain services a difficult item to predict. The structure of ‘central places’ described in this document appears not to take these complications fully into account. There is a need to ensure that basic services are carefully planned and, of necessary, supported within the lower order settlements.</p> <p>Knowlton is still essentially an area devoted to industry – even though that industry is mainly agriculture and thus less visible than, say, a steelworks. There is potential for greater exploitation of the tourist industry without noticeable effect on existing facilities. The industrial employment patterns – and the related tied accommodation – have been declining with increasing mechanisation since the early C 19th. Even in the last two</p>					

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											<p>decades, the number of people required to operate a farm has reduced and there has been little opportunity to replace either the housing or the jobs to any extent. Although there is a rump of farm workers or their widows retaining residence in what were tied cottages, this number is not likely to rise.</p> <p>In common with some of the adjacent parishes, Knowlton has a number of villages formed by the needs of large estates. In some cases, the estate remains not only the major agricultural landowner but also the holder of a significant portfolio of rental property. Houses previously tied or on peppercorn rent are now let as desirable country residences at commercial rents well beyond the capability of a large number of people, including the families of existing residents. This is not a criticism; it is an acknowledgement that landholders like this must make a commercial return. However, it is a contributory factor in the decline of community.</p> <p>The concept of a 'vibrant community' is often alluded to as desirable of this sort but is seldom defined. If 'vibrancy' equates to 'vibration', then a vibrant community will need an input of energy and stimulation. In some cases this not easy to see and may indeed be the factor in the most urgent decline. The work of Professor Mark Shucksmith at Newcastle University and elsewhere has shown the social imbalance arising in the rural areas, and in evidence in East Dorset, has been a significant factor in the decline of community cohesion and in the facilities which are so highly sought after by those taking up residence from elsewhere. In almost any community there is a recognisable set of 'people who do'. These are the ones who step forward when some community effort is required, be it a fete, a public celebration or maybe membership of a committee. Anyone who has tried recently to recruit a new councillor will recognise that the pool of 'people who do' has shrunk. Some members have been 'doing' for decades and are becoming less active, capable or willing.</p> <p>Village residents in the C21st seem to fall into one of the following broad categories: The Rural idyllist, the Rural Commuter (day and weekend), the Artisan (both employed and self-employed), the Fixed-Income Retired/Semi-Retired and the Agriculturalist. Many other sub-groups exist and emerge, but the important thing is that any group should not be over-represented to allow the development of community diversity in both social and age terms. Both practical and organisational skills are needed and appreciated. What is vital is a willingness to engage in community issues right across the spectrum – and a willingness equally to appreciate that the countryside is an asset which must be amenable to change.</p> <p>We are regularly reminded throughout that there is a significant shortfall of 'affordable housing' in East Dorset. Less frequently acknowledged is the existence of the 'hidden homeless' – those who do not qualify for consideration for an affordable house because they are living with Mum and Dad because local housing is beyond their grasp. There are clues all over the rural settlements: multiple cars in the drive and the occupied-looking</p>					

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											<p>caravan in the garden are a good starting point. There is a hidden need for housing for local people which is not currently being addressed and is more likely to increase in the 15-year time period as a further generation arrives:</p> <p>The development constraints and influences in rural East Dorset are well known, a significant portion of the land having one or more factor to consider, be it green belt or areas for the protection of the natural or built environments. For each of the parishes in Knowlton there is a village envelope which has been substantially filled, leaving little scope for expansion. Whilst the UK population continues to increase, some of these constraints must be examined in a more people-centred light and exceptions to previous policies must be considered in a more sympathetic and realistic way. The prospect of expanding existing environmental conservation areas should be treated with great caution.</p> <p>If local opposition to development – and there will be opposition from several sectors of the population – is to be answered, there needs to be a clear benefit accruing to the local community. Therefore, where a development of affordable houses is proposed, it must be shown to be substantially linked to benefit to people with a strong local association and that this restriction will be rigidly enforced. Whether it be via Section 106-type agreement or community land trust acquisition, the inevitability of a need for new housing within the timescale of this Strategy must be acknowledged and accepted by the communities themselves and reflected in the Strategy.</p> <p>Conclusions</p> <p>If the active sustainability of rural communities is to be a real objective of this process, it must represent and address the needs of all of the members of the community, however vociferously or otherwise their case is expressed or opposed. Social diversity is an essential ingredient if this to be achieved.</p> <p>Vague expectations of services provided at a distance are inadequate, especially where the transport infrastructure is lacking. There must be a greater presumption in favour of the preservation of services at a local level, be it health, welfare, shops, posts offices or even pubs and other social centres. Rural Tax-payers should expect to receive the same level of consideration in these matters as do their town counterparts, whatever the cost of delivery.</p> <p>The needs of communities must be allowed to achieve a higher profile than is currently permitted by the constraints of conservation and the support of the concept of the rural idyll.</p> <p>The Core Strategy as currently written falls short of these objectives. A fresh approach is needed to further work before this document is to be considered 'sound'.</p>					
359585	Mr Robert Finn		CSPS3071	Policy KS1	Yes	No	Yes	Yes	No	Yes	<p>Alderholt, being a Local Centre and the largest village in East Dorset, has potential for being more than a Rural Service Centre. Alderholt compares with Burton, in the southern area, which under policy CN2 has an allocation of a site for approx. 45 houses. Alderholt, in the northern area, should become the candidate for</p>	<p>Policy. Land off Blackwater Close rising to the south of the village is allocated for residential development for approx. 75 bungalows. A minimum of 42% of all the bungalows will be affordable. The</p>	Yes, I wish to participate at the oral examination	Wide range of issues raised.	127	<p>2254472_0_1.pdf 2254465_0_1.pdf 2254466_0_1.pdf 2254467_0_1.pdf 2254468_0_1.pdf</p>

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											<p>expansion in the form of residential development targeted at the older generation, my generation.</p> <p>The Core Strategy concentrates new development around the existing conurbation in order that services will be close at hand and journey times diminished. My generation, the 65 to 80 year olds have different needs though. We are not ready for sheltered accommodation inside a conurbation, indeed we are the new active 65's rather than the old "Active 55's" and we wish to remain independent, both physically and economically, for as long as possible.</p> <p>My generation, according to LPA statistics, is the fastest growing age group in the district and by 2020 there will be four retirees for every three of working age living here. The Core Strategy seems not to take account of this, quoting historical numbers with little provision for housing this expanding sector of the population.</p> <p>The local housing market is in need of a boost on the supply of new bungalows which would meet a demand of retirees trading down, thus freeing up family homes for those who could afford them, demand coming from, in my experience, one third local, one third London and the remaining third the rest of the country. I am advised by RSL providers that there is a shortage of 2B3P bungalows available on a shared equity basis generally. So the affordable element of these proposals could release 3B5P affordable or market housing elsewhere. I have an actual case study to support these claims.</p> <p>And so, I am proposing a residential development allocation on a site in Alderholt to be a good solution in the rejuvenation of the village, for part of my generation looking to trade down to an active retirement, release of some family homes to the market and in providing an affordable solution in active retirement, release of some family homes to the market and in providing an affordable solution in active retirement for locals or nearby neighbourhoods. The proposed site is entered through Blackwater Close and rises towards the south to a plateau. The development would not be seen by the majority of the village. The site borders two sides of the village envelope, is outside the green belt, has no heathland constraints, requires little off-site infrastructure and has all services, including gas, available nearby.</p> <p>Notes on my plan and drawings herewith:</p> <p>I have looked at the Three Dragons proposals for affordable housing but they assume the lowest density of 30dph which was a planning policy but is no longer viable. Their residual value assessment for this site @20dph would be interesting but, I fear inaccurate without their market value assumptions being reduced in the new economic world in which we live.</p> <p>Positively prepared - there appears to be no strategy of objectively assessed development too meet the needs of my generation, Justified - the plan cannot be justified as it fails to meet the needs of the fastest growing generation to which it purports to serve. Effective - in as much as my proposed change is deliverable the document would remain effective.</p> <p>Consistent with National Policy - in as much as the plan</p>	<p>development will contribute towards improved community facilities in Alderholt. The development will make appropriate contributions towards transport and heathlands.</p>				<p>1.pdf 2254469_0 1.pdf 2254470_0 1.pdf 2254471_0 1.pdf</p>

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											discriminates against the one market sector able to generate momentum in the housing market it probably is against national policy.					
490823	Mr Ian Jones	Ferndown Town Council	CSPS29 63	Policy KS1	Yes	Yes	No	No	No	No					127	
523531	Mr Tim Hoskinson	Savills	CSPS31 85	Policy KS1		Yes		Yes	Yes		The inclusion of Ferndown and West Parley as a main settlement in Policy KS1 is supported. Ferndown and West Parley together form the largest settlement within the East Dorset District administrative area, with a combined population of over 20,000, and offer a wide range of retail and other services, community facilities and employment opportunities, hence a sustainable location for new housing development.				127	2249912_01.pdf 2249910_01.pdf 2249911_01.pdf
656678	Mr James Cleary	Pro Vision Planning and Design	CSPS34 90	Policy KS1	Yes	No	Yes	Yes	Yes	Yes	Please see enclosed representations.	Please see enclosed representations.	Yes, I wish to participate at the oral examination	1) Because of the high level of public interest in reducing greenfield land take in East Dorset in favour of optimizing previously developed land. 2) To enable the Inspector to test the evidence demonstrating that the Core Strategy is unsound without the allocation of Little Canford Depot for a mixed use residential and employment development.	127	2258053_01.pdf
521508	Ms Lisa Jackson	Jackson Planning Ltd	CSPS36 42	Policy KS1	Yes	No	Yes	Yes	Yes	Yes	MEM Ltd believe that the plan is not sound as it does not comply with duty to co-operate and is therefore inconsistent with national policy. The plan should better reflect the wider considerations of the area following the duty to co-operate and the demise of the regional spatial strategy, therefore the Key Settlement Hierarchy should now look across boundaries and identify Bournemouth/ Poole as the 'Principal Urban Area'. The Roger Tym study for SW settlements (CBC evidence referred to in paragraph 4.8) identified Bournemouth/ Poole as Principal Urban Area. To ignore the wider role of Bournemouth/Poole is inconsistent with national policy regarding the duty to co-operate. In addition the policy with regard to Burton is not justified by evidence. It is wrong to class Burton as a Village, it should be identified as a rural service centre. The definition suggests that	The settlement hierarchy needs to include a new category in the table described as 'Principal Urban Area'. The settlement in this category should be Bournemouth/ Poole urban area. It should be identified as beyond the boundary, but its role in the hierarchy can be explained. This reflects the evidence from the Roger Tym study and makes a more effective plan with regard to cross boundary working. MEM Ltd also wish to see Burton categorised as a Rural Service Centre and not a village. This would make the plan more consistent with settlements in East Dorset	Yes, I wish to participate at the oral examination	CBC did not agree with MEM's options consultation response which sought to change the settlement hierarchy with regard to Burton so we wish to make the case to the Inspector directly. Given the property	127	

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											villages are those that serve the home community only. Burton serves a wider rural hinterland in particular for the school/ GP practice/ churches and shop. The CBC position is not justified by evidence. Please see attached catchment plans that show the school, nursery, and GP practice drawn from a significantly wider area. This would move Burton to a higher category where residential development will be allowed to reinforce the role of the village as a provider of community leisure (village hall) and potentially retail facilities. It would also make Burton's status consistent with other rural service centres in East Dorset District. Please note this representation is substantiated by additional evidence in a supporting statement submitted with the representations by MEM Ltd.	and is justified by the evidence provided in the information and catchment plans attached to the supporting report.		interests of MEM's clients in Bournemouth it is a legitimate concern that the settlement hierarchy is appropriate to the locality rather than the administrative limits which currently define the policy. MEM Ltd have land at Burton identified for development, it is appropriate the settlement hierarchy is reflective of evidence that has been provided.		
490815	Mrs Trish Jamieson	Burton Parish Council	CSPS3684	Policy KS1							Burton Village is felt by those who live there to be a very special community. Despite the spurt of housing growth in the 1960s and 1970s the new development was confined to the area between Salisbury Road and Stony Lane and Burton's essential character as a rural village has been maintained. This is recognised by the establishment of the Burton Conservation Area, which protects the core of the old village and its essential features. The Parish Council, elected in May 2011, in commenting on these proposals has as its aim the preservation and enhancement of the character of the village and the lives of its residents by: _ Preventing development inimical to the village _ Supporting and promoting appropriate developments To this end the Council supports the need for a new Local Plan and Core Strategy and acknowledges that without the new plan there is a considerable danger that developers will be able to seek to pursue development proposals which might not be in the best interests of the Village. The Parish Council also accepts that the new Core Strategy offers opportunities to protect services and facilities in the village, and to develop new ones - for example, to pursue extensions to public transport, to protect local shops and facilities, and to secure improvements to private transport.				127	

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											<p>Aware of the difficulties facing young couples with roots in the village finding housing, the Council welcomes the commitment to allowing a development of 100% affordable housing and will seek the adoption of a Rural Exception policy for Burton.</p> <p>For these reasons the Council welcomes many of the new policies and proposals, but it has to be noted that it has serious concerns over proposed Policy CN2.</p> <p>1. Settlement Hierarchy</p> <p>The Council notes and agrees with the place of Burton in the suggested Settlement Hierarchy which defines Burton as a settlement</p> <p>'... where only very limited development will be allowed that supports the role of the settlement as a provider of services to its home community.'</p> <p>The Council notes however that the Strategy states at Paragraph 4.21</p> <p>'A limited amount of housing is also proposed for Burton based on the specific need for new housing to serve the needs of the village'</p> <p>but also notes that the opportunity to define this housing by means of a local exceptions policy is not taken. In other words, this housing will not be specific to the needs of the village but will be available for general use in alleviating the waiting list, of the validity of which the Council has some concerns.</p>					
524088	Mr Ken Parke	Ken Parke Planning Consultants	CSPS3633	Policy KS1	No	No	Yes	Yes	Yes	Yes	Please see attached representations document and appendices	Please see attached representations document and appendices	Yes, I wish to participate at the oral examination	The representation has a significant bearing on the distribution of housing within the district and will require detailed oral examination.	127	2260318_01.pdf
656692	Mr Robin Henderson	Ken Parke Planning Consultants	CSPS3626	Policy KS1	Yes	No	Yes	Yes	Yes	Yes	The document fails to make positive provision for residential development necessary to secure the future of community services in Longham or the provision of housing to meet local needs during the life of the plan- please see attached statement.	The Core Strategy should be modified to include the expansion of the settlement boundary of Longham around the identified parcel of land to the rear of 122 Ringwood Road. This should feature as a district policy and map in chapter 10- please see the attached statement.	Yes, I wish to participate at the oral examination	The Oral Examination will facilitate discussion of the proposed change.	127	2260313_01.pdf
664634	C Benham		CSPS3830	Policy KS1		Yes					Emerging policy classifies Christchurch as a 'main settlement' and is therefore at the top of the settlement hierarchy (KS1). Emerging policy seeks to maintain and enhance Christchurch's role which is to be the focus for much of the major retail, employment and housing growth over the plan period. As other towns develop, so too should Christchurch and as such we support the Council's intention to maintain its position through the encouragement of further growth. This approach in Policy KS1 accords with national				127	2267822_01.pdf 2267823_01.pdf 2267824_01.pdf 2267825_01.pdf

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											policy and it is therefore considered sound.					
649505	Miss Dawn Leader		CSPS298	4.11	Yes	Yes	Yes	No	No	No	The land in VTSW5 is green belt, this land separates Verwood twon from Hampshire, it stops Verwood spilling into Hampshire therefore doing the job that green belt is supposed to.	Green belt should be preserved all around the boundary of Verwood so that we do not encroach on anyone and they do not encroach on us.	No, I do not wish to participate at the oral examination		132	
652710	Mr Gary Balmer		CSPS472	4.11	No	No	No	Yes	Yes	No	Surely sooner or later everyone will find a "good reason" to build on green belt. Just because the local council have to meet government target to build new houses doesn't mean that is a good reason to change green belt.	Green belt needs to be protected, once it is gone, we can never get it back.	No, I do not wish to participate at the oral examination		132	
654026	ms bev miller		CSPS605	4.11	No	No	Yes	Yes	Yes	Yes	Green belt MUST be protected at all costs. We cannot keep eating away at it to build more houses. The Green Belt boundaries have not changed significantly since they were first drawn in 1982.....surely a GOOD thing ?	Thewre should be NO CHANGE to existing green belt policy.	No, I do not wish to participate at the oral examination		132	
474462	Mrs Sheila Bourton		CSPS171	Policy KS2	Yes	No	No	No	Yes	No	I am very concerned that releasing part of the greenbelt for housing and associated development as an "exceptional case" as allowed in PPG2, this could result in further releases and loss of more greenbelt at another time in the future. Once the precedent has been set what will stop it happening again and urban sprawl developing? It is all very well to monitor on an annual basis, the impact of development on the Greenbelt but if it is found to be detrimental, it would be impossible for the development to be reversed.	There should be a moratorium put on any further greenbelt development for at least 50 years.	No, I do not wish to participate at the oral examination		135	
474490	Mrs Sheila Bourton	Keep Wimborne Green	CSPS210	Policy KS2	Yes	No		Yes			Although the release of some land from the Greenbelt is allowed in " exceptional cases" (see PPG2 Greenbelts) , our concern is that other so called "exceptional cases" may be put forward at some time in the future which would result in even more land being taken out of Greenbelt. There would appear to be no mechanism in place to ensure that once large swathes of greenbelt land have been taken out of this protection, then a moratorium should be put in place to prevent the loss of anymore greenbelt areas and urban sprawl developing. Our Council's plan to monitor the situation on an annual basis is simply "shutting the stable door when the horse has bolted". Any new development cannot be demolished if it is found that the loss of the previously designated Greenbelt is detrimental to both wildlife and local residents.	If the proposed development on greenbelt areas around Wimborne and other areas in East Dorset is approved and goes ahead, then a moratorium on Greenbelt development of any kind should be put in place after that for at least 50 years.	No, I do not wish to participate at the oral examination		135	
649505	Miss Dawn Leader		CSPS437	Policy KS2	No	No	Yes	Yes	Yes	Yes	In the case of VTSW5, the land is farmed, the farmer has ploughed and disc harrowed the land at least 4 times this year alone. Twice in the last week. The land certain isn't waste or derelict. He is using it as farm land, the intended use of green belt.	Urban land must be used and our green belt preserved.	No, I do not wish to participate at the oral examination		135	
652994	Mrs Kathleen Leader		CSPS541	Policy KS2	No	No	Yes	Yes	Yes		VTSw5 is green belt and it links a nearby a section of the Dorset Heathlands Special Protection Area (or SPA ie an internationally important wildlife site) with a section of Dorset Heaths Special Area of Conservation (SAC another international designation) and Ebblake Bog Site of Special Scientific Interest (SSSI). All of the wildlife that use these 3 areas also use VTSW5	Built development away from land that supports wildlife and doesn't extend boundaries	No, I do not wish to participate at the oral examination		135	

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											especially for the high volume of insects in this area due to the dampness. This green belt serves a very important purpose as that wedge to link them plus it separated dorset and hampshire.					
653852	Mrs Susan Newman-Crane		CSPS646	Policy KS2	No	Yes	Yes	Yes			If development has already taken place on quite a large scale on land which was deliberately kept out of the Green Belt to do so, Christchurch has surely lost enough land of this kind already. There comes a time when we need a plan for other aspects of the quality of our lives, of which retaining a natural environment is one. The Green Belt also supports our dwindling wildlife. It cannot be used piecemeal or precedent will be set and it will eventually have no meaning and we will have lost a policy which has proved very valuable in preventing urban sprawl.	Do not use Green Belt for any other purposes than Green belt.	No, I do not wish to participate at the oral examination		135	
654618	Tanner & Tilley	Pennyfarthing Homes	CSPS879	Policy KS2	Yes	No	Yes	Yes	Yes	Yes	The opportunity should be taken to review the Green Belt boundary to accommodate for the needs of development, including housing development, not just for that which will arise during the Plan Period but also beyond it. Paragraph 83 of the National Planning Policy Framework advocates that once established, Green belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, it proposes that authorities "...should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period". For this reason we suggest that the opportunity of reviewing the Green belt Boundary should be taken now to allow for the accommodation of possible future development that may be needed beyond the Plan Period.	To make Policy KS2 compliant and sound it is suggested that the last paragraph to the policy be changed to read:- "The existing boundaries will be reviewed and where necessary changed to enable some new housing and employment to meet local needs that may be required both within and beyond the Plan Period of the Core Strategy."	No, I do not wish to participate at the oral examination		135	
654688	Mr Paul Newman	Paul Newman Property Consultants Limited	CSPS772	Policy KS2	Yes	No	Yes	Yes	Yes	Yes	I do not feel that the LPA has taken into account when assessing housing demand and need in the district the actual true level of development that is required to meet the identified housing need. Further allocation of land is required which will involve the need to roll back the green belt further to ensure that a sufficient supply of housing land is to be provided. The evidence base is not sound nor is it robust in this respect. A continued reliance of a policy of urban area regeneration will not deliver the affordable housing the district requires.	The additional allocation of land is required to meet the identified housing need and this should be done by allowing the extension of the current proposed housing allocations, in particular those at Wimborne and Ferndown have and hold potential for a natural expansion and continuation of the development which will bring additional housing to the district.	Yes, I wish to participate at the oral examination	I would like to make the Inspector fully aware of the Council's appalling record in the delivery of affordable housing and to point out how a continued reliance on a policy of urban regeneration will not work and will produce any affordable housing without the need to roll back the green belt a little further.	135	2274440_01.pdf
220620	Miss S	Gleeson Developm	CSPS904	Policy KS2	Yes	Yes	Yes	Yes	Yes	Yes		Policy KS2 – Green Belt	Yes, I wish to		135	

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	Thorpe	ents Ltd											participate at the oral examination			
654962	Mr Christopher Hope		CSPS913	Policy KS2	No	No	Yes	Yes	Yes	Yes	Paragraph 4.19 of Policy KS2 is unsound in asserting that a lack of capacity to meet needs identified in the Housing Market Assessment makes it 'necessary' to identify sites in the Green Belt. Paragraph 4.21 is unsound in asserting that 'the difficulty in meeting housing needs provides the exceptional circumstances required to amend Green Belt boundaries'.	In Paragraph 4.11 delete all words after 'kept in place' in line 4. Delete paras 4.19 and 4.21.	Yes, I wish to participate at the oral examination	In order to express on behalf of my constituents their widespread and deep seated opposition to proposals in the plan to remove land currently designated as Green Belt from the Green Belt.	135	
654660	Anne Mason	Transition Town Christchurch	CSPS936	Policy KS2		No	No	No	No	No	to "To maintain an area of open land around the conurbation" Add "To protect key bio-services (key species, pollinators,) and biological systems which produce good air quality, water resources and carbon sinks."				135	2259130_01.pdf
654839	Miss Karen Mason		CSPS1007	Policy KS2	Yes	No	Yes	Yes	Yes	Yes	I was totally unaware of this development and proposal and as a resident of Burton I question why is this so; surely it is imperative that ALL RESIDENTS of our village are given the opportunity to consider. I have various objections as follows CN2 I strongly believe we should save and preserve our Green Belt and Conservation Areas. CS2/KS10 the additional traffic this will create will cause even more delays on Stony Lane which is already unable to cope with the current traffic generated from Burton and surrounding areas. CS2/KS10 The development will create more unsustainable vehicles in and around the village.		No, I do not wish to participate at the oral examination		135	
359547	Mrs V Bright	Verwood Town Council	CSPS1756	Policy KS2							The Guide and Scout huts should be included in the Urban Area not the Green Belt.				135	
524723	Mr John Worth	Wimborne Civic Society	CSPS1926	Policy KS2							In furtherance of the objectives set out above we would support limited changes to the boundaries of the Green Belt. We would therefore be happy to see 3.3hectares of Green Belt land at Bailie				135	

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											Gate be developed for new employment.					
523531	Mr Tim Hoskinson	Savills	CSPS2118	Policy KS2		No				No	<p>Object: The policy is unsound as it is not consistent with national policy</p> <p>The recognition in Policy KS2 of the need for changes to existing Green Belt boundaries is fully supported as the most appropriate option for the area taking into account the evidence base in relation to housing need and the availability of housing land. However the bullet points in the first part of the policy are considered unnecessary and inconsistent with the purposes of Green Belt policy set out in the NPPF. The reference to local needs should be extended to include strategic housing needs where these can be sustainably accommodated.</p>	<p>Changes required:</p> <p>Amend Policy KS2 as follows:</p> <p>Development in East Dorset District and Christchurch Borough will be contained by the South East Dorset Green Belt.</p> <p>Limited changes to the existing boundaries are proposed to enable some new housing and employment to meet local needs and strategic housing needs where these can be sustainably accommodated and also to include areas in the Green Belt that are no longer capable of providing for these needs.</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	135	
523893	Miss Lindsay Thompson	Terence O'Rourke Ltd	CSPS2050	Policy KS2	Yes	Yes					<p>Bloor Homes Limited supports the alterations to the South East Dorset Green Belt to accommodate growth at North Wimborne. However, the alterations are an important and justifiable component of the core strategy and we would suggest that as such this policy should define the new extent of the green belt to provide a clear strategy for the two districts to ensure deliverability. As such we would suggest the following wording is added to the policy:</p> <p>"The extent of the South East Dorset Green Belt within Christchurch Borough and East Dorset District is defined by the map XX. This follows the settlement boundaries of the main towns but allows for limited changes to the existing boundaries to enable some new housing and employment to meet local needs. These new housing and employment areas are defined in policies contained within this document</p>	<p>As such we would suggest the following wording:</p> <p>The extent of the South East Dorset Green Belt within Christchurch Borough and East Dorset District is defined by the map XX. This follows the settlement boundaries of the main towns but allows for limited changes to the existing boundaries to enable some new housing and employment to meet local needs. These new housing and employment areas are defined in policies contained within this document."</p>	Yes, I wish to participate at the oral examination	Our client has a significant interest in land at North Wimborne (Cranborne Road new neighbourhood) and we therefore consider it to be important that we are able to participate orally at the examination to expand on the comment we have made within this document.	135	
527744	Mr Alan Hannify	Alliance Planning	CSPS2308	Policy KS2							<p>Policy KS2 of the Pre-Submission Core Strategy states as follows:</p> <p>"Development in East Dorset District and Christchurch Borough will be contained by the South East Dorset Green Belt. The most important purposes of the Green Belt in the area are to:</p> <ul style="list-style-type: none"> • Protect the separate physical identity of individual settlements in the area by maintaining wedges and corridors of open land between them. • To maintain an area of open land around the conurbation. <p>Limited changes to the existing boundaries are proposed to enable</p>	<p>It is submitted that Policy KS2 should make express provision for developments which may represent 'very special circumstances'. It is also submitted that Policy KS2 should recognise that some renewable energy installations may be considered as 'very special circumstances', with reference to their wider environmental benefits and increased production of renewable energy.</p>	Yes, I wish to participate at the oral examination	We wish to participate at the oral part of the examination, in order to outline and expand on the evidence provide during this current	135	2249181_01.pdf

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											<p>some new housing and employment to meet local needs and also to include areas in the Green Belt that are no longer capable of providing for these needs.”</p> <p>Policy KS2 of the Core Strategy promotes the protection of the Green Belt, as well as making allowances for limited boundary changes to provide for additional housing and employment provision. Whilst we support the broad approach to Green Belt policy, it is our contention that in the case of Christchurch, there needs to be recognition that the development of renewable sources of energy will be likely to require development in Green Belt locations.</p> <p>The character of Christchurch Borough is such that it is either urban area or predominantly within the Green Belt and that further significant areas are constrained by flood risk and by international nature conservation designations. It is understood that 70% of the Borough (3,477 ha) is contained within the Green Belt. In this regard, the opportunities for the development of renewable energy sources are limited, other than at a very small, micro-scale on existing buildings and as part of new developments.</p> <p>The footprint requirements of most renewable energy installations are difficult to accommodate within urban areas. In particular, solar energy, bio-energy, and the generation of natural gas through anaerobic digestion, require larger footprints. Such installations are generally more appropriate and easier to accommodate within rural areas.</p> <p>The NPPF confirms that as with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in ‘very special circumstances’.</p> <p>With specific reference to renewable energy projects, Paragraph 91 of the NPPF states as follows: “When located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development. In such cases developers will need to demonstrate very special circumstances if projects are to proceed. Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources.”</p> <p>Policy KS2 of the Core Strategy does not make reference to ‘very special circumstances’ and does not reflect the NPPF’s acknowledgement that renewable energy projects may represent ‘very special circumstances’.</p> <p>We are concerned that the lack of detail contained in Policy KS2 could potentially have the effect of precluding certain forms of development in the Green Belt, which may merit consideration on the basis of ‘very special circumstances’. It is considered that the lack of flexibility in the current policy would limit the effectiveness of other policy statements in addressing the matter of climate change.</p> <p>It is therefore submitted that Policy KS2 in its current form is ‘unsound’ on the basis that it is not effective or consistent with national policy. We would recommend that the policy should make</p>	<p>We would propose the inclusion of the following text in Policy KS2: “Where proposals for renewable and decentralised energy are proposed within the Green Belt they will need to show that very special circumstances exist, including the impact on the Green Belt and the purposes of including land within the Green Belt.”</p> <p>Additionally, it is submitted that the following text should be included with respect to policy pertaining to renewable and low carbon energy: “It is recognised that in some cases, this may require consideration of Green Belt locations given the large footprint required and constrained nature of the built up area which otherwise limit the land available for such projects.”</p>		<p>consultation. 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, which is located within the Green Belt</p>		

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											express provision for developments which may represent 'very special circumstances' and recognise that some renewable energy installations may be considered as such, with reference to their wider environmental benefits and increased production of renewable energy.					
360082	Mr and Mrs K Healy		CSPS2409	Policy KS2	Yes	No	No	No	No	No	In this Policy you state the most important purposes of the Green Belt are the following: <ul style="list-style-type: none"> To prevent neighboring towns from merging into one another and To check the unrestricted sprawl of large built up areas (or in the words of East Dorset, to maintain an area of open land around the conurbation). We feel you have failed to mention and act upon another very important purpose of the Green Belt which is: 'to preserve the setting and special character of historic towns'. This is such an important purpose in an area of old established market towns and villages. We think this purpose should have been included in your Green Belt policy. NPPF paragraph 126 'the desirability of new development making a positive contribution to local character and distinctiveness;' It is a towns setting, which must include the approach to a town which is so important, especially when many historic 'approaches' have already been lost	Please add a 3rd Green Belt principle: 'to preserve the setting and special character of historic towns.'	No, I do not wish to participate at the oral examination		135	
360949	Mr Stuart Goodwill	Barratt David Wilson Ltd	CSPS2711	Policy KS2	No	No	Yes	Yes	Yes	Yes	The principle of Policy KS2 regarding the need for changes to existing Green Belt boundaries is supported and is considered the most appropriate option for the area taking into account the evidence base regarding housing need and the availability of housing land. However, the bullet points in the first part of the policy are considered unnecessary and inconsistent with the purposes of Green Belt policy set out in the NPPF. The reference to local needs should be extended to include strategic housing needs where these can be sustainably accommodated.	Amend Policy KS2 as follows: Development in East Dorset District and Christchurch Borough will be contained by the South East Dorset Green Belt. Limited changes to the existing boundaries are proposed to enable some new housing and employment to meet local needs and strategic housing needs where these can be sustainably accommodated and also to include areas in the Green Belt that are no longer capable of providing for these needs.	Yes, I wish to participate at the oral examination	The implications of the issues raised in the representations go to the heart of the soundness of the plan, in respect of the delivery of appropriate housing within the Core Strategy and as such it is imperative that we are present at the hearing sessions to discuss the matter with the Inspector.	135	
360962	Mrs V Hurst		CSPS2763	Policy KS2	No	No	Yes	Yes	Yes		KS2 states that 'limited changes to the existing boundaries are proposed to enable some new houses and employment to meet local needs'. The changes proposed as shown on maps in the document only apply to large scale development at the edge of existing boundaries and do not consider small plots to accommodate one or two houses on sites that adjoin existing boundaries which are sustainable and do not extend current development or impact on the protection of open land around	Please see my previous Response Form 'Core Strategy Options for Consideration' for my preferred wording for KS2. The current proposals only allow for large scale developers to build new estates for themselves. Given the change in wording proposed the character of the area would still be protected and even enhanced by	Yes, I wish to participate at the oral examination	I would certainly want to make a proper submission to the Inspector in the form of an oral examination because this form	135	

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											<p>conurbations used to separate the physical identities of individual settlements or change the characteristics of the area. The changes to existing Green Belt boundaries should allow for the possibility of all types of new developments where the rules of sustainability apply and should not be for only large scale housing schemes.</p>	<p>good quality individually designed properties. The purposes of the Green Belt would still be maintained by light appliance to all the suggested wording and the appeals procedure. *See enclosed letter and copy of previous form. Christchurch and East Dorset Pre-Submission Core Strategy Response Form Comments Mrs Valerie Hurst: Dogdean Cottage, Dogdean, Wimborne. Dear Sir/Madam Having tried to complete your response form as a local resident without the advantage of an Agent acting on my behalf, I wish to take this opportunity to make my comments on the Core Strategy Response Form. Question 6 of the form gives a small box to enable submission of details as to why I consider the document is not legally compliant or is unsound and following on, Question 7 enables me to set out the changes I consider necessary to make the document legally compliant or sound. At the bottom of the page it states: Please note your representation should cover succinctly all the information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations. After this stage, further submissions will only be at the request of the independent Inspector appointed by the Secretary of State, based on the matters and issues he/she identifies for examination. Bearing in mind the above statement, I am concerned that if this is indeed the last opportunity I have to make comments to the Inspector, the boxes on the form are too small to condense opinions in such a small space when using long hand. Although I am able to download the response form from your internet site you have not enabled comments to be typed directly on the form. On the original Response Form submitted in December 2010 following the extended consultation period starting October 2010, I requested the permission to copy the official form and make my comments on Option KS 2 in type, thereby enabling me to use the box to its full capacity. I do not feel I should</p>		<p>on its own does not give enough space to set out my case in favour of a change in Option KS2 to my preferred option.</p>		

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												<p>have to do this again, however I would certainly want to make a proper submission to the Inspector in the form of an oral examination because this second Response form on its own does not give enough space to set out my case in favour of a change in Option KS 2 to my Preferred Option.</p> <p>6. KS s states that 'limited changes to the existing boundaries are proposed to enable some new housing and employment to meet local needs' The changes proposed as shown on maps in the document only apply to large scale development at the edge of existing boundaries and do not consider small plots to accommodate one or two houses on sites that adjoin existing boundaries, which are sustainable and do not extend current development or impact on the protection of open land around conurbations used to separate the physical identities of individual settlements or change the characteristics of the area. The changes to existing Green Belt boundaries should allow for the possibility of all types of new developments where the rules of sustainability apply and should not be for only large scale housing schemes.</p> <p>7. Please see my previous Response Form 'Core Strategy Options for Consideration' for my preferred wording for KS2. The current proposals only allow for large scale developers to build new estates and are discriminatory towards people who own sustainable plots wishing to develop homes for themselves. Given the change in wording proposed the character of the area would still be protected and even enhanced by good quality individually designed properties. The purposes of the Green Belt would still be maintained by tight appliance to the suggested wording and the appeals procedure.</p> <p>Core Strategy Options for Consideration Response Form Response Form Core Strategy Options for Consideration Consultation period runs from 4 October 2010 until 12 noon, 24 December 2010 Name: Valerie Hurst Organisation Address: Dogdean Cottage, Dogdean, Wimborne, Dorset. BH21 4HA</p>				

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												<p>Option Number, Paragraph or Table reference your comment refers to Option KS2 – final paragraph beginning: Limited changes Do you support or object to this? Please state your reasons in the following box (please tick one answer) Support Object Yes Reasons why you support or object Option KS2 states that “limited changes to the existing boundaries are proposed to enable some new housing and employment to meet local needs” but the sites identified appear to be only larger developments on the edge of existing boundaries of major urban areas. This option should be expanded to allow for minor development in the Green Belt in highly accessible locations providing that the development: a) Was on the edge of existing boundaries, and b) Did not impact on the protection of open land around conurbations used to separate the physical identities of individual settlements, and c) Did not change the characteristics of the area It would allow for a limited number of well planned houses on larger plots, that are close to all existing amenities, suitable for families and those wishing to engage in more sustainable living. Core Strategy Options for Consideration Response Form Suggested Amendment to the Option, Paragraph or Table Preferred Option KS 2 Development in East Dorset and Christchurch Districts will be contained by the South East Dorset Green Belt. The purposes of the Green Belt are to: o Protect the separate physical identity of individual settlements in the area by maintaining wedges and corridors of open land between them o To maintain an area of open land around the conurbation. Limited changes to the existing boundaries are proposed to enable some new housing and employment to meet local needs. Minor</p>					

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												development on limited sites that adjoin existing boundaries will be considered for well planned and sustainable housing which do not impact on the purposes of the Green Belt. Include areas in the Green Belt that are no longer capable of providing for these needs. Signature Date Please use a separate copy of this form for each option you wish to comment on. Please return comments to us by 12 noon on Friday 24 December 2010 to: Planning Policy Team, Christchurch Borough Council, Freepost 575, Civic Offices, Bridge Street, Christchurch, BH21 1BR Email: Planningpolicy@christchurch.gov.uk				
490823	Mr Ian Jones	Ferndown Town Council	CSPS29 64	Policy KS2	Yes	No	Yes	Yes	Yes		The town council are concerned that major new housing, whilst providing much needed affordable housing, will also excessively add to the number of market homes and to the traffic problems of the Ferndown area. This deficiency needs to be addressed in the plan.	See above	No, I do not wish to participate at the oral examination		135	
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS32 40	Policy KS2		No	No			No	Within the Plan area, the Green Belt purpose of preserving the setting and special character of historic towns (notably Christchurch and Wimborne) is equally important (NPPF para 80).	Add third bullet point To preserve the setting and special character of historic towns.	No, I do not wish to participate at the oral examination		135	
498034	Mr Richard Cutler		CSPS31 78	Policy KS2		No	No	No	No	No	Our document entitled Stourbank Park, Wimborne: A Compelling Case – Part 1 (May 2010), resubmitted to East Dorset with our January 2011 representations, made the point at paragraph 19 et seq that there are exceptional circumstances for the release of this previously developed site from the Green Belt or, failing that, a 'safeguarded' allocation. Paragraph 4.28 of the draft strategy confirms that exceptional circumstances exist. Given the over dependence of East Dorset's draft strategy on two large employment sites (ie the Airport and Blunt's Farm), and the lack of balance in employment allocations (as evidences in our representations on Chapter 3), we would suggest that it is unsound for the strategy not to positively plan for a fall back strategy by allocating 'safeguarded land' as part of Policy KS2. In our case, allocating Stourbank Nursery as 'safeguarded land' (assuming that our representations on Chapter 10 do not yield a specific employment/nursery operation to continue whilst also setting a plan for the future which will avoid an impasse: ie an uneconomic nursery operation, with no possibility of restoring the land. Moreover, in a slightly counter-intuitive way, a 'safeguarded' (or other) allocation may well prolong the economic life of the nursery, either by allowing partial redevelopment and intensification, or by increasing the book value of the site to the business, enabling funds to be raised to repair or replace the glasshouses, or to	The Core Strategy can be made sound by adding the following sentence to the last paragraph of Policy KS2: "In turn, land will be removed from the Green Belt and 'safeguarded' at Stourbank Nursery and the Wessex Water Depot, Ham Lane, which shall be released for development if a case can be made based on the take up of land elsewhere, the evidenced need to create a balanced portfolio of employment sites, or specific demand from an employer deemed to be of a high value to the district"	Yes, I wish to participate at the oral examination	East Dorset has failed to engage with us on our representations so a third party hearing is essential in order to mediate our case. As a former Director of Arlington Securities Plc (now Goodman), the company that originated the business park concept in the UK, we have substantial experience in the delivery of employment and economic strategies, which	135	2254009_01.pdf

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											innovate in another way. The future of the adjoining Wessex Water Depot is also a material factor in underscoring the need to plan positively for this location. Finally, we are mindful of the recently published National Planning Policy Framework (March 2012), where paragraphs 18 to 21 set out the essential role of the economy. Safeguarded land (paragraph 85) can provide an important contribution with regard to flexibility and future proofing a plan.			ought to be of assistance to the examination.		
523531	Mr Tim Hoskinson	Savills	CSPS3192	Policy KS2		No	No	No	No	No	It is important for the Core Strategy to be sound. In order to do so it should be positively prepared, justified, effective and take account of and reflect Central Government policy and guidance, including the recently produced National Planning Policy Framework (NPPF). To be positively prepared the Core Strategy should take account of the Government's Localism agenda, which encourages the consideration of locally generated initiatives which deliver development to meet local needs and provide local facilities. Land at Wimborne Rd Colehill has been discussed between the landowner and Colehill Parish Council for a small area of housing development which will deliver a significant area of land for much needed allotments. This initiative is supported by the Parish Council and by the newly formed Colehill Allotments Group. The land is in the green belt and is not one of the District Council's strategic housing site allocations. It has not therefore been the subject of a specific consultation in the current or previous consultation rounds. The Core Strategy should allow for such initiatives to be fully and appropriately considered. As drafted, it fails to do so hence it fails in terms of its soundness by not engaging with such initiatives at this stage or providing an appropriate framework in which to engage with them at a later stage in the process. The Core Strategy is not justified in precluding the consideration of such sites at this stage. The process that the Council has adopted means that such sites may not be capable of being considered at the Site Specific Allocations Stage as they will need a modification of green belt boundaries, which by then will have been fixed at the strategic stage. Development opportunities of significant local importance may be precluded by this process. The effectiveness of the Core Strategy is therefore open to serious question. It is not positively prepared as it does not embrace local needs and considerations. The Core Strategy is not effective as it fails to meet the Government's advice in the NPPF and in relation to Localism.	The Core Strategy should address and explain how such sites and such local initiatives are to be addressed in policy terms. It should make provision for locally generated initiatives that will deliver local housing and local facilities to be considered and taken forward, including those that necessitate minor modifications to green belt boundaries. It should set out a framework through which such initiatives will be addressed. Colehill should be one of the parishes where minor amendments to the green belt would be permissible to facilitate local needs, including local housing and the delivery of local facilities.	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.	135	
523531	Mr Tim Hoskinson	Savills	CSPS3186	Policy KS2		No				No	The policy is considered unsound as it is not consistent with national policy The recognition in Policy KS2 of the need for changes to existing Green Belt boundaries is fully supported as the most appropriate option for the area taking into account the evidence base in relation to housing need and the availability of housing land. However the bullet points in the first part of the policy are considered unnecessary and inconsistent with the purposes of Green Belt policy set out in the NPPF. The reference to local needs should be extended to include strategic housing needs	Amend Policy KS2 as follows: Development in East Dorset District and Christchurch Borough will be contained by the South East Dorset Green Belt. Limited changes to the existing boundaries are proposed to enable some new housing and employment to meet local needs and strategic housing needs where these can be sustainably accommodated and also to include areas in the Green Belt that are no	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	135	2249911_0_1.pdf 2249910_0_1.pdf 2249912_0_1.pdf

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											where these can be sustainably accommodated.	longer capable of providing for these needs.		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.		
523319	Mr Ryan Johnson	Turley Associates	CSPS3293	Policy KS2	No	Yes	Yes	Yes	Yes	Yes	Concern over use of words 'meet local needs', which does not reflect the NPPF requirement to objectively assess and meet housing needs or provide compelling evidence why only 'local needs' can be met. This evidence should include assessments of unmet requirements from neighbouring authorities under the duty to co-operate set out in the Localism Act and NPPF. The decrease in working age population forecast in the district over the plan period (paragraph 2.22 of the Core Strategy) has implications on the number of people able to contribute to sustaining the local economy. If the Council are to sustain economic growth and fund necessary infrastructure for the population, then they should look to address not only 'local needs' for housing, but that needed to sustain planned economic growth (i.e. additional housing to attract younger economically active households).	Replace 'local' with 'objectively assessed'	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.	135	2255451_01.pdf 2255452_01.pdf
656678	Mr James Cleary	Pro Vision Planning and Design	CSPS3491	Policy KS2	Yes	No	Yes	Yes	Yes	Yes	Please see enclosed representations.	Please see enclosed representations.	Yes, I wish to participate at the oral examination	1) Because of the high level of public interest in reducing greenfield land take in East Dorset in favour of optimizing previously developed land. 2) To enable the Inspector to test the evidence demonstrating that the Core Strategy is unsound without the allocation of Little Canford Depot for a mixed use residential and employment development.	135	2258053_01.pdf

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656684	Mr Ed Denham	Dorset County Council	CSPS3618	Policy KS2							<p>Note on the possible movement of the Greenbelt for Basic Educational Need</p> <p>St. Michael's Middle School is a 140 PAN school with a current enrolment of 504 students as of January 2012. St. Michael's is one of two Middle Schools serving the Wimborne/Colehill areas. The Allenbourn Middle School is a 152 PAN school with 599 children on role and thus is working at 98.5% of capacity.</p> <p>The current Core Strategy for Wimborne identifies upwards of 1300 house for the area, with the children generated by these developments needing to access Middle School education in either St. Michael's or Allenbourn.</p> <p>Allenbourn from an enrolment point of view is already full. Its current site provides approximately 30,000m2 of outdoor learning and sports area. The required space for a school this size is 39,000m2. Given Allenbourn's location, surrounded by housing and with a water way restricting development to the East and North – it is unlikely that the school would able to expand and thus to increase enrolment on such a restricted site would compromise educational delivery.</p> <p>The number of houses being proposed could potentially require an additional 200 places in the middle school sector and these will have to be provided at St. Michael's in the first instance. If St. Michael's were to rise from 140 PAN (a planned admission capacity of 560) to a PAN 180(a planned admission capacity of 720) then there would need to be a significant amount of new infrastructure required on the St. Michael's site.</p> <p>The overall external play area is approximately 53,000m2. A 180 PAN Middle School would require 47,000m2 of space. Based on DFE Building Bulletin 98 the school rising from 140 PAN to 180 PAN would require approximately 850-750m2 of additional buildings to cope with the increase. This is made up of basic classrooms, specialist rooms, studio spaces, toilets, circulation and increased admin.</p> <p>The current buildings are enclosed by current greenbelt on the southern and western sides with the Colehill Lane to the East. The only realistic area for expansion based on the status quo is to the North or Northeast. Two significant issues arise from this option:</p> <p>a) Much of the school hard play is in this area and if it is lost to buildings, it would have to be replaced and the only likely areas are within the Greenbelt.</p> <p>b) The way the school is organised, the swimming pool is located on the northern edge of the buildings. This swimming pool has a community function and is accessed during the day by Toddler groups amongst others. The school has undertaken significant work to address some of the safeguarding issues as a result of the dual-use community co-operation initiative. If school infrastructure were to be developed to the north of the current buildings it is envisaged that there would be further child safeguarding issues with the school being divided in two with a public access facility dividing the site.</p> <p>On this basis it is clear that the practicable area of expansion is the South/Southwest quadrant of the site. The current Greenbelt</p>					135	2260744_01.pdf

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											follows the curtilage of the building very closely at this particular point. Based on this analysis DCC is requesting the movement of the Greenbelt in such way as to allow a modest area to the south and southwest of the school to be made available for the expansion of the buildings to accommodate a significant predicted increase in children as a result of the 1300+ houses that are planned for the period 2013-2026.					
656684	Mr Ed Denham	Dorset County Council	CSPS3621	Policy KS2							<p>Note on the possible movement of the Greenbelt for Exceptional Need</p> <p>The Beaucroft Foundation School is a Nursery to KS4 special school. The children have arrange of need from Autistic Spectrum Disorders, Moderate Learning Difficulties and Complex Learning Difficulties.</p> <p>As of January 2012 there are 141 pupils on role at Beaucroft Special School. Included in this number are the 6 students who are currently part of the Post 16 pilot programme.</p> <p>This pilot is a result of DCC's Children Services agreeing that there is a need to increase capacity across Dorset for Post 16 provision for these children. This will allow students to remain at the same institution from nursery through to 6th Form which will provide far better continuity of care and will further ensure the quality provision for their particular needs.</p> <p>In October 2010 the school was assessed for overall suitability. Based on the current intake across all age groups Beaucroft should have a total of 20 basic teaching areas as well as the other specialist and support areas. The school currently has 17 such teaching spaces.</p> <p>Given the current make up of year groups and based on January 2012 figure of 141 students, the school is overcapacity at 103.7%. The school has a published capacity of 151, and when the numbers reflect this then the school will be over capacity by 111.1%</p> <p>As part of a formal statutory notice published in 2012, Beaucroft will now be developing a Post 16 provision. This is to move the pilot programme into a formal permanent provision on the Beaucroft site. The additional 1, 2 or 3 years in the Post 16 department will help the young people to develop their skills so that they are able to transfer to a local college of further education at a later stage.</p> <p>It is anticipated that the numbers of students requiring Post 16 provision at Beaucroft could rise to 19 in 2013/2014 and then to 24 by 2016/2017. Part of this is as a result of a need to retain children in Dorset to decrease the level of out of county placements that can be disruptive to the students who have progressed smoothly from Nursery to KS3 on one site.</p> <p>Projections are also showing that the needs of children at all stages attending Beaucroft into the future will become ever more complex and the school will need sufficient flexibility to allow some development to reflect these changing needs. Re-alignment of the Greenbelt will also allow the development of the former caretakers</p>				135	2260760_01.pdf

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											<p>bungalow to accommodate the increasing numbers of Post 16 children. This minor change of the Greenbelt within the areas of the existing Beaucroft School will allow these changes to take place but will not significantly change the nature of the site. In addition this provision has been identified by OFSTED as being necessary for the quality delivery of Post 16 education at Beaucroft. They currently hold an 'OUTSTANDING' OFSTED Rating though Post 16 provision was only rated 'GOOD' due to the "the lack of appropriate accommodation for this group of students particularly for leisure and cooking, which limits their independence because they have to use the schools facilities" – OFSTED Nov 2009.</p> <p>The attached map proposes, marked with the red line, an alternate Greenbelt. This will allow the school to be more flexible when it comes to replacing the existing mobiles with permanent buildings which are more suitable for children with a diverse range of needs as well as allowing modest redevelopment of the caretakers bungalow for the Post 16 provision.</p>					
490815	Mrs Trish Jamieson	Burton Parish Council	CSPS3667	Policy KS2							<p>Burton Village is felt by those who live there to be a very special community. Despite the spurt of housing growth in the 1960s and 1970s the new development was confined to the area between Salisbury Road and Stony Lane and Burton's essential character as a rural village has been maintained. This is recognised by the establishment of the Burton Conservation Area, which protects the core of the old village and its essential features. The Parish Council, elected in May 2011, in commenting on these proposals has as its aim the preservation and enhancement of the character of the village and the lives of its residents by:</p> <ul style="list-style-type: none"> _ Preventing development inimical to the village _ Supporting and promoting appropriate developments <p>To this end the Council supports the need for a new Local Plan and Core Strategy and acknowledges that without the new plan there is a considerable danger that developers will be able to seek to pursue development proposals which might not be in the best interests of the Village.</p> <p>The Parish Council also accepts that the new Core Strategy offers opportunities to protect services and facilities in the village, and to develop new ones - for example, to pursue extensions to public transport, to protect local shops and facilities, and to secure improvements to private transport.</p> <p>Aware of the difficulties facing young couples with roots in the village finding housing, the Council welcomes the commitment to allowing a development of 100% affordable housing and will seek the adoption of a Rural Exception policy for Burton.</p> <p>For these reasons the Council welcomes many of the new policies</p>			135		

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											<p>and proposals, but it has to be noted that it has serious concerns over proposed Policy CN2.</p> <p>2. The Green Belt The Council strongly supports Policy KS2. The Council in particular notes and stresses the need to protect the separate physical identity of Burton by maintaining the Green Wedge between the village and Somerford. The Council notes that this wedge will be eroded from the south by the inclusion of Ambury Lane in the proposed Roeshot Hill urban extension and notes that the boundary of the Parish runs along the centre of Ambury Lane: thus development south of the railway line but north of Ambury Lane will be within the Parish. The Council is concerned over this development.</p> <p>3. Transport While supporting this policy the Council points to the serious morning peak time congestion in Stony Lane North caused by the inadequate junction with the A35 at Stony Lane. The Council stresses that there is a very urgent need for improvements at this junction and that these are needed now, before any development takes place on the proposed urban extension.</p>					
524088	Mr Ken Parke	Ken Parke Planning Consultants	CSPS3637	Policy KS2	No	No	Yes	Yes	Yes	Yes	Please see attached representations document and appendices	Please see attached representations document and appendices	Yes, I wish to participate at the oral examination	The representation has a significant bearing on the distribution of housing within the district and will require detailed oral examination.	135	2260318_01.pdf
619967		Home Builders Federation (South West)	CSPS3676	Policy KS2		No					<p>The policy is unsound as currently drafted as it is uncertain when the question of when the release of Green Belt land will occur, despite the release of areas of Green Belt (i.e. the revision of Green Belt boundary) being necessary to accommodate an element of the development needs of the two councils. The local plan also does not appear to show the boundaries of the Green Belt but it will need to delineate these boundaries through this local plan. We may have missed it, but we cannot locate such a map. Structure Plans and Regional Strategies may have done this, but these will soon be defunct. Establishing the Green Belt boundary in the local plan is a requirement of the Framework (para. 83). The policy should state clearly which sites in the Green Belt are to be allocated for housing development and be clear when during the life of the local plan the earmarked sites will be 'released' by the council, assuming, that is, that the Council will be operating some form of phasing policy. If the Council does intend to phase the release of sites (and it does not have to) then this requires the Council to set this out in the local plan and to explain this through a housing implementation strategy (para. 47) which should be</p>		Yes, I wish to participate at the oral examination	The HBF would like to appear at the examination to debate these matters further.	135	

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											included in the local plan. The release of these sites should be should be illustrated in the local plan through a housing trajectory which is also a requirement of the Framework (para. 47).					
523319	Mr Ryan Johnson	Turley Associates	CSPS3774	Policy KS2	No	Yes	Yes	Yes	Yes	Yes	<p>Thank you for the invitation to comment on the Pre-Submission Core Strategy DPD. I write on behalf of our client, Burry & 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.</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. 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 KS2 – Green Belt Comment Concern over use of words ‘meet local needs’, which does not reflect the objective assessment of needs advocated by NPPF, nor the duty to co-operate in addressing unmet requirements from neighbouring authorities (paragraph 182, NPPF).</p> <p>The decrease in working age population forecast in the district over the plan period (paragraph 2.22 of the Core Strategy) has implications on the number of people able to contribute to sustaining the local economy. If the Council are to sustain economic growth and fund necessary infrastructure for the population, then they should look to address not only ‘local needs’ for housing, but that needed to sustain planned economic growth (i.e. additional housing to attract younger economically active households).</p>	Suggested Change See comment for Policy KS3	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.	135	
654506	Mr John Showell		CSPS810	4.16	Yes	No		Yes	Yes		<p>The bullet points represent a wish to change the nature of the area which is out of the control of the land use planners. Particularly the aim of providing " an appropriate mix of housing to meet the needs of families and young people" There is a perfectly adequate supply of such houses in the area, the issue is that the employment base does not offer sufficiently high salaries to compete with affluent migrants from other parts of the country retiring into the area. Each area will age and properties will be released. In the 1970s areas such as Winton in Bournemouth were under occupied by an ageing population. As they died off the houses were released onto the market and the houses were sub divided and bought as buy to lets and the area has changed completely. This is a natural</p>	Be honest there is nothing in this plan or any other that has been put forward for South East Dorset since 1947 which has been able to meet the demand from financially disadvantaged sectors of the community to live in areas attractive to those able to price them out of the market. The nearest any plan managed to achieve this aim was in the 1950's and 1960's when large sections of North Bournemouth and parts of Poole were turned over to Council House Building. Government policy now precludes this type	No, I do not wish to participate at the oral examination		138	

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											progression brought on by death and market forces. Boscombe is another area which has changed its social make up yet the basic housing stock has changed little through new build.	of construction and with the proposals for locally determined Housing Benefit there could even be a significant reduction in the number of private landlords willing to rent out at the lower levels. For those with sufficient funds there is already an adequate supply of family housing. For example in my suburban road there is a 4 bedroom house which has stood empty for 18 years because the owner keeps it as a second home in case they need to return from Spain. The second home statistics will show up many more such examples.					
654989	Tanner & Tilley	Tanner & Tilley Planning Consultants	CSPS944	4.16	Yes	No	Yes		Yes	Yes	It is considered that Paragraph 4.16 should acknowledge not only that the population of the Plan area is ageing but that there is a need for the Core Strategy to encourage and provide for the delivery of specialist housing and care facilities to provide for their needs.	Include reference within this section to the need to encourage and provide for the delivery of specialist housing and care facilities to provide for the needs of the aging population.	No, I do not wish to participate at the oral examination		138		
524338	Mr Kenneth Brooks		CSPS254	4.17							I understand the Strategic Housing Land Availability Assessment (Base date 1st April 2010) supports the Core Strategy Pre-Submission Document. Appendix C shows a list of deliverable sites which constitutes the 5 year supply required to satisfy Government targets and which have generally received planning approval on specific planning applications. However, Appendix D - shows a list of 'physically deliverable sites' (year 6 to year 15 supply) which are not even site specific but merely maximum numbers of increased homes on designated areas, many consisting of 2 or even 3 roads. The National Planning Policy Framework, adopted 27th march 2012, in paragraph 48 states: 'Local Planning Authorities may make allowance for windfall sites if they have compelling evidence that such sites have consistently become available and will continue to provide a reliable source of supply. Strategic Housing Land Availability Assessments should not include residential gardens. The majority of new developments in St Leonards and St Ives have resulted from 'windfall sites' and have been built on residential gardens in order to replace on a 2 for 1, 3 for 1 or even 5 for 1 basis. I understand the East Dorset SHLAA will be revised during the summer of 2012 to reflect the above NPPF Policy and clearly this should result in substantially lower numbers of projected new homes in the 6 year to 15 year period in the Parish of St Leonards and St Ives.						
523531	Mr Tim Hoskinson	Savills	CSPS2119	4.18		No				No	Object: the paragraph 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. Paragraph 4.18 suggests that there is a need for 5,250 new market and affordable homes in East Dorset between 2013 and 2028. It is unclear how this calculation has been reached, or if any allowance	Amend the first paragraph 4.28 to include the following text: The Bournemouth and Poole Strategic Housing Market Assessment Update (2012) indicates that there is an affordable housing need for East Dorset of 426 homes per	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	140		

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											has been made for vacancy rates and second homes. and it is potentially a significant underestimate of the true housing needs of the area. The Bournemouth and Poole Strategic Housing Market Assessment Update (2012) indicates at figure 6.16 a total net annual housing need of 426 homes (6,816 homes over the period 2013 to 2028) for East Dorset. The SHMA update also includes a projection of household change (figure 7.6) of 336 homes per year (5,376 households over the period 2013 to 2028) in East Dorset. This is a projection forward of past demographic trends and should be considered alongside other indicators of housing need and demand such as affordability and economic growth targets. Allowance also needs to be made for vacancy rates and second homes, which would be circa 5-10% for East Dorset.	annum for East Dorset (6,816 homes over to period 2013 to 2028). Household formation rates are projected at 336 homes per year (5,376 households over to period 2013 to 2028), this is based on a projection forward of past demographic trends and does not take account of other indicators of housing need and demand such as affordability and economic growth targets. In translating these figures into housing provision for the District, allowance also needs to be made for vacancy rates and second homes.		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		
523531	Mr Tim Hoskinson	Savills	CSPS3188	4.18	No	No					The paragraph is considered 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. Paragraph 4.18 suggests that there is a need for 5,250 new market and affordable homes in East Dorset between 2013 and 2028. It is unclear how this calculation has been reached, or if any allowance has been made for vacancy rates and second homes. and it is potentially a significant underestimate of the true housing needs of the area. The Bournemouth and Poole Strategic Housing Market Assessment Update (2012) indicates at figure 6.16 a total net annual housing need of 426 homes (6,816 homes over the period 2013 to 2028) for East Dorset. The SHMA update also includes a projection of household change (figure 7.6) of 336 homes per year (5,376 households over the period 2013 to 2028) in East Dorset. This is a projection forward of past demographic trends and should be considered alongside other indicators of housing need and demand such as affordability and economic growth targets. Allowance also needs to be made for vacancy rates and second homes, which would be circa 5-10% for East Dorset.	Amend the first paragraph 4.28 to include the following text: The Bournemouth and Poole Strategic Housing Market Assessment Update (2012) indicates that there is an affordable housing need for East Dorset of 426 homes per annum for East Dorset (6,816 homes over to period 2013 to 2028). Household formation rates are projected at 336 homes per year (5,376 households over to period 2013 to 2028), this is based on a projection forward of past demographic trends and does not take account of other indicators of housing need and demand such as affordability and economic growth targets. In translating these figures into housing provision for the District, allowance also needs to be made for vacancy rates and second homes.	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.	140	2249912_01.pdf 2249910_01.pdf 2249911_01.pdf
656629	John Campbell	Roeshot Hill Allotment Association	CSPS3840	4.18							We appreciate that the strategy within the Document relates to a wide geographic area and the rationalisation of demands from a wide range of competing interests. Whilst the interests and concerns of Christchurch allotment gardeners may seem almost incidental in such context, they are by no means so. We have examined the Document from three perspectives: (1) proposals affecting Christchurch; (2) allotment provision in Christchurch and (3) the impact on the rural environment of Christchurch. We have found that a number of the issues that concern us touch upon fundamental principles contained in the document. HOUSING POLICY - Christchurch The Document draws upon a number of assessments of housing supply and predicted demand to conclude that urban infill will be		Yes, I wish to participate at the oral examination		140	2267876_01.pdf

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											<p>insufficient to meet future housing needs. After briefly reviewing the physical constraints on building elsewhere in Christchurch, it is proposed to adjust the Green Belt area at Roeshot Hill, Burton and Marsh Lane to accommodate housing developments.</p> <p>1. We consider these proposals to be unjustified in that:</p> <p>1.1 They rest on the assumption that 'housing trumps environment' in a Borough which is characterised by its urban, rural and coastal mix, which makes 'life pleasant' for its inhabitants and which attracts a large volume of visitors and vacationers. Our view is that the assumption in the document is merely a subjective assessment, and that it fails to grasp the inconvenient truth that Christchurch cannot accommodate all who may wish to live in the Borough whilst maintaining its present character.</p> <p>1.2 The proposals for housing at Burton fail to explain how an additional 45 dwellings will serve the 'specific needs' of the village. On the contrary, the effect of the proposal would be negative by turning Burton from a village into a conurbation.</p> <p>1.3 The Document contemplates the development of 'exception sites' in order to meet the need for affordable housing in the area. This weakens the case for provision of new market homes at the expense of the rural environment.</p> <p>2. The proposals are ineffective in that:</p> <p>2.1 They would adversely affect the Green Belt by releasing some of the 'best and most versatile agricultural land' at Roeshot Hill and substituting unspecified land of lesser value.</p> <p>2.2 They do not ensure the reduction of local demand for new market homes in the absence of a residential qualification (such as applied elsewhere in Dorset) and/or other measures to ensure that local residents have the ability and opportunity to absorb new housing as it becomes available. The document admits the attractions of Christchurch as a retirement location, and the phenomenon of 'supply stimulating demand' could well result in migrants from other areas of the country exacerbating rather than reducing the demands on local resources without reducing local housing needs.</p> <p>3. The proposals are non-compliant with section 110 Localism Act 2011</p> <p>Christchurch shares a housing market area and travel to work area with Bournemouth and Poole, New Forest Council and adjacent local authorities in Hampshire. It is mostly a matter of preference rather than strategic issues that determine where people live. If it is the case that Christchurch cannot accommodate more than 2060 additional homes without impacting on its rural villages and Green Belt, the question arises as to whether there has been a reasonable allocation of resources to absorb regional housing needs.</p> <p>Despite some reference to joint working with neighbouring Dorset authorities (but not Hampshire) there is no evidence of any specific arrangement whereby unmet requirements in Christchurch might be met by neighbouring authorities, particularly by Bournemouth, which is by far the largest authority. We feel that it is reasonable to conclude that the Christchurch Borough Council and East Dorset</p>					

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											District Council have failed to fully exhaust the duty to co-operate with adjoining local authorities within the spirit of section 110. 4. The proposals are non-compliant in respect of Sustainability The Sustainability Assessment is not on consultation and is only referred to in paragraph 1.21. By not have the SA open for consultation in the same way as the Core Strategy the Council are failing to complete stage D of the Sustainability Assessment effectively and thus the Core Strategy is unsound. This could be subject to Judicial Review.					
654026	ms bev miller		CSPS606	4.21	No	No	Yes	Yes	Yes	Yes	No mention at all of brownfield sites. Unacceptable to keep going on about altering the green boundary. People live in this area because it has a 'green edge'. Complete urbanisation imminent if green fields go.				143	
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS3242	4.21		No	No	No		No	Sustainable development must include all three strands of Sustainability - social, economic and environmental. The brief for the Masterplan was unbalanced and only addressed in-commuting: it failed to address out-commuting. There was no consideration of the natural environment, only the existing urban environment. Such an approach is inconsistent with NPPF para 7-9.		No, I do not wish to participate at the oral examination		143	
490815	Mrs Trish Jamieson	Burton Parish Council	CSPS3665	4.21							Burton Village is felt by those who live there to be a very special community. Despite the spurt of housing growth in the 1960s and 1970s the new development was confined to the area between Salisbury Road and Stony Lane and Burton's essential character as a rural village has been maintained. This is recognised by the establishment of the Burton Conservation Area, which protects the core of the old village and its essential features. The Parish Council, elected in May 2011, in commenting on these proposals has as its aim the preservation and enhancement of the character of the village and the lives of its residents by: <ul style="list-style-type: none"> _ Preventing development inimical to the village _ Supporting and promoting appropriate developments To this end the Council supports the need for a new Local Plan and Core Strategy and acknowledges that without the new plan there is a considerable danger that developers will be able to seek to pursue development proposals which might not be in the best interests of the Village. <p>The Parish Council also accepts that the new Core Strategy offers opportunities to protect services and facilities in the village, and to develop new ones - for example, to pursue extensions to public transport, to protect local shops and facilities, and to secure improvements to private transport.</p> <p>Aware of the difficulties facing young couples with roots in the village finding housing, the Council welcomes the commitment to allowing a development of 100% affordable housing and will seek the adoption of a Rural Exception policy for Burton.</p> <p>For these reasons the Council welcomes many of the new policies and proposals, but it has to</p>				143	

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											<p>be noted that it has serious concerns over proposed Policy CN2.</p> <p>1. Settlement Hierarchy The Council notes and agrees with the place of Burton in the suggested Settlement Hierarchy which defines Burton as a settlement '... where only very limited development will be allowed that supports the role of the settlement as a provider of services to its home community.' The Council notes however that the Strategy states at Paragraph 4.21 'A limited amount of housing is also proposed for Burton based on the specific need for new housing to serve the needs of the village' but also notes that the opportunity to define this housing by means of a local exceptions policy is not taken. In other words, this housing will not be specific to the needs of the village but will be available for general use in alleviating the waiting list, of the validity of which the Council has some concerns.</p>					
656629	John Campbell	Roeshot Hill Allotment Association	CSPS3839	4.21							<p>We appreciate that the strategy within the Document relates to a wide geographic area and the rationalisation of demands from a wide range of competing interests. Whilst the interests and concerns of Christchurch allotment gardeners may seem almost incidental in such context, they are by no means so. We have examined the Document from three perspectives: (1) proposals affecting Christchurch; (2) allotment provision in Christchurch and (3) the impact on the rural environment of Christchurch. We have found that a number of the issues that concern us touch upon fundamental principles contained in the document.</p> <p>HOUSING POLICY - Christchurch The Document draws upon a number of assessments of housing supply and predicted demand to conclude that urban infill will be insufficient to meet future housing needs. After briefly reviewing the physical constraints on building elsewhere in Christchurch, it is proposed to adjust the Green Belt area at Roeshot Hill, Burton and Marsh Lane to accommodate housing developments.</p> <p>1. We consider these proposals to be unjustified in that: 1.1 They rest on the assumption that 'housing trumps environment' in a Borough which is characterised by its urban, rural and coastal mix, which makes 'life pleasant' for its inhabitants and which attracts a large volume of visitors and vacationers. Our view is that the assumption in the document is merely a subjective assessment, and that it fails to grasp the inconvenient truth that Christchurch cannot accommodate all who may wish to live in the Borough whilst maintaining its present character. 1.2 The proposals for housing at Burton fail to explain how an additional 45 dwellings will serve the 'specific needs' of the village. On the contrary, the effect of the proposal would be negative by turning Burton from a village into a conurbation. 1.3 The Document contemplates the development of 'exception sites' in order to meet the need for affordable housing in the area. This weakens the case for provision of new market homes at the expense of the rural environment.</p>	Yes, I wish to participate at the oral examination		143	2267876_01.pdf	

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											<p>2. The proposals are ineffective in that:</p> <p>2.1 They would adversely affect the Green Belt by releasing some of the 'best and most versatile agricultural land' at Roeshot Hill and substituting unspecified land of lesser value.</p> <p>2.2 They do not ensure the reduction of local demand for new market homes in the absence of a residential qualification (such as applied elsewhere in Dorset) and/or other measures to ensure that local residents have the ability and opportunity to absorb new housing as it becomes available. The document admits the attractions of Christchurch as a retirement location, and the phenomenon of 'supply stimulating demand' could well result in migrants from other areas of the country exacerbating rather than reducing the demands on local resources without reducing local housing needs.</p> <p>3. The proposals are non-compliant with section 110 Localism Act 2011</p> <p>Christchurch shares a housing market area and travel to work area with Bournemouth and Poole, New Forest Council and adjacent local authorities in Hampshire. It is mostly a matter of preference rather than strategic issues that determine where people live. If it is the case that Christchurch cannot accommodate more than 2060 additional homes without impacting on its rural villages and Green Belt, the question arises as to whether there has been a reasonable allocation of resources to absorb regional housing needs.</p> <p>Despite some reference to joint working with neighbouring Dorset authorities (but not Hampshire) there is no evidence of any specific arrangement whereby unmet requirements in Christchurch might be met by neighbouring authorities, particularly by Bournemouth, which is by far the largest authority. We feel that it is reasonable to conclude that the Christchurch Borough Council and East Dorset District Council have failed to fully exhaust the duty to co-operate with adjoining local authorities within the spirit of section 110.</p> <p>4. The proposals are non-compliant in respect of Sustainability</p> <p>The Sustainability Assessment is not on consultation and is only referred to in paragraph 1.21. By not have the SA open for consultation in the same way as the Core Strategy the Council are failing to complete stage D of the Sustainability Assessment effectively and thus the Core Strategy is unsound. This could be subject to Judicial Review.</p>					
360149	Mr John Urganhart		CSPS86	Policy KS3							I do not believe that building 850 homes at Roeshot Hill is in any way sustainable. It will result in chaos on the already congested A35 and surrounding roads. No mention is made of the need for new schools, doctors surgeries etc.				148	
647876	Mr Christopher Whitcher		CSPS121	Policy KS3							As with the decision made about the future of Druitt Hall this complete leaflet is irrelevant as it appears to me that the final decision has been made. I also begrudge even more money wasted on this leaflet as with the rise in Councillors expenses "austerity"?				148	
647898	Mr Derek		CSPS112	Policy KS3							Justify the numbers				148	

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	Beasley															
651766	Mr Mark Farrant		CSPS42g	Policy KS3							This consultation is a sham. There is no point pretending to take the views of residents into account when the policy has been decided. We need fewer people and less houses or Christchurch 'Where time is pleasant' will be a dim and distant memory. What ever happened to conservative localism?				148	
653227	Mrs Wendy Bailey		CSPS68g	Policy KS3	Yes	No	No	Yes	Yes	Yes	There is too much development planned for too small an area. We do not have the roads or network to cope with the amount of development that is planned. For example, CN2, 45 houses may not sound very many, but this could involve 2 or more cars per household trying to get on to an already overcrowded road. This is bad enough in the winter, but in the holiday season the traffic and population increases significantly with the enormous amount of holiday accommodation in the area. KS3 The same applies here. There is far too much development planned for a small area. Christchurch does not have the capacity or facilities to cope with this development that is planned. It's time someone thought about the existing population and their needs. Where are all these people coming from to live in the new houses? Christchurch is too small a community to cope and it will be destroyed by the plans.	I think the document should be destroyed	No, I do not wish to participate at the oral examination		148	
653603	Mr Malcolm Edmund Parsons		CSPS57g	Policy KS3		No			No		To be sound there must be adequate provision of public services eg health education etc. Implications too for Christchurch Hospital on Fairmile Road.				148	
654588	Mr Keith Hayman		CSPS79g	Policy KS3	No		No	No	No	No	Response to Core Strategy Document. 1. How is it that option 3 & 4 was voted the most popular, in that it stated that Roeshot Hill Allotments should stay where there are and also SANGS to be south of the railway. Yet for some reason this now deemed the least popular by the Council. 2. There has been no actual indication where exactly the Allotments will be re- located other than North of the railway. Has land actual been aquired for the proposed re- location? 3. The people that really lose out on all this are the current tenants on Roeshot Hill allotments. A good many of them have been cultivating there plots for a very long time, and the thought of having to start all over again is very duanting.	A more comprehensive consultation with the Allotment Association as to when and where the Allotments will actually end up.	Yes, I wish to participate at the oral examination	To put forward the Allotments assoications requirements.	148	
654618	Tanner & Tilley	Pennyfarthing Homes	CSPS88q	Policy KS3	No	No	Yes		Yes	Yes	It would appear from the 2011 Christchurch SHLAA Report that the Local Authority are unable to deliver a 5 year supply of deliverable sites for housing, nor the 5% additional buffer required in terms of the National Planning Policy Framework. Furthermore, the 2011 SHLAA has been prepared on assumptions used in the preparation of the 2008 SHLAA, which presumably assumes that the majority of development will be at a minimum of 30 dwellings per hectare, which applied in 2008. The reliance on such a high percentage of windfall development also makes it questionable that the level of housing to provide for the identified need will be delivered. With no minimum density being set and with delivery relying on a large percentage of former garden land coming	We consider that the Local Authority needs to revisit the evidence base and to more realistically identify how it will provide for delivery of a five year housing supply together with an additional buffer of 5% to according with the requirements of the National Planning Policy Framework.	Yes, I wish to participate at the oral examination	We wish to participate to ensure that the views of the housing development sector are properly represented.	148	

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											forward for development where densities of 30 dwellings per hectare or more is likely to be resisted, it is difficult to see how the Core Strategy will deliver the houses needed during the Plan period without the allocation of more greenfield sites or housing allocations within the existing built up area.					
654730	Mr Luke Siemaszko		CSPS789	Policy KS3	Yes	No	Yes	No	Yes	No	Development at Roeshot Hill is not realistic. This number of houses would have an impact similar to that of doubling the size of Burton village - the number of residents is approaching the population of Burton. Firstly, the density is too high and the location unattractive, sandwiched between the A35 and the railway. The transport is inadequate, the only access would be onto the A35 Eastbound. It is doubtful if this would be adequate in the first place, and the lack of any alternative route into / out of the development makes it of dubious practicality. I doubt there are sufficient local amenities school places, doctors' surgeries, dentists. For all these reasons it seems an impractical proposal.		No, I do not wish to participate at the oral examination		148	
653576	Mrs Sue Ellis		CSPS1118	Policy KS3							No. 6,000 more cars. More people requiring hospitals etc and schools. Surely this is too high a number - 3,020 for an already busy full area. We cannot spill into the sea so we are restricted by the coastline. Insufficient petrol stations for all these people				148	
654775	Mr David Monks		CSPS887	Policy KS3	No	No	Yes	No	No	No	<p>This is my letter which covers the need for a "Real Christchurch Bye Pass" before many of the proposed plans are implimented. The Planning Policy Team Christchurch Borough Council Civic Offices Bridge Street Christchurch BH23 1BR Dear Sir Transport – in Particular - Roads for Emergency Vehicles, Buses & Private Vehicles. A Gridlocked Town Centre for want of a Real Bye Pass Core Strategy Pre-Submission Document Urban Extension - Additional Housing Core Strategy</p> <p>It is noted that any comments to this pre-submission document must be in by midnight 25th June 2012 and I am endeavouring to comply at this late stage but still find it hard to unveil all the current and archived facts of the case. There are many aspects I have an interest in but I shall restrict my comments to those of most importance to all residents of (and future viability of) Christchurch and the nearby towns that are also affected. Urban Extension - Additional Housing KS3 Says - 3020 new homes will be provided in Christchurch by 2028, including the 90+45 in Burton and 850 at Roeshot Hill. Assume that just for the latter 850 homes, each will have on average 2 cars, that's a further 1700 cars trying to get onto our already very crowded roads plus the extra buses that will be needed. CN1 In mentioning Roeshot Hill, the plan to move the allotments to</p>	See the letter in Q4 above	Yes, I wish to participate at the oral examination	There could be information available from previous attempts at providing a viable and effective REAL bye pass for Christchurch and I am willing to assist in achiveing an effective plan if mine needs amendment.	148	2255781_01.pdf

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											<p>north of the Railway against the plot holder's wishes is well out of order and Statutory Requirements.</p> <p>KS10 & CH1 Christchurch Town Centre, often Gridlocked for want of a Real Bye Pass</p> <p>Local maps show A35 as a "Christchurch Bye Pass"!! It should be renamed "Somerset Bye Pass" as that is what it is. It must be the only Bye Pass in the world that ends in the middle of an ancient town at the infamous Fountains Roundabout. Let us be honest for once; no amount of money spent on this roundabout can overcome the congestion.</p> <p>Summer warm weather, the air show, other special events, locals from further east are trying in-vain to get to Bournemouth or the airport. Not only from towns as far as Lymington and beyond but even all of London and towns between. Knowing that the spur Road A338 is always busy at these times, people think wrongly that they can miss all that by using the A35 through Christchurch. It is a known fact that there are insufficient and inadequate crossings of the River Avon South of Salisbury. More than 40 years ago plans were made for a Christchurch Relief Road. It is either cancelled or still pending!!! The only good crossings are the dual carriageways A31 at Ringwood and A35 at Christchurch and yet they cannot cope. The only other (single carriageways) are Avon Causeway and Bridge Street in the town and whereas these are useful, they can only be considered as a joke for moving volume traffic.</p> <p>At times of mass congestion on these roads, for those who live East of the River Avon, Heaven Help anyone who has a heart attack or a house fire, as emergency vehicles cannot get to you in time.</p> <p>BA2 A Real Christchurch Bye Pass</p> <p>Thankfully there is a solution and one that must be put in place ahead of any more housing and certainly long before 2028!! A new road must be built linking A35 (North of the railway and Roeshot Hill) and in an almost straight line to the Hurn village roundabout and on to Bournemouth International Airport. It should start with a two lane large roundabout on A35 in way of the entrance to the existing Pick-Your-Own farm. It should have no further access until the A338 Spur Road and have flyovers for the 3 road crossings including B3347 where it also crosses the River Avon. See the attached map. At Hurn and the adjacent Moors River there should likewise be a flyover and maybe access to the new road. Even without the new road, the Hurn roundabout and Moors River bridge are long overdue for a major widening and upgrade.</p> <p>Note: - Most town Bye Passes have to be of a circuitous nature with many curves. As this road is virtually straight, it is thankfully a very cost effective solution at 5.5 miles long.</p> <p>This scheme is of major importance to the whole of Dorset and Hampshire and that is why I have addressed it not just to Christchurch but also I have copied it to East Dorset & New Forest District Councils and the Dorset County office. I am also copying it to our MP and to the Bournemouth Echo so the local people can know of my suggestion and have their say. I see that in March</p>					

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											<p>2011, they ran an article "Battling for Christchurch bypass plan". Whereas it has great benefit potential for many, I can foresee objections for some, such as the people of Burton/Winkton and Hurn and also the land owners, especially Meyrick Estates. Of further interest, I see that in March 2009 the Echo also did an article "Christchurch residents urged to fight gravel extraction". I am not sure but I guess if this was to go ahead, I expect this would be north of the Railway Line on Meyrick Estate land. I also believe Meyrick own and wish to sell the land of the large field and the allotment at Roeshot Hill where the urban extension for 850 houses are to be built.</p> <p>Question: - If the gravel extraction scheme where to go ahead, would it be bang in the middle of the new road I am now proposing???</p> <p>I look forward to your acknowledgment and subsequent reply Yours sincerely</p> <p>Note: - The attached map showing the route of the new bye pass would not copy here but it has been delivered by hand and email</p>					
654962	Mr Christopher Chope		CSPS915	Policy KS3	No	No	Yes	Yes	Yes	Yes	<p>Policy KS3 does not comply with the National Planning Policy Framework because 985 of the 3020 new homes to be provided in Christchurch would be built on land which is currently designated as being in the Green Belt.</p> <p>Paragraph 14 of the National Planning Policy Framework states that in addressing plan-making 'local plans should meet objectively assessed needs with sufficient flexibility to adapt to rapid change unless ... specific policies in this framework indicate development should be restricted - as with land designated as Green Belt (see Footnote 9).</p>	Deletion of the reference to the 985 new homes proposed to be built on land currently designated as Green Belt.	Yes, I wish to participate at the oral examination	To express on behalf of my constituents their widespread and deep seated opposition to removal of land designated as Green Belt in Christchurch as part of the Plan.	148	
654704	Mrs J E John		CSPS1051	Policy KS3							<p>Overall this policy is not sound. Of course people need new homes all the time but if every hamlet, every village and every town council could build up to 30 - 35 new homes, including affordable and social housing from northern to southern England, we could help enormously the housing need. However to build 850 new homes anywhere one must consider the infrastructure to be put into place. Extra school space, extra buses, patient space with local GP's, hospital ability to cope with new extra need, maternity services, plus importantly congestion on local roads. Christchurch is already very congested road wise. Lessen this huge number of houses and allow Christchurch to cope with extra.</p>				148	
655432	Mr Andy Davies		CSPS1020	Policy KS3							No. We do not need this level of housing.				148	
655526	Mr Paul Morrison		CSPS1035	Policy KS3							<p>Only for a limited time.</p> <p>See CN1 / CN2. The current birth rate will make these new homes ridiculous underestimate of the true figure required. Unless I have missed it, no provision of additional school places is listed. Surely the local sewage farm system will not cope with the burgeoning population. Another 10 - 15 thousand vehicles in use by local residents daily.</p>				148	

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507477	Mrs Sally Owen		CSPS1846	Policy KS3	Yes	No	Yes			Yes	I think insufficient care has been taken with regard to traffic and its effects on the B3347 - A35 and country lanes.	Consultation with Hampshire County Council with regard to roads - Sopley Woolpack Bridge etc.	No, I do not wish to participate at the oral examination		148		
656867	Mrs Alison Ramsey		CSPS1723	Policy KS3		No	Yes	Yes	Yes	Yes	How have you arrived at this number and who is to say circumstances will not change before 2028. In this policy you state that the council aims for 35% of these new homes will be affordable, yet in policy LN3 this is subject to negotiation and agreement with the council, who I believe will still not reach their targets!	If there is a requirement, and I believe more assessment is required on the number required, then put pressure on government to change the tax legislation on renovating current empty homes in the area before destroying the existing Green Belt.	Yes, I wish to participate at the oral examination	This proposal is both unsound and unjustified and I would therefore wish to participate in the oral part of the examination to ensure all objections are considered satisfactorily.	148		
656228	Mr Adrian Dwyer		CSPS2473	Policy KS3							No. Christchurch is full. Roads are congested and at full capacity already.				148		
656650	Mrs Patricia Fear		CSPS2440	Policy KS3							No. You cannot build houses here!. We do not elect a Council to spoil out town. I always say Christchurch Council are better with planning than Bournemouth. Do not let me down! Because the planning is very wrong.				148		
656664	Mr Glen Morrison		CSPS2456	Policy KS3							The intended development of 3020 new homes will stretch Christchurch town infrastructure unless the key factors that the new development will depend upon are currently addressed, to provide the flexibility and a framework that would allow such growth. These being roads, parking, public transport and other factors that will be affected in the long term.				148		
657462	Ms Carla Fulgoni	The Planning Bureau Limited	CSPS2348	Policy KS3							I set out below the comments on behalf of our clients McCarthy & Stone Retirement Lifestyles Ltd in respect of the Core Strategy. McCarthy & Stone is the UK's leading provider of specialist Retirement and Extra Care Housing for older owner-occupiers and are members of the Housing and Ageing Alliance. Having developed over 800 developments throughout the UK the company is in a very strong position to comment upon the impact of emerging Development Plan policies, in particular in relation to private retirement and extra care developments. This is a specialised form of development that has its unique development and selling constraints that make it very different to open market housing. The principle ongoing objection that McCarthy and Stone have to the emerging Core Strategy policies of the Council stems from the need to ensure that greater weight and emphasis be placed upon the ageing population and their associated housing needs and options. It should not be underestimated that unless it is properly planned for over the next 20 years there is likely to be a serious short fall in specialist accommodation for the older population, which will have a knock on effect in meeting housing needs of the					148	

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											<p>whole area and wider policy objectives. McCarthy and Stone therefore raise objection to the absence of policy consideration. Core Strategy</p> <p>The Core Strategy rightly draws out that the Districts will experience a “significant ageing of the population” during the plan period. Strategic Objective 5 of the Core Strategy states the need to deliver a suitable, affordable and sustainable range of housing to provide for local needs. In broad overall terms McCarthy and Stone set out that as part of the Core Strategy’s priorities and objectives more specific reference should be made to the needs of the ageing population and particular emphasis made to the housing of this proportionately rising section of society. The Core Strategy identifies the quantities of residential dwellings required in each of the District’s settlements, in policies. However a specific policy or reference to the needs of the ageing population should be included to identify the wide ranging issues that will be associated with a larger proportion of people in need of accommodation, care and other facilities which cannot be addressed under the wider “residential” heading. While saved policy HODEV3 sets out the criteria for the Development Of Older Person’s Accommodation this needs to be updated, whether it is incorporated into the settlement housing allocations or as a standalone policy. It is clear that the opportunity exists to provide a dedicated policy or acknowledgment within policies KS3 and KS4 to outline the benefits of older person’s accommodation including owner occupier retirement and extra care housing. This is evident in the document as it states that some areas, for example West Moors, have an older population profile with 40% of its population over retirement age and others have a considerably younger population profile, such as Corfe Mullen. The complex needs, expectations, provision of care and support will vary considerably within this age group and there will be a need to provide a holistic approach to different types of housing and care provision from the public and private sector, and across all types of tenure. The Core Strategy itself fails to fully explore the implications and lacks policy promotion and as such the strategy should pick up this more detailed issue.</p> <p>By actively supporting such accommodation at policy level whether through proactive policies or specific land allocation the supply of retirement housing will increase and help release larger properties back into the housing market for more efficient use of the housing stock. This will help achieve the Core Strategy’s objective 5 to create a sustainable range of housing to meet local needs and demands.</p> <p>Specialist Accommodation for the Older Population - NPPF</p> <p>The National Planning Policy Framework sets out the strategic case to assess the housing need for the older population. Para 50 of the NPPF states that ... To deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should: “.....plan for a mix of housing based upon current and future demographic trends and the needs of different</p>					

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											<p>groups in the community (such as, but not limited to, families with children, older people, people with disabilities” and”...identify the size, type, tenure and range of housing that is required in particular locations reflecting local demand...” and “where they have identified that affordable housing is needed, set policies for meeting this need on site, unless off site provision or financial contribution of broadly equivalent value can be robustly justified (for example to improve or make more effective use of the existing housing stock) and the agreed approach contributes to the objective of creating mixed and balanced communities. Such policies should be sufficiently flexible to take account of changing market conditions over time.</p> <p>By 2026 older people will account for almost half (48 per cent) of the increase in the total number of households, resulting in 2.4 million more older households than there are today . The number of people aged 85 or over will increase by 2.3 million by 2036 – 184 per cent increase . The ageing of society poses one of our greatest housing challenges. The Government has recognised this and has set out its aims and objectives of providing more specialised housing for older people in ‘A National Strategy for Housing in an Ageing Society – Lifetime Homes, Lifetime Neighbourhoods’. The National Strategy identifies the important role the planning system has in delivering housing choice for older people, stating;</p> <p>‘Spatial planning offers a new and real opportunity to provide more and better quality housing – across the necessary range – for an ageing population in a way that we’ve not done before.’</p> <p>In respect to future planning policy the Strategy is clear as to the level of importance to be given to an ageing society, stating;</p> <p>‘Recent reforms to the planning system require regional and local plans to take proper account of ageing and the needs of older people. Future planning policy reform will reflect the high priority we are giving to the challenge of ageing.’</p> <p>It is considered that in light of the Government Strategy guidance that it is appropriate for the Core Strategy to have greater regard to this objective. My Client’s response is based on meeting the Government’s objective, set out in the National Strategy, to ensure that sufficient specialist housing is delivered to meet the growing needs of an ageing population. This is reinforced in recent publications, please refer to the attached appendix to this letter. The ageing population has increasingly been seen as a potential issue that needs to be positively planned for in all new Local Development Frameworks and particularly at the Core Strategy level. The Department of Health and Communities and Local Government document ‘Lifetime Homes, Lifetime Neighbourhoods – A National Strategy for Housing in an Ageing Society’ dated February 2008 takes this further in looking at the wide range of options that policy makers need to include in formulating future plans. The Strategy identified providing a positive vision for specialised housing and providing more homes and more choice through public funding and encouraging private sector provision through planning system reforms(para 27). The strategy also noted</p>					

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											<p>that the vast majority of older householders (68%) owned their own home in 2001, and the figure was projected to rise to 75% by 2026. As such, these people are expected to wish to maintain their own independence by continuing to own their own homes.</p> <p>Chapter 11 of the Lifetimes Homes strategy specifically deals with specialised housing identifying that there is a continuing need for specialised housing and that such accommodation will continue to offer a certain advantage over private housing, particularly to those who need a physical environment designed for those with impairments, better access to help and care, company and a sense of safety. In the provision of appropriate accommodation for the elderly it is also recognised that the private sector has a major strategic role in this.</p> <p>Specialist Retirement Housing Needs Specialist retirement housing meets a number of Core Strategy aims and yet is given little weight in the overall document.</p> <p>Retirement Housing and Assisted Living Extra Care:</p> <ol style="list-style-type: none"> 1. brings older people closer to transport links, local shops and services reducing car dependency, 2. enables older people to release equity, 3. frees up the housing chain, 4. reduces under occupation and meets the wider Core Strategy aims of retaining and enhancing much needed housing stock to families (85% of McCarthy and Stone customers downsize from houses to move to retirement housing), 5. creates opportunities for more efficient provision of local care services eg GP services, reduces the need for respite care after hospital stays, offers a supportive setting with close family, neighbours and house manager, reduces pressure on working families to provide informal care, and 6. it makes optimum use of centrally located brownfield sites. <p>Well located and designed specialist housing for older home owners is a highly sustainable form of housing. There should be a presumption in favour of sustainable housing and in particular specialist housing which is being proposed on suitable sites.</p> <p>Mix of Housing – A retirement and care development such as that developed by McCarthy and Stone is an important contributor to the housing mix in a particular area. By its very nature it is a single entity with communal space and facilities and could not provide a mix of house types and tenure within the same block.</p> <p>Summary It is clear from local and national statistical data that the demographics of Christchurch and East Dorset and the UK as a whole is ageing. The Council recognise the current and future increase in the older people in the district and in older person households which will have significant implications on the overall housing market in a district with many physical constraints on residential development. The evidence suggests that there is a current and growing need for specialised forms of private sector accommodation for older persons such as retirement housing (cat II type sheltered housing) and assisted living extra care.</p> <p>The Core Strategy fails to draw out sufficient policy weight on this</p>					

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											issue. I have appended to this letter recent assessments and reports that reinforce the need for LPAs to give more appropriate weight to such specialist housing and extra care. I trust that due weight will be given to these reports and the requirements of the NPPF to provide policy support for this highly sustainable form of development.						
359277	Mr Jamie Sullivan	Tetlow King	CSPS2647	Policy KS3	Yes	No	No	No			<p>We welcome the increase in dwellings per annum proposed above the RSS target to 201 dwellings per annum (dpa). The RSS set a target of 173 dpa between 2006 and 2026. However, this needs to be viewed in the context of a period of very low provision over the past 5 years. The most up-to-date monitoring report shows that Christchurch Borough Council have only been delivering an average of 125 dpa between 2006 and 2011. There were 73 affordable housing completions in total in the last three years, but none in the previous monitoring year. We urge the Council to make up for this backlog of housing demand in addition to providing housing at a higher level than the RSS.</p> <p>The 2011 SHMA Update by Justin Gardner Consulting stated that the absolute change in households between 2011-2031 is 4,371 (219 per annum). However, this is based on demographic changes and in addition to this there is the newly arising affordable housing need of 332 dwellings per annum. Whilst there will be some overlap from these two sources, it is clear that the proposed target of 201 dwellings per annum total will not be sufficient. We consider it likely that this will lead to a worsening of the already chronic affordability problems in the Borough.</p> <p>Even with a target of 40% affordable housing, the housing target will not deliver close to enough affordable housing units and there will be significant strain on the stock of affordable housing units in the Borough over the plan period.</p> <p>Consultation on this document began just a few days after the final version of the NPPF was published so we consider it unlikely that there was time for proper consideration of the document against the requirements of the NPPF. We consider that in order for the Local Plan to be in accordance with the NPPF a number of changes will need to be made. The Presumption in Favour of Sustainable Development is the "golden thread" that runs through the NPPF and with regard to plan-making it states that: "local planning authorities should positively seek opportunities to meet the development needs of their area; Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change unless: -any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole".</p> <p>As demonstrated above the proposed housing target does not meet objectively assessed need and the Local Plan has not set out any "adverse impacts" which would outweigh delivering a larger provision of housing. We consider the Council will need to assess whether it can provide higher levels of housing to ensure it is sound and positively prepared as per the requirements of the</p>					148	

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											<p>NPPF. The NPPF sets out the tests of soundness that the local Plan will be assessed against. One of these tests is that it is positively prepared and that local authorities should seek to: meet objectively assessed development and infrastructure requirements, including some unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development." Currently the local authorities are not aiming to meet the housing needs arising within their own local authority areas. In addition there is little chance of neighbouring Districts being able to accommodate the overspill housing from these areas. Southampton and Poole have already adopted their Core strategies and Bournemouth has reached the examination stage with a Core Strategy which excludes a 3,000 home urban extension proposed by the RSS to meet local housing needs. This under supply is likely to lead to further pressures on the housing stock of East Dorset and Christchurch. In our view, the two Councils need to fully assess the impact of the housing pressures from neighbouring districts and seek to meet them where possible in order for the Core Strategy to be declared sound. "For market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period and set out a housing implementation strategy for the full range of housing describing how they will maintain delivery of a five-year supply of housing land to meet their affordable housing target."</p>					
510796	Mr Rollo Reid		CSPS2716	Policy KS3							No. Not needed. Not wanted. Already overcrowded. Too much traffic. Hundreds of unsold houses. If "affordable" they will be resold quickly unaffordably.				148	
654854	Mrs Jeannie Seymour		CSPS2869	Policy KS3							No. 3020 new homes = 9,000 - 10,000 + extra residents. Possibly 3,000 - 5,000 extra children in need of school places; probably 3,000 plus extra vehicles. The burden on the community is not sustainable - the road network would become intolerable. It is already bad at peak times. Christchurch would certainly lose its appeal.				148	
656369	Mr Timothy Peter Cook	John Reid and Sons (Structsteel) Ltd	CSPS2761	Policy KS3							No. Area already too congested to take large scale increase in population and more development in Christchurch.				148	
656426	Mrs Pauline Pritchard		CSPS2723	Policy KS3							Affordable to whom? There is already a high level of poverty in the Burton area. This does not need to be increased. At the other end, houses may be bought as second homes for people with money.				148	
656542	Mrs Deidre Harding		CSPS2839	Policy KS3							To a certain extent. But careful thought rather than hasty decision is needed; as to the siting of homes.				148	
656567	Mr Michael D Chappell		CSPS2858	Policy KS3							No. Too many new homes.				148	
360792	Miss Carol Evans	Evans & Traves LLP	CSPS3247	Policy KS3	No	Yes	Yes	Yes	Yes	Yes	The NPPF states in paragraph 47 that in order to boost significantly the supply of housing LPA's should identify and	Increase the 5 year portion of the housing target by 20%.	No, I do not wish to		148	

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											<p>update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements. Paragraph 47 goes on to state that, 'where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land.'</p> <p>Policy KS3 sets a target for housing provision at 3,020 new homes over the plan period. This equates to 201 dwellings per year. Through the SHLAA work since 2008 and the annual monitoring reports, there has been a persistent case of under delivery on the 5 year housing supply. The SHMA identifies a need for 220 dwellings per annum, however, for a 5 year supply of housing with the SHLAA 2011 only being able to demonstrate 683 dwellings, a shortfall of 417 dwellings. This is significantly less than the anticipated average of 201 dwellings per year within a 5-year period.</p> <p>The SHLAA 2011 is also considered to be a flawed piece of evidence as paragraph 3.13 on page 18 states that housing can still be delivered through the source of back gardens as per historic trends. This is re-enforced in paragraph 3.20 in the last sentence. However, paragraph 48 of the NPPF states that 'Strategic Housing Land Availability Assessments... should not include residential gardens.' It is therefore considered that the 5 year and subsequent years housing supply is overly optimistic in the context of this methodology.</p> <p>For the target housing figure to be consistent with the NPPF the 5-year figure needs to be increased to incorporate a buffer of 20% and not to hide the persistent under delivery within the overall housing target figure. Even doing this the target-housing figure is below the SHMA's figure of 220 dwellings per annum. Reliance on the identified urban extensions through the post 5 year period in the SHLAA will not comply with the objectives on the NPPF as it will not 'ensure choice and competition in the market for land.' (paragraph 47 of the NPPF).</p> <p>For the reasons stated the document is unsound and cannot be justified and is unlikely to effectively deliver the level of needed housing both market and affordable. The housing target needs to be raised to ensure greater choice and competition in the market for land for housing as per the objectives of the NPPF.</p>		participate at the oral examination			
656643	Mr Tom Whild	Terence O'Rourke Ltd	CSPS3168	Policy KS3	Yes	No	Yes	Yes	Yes	Yes	<p>Policies KS3 and KS4 are central to the Core Strategy as they set the housing requirements for Christchurch and East Dorset, respectively for the plan period. Therefore it is vital for the future of both districts that the figures are set at a level, which will ensure that the housing needs of the district can adequately be met. Paragraph 182 of the National Planning Policy Framework (NPPF) states that for Development Plan Documents to be considered sound they need to be Positively Prepared, Justified, Effective and Consistent with national policy. In order to meet the test of being positively planned the NPPF states that the strategy should seek to</p>	<p>In order to ensure that an appropriate level of housing can be delivered across both districts, the overall housing allocation for East Dorset should be increased from 5,250 to at least 5,605 for the plan period, in order to meet the shortfall of housing in Christchurch. This change should be supported by an additional paragraph in the supporting text explaining that the increase in East Dorset is to meet the deficit from</p>	Yes, I wish to participate at the oral examination	<p>The Perry Family Trust holds land which could be made available as a suitable additional allocation to meet the overflow requirements arising from</p>	148	2253414_0_1.pdf

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											<p>“meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development. Paragraph 159 of the NPPF requires that Local Planning Authorities have a clear understanding of housing needs within their area. In this context, the key evidence base supporting the housing figures for each district is the Strategic Housing Market Assessment (SHMA). While the housing figure for East Dorset meets the need identified in the SHMA, the final figure for Christchurch is set below the figure in the SHMA to the extent that there would be a shortfall of 355 dwellings within the district over the plan period. In this respect Policy KS3 cannot be considered to be positively planned, as it does not meet the objectively assessed needs of Christchurch. Policy KS4, setting the housing requirements for East Dorset, meets the housing need for the district as determined through the SHMA. While this would not be an issue if the core strategy were being prepared as a district wide document, this is a joint core strategy which encompasses both Christchurch and East Dorset. As the joint core strategy covers both districts we consider that it should take a more holistic approach to the delivery of housing. This is supported by the requirement of the NPPF for plans to be positively prepared, which requires them not only to meet the objectively assessed requirements of the district but also to include unmet requirements from neighbouring authorities. The production of a joint core strategy for Christchurch and East Dorset presents a prime opportunity for the housing requirements which cannot be met within Christchurch to be provided within East Dorset District. The supporting text for these policies recognises the fact that both authorities are amongst the least affordable areas in the south west. In this context it is wholly inappropriate to propose a strategy which would fail to meet the objectively assessed housing needs for the plan area. The overall effect of this would likely be to further worsen the affordability of housing within both districts. In addition to failing to meet the requirements of the district, policies KS3 and KS4 also conflict with strategic objective 5 of the Core Strategy. That objective is “To deliver a suitable, affordable and sustainable range of housing to provide for local needs.” The interpretation for that objective goes on to state that sufficient housing will be provided within Christchurch and East Dorset to reduce local needs. However as the housing numbers identified in policy KS3 fail to provide even the minimum identified for Christchurch through the SHMA, the core strategy will fail to meet this objective. This is the case without giving consideration to the potential for issues with the deliverability with strategic development sites.</p>	<p>Christchurch. In order to ensure that such a policy change does not result in unplanned and speculative development within East Dorset, the authorities may wish to consider allocating one or more ‘overflow’ sites specifically to meet the additional housing requirement arising from Christchurch. The suitability of any overflow site should be assessed in terms of the normal plan making process.</p>		<p>Christchurch. We are able to provide specialist technical insight and a wealth of local knowledge which may assist the inspector in assessing the Core Strategy.</p>		
654775	Mr David Monks		CSPS3471	Policy KS3							<p>KS3 Says - 3020 new homes will be provided in Christchurch by 2028, including the 90+45 in Burton and 850 at Roesht Hill. Assume that just for the latter 850 homes, each will have on</p>				148	

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											average 2 cars, that's a further 1700 cars trying to get onto our already very crowded roads plus the extra buses that will be needed.					
656228	Mr Adrian Dwyer		CSPS3598	Policy KS3							<p>1. The strategy has not considered brown-field development at all yet there are probably more underutilised brown-field sites in the Borough than ever before. For example the sites at Priory Motorworks, opposite Priory Motorworks, Beagle Aviation, sites alongside the railway line etc. Without considering brown-field development before considering building on green belt, the consultation is grossly biased in favour of development.</p> <p>2. Protection of Green Belt. The document gives the impression of protecting the green belt, whereas in fact the strategy is proposing precisely the opposite - building on greenbelt. As such the consultation document is grossly misleading.</p> <p>3. The size of diagram CN1 has deliberately been made the same size as the diagram CN2, thus giving the impression of similar sized developments. In fact they are vastly different in scale and this is a deliberate attempt to mislead the public as to the scale of the larger development. As such, the consultation document is grossly misleading.</p> <p>4. The strategy is based on the assumption that more housing is required. A well respected Christchurch estate agent said "There are more unsold properties on the market now than in living memory". The strategy has not taken into consideration the volume of unsold properties on the market, and by not considering supply outstripping demand, the consultation document is grossly misleading.</p> <p>5. The strategy has not considered the impact of reduced Gross Development Values as a result of increased allowance for social housing allowance. Expert opinion suggests the financial overhead will, on balance, reduce the cost of housing, thus making it more affordable.</p> <p>For the reasons stated above I believe the consultation document is grossly misleading. Queen's Council has indicated that the case for dismissing data or analysis resulting from the consultation is a strong one. As such, the consultation document is fatally flawed.</p> <p>6. The document has not considered a strategy for reducing the number of unoccupied properties, nor has it considered a strategy for addressing the issue of 2nd or 3rd homes. [in close proximity to my house there are more than 10 properties unoccupied, most of which are 2nd or 3rd homes].</p> <p>7. Christchurch is FULL. Christchurch infrastructure cannot support a significant increase in the population, as evidenced by the severely congested roads, nor would a significant increase in the number of residents be desirable.</p>			148		
656629	John Campbell	Roeshot Hill Allotment Association	CSPS3598	Policy KS3							We appreciate that the strategy within the Document relates to a wide geographic area and the rationalisation of demands from a wide range of competing interests. Whilst the interests and concerns of Christchurch allotment gardeners may seem almost incidental in such context, they are by no means so. We have examined the Document from three perspectives: (1) proposals		Yes, I wish to participate at the oral examination		148	2267876_0_1.pdf

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											<p>affecting Christchurch; (2) allotment provision in Christchurch and (3) the impact on the rural environment of Christchurch. We have found that a number of the issues that concern us touch upon fundamental principles contained in the document.</p> <p>HOUSING POLICY - Christchurch</p> <p>The Document draws upon a number of assessments of housing supply and predicted demand to conclude that urban infill will be insufficient to meet future housing needs. After briefly reviewing the physical constraints on building elsewhere in Christchurch, it is proposed to adjust the Green Belt area at Roeshot Hill, Burton and Marsh Lane to accommodate housing developments.</p> <p>1. We consider these proposals to be unjustified in that:</p> <p>1.1 They rest on the assumption that 'housing trumps environment' in a Borough which is characterised by its urban, rural and coastal mix, which makes 'life pleasant' for its inhabitants and which attracts a large volume of visitors and vacationers. Our view is that the assumption in the document is merely a subjective assessment, and that it fails to grasp the inconvenient truth that Christchurch cannot accommodate all who may wish to live in the Borough whilst maintaining its present character.</p> <p>1.2 The proposals for housing at Burton fail to explain how an additional 45 dwellings will serve the 'specific needs' of the village. On the contrary, the effect of the proposal would be negative by turning Burton from a village into a conurbation.</p> <p>1.3 The Document contemplates the development of 'exception sites' in order to meet the need for affordable housing in the area. This weakens the case for provision of new market homes at the expense of the rural environment.</p> <p>2. The proposals are ineffective in that:</p> <p>2.1 They would adversely affect the Green Belt by releasing some of the 'best and most versatile agricultural land' at Roeshot Hill and substituting unspecified land of lesser value.</p> <p>2.2 They do not ensure the reduction of local demand for new market homes in the absence of a residential qualification (such as applied elsewhere in Dorset) and/or other measures to ensure that local residents have the ability and opportunity to absorb new housing as it becomes available. The document admits the attractions of Christchurch as a retirement location, and the phenomenon of 'supply stimulating demand' could well result in migrants from other areas of the country exacerbating rather than reducing the demands on local resources without reducing local housing needs.</p> <p>3. The proposals are non-compliant with section 110 Localism Act 2011</p> <p>Christchurch shares a housing market area and travel to work area with Bournemouth and Poole, New Forest Council and adjacent local authorities in Hampshire. It is mostly a matter of preference rather than strategic issues that determine where people live. If it is the case that Christchurch cannot accommodate more than 2060 additional homes without impacting on its rural villages and Green Belt, the question arises as to whether there has been a reasonable allocation of resources to absorb regional housing</p>					

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											<p>needs.</p> <p>Despite some reference to joint working with neighbouring Dorset authorities (but not Hampshire) there is no evidence of any specific arrangement whereby unmet requirements in Christchurch might be met by neighbouring authorities, particularly by Bournemouth, which is by far the largest authority. We feel that it is reasonable to conclude that the Christchurch Borough Council and East Dorset District Council have failed to fully exhaust the duty to co-operate with adjoining local authorities within the spirit of section 110.</p> <p>4. The proposals are non-compliant in respect of Sustainability The Sustainability Assessment is not on consultation and is only referred to in paragraph 1.21. By not have the SA open for consultation in the same way as the Core Strategy the Council are failing to complete stage D of the Sustainability Assessment effectively and thus the Core Strategy is unsound. This could be subject to Judicial Review.</p>					
656794	Pam Higginson		CSPS3516	Policy KS3							<p>It has come to my knowledge that there are several housing planning applications by Christchurch Council in process all around where I live.</p> <p>It is nigh impossible to find out any details via the web, and it is only through 'word-of-mouth' or some person I know having received information that I have found out about this.</p> <p>Why is it that all these applications are not made known to all Christchurch residents in an easily accessible form?</p> <ol style="list-style-type: none"> 1) Roeshot Hill housing 2) Burton Farm (Farwells) 3) Transfer of Roeshot Hill allotments 4) Business/retail outlets on south of Somerford Rd 5) Gravel extraction to north of railway line Burton Common area <p>My objections to ALL OF THESE mainly concern the unnecessary destruction of 'green belt', and the excessive traffic all this housing/allotments/gravel extraction will bring to the already busy A35 and Stony Lane.</p> <p>Apart from destroying green belt, the building of houses south of the railway line to the bypass, and from Salisbury Rd, Burton right up to Roeshot Hill is unbelievable! Who, in their right minds, would want to buy a house right next to a railway line anyway!!</p> <p>Combined with the building on fields in the area of Burton Farm, all this will totally destroy the rural feel of the area. Green belt should REMAIN GREEN BELT - otherwise it makes a mockery of the classification?!</p> <p>The increase in cars/lorries from all these plans will cause an excessive increase in traffic - particularly out onto the A35, Salisbury Rd and Stony Lane, where congestion already occurs. More retail/superstores are NOT needed in this area. Additional housing should be built on these Brownfield sites. If a site off Grange Rd can be allocated for building for gypsies!! Then it should now be used to building homes for those residents in need locally.</p> <p>2035 new homes is excessive, considering the number of properties that are already up for sale around the area. This area is</p>				148	

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											well-known for attracting second-home/holiday home buyers, so who would monitor that these 'affordable' houses will only be bought by local young people who are in need? Or that the prices will stay affordable? Please accept this letter of objection.					
521508	Ms Lisa Jackson	Jackson Planning Ltd	CSPS36 47	Policy KS3	Yes	No	Yes	Yes	Yes	Yes	<p>Policy KS3 is not sound as it is inconsistent with National Policy. The NPPF has made it clear that Local Planning Authorities should meet the full objectively assessed needs for market and affordable housing in their area. CBC have identified an objective need for 3375 within the plan period but fail to allocate sufficient sites to meet that full need. The Core Strategy only identifies sites to meet less than 90% of identified need.</p> <p>In addition the plan relies on 67% of the supply of new homes from non strategic sites within the urban area. In previous years this has generated most of the supply with over 90% production in the urban area. Recent figures in the last 3 years, published in AMR March 2012 show that production, at best, about 100 units. in 2010/11 no affordable houses were produced in Christchurch Borough. This would appear to be an upper limit on supply within the urban area given economic conditions. The Trajectory until 2016 includes very limited greenfield supply and acknowledges that housing needs for the first four years of the plan will not be met.</p> <p>The consequences of this undersupply of sites also means that affordable housing supply is insufficient and this will have a negative effect on the economy as acknowledged in the AMR. This further reinforces that the plan does not meet the requirements of the NPPF which is seeking to boost housing supply to support the economy. This situation is untenable given the extent of affordable housing need.</p> <p>A justified and effective solution to this problem is to identify more housing land on suitable sites within the Borough where these are genuinely sustainable, available and developable. The LPA should seek to maximise these solutions when they are available, one such solution is the allocation of the site at Burton which would boost the supply of market and affordable housing within the first five years of the plan.</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 Core Strategy must address objective housing needs as they are identified. The Core Strategy must address a more positive and proactive approach to affordable delivery that is sensitive to market conditions as required by the NPPF. The Council must look for other solutions to do this. For example an increase in allocation at Burton could lead to greater delivery of affordable housing in the early part of the plan period which goes some way to meeting needs. The representation to policy CN2 refers.</p>	Yes, I wish to participate at the oral examination	<p>The delivery of housing , and in particular the need to boost supply as required by the NPPF is not being addressed in the early part of the plan period. MEM have proposed an alternative solution that would boost supply in the first five year period of the Core Strategy and have provided evidence to show how the site at Burton can deliver more housing within the plan period.</p>	148	2267120_01.pdf
490815	Mrs Trish Jamieson	Burton Parish Council	CSPS36 68	Policy KS3							<p>Burton Village is felt by those who live there to be a very special community. Despite the spurt of housing growth in the 1960s and 1970s the new development was confined to the area between Salisbury Road and Stony Lane and Burton's essential character as a rural village has been maintained. This is recognised by the establishment of the Burton Conservation Area, which protects the core of the old village and its essential features. The Parish Council, elected in May 2011, in commenting on these proposals has as its aim the preservation and enhancement of the</p>				148	

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											<p>character of the village and the lives of its residents by:</p> <ul style="list-style-type: none"> _ Preventing development inimical to the village _ Supporting and promoting appropriate developments <p>To this end the Council supports the need for a new Local Plan and Core Strategy and acknowledges that without the new plan there is a considerable danger that developers will be able to seek to pursue development proposals which might not be in the best interests of the Village.</p> <p>The Parish Council also accepts that the new Core Strategy offers opportunities to protect services and facilities in the village, and to develop new ones - for example, to pursue extensions to public transport, to protect local shops and facilities, and to secure improvements to private transport.</p> <p>Aware of the difficulties facing young couples with roots in the village finding housing, the Council welcomes the commitment to allowing a development of 100% affordable housing and will seek the adoption of a Rural Exception policy for Burton.</p> <p>For these reasons the Council welcomes many of the new policies and proposals, but it has to be noted that it has serious concerns over proposed Policy CN2.</p> <p>2. The Green Belt</p> <p>The Council strongly supports Policy KS2.</p> <p>The Council in particular notes and stresses the need to protect the separate physical identity of Burton by maintaining the Green Wedge between the village and Somerford. The Council notes that this wedge will be eroded from the south by the inclusion of Ambury Lane in the proposed Roeshot Hill urban extension and notes that the boundary of the Parish runs along the centre of Ambury Lane: thus development south of the railway line but north of Ambury Lane will be within the Parish. The Council is concerned over this development.</p> <p>3. Transport</p> <p>While supporting this policy the Council points to the serious morning peak time congestion in Stony Lane North caused by the inadequate junction with the A35 at Stony Lane. The Council stresses that there is a very urgent need for improvements at this junction and that these are needed now, before any development takes place on the proposed urban extension.</p>					
619967		Home Builders Federation (South West)	CSPS3677	Policy KS3	No					Yes	<p>The CED LP proposed level of housing provision is unsound as it is deficient in several respects with regard to the requirements of national policy and the assessment of the housing requirement. It is deficient in respect to national policy in the following areas:</p> <p>a) the assessment of the housing need over the plan period does not meet the requirements of the Framework as set out in</p>		Yes, I wish to participate at the oral examination	The HBF would like to appear at the examination to debate these matters further.	148	

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											<p>paragraphs 47 and 159 (or indeed, PPS3) in terms of assessing market as well as affordable housing needs;</p> <p>b) the planned level of provision in both districts fails to address the assessed level of need for affordable housing, let alone market (and potentially other housing needs) in addition to this. Consequently the proposed plan fails to meet one of the assessed levels of need; and</p> <p>c) the proposed housing requirements fail to take into account cross boundary impacts including the unmet needs of neighbouring boroughs. The proposed plan has therefore fail to meet its own assessed level of need plus potentially the unmet needs of neighbouring districts.</p> <p>We will consider each area in turn.</p> <p>a) Meeting the requirements of the Framework for outputs from the SHMA</p> <p>The SHMA evidence is not very transparent. There are a multitude of reports listed on the website and included as part of the evidence base. The reports that relate to Christchurch and East Dorset are also confusingly titled as reports for Bournemouth and Poole. This is not satisfactory and hardly aids public transparency and accessibility to the information.</p> <p>Despite all these reports, their length, and no doubt the cost of production, they fail to meet the elementary requirements of the Framework and for that matter PPS3 (see for example figure 1.1 describing the core outputs of a SHMA in the DCLG SHMA Practice Guidance, 2007). The various reports fail to identify clearly the market as well as the affordable housing need despite this being a requirement of national planning policy under the old as well as the new planning regime. A SHMA report that does not assess future market housing requirements cannot be considered a robust and credible evidence base (page 9). We may be wrong, but it is not clear.</p> <p>The 2011 SHMA Update summary reports for both Christchurch and East Dorset provide an assessment of affordable housing need. For Christchurch this is 332 units per year (page 12), and in the case of East Dorset it is 426 units per year (page 13). Both reports also provide an assessment of projected household growth over the twenty years from 2011 to 2031. For Christchurch this is 219 per year (page 17). For East Dorset it is 336 homes per year (page 19). It is not clear, however, how these latter figures relate to affordable housing figures quoted earlier in the report. It is not clear if these figures of stated household growth represent the market need for homes, and if they do, if these figures then need to be added to the earlier stated figures of affordable housing need.</p> <p>Thus if these figures are added together they would give the following results:</p> <p>Housing needs per year: AH need Market need Total housing requirement Christchurch 332 219 551 East Dorset 426 336 762</p> <p>We accept this may be wrong but it is not clear what the need for</p>					

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											<p>market and need for affordable homes is for both districts over the plan period. The Council should clarify what figures in the SHMA summaries constitute the objectively assessed housing need for districts in accordance with the Framework, and figure 1.1 of the DCLG SHMA Practice Guidance.</p> <p>It is necessary that the Councils clarify this for the purposes of assessing whether the plan is complying with the Framework and its requirement that the local authority should identify its objectively assessed housing need (as set out in paragraphs 47 and 159).</p> <p>b) Does the plan make provision to meet the objectively assessed housing needs?</p> <p>It is clear that when the proposed housing requirements as set out in policies KS3 and KS4 are considered in the context of the Framework, on the basis of the affordable housing need alone the plan is unsound since it fails to meet the assessed level of need. The Government attaches considerable importance to local authorities meeting their objectively assessed housing need (unless it conflicts with other policies in the Framework) hence the several references to this in the Framework. These references can be found in paragraphs 14 (what constitutes 'sustainable' development), 17 (core planning principles), 47, 179 (cross boundary planning) and 182 (tests of soundness of plans).</p> <p>The SHMA evidence: Christchurch The SHMA for Christchurch identified a need for 332 affordable homes per year over the five year period 2011 to 2016. This is set out on page 12 of the 2011 Strategic housing Market Assessment: Summary report.</p> <p>We are concerned to read that the proposed housing requirement for Christchurch is only for 3,020 homes when compared with a SHMA requirement for 4,980 affordable homes (332 units x 15 years of the plan) quite apart from the market need in addition to this.</p> <p>The SHMA evidence: East Dorset The SHMA for East Dorset identified a need for 426 affordable homes per year over the five year period 2011 to 2016. This is set out on page 12 of the 2011 Strategic housing Market Assessment: Summary report.</p> <p>We are concerned to read that the proposed housing requirement for Christchurch is only for 5,250 homes when compared with a SHMA requirement for 6,390 affordable homes (426 units x 15 years of the plan) quite apart from the market need in addition to this.</p> <p>The Councils will need to have a strategy to provide for their objectively assessed housing needs if not through the plan itself. This will require cooperation with adjoining councils and an agreed strategy to provide for these needs. The CDE LP provides no such strategy.</p> <p>c) Taking into account cross boundary impacts including unmet needs of neighbours (paragraphs 17, 157, 179 and 182 of the Framework) The CED LP includes no assessment of the potential impact of the failure of neighbouring authorities to meet their own objectively</p>					

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											<p>assessed housing needs. For example, we note that Bournemouth's emerging plan housing requirement is for only 14,600 homes over 20 years (730 homes a year) even though its SHMA indicates a need for 3,015 affordable homes per year. As Poole is only going to provide 14,000 homes over the next 20 years (its adopted plan target) it clearly is not going to be able to accommodate Bournemouth's unmet need, or that of Christchurch or East Dorset. Indeed, Poole will not be accommodating its own objectively assessed need of 1,199 affordable homes a year. In view of the scale of the undersupply in Bournemouth and Poole when judged against the evidence of the SHMA then these pressures will spill over to the adjacent authorities. There will be impacts for Christchurch and East Dorset. The decline in housing supply in proportion to demand will be felt most acutely by those on lower incomes who will be priced out of the local market by more affluent incomers.</p> <p>Things are not any better on the other side of Christchurch and East Dorset. The New Forrest District Council (outside the park) is only providing 3,920 homes over the next 20 years, or 196 a year against an assessed affordable housing need of 998 homes a year. It is highly likely that Christchurch and East Dorset will need to make some provision for the refugees from the New Forrest that this council will not be providing for.</p> <p>Southampton City has an adopted core strategy that provides for 16,300 homes over 20 years, or 815 homes per year. Its SHMA, however, has assessed the affordable housing need as 1,391 homes per year.</p> <p>Once the market needs for these authorities are factored in (for Poole, Bournemouth, New Forrest, and Southampton: their SHMAs appear to have neglected this despite the requirements of PPS3) then it is very apparent that the Dorset/West Hants area is going to experience a very acute housing crisis. The submitted local plan makes no reference to this strategic pressure.</p> <p>Under the circumstances the submitted plan is unsound as it fails to account for cross border pressures. The Framework sets out core planning principles, one of which is for plans to be based on cooperation to address larger than local issues (paragraph 17). The Framework states that local plans must be based on cooperation with neighbouring authorities (paragraph 157) and sound plans must make provision for unmet requirements from neighbouring authorities where it is reasonable to do so (paragraph 182).</p> <p>Given the disparities between the planned levels of provision and need we have cited above Christchurch and East Dorset must meet their own objectively assessed housing needs through the plan since it is very apparent that they cannot rely on any adjoining authorities to do so.</p> <p>'About' x homes The expression of the targets in policies KS3 and KS4 is also imprecise and creates uncertainty. Both policies refer to 'about x new homes' to be provided between the years 2013 to 2028. The expression of the housing targets needs to be precise for the</p>					

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											<p>purposes of calculating the five year land supply and planning the housing trajectory. The use of the word 'about' should be deleted. The targets should be treated as minimum targets, so if other suitable sites materialise over the plan period that satisfy the provisions of the Framework, these will enable the Councils to exceed the targets.</p> <p>Capacity and market constraints We do not accept the argument that a weak housing market justifies reducing the housing requirement. If there is an objective need for housing, then that need will need to be met somehow, despite the effects of the recession. It may mean that there is a need for a higher proportion of social and rental sector homes than those for owner occupation, but the basic housing need does not go away.</p> <p>We are also concerned that a housing requirement that is informed by a recessionary outlook will become self fulfilling: a plan that does not provide the optimum conditions to facilitate growth (by providing a range of sites in various locations to ensure competition in the land market) will guarantee that new housebuilding in the district will continue at moribund levels. Moreover, the relative scarcity of new supply provided for by the plan when measured against the objective housing assessment will serve to inflate land prices. Land owners recognising that they have a scarce and precious commodity that the Council needs to meet its plan objectives will not release this land for less than the top dollar.</p> <p>A reduced housing requirement will do nothing to improve affordability across the districts. As attractive districts, more affluent incomers, equity-rich retirees and second homes owners will price existing residents out. This will have adverse consequences for economic growth as land is increasingly valued for speculative purposes, rather than as a utility that provides homes or places of employment.</p> <p>The recently published European Commission report: Europe 2020 which considers the economic health of each of the EU members identifies housing undersupply as a one of the UK economy's major structural weaknesses. As the report summarises, the UK needs to: "Address the destabilising impact of high and volatile house prices and high household debt by implementing a comprehensive housing reform programme to increase housing supply and alleviate problems of affordability and the need for state subsidy of housing. Pursue further reforms to the mortgage and rental markets, financial regulation and property taxation to prevent excessive volatility and distortions in the housing market." In citing the recession as a constraint on addressing the objective need the Councils are ignoring the Ministerial Planning for Growth statement which requires LPAs to make every effort to identify and meet the housing and other development needs of the district. This principle is reiterated in several places in the Framework but especially paragraphs 14 and 17. Housing trajectory</p>					

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											The plan is unsound as it is inconsistent with the Framework since it does not include a housing trajectory or a housing implementation strategy that shows how the Councils will maintain delivery of a five year supply of housing. This is a requirement of the Framework (paragraph 47).					
523319	Mr Ryan Johnson	Turley Associates	CSPS3776	Policy KS3	No	Yes	Yes	Yes	Yes	Yes	<p>Thank you for the invitation to comment on the Pre-Submission Core Strategy DPD. I write on behalf of our client, Burry & 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.</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. 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 KS3 – Housing Provision in Christchurch</p> <p>Comment i. Housing Provision</p> <p>NPPF requires LPAs to objectively assess and meet the need for market and affordable housing in their area, as far as is consistent with NPPF, including any unmet requirements from neighbouring authorities where it is reasonable and sustainable to do so (paragraph 14, 47 and 182, NPPF).</p> <p>For the plan to satisfy the tests of soundness, the Council must have first objectively assessed such needs and then tested alternative strategies to meet this need. Only once this process is complete can the Council claim their strategy satisfies the ‘justified’ test of soundness.</p> <p>We contend the Council have not tabled sufficient evidence as yet to meet the NPPF requirement to ‘objectively assess’ their housing need, including any unmet requirements from adjoining authorities (paragraph 182 of NPPF). Nor have the Council assessed and consulted on alternative ways of meeting such housing needs either within or outside the borough through the duty to cooperate requirements of the Localism Act and NPPF. We set out below our comments and suggested changes required to remedy this before the plan is formally submitted to the Secretary of State.</p> <p>Addressing first the issue of housing need. The Dorset authorities published an update to their SHMA in January 2012. This indicates an annual need for 332 affordable homes to be built over the plan period (4,980 homes if extrapolated over the plan period 2013-</p>	<p>Suggested Change The evidence base informing the policy should be updated as indicated above. Further consultation should be undertaken on this, along with any material revisions to the plan that may arise from this. For assistance, we refer the Council to the statements made recently by the Planning Inspectors examining both the Wigan and York plans.</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>	148	

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											<p>2028).</p> <p>Paragraph 14, 47 and 182 of NPPF requires LPAs to objectively assess housing need, and then look at options to meet this need, before concluding on a preferred option. We have reviewed the Council's evidence base and cannot find any evidence to suggest they have explored and consulted upon options to meet the identified need for 332 affordable homes per year. The SHMA merely concludes it would be unrealistic to meet the 332pa figure on grounds of past completions and the potential for significant impact on the private rented sector of the housing market. This does not in our view provide robust evidence to justify why some or all of the 332pa cannot be met. This evidence is required if the Council are to satisfy paragraphs 14, 47 and 182 of the NPPF. The SHMA update (January 2012) instead recommends that the borough's housing provision figure should comprise the total anticipated housing completions for the plan period. Using only trend-based data, which excludes assessments of the actual need for housing (inc. those associated with employment growth), a housing provision figure of around 225 homes per year is suggested for the period 2011-2031. This equates to 3,375 homes for the current plan period 2013-2028. The SHMA indicates that less than 90 of the suggested 225 homes per year will comprise affordable homes. This is considerably less than the assessed need for 332 affordable homes per year.</p> <p>The Council will need to provide evidence to justify why they have only assessed a single trend based option of 225 homes per year. The Council have not produced and tested alternative options to this, particularly ones that factor in employment growth. The latter is fundamental in our view in a borough with an ageing population and declining population of working age (paragraph 2.21-2.22 of the Core Strategy DPD). This factor would suggest the need to test alternative levels of housing growth to redress a decline that has significant consequences for the borough's future economic prosperity.</p> <p>To compound this further, Policy KS3 of the Core Strategy only proposes to accommodate 201 homes out of the 225 homes a year suggested by the SHMA. This is 355 homes short of the provision suggested by the SHMA, and 1,960 less than the assessed need for affordable homes over the plan period. No evidence is provided by the Council to demonstrate why such requirements cannot be accommodated within the plan period. To satisfy paragraphs 14, 47 and 182 of NPPF, we conclude the Council will need to provide compelling evidence to demonstrate:</p> <ul style="list-style-type: none"> i. What the objectively assessed need for housing is over the plan period, having regard to any unmet requirements from neighbouring authorities and; ii. Why the Council are unable to accommodate this need, or a greater proportion of this need, than the 201 homes per annum currently proposed in Policy KS3. <p>Under item one, we recommend the Council test alternative options to accommodate more of their objectively assessed housing need. This should factor in not only the need for affordable</p>					

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											<p>housing, but also that associated with employment growth in the borough / adjoining boroughs.</p> <p>To fulfil item two, the housing growth options identified must be tested to see if they can be sustainably delivered within the plan period from suitable and available sources of land supply. A robust SHLAA is needed to do this, which we contend the Council cannot claim at present. We elaborate on this in the section below. Until this assessment process is completed, Policy KS3 will not in our view satisfy the tests of soundness in NPPF.</p> <p>ii. Housing Supply</p> <p>Policy KS3 indicates 3,020 homes are to be provided in the period 2013-2028. This comprises up to 2,035 homes in the urban areas, with the remaining 985 homes directed to green belt land. On closer scrutiny of the SHLAA however, a significant proportion of sites included in the 2,035 urban potential figure are yet to be confirmed as available or achievable within the plan period. To accord with paragraph 47 of NPPF we recommend the Council obtain this evidence prior to submission of the plan to the Secretary of State. This evidence may well indicate the need for revisions to the Core Strategy DPD and further consultation prior to formal submission.</p> <p>We would refer the Council to the recent pre-hearing statements made by Planning Inspectors examining the Wigan and York plans. Both illustrate the importance of ensuring this evidence base is robust.</p> <p>In addition, a large proportion of supply comprises possible opportunities for intensification within existing residential areas. This includes a significant proportion from the sub-division of detached units and building on residential gardens. The latter no longer affords the status of previously developed land and should not be included in land supply calculations under paragraph 48 of the NPPF. In the absence of evidence to confirm the availability of these sources of supply, such sites are neither deliverable, developable, nor broad locations for growth identified on the Key Diagram; and therefore fall into the definition of windfall under paragraphs 47-49 of NPPF. We would therefore question whether this satisfies the tests of soundness in NPPF, particularly the 'Effective' test given the inherent uncertainties surrounding housing delivery from such sources within the plan period.</p> <p>This places greater emphasis in our view on the Council to produce compelling evidence that their housing trajectory has a reasonable prospect of delivery within the plan period, particularly within the first five years of adoption of the plan (paragraph 47 of the NPPF). At present the uncertainties over the availability and achievability of a significant proportion of supply bring this into question.</p> <p>The latest SHLAA (2011) published by the Council indicates there is unlikely to be a sufficient supply of land to meet housing requirements in the first five years of the plan period. No contingencies are put in place to address this in Policy KS3, which is contrary to paragraph 47 of NPPF in our view. Under paragraph 49 of NPPF the land supply policies of the plan would therefore be</p>					

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											<p>out of date at the point of adoption.</p> <p>To accord with paragraph 47 of NPPF, the Council should include a contingency strategy to address shortfalls in five year housing land supply. This could include the release of certain sites from the SHLAA to address shortfalls, and/or criteria the Council will apply to planning applications submitted on five year land supply grounds (i.e. under paragraph 49, NPPF).</p> <p>An example of interim release policies has been adopted by Chichester City Council. Another adopted example includes Wokingham Borough Council's Core Strategy DPD, which includes an interim release strategy pending adoption of their Site Allocations DPD. Contingency policies such as these provide the Council with a measure of control when land supply drops below five years. This is shown to be the case at present. This highlights the need to redress this shortfall by allocating more land in the Core Strategy, or putting in place contingency policies to release land from the SHLAA.</p> <p>iii. Most Appropriate Strategy</p> <p>If the Council are to justify their decision to opt for 3,020 homes as the housing provision for the borough in the period 2013-2028, and accord with NPPF, they must first objectively assess housing need and then test options to meet this need. Only once this has been completed can the Council claim they have met the 'justified' test of soundness in NPPF.</p> <p>We have indicated in the previous sections the need for alternative growth option assessments. These should test whether a greater proportion of the borough's housing needs can be met within the borough, our outside the borough through the duty to co-operate provisions of the Localism Act. Equally, the Council should demonstrate they have also assessed whether the borough could accommodate any unmet requirements from adjoining authorities (paragraph 182, NPPF). These assessments should be based on a robust SHLAA, which for the reasons stated we contend the Council are unable to claim at present.</p> <p>Finally, the Council have not consulted on alternative options to development at Roeshot Hill, east of Marsh Lane or south of Burton. In the absence of this it is difficult to see how the Council can satisfy the 'Justified' test of soundness in NPPF, particularly as this is the proposed plan for submission to the Secretary of State. We understand an alternative sites consultation is to take place over the summer/ autumn this year. However, it is unclear how the results of this will inform the plan given its advanced stage of preparation. In our view the Council will need to demonstrate they have assessed and consulted upon reasonable alternatives, and having assessed them concluded on a preferred strategy for the plan period.</p>					
360692	Mrs Wendy Britton		CSPS67g	Policy KS4	Yes	No	Yes	Yes	Yes	Yes	<p>This objection relates to the Pre-Submission Core Strategy (PSCS) and the 'soundness' of the policies regarding the potential development of land at Arch Ground, Station Road, Sturminster Marshall as a New Neighbourhood and Area of Public Open Space with recreational and community facilities.</p>	<p>The following alterations are required to be made:-</p> <p>1. Generally – Amend the Pre-Submission Core Strategy to include a Strategic Policy regarding, The development of a 'New</p>	Yes, I wish to participate at the oral examination	To support my proposal	149	2252889_01.pdf

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											<p>References are made (but not exclusively) to the PSCS and the following policies:-</p> <ol style="list-style-type: none"> 1. KS1 (settlement hierarchy) 2. KS4 (housing provision and provision of land) 3. HE4 (open space provision) 4. Chapter 4 (the broad location and scale of housing) 5. Chapter 12 (strategic allocations) 6. Chapter 14 (creating high quality and distinctive environments) 7. Chapter 15 (meeting local needs) 8. RA1 (Baillie Gate) <p>BACKGROUND</p> <p>This objection is in respect of policies and the text of the PSCS which would if implemented deny the development of about 7.2 hectares (ha.) of land known as Arch Ground (as shown edged red on the map attached to the hard copy submitted). The promotion of the land for development has a long planning history which is available from the files held by East Dorset District Council and the owners. However, to date planning permission has not been secured due to policy restrictions resulting from the site being within the Green Belt.</p> <p>The current use of the land is agricultural. It is enclosed by Station Road and by the housing opposite fronting that road. It is also enclosed by the hedge-row, trees and the industrial buildings situated on or near the adjacent boundary of the Baillie Gate industrial estate. The other two boundaries are bounded by natural high hedge-rows etc. The south-east boundary is also clearly defined by an existing access track. The land is not within the conservation area, nor is it subject to flooding. Access to the site is from Station Road. The land is in private ownership and does not provide any public amenity. Views to the distant open countryside are restricted by the boundaries as previously described. The land is flat and constrained and is visually uninspiring. The site is situated on the main road through the existing built-up area. It is close to existing local amenities, facilities and services including public service vehicle routes to nearby Wimbourne Minster (5m), Poole(7m) and Blandford(7m). It is also close to the shops, post-office, school, 3 pubs, church, pharmacy, garage, hairdresser, community hall, golf course and is immediately proximate to the site of a large industrial employment estate.</p> <p>THE PROPOSAL</p> <p>It is clear from the above information that the land meets all the requirements necessary (see Note.1) for the development of a New Neighbourhood as defined in policy KS4 and referred to in Chapter 4.21. The area proposed for residential development would require the redefinition of the Green Belt boundaries to allow the removal of about 3.7ha. from the total site area of 7.2ha. currently in the Green Belt.</p> <p>Economically viable and highly sustainable low density residential development of the site would be phased in line with demand and the need to make good, the substantial housing short-fall which has accrued over the last decade or so.</p> <p>In addition the Proposal incorporates the provision of the 3.5 ha. of</p>	<p>Neighbourhood' and area of Public Open Space etc. at Station Road Sturminster Marshall. This policy should be drawn for the sake of clarity in a similar form as to Policy RA1.</p> <ol style="list-style-type: none"> 2. Pol.HE4 - amend table to incorporate the above. 3. Pol.KS1. - amend to incorporate 1 above. 4. Pol. KS4. - Ditto 5. Chapter 4 – Ditto 6. Chapter12 – Ditto 7. Chapter 14 – Ditto 8. Chapter 15 – Ditto 				

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											retained Green Belt land as Public Open Space with recreational and community facilities, similar to that described in the 'saved policy SM2 and SM3' of the 2002 local plan. It is to be noted that the removal of above 3.7ha. of land from the from Green Belt replicates the similar removal of 3.3he. from the Green Belt in order for the highly successful and adjacent Bailie Gate industrial estate to be expanded as set out in Policy RA1. It is also to be noted that as an indirect result of the expansion of the Bailie Gate industrial estate the New Neighbourhood would meet the potential need for additional housing in the Sturminster Marshall area, over and above that required to meet future household growth and the making good of the current substantial short-fall. The Proposal would also provide additional support and enable the growth of existing services etc. currently available in Sturminster Marshall area of East Dorset. Note1. 'New Neighbourhoods' are residential led schemes around settlements with good access to key services, facilities and employment. They are designed to produce high quality sustainable developments, that are able to be integrated into the local character of the area without having a detrimental impact on the surrounding countryside They will require the re-drawing of the Green Belt boundaries to accommodate them. The difficulty in meeting housing need, will provide the exceptional circumstances to enable the provision of New Neighbourhoods.					
654618	Tanner & Tilley	Pennyfarthing Homes	CSPS881	Policy KS4	No	Yes	Yes	Yes	Yes	Yes	Policy KS4 relies on the delivery of the identified housing need through the provision of 2,800 of the 5,250 dwellings on existing brownfield sites. However, unless clear policy guidance is given within the Core Strategy accepting that the character of some of those areas will necessarily have to change in terms of density and appearance, and unless there is clear policy requiring minimum densities of at least 30 dwellings per hectare to be achieved, unless it is in areas specially designated as "special character areas of low density", it is considered that this level of housing provision will not be achieved. The policy relies heavily on garden land within existing built up areas being developed for housing. Within these areas there will be strong resistance to development and wher development is likely to be achieved it is likely to be at densities significantly below 30 dwellings per hectare. Furthermore, significant parts of existing residential areas in East Dorset are identified as 'Special Character Areas' which will act as a further constraint to the density of development that can be achieved.	To address this concern and to ensure that 5,250 dwellings are delivered in East Dorset during the Plan period the Core Strategy will need to accept that certain parts of existing residential areas will need to accommodate higher densities of development which may change their character and appearance. In order to ensure delivery of this level of housing it is also considered necessary that the Core Strategy should identify that existing areas identified as "Areas of Special Character" be critically reviewed with a view to allowing subdivision and or higher density development to take place. Alternatively, provision should be made for the allocation of additional greenfield sites for housing which may require Green Belt boundaries to be the reviewed.	Yes, I wish to participate at the oral examination	We consider that participation in the oral examination will assist the Inspector to gain an understanding of how applications for development of previously developed sites and garden land are likely to be limited to low density development.	149	
654688	Mr Paul Newman	Paul Newman Property Consultants Limited	CSPS771	Policy KS4	Yes	No	Yes	Yes	Yes	Yes	I do not feel that the LPA has taken into account when assessing housing demand and need in the district the actual true level of development that is required to meet the identified housing need. Further allocation of land is required which will involve the need to roll back the green belt further to ensure that a sufficient supply of housing land is to be provided. The evidence base is not sound nor is it robust in this respect. A continued reliance of a policy of urban	The additional allocation of land is required to meet the identified housing need and this should be done by allowing the extension of the current proposed housing allocations, in particular those at Wimborne and Ferndown have and hold potential for a natural expansion and continuation of the	Yes, I wish to participate at the oral examination	I would like to make the Inspector fully aware of the Council's appalling record in the delivery of	149	2274440_01.pdf

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											area regeneration will not deliver the affordable housing the district requires.	development which will bring additional housing to the district.		affordable housing and to point out how a continued reliance on a policy of urban regeneration will not work and will produce any affordable housing.		
220620	Miss S Thorpe	Gleeson Developments Ltd	CSPS905	Policy KS4	Yes	Yes	Yes	Yes	Yes	Yes		<p>Policy KS4 – housing provision</p> <p>Gleeson are supportive of the proposed housing provision across the joint districts during the plan period. We are also supportive of the proposed residential allocations within the Core Strategy which comprises of a total of 5,250 units across the period of 2013 to 2028, with up to 2,500 on green field allocations.</p> <p>Through the background reports and studies undertaken by the joint authorities and wider Dorset Councils, the publications have demonstrated that Dorset, including East Dorset, has an aging population and the existing housing stock does not meet housing need for the current population within the District. This is due to the historic mix of the housing stock not meeting housing demand. East Dorset District Council have identified that their housing stock is deficient in smaller houses for residents to downsize, for young families and first time buyers to enter the housing market. If the council were minded to increase the housing target for the joint areas this would increase the overall level of affordable units delivered across the two Districts. Over recent years the delivery of affordable housing has been low and an increase in the overall housing target would be beneficial to the delivery of both market and affordable housing to meet existing and future demand across the plan period.</p> <p>Gleeson supports the continued progress of the joint Christchurch and East Dorset Core Strategy, and the identification of Wimborne Minster as a settlement suitable for accommodating residential growth across the plan period. Wimborne is a sustainable location with connectivity and proximity to</p>	Yes, I wish to participate at the oral examination		149	

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												existing employment providers and transportation network to wider community and commercial amenities. Gleeson are particularly supportive of the proposed allocation for residential development to the south of Leigh Road, Wimborne with the provision of SANG and Country Park to the south of the A31.				
654506	Mr John Showell		CSPS811	Policy KS4	No		Yes	Yes			All the internal demand for new housing that can be met from the release of houses from the ageing population as they pass on.	As the excess demand for housing comes from migration this should be put to the test by locating all new housing in a New Town. The Housing market for retired migrants is into Dorset or even the South West, at the point of migration they have a wide choice (see a home in the country on television) so the demand could be met by creating such a town anywhere in Dorset, This plan should go no further until this option is considered at a higher level.	No, I do not wish to participate at the oral examination		149	
654962	Mr Christopher Chope		CSPS916	Policy KS4	No	No	Yes	Yes	Yes	Yes	Policy KS4 is not compliant as most of the 2500 new homes proposed for 'outside existing urban areas' are to be built on land currently designated as Green Belt.	Deletion of the reference to the construction of new homes on land currently designated as Green Belt.	Yes, I wish to participate at the oral examination	To express on behalf of my constituents their widespread and deep seated opposition to removal of Green Belt in East Dorset, particularly in West Parley.	149	
656249	Ms Gemma Care	Barton Willmore LLP	CSPS1087	Policy KS4	Yes	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>Background</p> <p>Barton Willmore LLP has been instructed to make representations to this document, on behalf of Stour Valley Properties (Dorset) Std. ('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</p>	<p>Summary Findings</p> <p>It is accepted that the housing target embodied within Policy KS4 of the Pre Submission JCS broadly aligns with the 2008-based CLG household projection, but as explained above this projection is based on limited net-migration data from the past two to three years, which, at most, averages net in-migration of 466 people per annum. The 5 and 10-year average trends published by ONS show net in-migration of 600 (2005-2010) and 800 (2000-2010) people per annum respectively. The 10-year trend of 800 people per annum incorporates a much broader period and would represent a significantly more robust basis for projecting dwelling growth over the Plan period as it encompasses a period of economic growth and decline.</p> <p>Projecting forward the 5-year (600 people</p>	Yes, I wish to participate at the oral examination	To ensure our case is presented in full and to be party to discussions.	149	2248977_01.pdf

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											<p>JCS is inappropriate and inconsistent with national planning policy, which states that each local planning authority should ensure that the Local Plan is based on adequate up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local planning authorities are expected to ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals.</p> <p>Consideration is given within the submitted representations to the strategic site allocations for Wimborne and Colehill identified within the JCS and the extent to which the proposed allocations fulfil the overall objectives and spatial vision for East Dorset and 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. Within these representations we do not comment on every aspect of the JCS; our intention is to comment on those sections where we non-compliance with tests of soundness is apparent, or where we are particularly supportive. To be clear, our primary concern in this instance is the content and justification of Policy KS4 and the proposed housing allocations for Wimborne and Colehill – specifically Policy WMC6.</p> <p>An alternative proposal for housing to the south of Wimborne is considered with specific reference to the SVP land shown on the concept plan attached at Appendix 1 to these submissions. Comments are also provided on a number of other policies within the JCS, on individual response forms, as requested. The full list of policies to which these representations respond are: Policy KS1, KS4, KS5, KS10 Policy WMC3, WMC6 Policy FWP3, FWP4, FWP6, FWP7, FWP8 Policy ME3 Policy HE4</p> <p>Copies of all Core Strategy Response Forms relating to each policy addressed within these representations are contained at Appendix 4.</p> <p>Appendices 1 – 3 to this cover letter are those referred to in the various consultation forms.</p> <p>I trust that all of the enclosed is clear and in order and we look</p>	<p>per annum) or 10-year (800 people per annum) trend would be extremely likely to produce a housing demand figure in excess of the 2008-based CLG projection on which the JCS target is based, owing to the 2008-based figure being based on a much shorter period of lower net migration.</p> <p>In addition, the 2012 Workspace Study includes the Autumn 2011 Experian projection which projects growth of 4,875 new full time equivalent (FTE) jobs over the Plan period. However there is no evidence presented by the Council to show the number of dwellings that would be required to house the labourforce population that would be generated by this growth in employment. However it is considered highly likely that the increase projected by Experian would require dwellings in excess of the 5,250 new dwellings targeted in the JCS.</p> <p>In respect of affordable housing need, the Council has acknowledged the need for 2,130 affordable dwellings over the next 5 years. This need equates to 426 new affordable units per annum taking into account the existing backlog. This high level of affordable need is another factor which would need to be addressed in a more robust assessment of housing need.</p> <p>Paragraph 5.12 of the SHMA refers to provision of 40% of the overall housing requirement (350 per annum, 2013-2028) as affordable (140 affordable units per annum, 2013-2028). The 5-year requirement of affordable need (426 per annum or 2,130 affordable units 2011-2016) identified in the SHMA if spread over the 15-year Plan period of 2013-2028, would yield a rate of 140 per annum: which equates to 40% of 350 homes per annum. This does not consider the additional need that will arise after 2016 (indeed the SHMA confirms the annual need is 347 affordable homes per annum: accordingly it is argued that the plan as it stands fails to address an objectively identified need: which has increased by 46% in the Conurbation as a whole since the 2007 SHMA (paragraph 6.42 of the SHMA 2012), and that much more should be done to encourage delivery of clearly much needed affordable housing within the area. Increasing the overall housing requirement is</p>				

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											<p>forward to engaging with you further in the consultation process.</p> <p>PROPOSED HOUSING REQUIREMENT FOR EAST DORSET: POLICY KS4</p> <p>We 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>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 (our emphasis). 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>Consideration is given within the submitted representations to the strategic site allocations for Wimborne and Colehill identified within the JCS and the extent to which the proposed allocations fulfil the overall objectives and spatial vision for East Dorset and 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 material.</p> <p>Within these representations we do not comment on every aspect of the JCS; our intention is to comment on those sections where we non-compliance with the 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 to these submissions.</p> <p>There is concern that the total housing requirement for East Dorset is inappropriate and not fully justified: there is a question as to whether or not the forecast requirement is an adequate reflection of East Dorset's housing needs, based on a range of housing, economic and demographic factors, trends and forecasts, and</p>	<p>one way in which this may be facilitated. For these reasons, it is considered that the housing target proposed in the JCS has not been set in the context of a fully robust evidence base, and that further scenarios for growth in the context of the economic growth aspirations of the NPPF should be pursued by the Council.</p> <p>Accordingly, we submit that Policy KS4 of the JCS Pre Submission version is unsound on the basis that it is neither fully justified with respect to evidence or in accordance with national planning policy, specifically the requirements to take account of economic signals and to meet household and population projections, taking account of migration and demographic change. It is therefore not 'positively prepared' in that it fails to address objectively assessed need. This policy requires review and additional work undertaken to ensure it meets the requirements of the NPPF and the tests of soundness referred to above. At present it is considered that the policy fails to plan positively for economic growth and the high level of identified affordable housing need, and that insufficient regard has been had to net-migration trends, which, we suggest, would be likely to produce a housing demand figure in excess of the 2008-based CLG projection if projected 5 – 10 years forward. We content that the JCS housing requirement should, as a minimum be the same as that set in the RS – i.e. 6,400 new dwellings across the plan period. This figure was objectively assessed; in the absence of a robust alternative it would represent a suitable benchmark and one founded on a robust evidence base.</p>				

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											<p>whether there is persuasive evidential support the target that has set.</p> <p>Responsibility for establishing local housing requirement figures for LDFs ultimately falls to local councils, providing, in accordance with the NPPF, they give greater prominence to economic growth in their decision making and the targets set are aspirational, but realistic : a five year housing supply should continue to be demonstrated and LPAs should be prepared to evidence and defend their proposed figures at examination.</p> <p>In order to assess the future demographic and economic pressures of East Dorset and accordingly properly consider a realistic housing requirement for the area, it is important to consider it in the context of previous trends, including what has been driving the trends and the extent to which they may continue in the future, taking into account current circumstances. This allows an assessment to be made as to what may reasonably occur in the future.</p> <p>In examining why the Council have opted for a growth scenario of 5,250 dwellings for East Dorset across the plan period, careful consideration has been given to the content of the various background papers produced to support the JCS Pre Submission draft. The following paragraphs set out the results of this analysis, beginning with a review of the planning policy context in which the housing target has been set. We then move on to a consideration of Central Government population and housing projections before setting out the conclusions we have reached as a result of our appraisal of the JCS evidence base.</p> <p>National Planning Policy The National Planning Policy Framework (NPPF) The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these are expected to be applied. The NPPF must be taken into account in the preparation of local and neighbourhood plans. The NPPF considers there to be three dimensions to sustainable development, being economic, social and environmental. Accordingly the planning system is required to perform these same three roles. In respect of its economic role the planning system is intended to contribute to building a strong, responsive and competitive economy, by ensuring sufficient land availability, and by identifying and coordinating development requirements. In its social role, the planning system is intended to support strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations. In its environmental role it should contribute to protecting and enhancing our natural, built and historic environment. Paragraph 8 of the NPPF confirms that these roles should not be undertaken in isolation, because they are mutually dependant. In delivering sustainable development the NPPF confirms that the Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth and that Planning should operate to encourage and not act as an</p>					

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											<p>impediment to sustainable growth. Significant weight should therefore be placed on the need to support economic growth through the planning system.</p> <p>Paragraph 20 confirms that to help achieve economic growth, local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21st Century.</p> <p>The NPPF confirms the need, at paragraph 47, to boost significantly the supply of housing and in doing so confirms that local planning authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing. Furthermore, paragraph 50 confirms the need to plan for a mix of housing based on current and future demographic trends.</p> <p>In dealing with the Plan Making process, paragraph 152 of the NPPF confirms that local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. Significant adverse impacts on any of these dimensions should be avoided. Paragraph 154 confirms the need for Plans to be aspirational, but realistic.</p> <p>The NPPF refers to use of a proportionate evidence base as follows: "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 should 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." More specifically in respect of housing evidence, paragraph 159 of the NPPF confirms that strategic housing market assessments should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period, which: "meet household and population projections, taking account of migration and demographic change;"</p> <p>In respect of business needs, paragraph 160 confirms that local planning authorities should have a clear understanding of business needs within the economic markets operating in and across their area, and that they should work closely with the business community to understand their changing needs and identify and address barriers to investment, including a lack of housing.</p> <p>'Planning for Growth' (23 March 2011) The 'Planning for Growth' statement of 23 March 2011 by the Minister of State for Decentralisation sets out how the planning system has a key role to play in rebuilding the Country's economy, by ensuring that the sustainable development needed to support economic growth is able to proceed as easily as possible. The statement advises that when deciding whether to grant planning permission, local planning authorities should support enterprise and facilitate housing, economic and other forms of sustainable</p>					

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											<p>development. This requires local authorities to take into account the need to maintain a flexible and responsive supply of land for key sectors, including housing; and to consider the range of likely economic, environmental and social benefits of proposals; including long term or indirect benefits such as increased consumer choice, more viable communities and more robust local economies. The statement continues by saying that Local Authorities should make every effort to identify and meet the housing, business and other development needs of their areas, and respond positively to wider opportunities for growth, taking full account of relevant economic signals such as land prices.</p> <p>'Planning and the Budget' (24 March 2011)</p> <p>The 'Planning and the Budget' document published on 24th March 2011 reaffirms the principles of 'Planning for Growth' in respect of Planning and its role in 'doing everything possible to support economic growth and sustainable development, helping to re-build Britain's economy.' The document reasserts the presumption in favour of sustainable development, and the presumption's importance in speeding up the planning process and therefore encouraging economic growth. In paragraph 5 of the document the immediate priority of the Government is set out as follows:</p> <p>'local authorities can start immediately prioritising growth in the decisions that they take locally. The Government has today made clear its expectation that every council should be firmly on the front foot in encouraging and supporting growth.'</p> <p>In summary, national planning policy requires that in planning for future levels of housing, Local Authorities should (bold text our emphasis):</p> <ol style="list-style-type: none"> 1 Should boost significantly the supply of housing in their area; 2 Should identify a scale of housing that meets household and population projections; 3 Should account for migration and demographic change in formulating housing requirements; 4 Ensure that assessment of, and strategies for, housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals; and 5 Should work closely with the business community to understand their changing needs and identify and address barriers to investment, including a lack of housing. <p>Regional Planning Policy Draft Regional Strategy for the South West 2006-2026 (Draft RS) – June 2006</p> <p>Table 4.1 of the Draft RS sets out a housing target for the Bournemouth and Poole Housing Market Area (SHMA) of 38,500-41,800 new dwellings (1,925-2,090 new dwellings per annum) over the period 2006-2026. The SHMA comprises the administrative areas of Bournemouth, Poole, Christchurch, East Dorset, Purbeck and North Dorset. The Draft RS housing target for East Dorset (2006-2026) was set as follows:</p> <ol style="list-style-type: none"> 6 East Dorset (South East Dorset Joint Study Area): 5,200 new dwellings; 7 East Dorset (outside of Joint Study Area): 200 new dwellings. 					

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											<p>A total of 5,400 new dwellings were originally proposed for East Dorset District in the draft RS (our emphasis). Policy SR29 of the Draft RS refers to the South East Dorset Joint Study Area (JSA) and allocates 85 new dwellings per annum to proposed urban extensions at Wimborne Minster and Ferndown in East Dorset District. When considering the housing targets of the Draft RSS it is important to note that the dwelling targets were based on the 2003-Based ONS population projections, but used household formation rates from the 1998-based household projections, which pre-dated the 2001 census. Draft Regional Strategy for the South West Examination in Public Panel Report – December 2007 The Panel Report was published in December 2007 following examination of selected issues arising from the Draft RS of June 2006. As part of their modifications, the Panel deleted Policy SR29 of the draft RS, and replaced it with new policy SR7.4 in respect of housing distribution within the Bournemouth and Poole SHMA. The replacement policy allocated a total of 48,100 new dwellings, 2006-2026, to the SHMA, an increase of 6,300 dwellings from the upper provision target set in the draft RS (41,800 new dwellings). As part of the increased allocation to the SHMA, the provision in East Dorset District was increased from 5,400 to 6,400 new dwellings, 2006-2026 (our emphasis). It should be noted that the Panel modifications were considered in the context of the 2003-based DCLG household projections. The Panel's modifications to policies also confirm a requirement to provide for 45,500 jobs within the Bournemouth and Poole SHMA, of which 23,000 new jobs were to be provided in Bournemouth and 19,000 new jobs in Poole. These figures were subsequently confirmed in the Secretary of State's Proposed Changes of 2008. These were never adopted on account of prospective legal challenges and ultimately the change of Government in May 2010. Central Government Projections Table 2.1 below illustrates the increase in projected population change over the Plan period (2013-2028), from the 2004-based series to the most recent 2010-based Sub National Population Projections (SNPP). The table shows a significant increase between the population growth projection in the 2006-based series (6,100 people) and the 2008-based series (8,400 people). The latest 2010-based series projects lower population growth than the previous 2008-based series (6,700 people). (See Tables in attachment) Critique of Proposed East Dorset Housing Requirement Christchurch and East Dorset Core Strategy Pre-Submission – April 2012 The Christchurch and East Dorset Core Strategy Pre-Submission document (Joint Core Strategy) was published in April 2012 and sets out the planning strategy for the two administrative areas over the Plan period of 2013-2028.</p>					

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											<p>Paragraph 2.26 of the JCS, in setting out the socio-economic profile of the area, advises that: Demand for housing is high and there is a significant problem of affordability due to the high house price:income ratios in the area. Section 3 of the document sets out the challenges that the Council need to deal with. Paragraph 3.1 advises that EDDC need to plan for, inter alia:</p> <ul style="list-style-type: none"> - A significant housing waiting list, with annual housing need identified through the 2012 Strategic Housing Market Assessment, far exceeding even total housing supply; - Almost limitless housing demand, given the popularity of the area to live in. - <p>Paragraph 3.2 emphasises that there is an expectation that planning should be genuinely plan-led, with succinct Local Plans setting out a 'positive long term vision' for an area. Paragraph 3.3 makes reference to the NPPF and the need for Local Plans to be aspirational, but realistic and confirms that strategic priorities should be set for housing and economic development requirements.</p> <p>In respect of housing provision, Section 4 – 'Key Strategy' of the Joint Core Strategy (JCS) sets out the targeted level of housing over the Plan period. As we have established, in respect of the East Dorset District, a total of 5,250 new dwellings are proposed over the Plan period via policy KS4, which equates to an annual average of 350 new dwellings per annum. The policy states: About 5,250 new homes will be provided in East Dorset between the years 2013 and 2028. This will comprise about 2,800 homes within the existing urban areas and about a further 2,500 homes to be provided as new neighbourhoods. The Council aims for a total of 35% of these new homes to be affordable.</p> <p>In setting this target for East Dorset, the JCS acknowledges the following issues (derived from the Bournemouth and Poole Strategic Housing Market Assessment of 2012):</p> <ul style="list-style-type: none"> - Christchurch and East Dorset are amongst the least affordable in the South West; - The size of households in the area is shrinking which increases housing demands. - Young people find it particularly hard to afford a home in the area. - There is a need to provide suitable housing to reduce health inequalities and improve educational attainment. - The population of Christchurch and East Dorset is ageing and a lack of housing delivery will contribute to local economic decline. <p>There is a need to provide an appropriate mix of housing to meet the needs of families and young people who are vital to the economy of the area.</p> <p>In this context, the JCS reports that the Bournemouth and Poole Housing Market Assessment (SHMA) (2012) has been used to assess the need for market and affordable housing. In this respect, the JCS states that: 'The Bournemouth and Poole Strategic Housing Market Assessment (2012) provides an assessment of need for market</p>					

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											<p>and affordable housing. In Christchurch there is a need for 3,375 new market and affordable homes and for 5,250 in East Dorset between 2013 and 2028. In establishing housing targets for Christchurch and East Dorset the assessment of housing need must be balanced against the level of housing that can be delivered sustainably.' (our emphasis)</p> <p>The JCS considers the level of need against the sustainable delivery of new housing. Although this is a consideration it should be noted that in a recent post-NPPF appeal decision, the Inspector addressed this point as follows:</p> <p>'I do not share the Council's view that constraints on growth should play any part in establishing the housing requirement. Such constraints do not bear upon the actual need for dwellings, but rather upon the arrangements for their provision. In my view, the stage at which growth constraints should be taken into account is when assessing how the identified housing need can be addressed in a sustainable way; they cannot reasonably be used as justification simply to reduce the number of dwellings calculated as necessary to meet housing need.'</p> <p>It therefore follows that the overall need should be established first, before the consideration of its sustainable delivery is addressed. Bournemouth/Poole Housing Market Area 2011 Strategic Housing Market Assessment Update Summary report for East Dorset District Council (January 2012)</p> <p>As set out in the JCS, the Bournemouth/Poole SSHMA has been used to determine the need of market and affordable housing required over the Plan period, resulting in the target of 5,250 new dwellings between 2013-2028 as set out in the JCS. This following paragraphs appraise the East Dorset District section of the SSHMA and its conclusions regarding housing need.</p> <p>Section 5 of the SSHMA is entitled 'Housing Need' and addresses the affordable housing need within East Dorset. Using the CLG housing needs model, the analysis contained in the SSHMA has concluded a requirement for 426 new affordable housing units per annum between 2011-2016. This would represent a total of 2,130 new affordable dwellings over the 5-year period; approximately 41% of the total housing provision targeted over the 15-year Plan period (2013-2028) in the JCS.</p> <p>In respect of other influences on housing need section 6 – 'The Future Housing Market' acknowledges that the economy has a significant role to play as follows:</p> <p>'It is also influenced by the economy at the local and sub regional level, recognising that changes in employment will influence future migration patterns as people move to and from the area to access jobs.'</p> <p>However, despite this acknowledgement the SHMA provides no scenario for growth based on economic growth. The 'Bournemouth, Dorset and Poole Workspace Study: 2012 Update' includes employment projections for sub-region and for East Dorset, which are discussed in the further on in these representations. However, in the context the housing need section of the SHMA, the NPPF states the following:</p>					

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											<p>'Planning policies should recognise and seek to address potential barriers to investment, including a poor environment or any lack of infrastructure, services or housing.'</p> <p>Due consideration to economic growth should therefore be considered: but there are no scenarios for growth based on job growth set out within the SHMA.</p> <p>Section 6 of the SHMA acknowledges demographic projections in accordance with the consideration requirements of the NPPF. However, the SHMA simply sets out the latest 2008-based household projection produced by CLG, which projects growth of approximately 336 new dwellings per annum (5,040 new dwellings, 2013-2028). A 4% vacancy rate provides an additional 14 dwellings per annum, reaching the total of 350 dwellings per annum over the Plan period (5,250 new dwellings, 2013-2028). In concluding, section 8 of the SHMA simply states the following: 'Pre economic downturn migration trends would result in household growth in East Dorset of around 336 per annum which is significantly above completions over the past four years.'</p> <p>Despite this acknowledgement, the SHMA does not consider any other household projection scenarios other than that based on the 2008-based CLG household projection series. The CLG projection only considers the net-migration trends of the past two to three years. They do not consider the 5 or 10-year average trends as set out in Table 2.3 above. Modelling based on the longer 5 and 10-year periods would incorporate experienced fluctuations in the demographics of East Dorset and would therefore provide far more robust scenarios for household growth than the Central Government household projections.</p> <p>Instead the SHMA includes two scenarios for growth based on delivery of 30% and 40% of the affordable housing need, 2011-2031. Absence of demographic-led scenarios conflicts with paragraph 159 of the NPPF which states:</p> <p>'The Strategic Housing Market Assessment (SHMA) should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which meets household and population projections, taking account of migration and demographic change.' (Our emphasis)</p> <p>Bournemouth, Dorset and Poole Workspace Study: 2012 Update (March 2012)</p> <p>The 2012 Workspace Study provides up-to-date economic projections for the sub-region and its constituent local authorities. The emphasis on economic growth presented in the NPPF, and its relationship to housing provision is clear, and as set out above housing provision should not act as a barrier to building a strong, competitive economy.</p> <p>However, as set out above the East Dorset SHMA fails to consider an economic-led scenario for housing growth. The SHMA reports that over the period of 2011-2031 the working age population will drop by approximately -4% in East Dorset. It is imperative therefore that enough new dwellings are provided to ensure that the projected number of jobs in East Dorset can be filled by residents of the Borough. Failure to do so would only exacerbate</p>					

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											<p>commuting patterns, conflicting with National, Regional and Local policies for sustainable development.</p> <p>Paragraph 9.12 of the 2012 Workspace Study sets out the Autumn 2011 projections for job growth in East Dorset. This up-to-date projection shows that 6,500 Full Time Equivalent (FTE) jobs will be generated in East Dorset over the period of 2011-2031. This equates to 325 new FTE jobs per annum, and a total of 4,875 new FTE jobs over the Plan period (2013-2028).</p> <p>In the JCS and its evidence base, the effect on the housing need to accommodate this latest projection of job growth is absent. This conflicts directly with the provisions of the NPPF, particularly paragraph 158 which states:</p> <p>‘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 should 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>In summary it is considered that East Dorset and Christchurch Council have provided limited technical evidence in support of their proposed housing target; 5,250 new dwellings, 2013-2028. As set out above the Council only consider two scenarios based on 30% and 40% affordable housing provision in their SHMA. There are no migration or economic-led scenarios considered.</p>					
359553	Mrs Linda Leeding	West Parley Parish Council	CSPS1639	Policy KS4	No						<p>This policy is Unsound.</p> <p>The figure of 5250 new homes in East Dorset between 2013 and 2028 is not justified by the evidence. Para 2.28 of the Core Strategy quotes the requirement in the Strategic Housing Market Assessment 2011 as about 430 affordable houses per year in East Dorset. In fact the SHMA does arrive at this figure after a long theoretical “practice guide” study – but the SHMA then goes on to dismiss it as unrealistic in the current investment climate.</p> <p>The SHMA goes on to observe that in reality the private rented sector will continue to house many people in the affordable housing group. It concludes that it will be for Councils to take a qualitative view on realistic housing targets dependent on economic viability and policy priorities as well as the level of housing need.</p> <p>It is therefore misleading and unjustified for the Core Strategy pre submission document to claim the support of the SHMA for any particular figure for housebuilding. The District Council has obviously made its own judgements, as the SHMA advised it to do. But it is a very serious omission – and fundamental to the whole Core Strategy – that even though the proposed scale of housebuilding will destroy whole swathes of important green belt throughout East Dorset, the Core Strategy uses a figure for which there is no realistic quantitative evidence and gives no reasons at all for its qualitative choice.</p>		Yes, I wish to participate at the oral examination		149	
656493	Cllr Tony Gibb	Eastern Area DAPTC	CSPS1472	Policy KS4	No	No	No	No	No	No	RURAL RESPONSE TO EAST DORSET AND CHRISTCHURCH CORE STRATEGY	The East Dorset and Christchurch Core Strategy needs to be enhanced in a number			149	

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											<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 & Shapwick, Sixpenny Handley with Pentridge, Sturminster Marshall. It does not include the conurbations along the A31 or Verwood and Three Legged Cross. 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. http://webarchive.nationalarchives.gov.uk/20110215111010/http://archive.defra.gov.uk/evidence/statistics/rural/rural-definition.htm .</p> <p>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. "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> <p>All the points made in the latest CRC State of the Countryside Report 2010 are valid in East Dorset http://www.defra.gov.uk/crc/documents.state-of-the-countryside-report/sotc2010/ . 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, Crichel, 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</p>	<p>of areas before it can be said to reflect the majority of the East Dorset area. It cannot be endorsed in its current state.</p>				

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											<p>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. 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. 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. 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 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</p>					

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											<p>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"> • 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%. • 23.5% of people in rural areas are over state retirement age compared with 18.1% in urban areas. • 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. • Approximately 5% of rural households were using dial-up internet connections in 2009 compared with 2% in urban areas. • 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. • 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. • 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%. • 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. • 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. <p>New Neighbourhoods are not defined.</p>					
359553	Mrs Linda Leeding	West Parley Parish Council	CSPS2006	Policy KS4	No						<p>This policy is Unsound. The figure of 5250 new homes in East Dorset between 2013 and 2028 is not justified by the evidence. Para 2.28 of the Core Strategy quotes the requirement in the Strategic Housing Market Assessment 2011 as about 430 affordable houses per year in East Dorset. In fact the SHMA does arrive at this figure after a long</p>		Yes, I wish to participate at the oral examination		149	

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											<p>theoretical “practice guide” study – but the SHMA then goes on to dismiss it as unrealistic in the current investment climate. The SHMA goes on to observe that in reality the private rented sector will continue to house many people in the affordable housing group. It concludes that it will be for Councils to take a qualitative view on realistic housing targets dependent on economic viability and policy priorities as well as the level of housing need.</p> <p>It is therefore misleading and unjustified for the Core Strategy pre submission document to claim the support of the SHMA for any particular figure for housebuilding. The District Council has obviously made its own judgements, as the SHMA advised it to do. But it is a very serious omission – and fundamental to the whole Core Strategy – that even though the proposed scale of housebuilding will destroy whole swathes of important green belt throughout East Dorset, the Core Strategy uses a figure for which there is no realistic quantitative evidence and gives no reasons at all for its qualitative choice.</p>						
524723	Mr John Worth	Wimborne Civic Society	CSPS1896	Policy KS4							<p>Criteria - The Core Strategy is required to be 'justified'. 'effective' and 'consistent with national policy'. To these criteria the Government, at a late stage, has added that the strategy must be 'positively prepared' including, inter alia, seeking to meet 'unmet requirements from neighbouring authorities'.</p> <p>Effectiveness - East Dorset needs a planning policy which is comprehensible by and responsive to the priorities of its residents. The effectiveness of the Core Strategy will therefore be judged on how far it meets these two objectives. The strategy will need to be a safeguard against inappropriate action by developers and misguided initiatives at parish or neighbourhood level. It must be practicable and open to amendment in response to changing circumstances.</p> <p>Justification - As to justification it is appreciated that targets have been set for housing, commercial and other areas. However we seriously question the changes in housing targets for the Wimborne/Colehill area between the Core Strategy Options for Consideration of October 2012 and the current pre-submission document. Excluding Leigh Park, yet to be determined, the proposed Wimborne/colehill additional housing units have risen from 955 to 1300, up 36%, in addition to the 186 dwelling scheduled for the Cobhams/Brook Road development.</p>						
359261	Mr Doug Cramond	DC Planning Ltd	CSPS2093	Policy KS4		Yes							Yes, I wish to participate at the oral examination	In connection with comments on WMC3	149		
523531	Mr Tim Hoskinson	Savills	CSPS2121	Policy KS4		No		Yes			<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. The recognition in policy KS2 of the need to provide extensions to existing urban areas to meet development needs is welcomed. However the evidence base suggests the need for new housing is</p>	<p>Amend Policy KS4 as follows: At least 5,250 new homes will be provided in East Dorset between the years 2013 and 2028. This will comprise about 2,800 homes within the existing urban areas and at least a further 2,500 homes to be provided as new</p>				149	

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											potentially significantly higher than the level of housing provision set out in Policy KS4. The level of housing provision set out in Policy KS4 should therefore be considered a minimum	neighbourhoods.				
359529	Mrs Lisa Goodwin	Sixpenny Handley with Pentridge Parish Council	CSPS2470	Policy KS4							The term New Neighbourhoods is not defined.				149	2248860_0_1.pdf 2248941_0_1.pdf 2248948_0_1.pdf
657462	Ms Carla Fulgoni	The Planning Bureau Limited	CSPS2351	Policy KS4							<p>I set out below the comments on behalf of our clients McCarthy & Stone Retirement Lifestyles Ltd in respect of the Core Strategy. McCarthy & Stone is the UK's leading provider of specialist Retirement and Extra Care Housing for older owner-occupiers and are members of the Housing and Ageing Alliance. Having developed over 800 developments throughout the UK the company is in a very strong position to comment upon the impact of emerging Development Plan policies, in particular in relation to private retirement and extra care developments. This is a specialised form of development that has its unique development and selling constraints that make it very different to open market housing.</p> <p>The principle ongoing objection that McCarthy and Stone have to the emerging Core Strategy policies of the Council stems from the need to ensure that greater weight and emphasis be placed upon the ageing population and their associated housing needs and options. It should not be underestimated that unless it is properly planned for over the next 20 years there is likely to be a serious short fall in specialist accommodation for the older population, which will have a knock on effect in meeting housing needs of the whole area and wider policy objectives. McCarthy and Stone therefore raise objection to the absence of policy consideration.</p> <p>Core Strategy</p> <p>The Core Strategy rightly draws out that the Districts will experience a "significant ageing of the population" during the plan period. Strategic Objective 5 of the Core Strategy states the need to deliver a suitable, affordable and sustainable range of housing to provide for local needs. In broad overall terms McCarthy and Stone set out that as part of the Core Strategy's priorities and objectives more specific reference should be made to the needs of the ageing population and particular emphasis made to the housing of this proportionately rising section of society. The Core Strategy identifies the quantities of residential dwellings required in each of the District's settlements, in policies. However a specific policy or reference to the needs of the ageing population should be included to identify the wide ranging issues that will be associated with a larger proportion of people in need of accommodation, care and other facilities which cannot be addressed under the wider "residential" heading. While saved policy HODEV3 sets out the criteria for the Development Of Older Person's Accommodation this needs to be updated, whether it is incorporated into the settlement housing allocations or as a standalone policy. It is clear that the opportunity exists to provide a dedicated policy or</p>				149	

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											<p>acknowledgment within policies KS3 and KS4 to outline the benefits of older person's accommodation including owner occupier retirement and extra care housing. This is evident in the document as it states that some areas, for example West Moors, have an older population profile with 40% of its population over retirement age and others have a considerably younger population profile, such as Corfe Mullen. The complex needs, expectations, provision of care and support will vary considerably within this age group and there will be a need to provide a holistic approach to different types of housing and care provision from the public and private sector, and across all types of tenure. The Core Strategy itself fails to fully explore the implications and lacks policy promotion and as such the strategy should pick up this more detailed issue.</p> <p>By actively supporting such accommodation at policy level whether through proactive policies or specific land allocation the supply of retirement housing will increase and help release larger properties back into the housing market for more efficient use of the housing stock. This will help achieve the Core Strategy's objective 5 to create a sustainable range of housing to meet local needs and demands.</p> <p>Specialist Accommodation for the Older Population - NPPF The National Planning Policy Framework sets out the strategic case to assess the housing need for the older population. Para 50 of the NPPF states that ... To deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should: ".....plan for a mix of housing based upon current and future demographic trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities" and".....identify the size, type, tenure and range of housing that is required in particular locations reflecting local demand..." and "where they have identified that affordable housing is needed, set policies for meeting this need on site, unless off site provision or financial contribution of broadly equivalent value can be robustly justified (for example to improve or make more effective use of the existing housing stock) and the agreed approach contributes to the objective of creating mixed and balanced communities. Such policies should be sufficiently flexible to take account of changing market conditions over time.</p> <p>By 2026 older people will account for almost half (48 per cent) of the increase in the total number of households, resulting in 2.4 million more older households than there are today . The number of people aged 85 or over will increase by 2.3 million by 2036 – 184 per cent increase . The ageing of society poses one of our greatest housing challenges. The Government has recognised this and has set out its aims and objectives of providing more specialised housing for older people in 'A National Strategy for Housing in an Ageing Society – Lifetime Homes, Lifetime Neighbourhoods'. The National Strategy identifies the important role the planning system has in delivering housing choice for older</p>					

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											<p>people, stating; 'Spatial planning offers a new and real opportunity to provide more and better quality housing – across the necessary range – for an ageing population in a way that we've not done before.' In respect to future planning policy the Strategy is clear as to the level of importance to be given to an ageing society, stating; 'Recent reforms to the planning system require regional and local plans to take proper account of ageing and the needs of older people. Future planning policy reform will reflect the high priority we are giving to the challenge of ageing.' It is considered that in light of the Government Strategy guidance that it is appropriate for the Core Strategy to have greater regard to this objective. My Client's response is based on meeting the Government's objective, set out in the National Strategy, to ensure that sufficient specialist housing is delivered to meet the growing needs of an ageing population. This is reinforced in recent publications, please refer to the attached appendix to this letter. The ageing population has increasingly been seen as a potential issue that needs to be positively planned for in all new Local Development Frameworks and particularly at the Core Strategy level. The Department of Health and Communities and Local Government document 'Lifetime Homes, Lifetime Neighbourhoods – A National Strategy for Housing in an Ageing Society' dated February 2008 takes this further in looking at the wide range of options that policy makers need to include in formulating future plans. The Strategy identified providing a positive vision for specialised housing and providing more homes and more choice through public funding and encouraging private sector provision through planning system reforms(para 27). The strategy also noted that the vast majority of older householders (68%) owned their own home in 2001, and the figure was projected to rise to 75% by 2026. As such, these people are expected to wish to maintain their own independence by continuing to own their own homes. Chapter 11 of the Lifetimes Homes strategy specifically deals with specialised housing identifying that there is a continuing need for specialised housing and that such accommodation will continue to offer a certain advantage over private housing, particularly to those who need a physical environment designed for those with impairments, better access to help and care, company and a sense of safety. In the provision of appropriate accommodation for the elderly it is also recognised that the private sector has a major strategic role in this. Specialist Retirement Housing Needs Specialist retirement housing meets a number of Core Strategy aims and yet is given little weight in the overall document. Retirement Housing and Assisted Living Extra Care: 1. brings older people closer to transport links, local shops and services reducing car dependency, 2. enables older people to release equity, 3. frees up the housing chain, 4. reduces under occupation and meets the wider Core Strategy aims of retaining and enhancing much needed housing stock to</p>					

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											<p>families (85% of McCarthy and Stone customers downsize from houses to move to retirement housing),</p> <p>5. creates opportunities for more efficient provision of local care services eg GP services, reduces the need for respite care after hospital stays, offers a supportive setting with close family, neighbours and house manager, reduces pressure on working families to provide informal care, and</p> <p>6. it makes optimum use of centrally located brownfield sites. Well located and designed specialist housing for older home owners is a highly sustainable form of housing. There should be a presumption in favour of sustainable housing and in particular specialist housing which is being proposed on suitable sites.</p> <p>Mix of Housing – A retirement and care development such as that developed by McCarthy and Stone is an important contributor to the housing mix in a particular area. By its very nature it is a single entity with communal space and facilities and could not provide a mix of house types and tenure within the same block.</p> <p>Summary</p> <p>It is clear from local and national statistical data that the demographics of Christchurch and East Dorset and the UK as a whole is ageing. The Council recognise the current and future increase in the older people in the district and in older person households which will have significant implications on the overall housing market in a district with many physical constraints on residential development. The evidence suggests that there is a current and growing need for specialised forms of private sector accommodation for older persons such as retirement housing (cat II type sheltered housing) and assisted living extra care. The Core Strategy fails to draw out sufficient policy weight on this issue. I have appended to this letter recent assessments and reports that reinforce the need for LPAs to give more appropriate weight to such specialist housing and extra care. I trust that due weight will be given to these reports and the requirements of the NPPF to provide policy support for this highly sustainable form of development.</p>					
359277	Mr Jamie Sullivan	Tetlow King	CSPS2671	Policy KS4	Yes	No	No	No	No	No	<p>We also welcome the increase in East Dorset in dwellings per annum proposed (dpa) above the RSS target up to 350 dpa. The RSS set a target of 320 dpa between 2006 and 2026. However, as with Christchurch, this needs to be viewed against the period of very low delivery over the past five years. The most up-to-date annual monitoring report shows that Christchurch Borough Council have only been delivering an average of 127 dpa between 2006 and 2011. the statistics also show that only 61 dwellings have been completed over the past three years. We urge the Council to attempt to make up for this backlog of housing demand in addition to providing housing at a higher level than the RSS.</p> <p>As with Christchurch the proposed housing target will need to demonstrate that it will meet objectively assessed housing needs to accord with the NPPF. It does not appear that the current housing target will achieve this. The 2011 SHMA states that the demographic growth is 6,714 households between 2011 and 2031</p>		No, I do not wish to participate at the oral examination		149	

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											<p>(336 households per annum) and 440 affordable housing dwellings per annum. Again the target of 350 dpa is not sufficient to meet this need, even taking into account overlap between the affordable and demographic figures.</p> <p>We therefore recommend that the District Council assess a much higher housing target given the findings of the 2011 SHMA, in order to ensure this policy is sound and positively prepared as per the requirements of the NPF. Whatever target the local authorities decide upon, they will need to set out a clearer justification for the figure they have arrived at based on the available evidence. The RSS can be relied on to provide justification, but on this occasion more up-to-date evidence points to a higher housing target. Furthermore, the RSS only covers the period up to 2026 and the plan runs to 2028.</p> <p>The NPPF sets out the tests of soundness that the Local Plan will be assessed against. One of these tests is that it is positively prepared and that local authorities should seek to: meet objectively assessed development and infrastructure requirements, including some unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development."</p> <p>Currently the local authorities are not aiming to meet the housing needs arising within their own local authority areas. In addition there is little chance of neighbouring Districts being able to accommodate the overspill housing from these areas. Southampton and Poole have already adopted their Core Strategies and Bournemouth has reached the examination stage with a Core Strategy which excludes a 3,000 home urban extension proposed by the RSS to meet local housing needs. This under supply is likely to lead to further pressures on the housing stock of East Dorset and Christchurch. In our view, the two Councils need to fully assess the impact of the housing pressures from neighbouring districts and seek to meet them where possible in order for the Core Strategy to be declared sound.</p> <p>"For market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period and set out a housing implementation strategy for the full range of housing describing how they will maintain delivery of a five-year supply of housing land to meet their affordable housing target."</p>					
490823	Mr Ian Jones	Ferndown Town Council	CSPS29 86	Policy KS4	Yes	No	No	Yes	Yes		Lack of information about numbers of people who are on more than one local authorities' housing register needs to be rectified since this deficiency may lead to an exaggerated housing need for S E Dorset. At the focus group meeting held on 11th June 2012 the figure of 50% affordable housing was suggested. This will be unachievable on the evidence discussed at that meeting.	See above	No, I do not wish to participate at the oral examination		149	
656643	Mr Tom Whild	Terence O'Rourke Ltd	CSPS31 79	Policy KS4	Yes	No	Yes	Yes	Yes	Yes	Policies KS3 and KS4 are central to the Core Strategy as they set the housing requirements for Christchurch and East Dorset, respectively for the plan period. Therefore it is vital for the future of both districts that the figures are set at a level, which will ensure that the housing needs of the district can adequately be met. Paragraph 182 of the National Planning Policy Framework (NPPF)	In order to ensure that an appropriate level of housing can be delivered across both districts, the overall housing allocation for East Dorset should be increased from 5,250 to at least 5,605 for the plan period, in order to meet the shortfall of housing in	Yes, I wish to participate at the oral examination	The Perry Family Trust holds land which could be made available as a suitable additional	149	2253414_0_1.pdf

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											<p>states that for Development Plan Documents to be considered sound they need to be Positively Prepared, Justified, Effective and Consistent with national policy. In order to meet the test of being positively planned the NPPF states that the strategy should seek to “meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.</p> <p>Paragraph 159 of the NPPF requires that Local Planning Authorities have a clear understanding of housing needs within their area. In this context, the key evidence base supporting the housing figures for each district is the Strategic Housing Market Assessment (SHMA). While the housing figure for East Dorset meets the need identified in the SHMA, the final figure for Christchurch is set below the figure in the SHMA to the extent that there would be a shortfall of 355 dwellings within the district over the plan period. In this respect Policy KS3 cannot be considered to be positively planned, as it does not meet the objectively assessed needs of Christchurch.</p> <p>Policy KS4, setting the housing requirements for East Dorset, meets the housing need for the district as determined through the SHMA. While this would not be an issue if the core strategy were being prepared as a district wide document, this is a joint core strategy which encompasses both Christchurch and East Dorset. As the joint core strategy covers both districts we consider that it should take a more holistic approach to the delivery of housing. This is supported by the requirement of the NPPF for plans to be positively prepared, which requires them not only to meet the objectively assessed requirements of the district but also to include unmet requirements from neighbouring authorities.</p> <p>The production of a joint core strategy for Christchurch and East Dorset presents a prime opportunity for the housing requirements which cannot be met within Christchurch to be provided within East Dorset District. The supporting text for these policies recognises the fact that both authorities are amongst the least affordable areas in the south west. In this context it is wholly inappropriate to propose a strategy which would fail to meet the objectively assessed housing needs for the plan area. The overall effect of this would likely be to further worsen the affordability of housing within both districts.</p> <p>In addition to failing to meet the requirements of the district, policies KS3 and KS4 also conflict with strategic objective 5 of the Core Strategy. That objective is “To deliver a suitable, affordable and sustainable range of housing to provide for local needs.” The interpretation for that objective goes on to state that sufficient housing will be provided within Christchurch and East Dorset to reduce local needs. However as the housing numbers identified in policy KS3 fail to provide even the minimum identified for Christchurch through the SHMA, the core strategy will fail to meet this objective. This is the case without giving consideration to the potential for issues with the deliverability with strategic development sites.</p>	<p>Christchurch. This change should be supported by an additional paragraph in the supporting text explaining that the increase in East Dorset is to meet the deficit from Christchurch.</p> <p>In order to ensure that such a policy change does not result in unplanned and speculative development within East Dorset, the authorities may wish to consider allocating one or more ‘overflow’ sites specifically to meet the additional housing requirement arising from Christchurch. The suitability of any overflow site should be assessed in terms of the normal plan making process.</p>		<p>allocation to meet the overflow requirements arising from Christchurch. We are able to provide specialist technical insight and a wealth of local knowledge which may assist the inspector in assessing the Core Strategy.</p>		

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657138	Mr Mike Hirsh	Intelligent Land	CSPS3214	Policy KS4	Yes	No	Yes	Yes	Yes	Yes	<p>The Core Strategy does not provide for: a policy to positively resolve the future of Stapehill Abbey and its grounds in accordance with the general advice of the National Planning Policy Framework. A full range of housing and in sufficient number of proposed units at variance with National Planning Policy Framework advice.</p>	<p>Policy: Stapehill Abbey Ferndown A New Neighbourhood is located at Stapehill Abbey west of Ferndown to provide a site for new homes, including those arising from the conversion of the Abbey complex. The total development will comprise approximately fifty-five residential units. To enable this development the Green Belt will be amended to exclude the site for new housing. Use of the existing "listed" Abbey complex, layout and design. The use of the existing listed building complex will be determined by the best solution for the long term future of the historic fabric, in the main providing a residential conversion for dwelling units. Suitable additional uses for parts of the building may include offices (B1), educational or leisure. A development brief detailing the uses for the listed building and the implementation of a package to ensure its early restoration shall be agreed by the Council. The brief will set out the financial arrangements and the phasing of associated enabling development to ensure that any "conservation Deficit" is satisfactorily resolved. Once the development identified above has come forward and the historic fabric has been restored accordingly, a second phase of development will be permitted for a scheme where prime housing at a net density of no more than three dwelling per hectare shall be provided. In addition a scheme for a minimum of ten affordable housing units, an on-site SANG and up to two hectares of land for allotments shall be developed. Delivery and monitoring Process: The development management process. The Architect's Panel will be used to inform decision making Close working with local community, the existing landowner, the Town Council in relation to the allotment provision and other authorities and service providers. The Policy will be monitored: Regular visits from the Design and Conservation Officer during the restoration. Building for life assessments. The annual completion survey.</p>	Yes, I wish to participate at the oral examination	It will inform the Inspector about housing land supply generally and "prime housing" in particular. (In relation to housing land supply Intelligent Land is willing to try to agree with the council common ground to minimise the time before the Inspector)	149	2253857_0_1.pdf 2253838_0_1.pdf 2253853_0_1.pdf 2253854_0_1.pdf 2253842_0_1.pdf 2253841_0_1.pdf

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523531	Mr Tim Hoskinson	Savills	CSPS3190	Policy KS4		No		No			<p>The policy is considered 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 recognition in policy KS2 of the need to provide extensions to existing urban areas to meet development needs is welcomed. However the evidence base suggests the need for new housing is potentially significantly higher than the level of housing provision set out in Policy KS4. The level of housing provision set out in Policy KS4 should therefore be considered a minimum.</p>	<p>Amend Policy KS4 as follows: At least 5,250 new homes will be provided in East Dorset between the years 2013 and 2028. This will comprise about 2,800 homes within the existing urban areas and at least a further 2,500 homes to be provided as new neighbourhoods.</p>	Yes, I wish to participate at the oral examination	<p>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.</p>	149	2249911_01.pdf 2249910_01.pdf 2249912_01.pdf
523319	Mr Ryan Johnson	Turley Associates	CSPS3294	Policy KS4		No	Yes	Yes	Yes	Yes	<p>Housing Provision NPPF requires LPAs to objectively assess and meet the need for market and affordable housing in their area, as far as is consistent with NPPF, including any unmet requirements from neighbouring authorities where it is reasonable and sustainable to do so (paragraph 14, 47 and 182, NPPF). For the plan to satisfy the tests of soundness, the Council must have first objectively assessed such needs and then tested alternative strategies to meet this need. Only once this process is complete can the Council claim their strategy satisfies the 'justified' test of soundness. We contend the Council have not tabled sufficient evidence as yet to meet the NPPF requirement to 'objectively assess' their housing need. Nor have the Council assessed and consulted on alternative ways of meeting themselves, or with the help of adjacent authorities (under the duty to cooperate defined in the Localism Act and NPPF) some or all of these objectively assessed needs. We set out below our comments and suggested changes required to remedy this before the plan is formally submitted to the Secretary of State. Addressing first the issue of housing need. The 2011 SHMA Update published by the Dorset authorities in January 2012 indicates that affordable need alone in East Dorset is 426 homes a year (6,390 if extrapolated over the plan period 2013-2028). Paragraph 14, 47 and 182 of NPPF requires LPAs to objectively assess housing need, and then look at options to meet this need, before concluding on a single option. We have reviewed the Council's evidence base and cannot find any evidence to suggest they have explored options to meet the identified need for</p>	<p>The evidence base informing the policy should be updated as indicated above. Further consultation should be undertaken on this and any material revisions to the plan that may arise from this. For assistance, we refer the Council to the statements made recently by the Planning Inspectors examining both the Wigan and York plans.</p>	Yes, I wish to participate at the oral examination	<p>We would wish to participate at the Examination in Public to elaborate on these comments, particularly in the context of the lands controlled by our client.</p>	149	2255452_01.pdf 2255451_01.pdf

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											<p>affordable housing within the district themselves, or jointly with adjoining authorities. The SHMA merely concludes it would be unrealistic to meet the 426pa figure on grounds of past completions and potential significant impact on the private rented sector of the housing market. This does not in our view provide robust evidence to justify why some or all of the 426pa cannot be met. We conclude the Council will need to provide this evidence if they are to satisfy paragraph 14, 47 and 182 of the NPPF. Rather than testing alternative options to meet this need (as NPPF requires), the SHMA recommends that anticipated housing completions over the plan period be used to deduce the housing provision figure for the district. Using only trend-based data, which excludes employment growth implications, a combined market and affordable housing provision figure of around 350 homes per year is suggested for the period 2011-2031. This equates to 5,250 homes for the current plan period 2013-2028. Less than 140 of the 350 homes per year will comprise affordable homes according to the SHMA. This is considerably less than the assessed need for 426 affordable homes per year. The Council will therefore need to provide compelling evidence to show why they could not meet more of this housing need. Indeed, paragraphs 14, 47 and 182 of NPPF require it. This needs to be provided before the Core Strategy DPD is formally submitted to the Secretary of State if the Council are to satisfy the tests of soundness within NPPF. The annual housing provision figure of 350pa suggested by the SHMA for inclusion in the Core Strategy is a single trend based option. The Council have not produced and tested alternative options that factor in employment growth. The latter is fundamental in our view in a district with an ageing population and declining population of working age (paragraph 2.21-2.22 of the Core Strategy DPD). This factor may suggest the need to test alternative levels of housing growth to redress a decline that has significant consequences for the district's future economic prosperity. In light of the above, we recommend the Council test alternative options to accommodate more of their objectively assessed housing need. This should factor in housing needs associated with the employment growth proposed in the district and adjoining districts, as required by paragraphs 14, 47 and 182 of the NPPF. Once growth options are deduced, they must then be tested to see if they can be sustainably accommodated from suitable and available sources of land supply. A robust SHLAA is needed to do this, which we contend the Council cannot claim at present. We elaborate on this in the section below.</p> <p>ii. Housing Supply Policy KS4 indicates 5,250 homes are to be provided in the period 2013-2028. This comprises up to 2,800 homes in the urban areas, with the remaining 2500 homes directed to new neighbourhoods largely on green belt land. On closer scrutiny of the SHLAA however, a significant proportion of sites included in the 2800 urban supply are yet to be confirmed as available and therefore achievable within the plan period. To accord with paragraph 47 of NPPF we recommend the Council</p>					

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											<p>obtain this evidence prior to submission of the plan to the Secretary of State. This evidence may well indicate the need for revisions to the Core Strategy DPD and further consultation prior to formal submission.</p> <p>We would refer the Council to the recent pre-hearing statements made by Planning Inspectors examining the Wigan and York plans. Both illustrate the importance of ensuring this evidence base is robust.</p> <p>In addition, a large proportion of supply comprises possible opportunities for intensification within existing residential areas. This includes a significant proportion from the sub-division of detached units and building on residential gardens. The latter no longer affords the status of previously developed land and should not be included in land supply calculations under paragraph 48 of the NPPF. In the absence of evidence to confirm the availability of these sources of supply, such sites are neither deliverable, developable, nor broad locations for growth identified on the Key Diagram; and therefore fall into the definition of windfall. We would therefore question whether this satisfies the tests of soundness in NPPF, particularly the 'Effective' test given the inherent uncertainties surrounding delivery from such sources within the plan period.</p> <p>This places greater emphasis on the Council to produce compelling evidence that their housing trajectory has a reasonable prospect of delivery within the plan period, particularly within the first five years of adoption of the plan (paragraph 47 of the NPPF). At present the uncertainties over the availability and achievability of a significant proportion of supply bring this into question. Recent post NPPF appeal decisions concerning five year housing land supply (i.e. APP/C1625/A/11/2165865) indicate housing shortfalls should aim to be recovered in the next five years of the plan period. This and the NPPF (footnote 41) confirm that RSS remains a material consideration until formally revoked by order. Given this context and looking at the latest SHLAA (2011) published by the Council, there is unlikely to be a sufficient supply of land to meet housing requirements in the first five years of the plan period. No contingencies are put in place to address five year supply shortfalls in Policy KS4, contrary to paragraph 47 of NPPF. Under paragraph 49 of NPPF the land supply policies of the plan would therefore be out of date at the point of adoption.</p> <p>To accord with paragraph 47 of NPPF, the Council should allocate further land to address such shortfalls and include a contingency strategy to address any future shortfalls in five year housing land supply. This could include the release of certain sites from the SHLAA to address shortfalls, and possibly criteria the Council will apply to planning applications on such sites. An example of such an interim release policy has been adopted by Chichester City Council. Another adopted example includes Wokingham District Council's Core Strategy DPD, which includes an interim release strategy pending adoption of their Site Allocations DPD. Contingency policies such as these provide the Council with a measure of control when land supply drops below five years. This</p>					

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											<p>is shown to be the case at present and therefore highlights the importance of allocating further land and including contingencies to accord with NPPF paragraph 47.</p> <p>iii. Most Appropriate Strategy</p> <p>If the Council are to justify their decision to opt for 5,250 homes as the housing provision for the district in the period 2013-2028, and accord with NPPF, they must first objectively assess housing need and then test options to meet this need. Only once this has been completed can the Council claim they have met the 'justified' test of soundness in NPPF.</p> <p>We have indicated in the previous sections the need for alternative growth option assessments. These should test whether a greater proportion of the district's housing needs can be met within the district, or outside the district through the duty to co-operate provisions of the Localism Act. Equally, the Council should demonstrate they have also assessed whether the district could accommodate any unmet requirements from adjoining authorities (paragraph 182, NPPF). These assessments should be based on a robust SHLAA, which for the reasons stated we contend the Council are unable to claim at present.</p> <p>Finally, the Council have not consulted on alternative options to development proposed in policy CM1. In the absence of this it is difficult to see how the Council can satisfy the 'Justified' test of soundness in NPPF, particularly as this is the proposed plan for submission to the Secretary of State. We understand an alternative sites consultation is to take place in the autumn this year. However, it is unclear how the results of this will inform the plan given its advanced stage of preparation. In our view the Council will need to demonstrate they have assessed and consulted on reasonable alternatives and in light of this have concluded that the CM1 strategy proposed is the most appropriate for the plan period. The Council are unable to demonstrate this at present and therefore fail the 'Justified' test of soundness in NPPF in our view.</p>					
656678	Mr James Cleary	Pro Vision Planning and Design	CSPS3492	Policy KS4	Yes	No	Yes	Yes	Yes	Yes	Please see enclosed representations.	Please see enclosed representations.	Yes, I wish to participate at the oral examination	1) Because of the high level of public interest in reducing greenfield land take in East Dorset in favour of optimizing previously developed land. 2) To enable the Inspector to test the evidence demonstrating that the Core Strategy is unsound without the allocation of	149	2258053_01.pdf

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														Little Canford Depot for a mixed use residential and employment development.		
619967		Home Builders Federation (South West)	CSPS3678	Policy KS4	No					Yes	<p>The CED LP proposed level of housing provision is unsound as it is deficient in several respects with regard to the requirements of national policy and the assessment of the housing requirement. It is deficient in respect to national policy in the following areas:</p> <p>a) the assessment of the housing need over the plan period does not meet the requirements of the Framework as set out in paragraphs 47 and 159 (or indeed, PPS3) in terms of assessing market as well as affordable housing needs;</p> <p>b) the planned level of provision in both districts fails to address the assessed level of need for affordable housing, let alone market (and potentially other housing needs) in addition to this. Consequently the proposed plan fails to meet one of the assessed levels of need; and</p> <p>c) the proposed housing requirements fail to take into account cross boundary impacts including the unmet needs of neighbouring boroughs. The proposed plan has therefore fail to meet its own assessed level of need plus potentially the unmet needs of neighbouring districts.</p> <p>We will consider each area in turn.</p> <p>a) Meeting the requirements of the Framework for outputs from the SHMA</p> <p>The SHMA evidence is not very transparent. There are a multitude of reports listed on the website and included as part of the evidence base. The reports that relate to Christchurch and East Dorset are also confusingly titled as reports for Bournemouth and Poole. This is not satisfactory and hardly aids public transparency and accessibility to the information.</p> <p>Despite all these reports, their length, and no doubt the cost of production, they fail to meet the elementary requirements of the Framework and for that matter PPS3 (see for example figure 1.1 describing the core outputs of a SHMA in the DCLG SHMA Practice Guidance, 2007). The various reports fail to identify clearly the market as well as the affordable housing need despite this being a requirement of national planning policy under the old as well as the new planning regime. A SHMA report that does not assess future market housing requirements cannot be considered a robust and credible evidence base (page 9). We may be wrong, but it is not clear.</p> <p>The 2011 SHMA Update summary reports for both Christchurch and East Dorset provide an assessment of affordable housing need. For Christchurch this is 332 units per year (page 12), and in the case of East Dorset it is 426 units per year (page 13). Both reports also provide an assessment of projected household growth over the twenty years from 2011 to 2031. For Christchurch this is 219 per year (page 17). For East Dorset it is 336 homes per year (page 19). It is not clear, however, how these latter figures relate to</p>		Yes, I wish to participate at the oral examination	The HBF would like to appear at the examination to debate these matters further.	149	

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											<p>affordable housing figures quoted earlier in the report. It is not clear if these figures of stated household growth represent the market need for homes, and if they do, if these figures then need to be added to the earlier stated figures of affordable housing need.</p> <p>Thus if these figures are added together they would give the following results: Housing needs per year: AH need Market need Total housing requirement Christchurch 332 219 551 East Dorset 426 336 762</p> <p>We accept this may be wrong but it is not clear what the need for market and need for affordable homes is for both districts over the plan period. The Council should clarify what figures in the SHMA summaries constitute the objectively assessed housing need for districts in accordance with the Framework, and figure 1.1 of the DCLG SHMA Practice Guidance.</p> <p>It is necessary that the Councils clarify this for the purposes of assessing whether the plan is complying with the Framework and its requirement that the local authority should identify its objectively assessed housing need (as set out in paragraphs 47 and 159).</p> <p>b) Does the plan make provision to meet the objectively assessed housing needs?</p> <p>It is clear that when the proposed housing requirements as set out in policies KS3 and KS4 are considered in the context of the Framework, on the basis of the affordable housing need alone the plan is unsound since it fails to meet the assessed level of need. The Government attaches considerable importance to local authorities meeting their objectively assessed housing need (unless it conflicts with other policies in the Framework) hence the several references to this in the Framework. These references can be found in paragraphs 14 (what constitutes 'sustainable' development), 17 (core planning principles), 47, 179 (cross boundary planning) and 182 (tests of soundness of plans).</p> <p>The SHMA evidence: Christchurch The SHMA for Christchurch identified a need for 332 affordable homes per year over the five year period 2011 to 2016. This is set out on page 12 of the 2011 Strategic housing Market Assessment: Summary report.</p> <p>We are concerned to read that the proposed housing requirement for Christchurch is only for 3,020 homes when compared with a SHMA requirement for 4,980 affordable homes (332 units x 15 years of the plan) quite apart from the market need in addition to this.</p> <p>The SHMA evidence: East Dorset The SHMA for East Dorset identified a need for 426 affordable homes per year over the five year period 2011 to 2016. This is set out on page 12 of the 2011 Strategic housing Market Assessment: Summary report.</p> <p>We are concerned to read that the proposed housing requirement for Christchurch is only for 5,250 homes when compared with a SHMA requirement for 6,390 affordable homes (426 units x 15</p>					

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											<p>years of the plan) quite apart from the market need in addition to this.</p> <p>The Councils will need to have a strategy to provide for their objectively assessed housing needs if not through the plan itself. This will require cooperation with adjoining councils and an agreed strategy to provide for these needs. The CDE LP provides no such strategy.</p> <p>c) Taking into account cross boundary impacts including unmet needs of neighbours (paragraphs 17, 157, 179 and 182 of the Framework)</p> <p>The CED LP includes no assessment of the potential impact of the failure of neighbouring authorities to meet their own objectively assessed housing needs. For example, we note that Bournemouth's emerging plan housing requirement is for only 14,600 homes over 20 years (730 homes a year) even though its SHMA indicates a need for 3,015 affordable homes per year. As Poole is only going to provide 14,000 homes over the next 20 years (its adopted plan target) it clearly is not going to be able to accommodate Bournemouth's unmet need, or that of Christchurch or East Dorset. Indeed, Poole will not be accommodating its own objectively assessed need of 1,199 affordable homes a year.</p> <p>In view of the scale of the undersupply in Bournemouth and Poole when judged against the evidence of the SHMA then these pressures will spill over to the adjacent authorities. There will be impacts for Christchurch and East Dorset. The decline in housing supply in proportion to demand will be felt most acutely by those on lower incomes who will be priced out of the local market by more affluent incomers.</p> <p>Things are not any better on the other side of Christchurch and East Dorset. The New Forrest District Council (outside the park) is only providing 3,920 homes over the next 20 years, or 196 a year against an assessed affordable housing need of 998 homes a year. It is highly likely that Christchurch and East Dorset will need to make some provision for the refugees from the New Forrest that this council will not be providing for.</p> <p>Southampton City has an adopted core strategy that provides for 16,300 homes over 20 years, or 815 homes per year. Its SHMA, however, has assessed the affordable housing need as 1,391 homes per year.</p> <p>Once the market needs for these authorities are factored in (for Poole, Bournemouth, New Forrest, and Southampton: their SHMAs appear to have neglected this despite the requirements of PPS3) then it is very apparent that the Dorset/West Hants area is going to experience a very acute housing crisis. The submitted local plan makes no reference to this strategic pressure.</p> <p>Under the circumstances the submitted plan is unsound as it fails to account for cross border pressures. The Framework sets out core planning principles, one of which is for plans to be based on cooperation to address larger than local issues (paragraph 17). The Framework states that local plans must be based on cooperation with neighbouring authorities (paragraph 157) and sound plans must make provision for unmet requirements from</p>					

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											<p>neighbouring authorities where it is reasonable to do so (paragraph 182).</p> <p>Given the disparities between the planned levels of provision and need we have cited above Christchurch and East Dorset must meet their own objectively assessed housing needs through the plan since it is very apparent that they cannot rely on any adjoining authorities to do so.</p> <p>'About' x homes</p> <p>The expression of the targets in policies KS3 and KS4 is also imprecise and creates uncertainty. Both policies refer to 'about x new homes' to be provided between the years 2013 to 2028. The expression of the housing targets needs to be precise for the purposes of calculating the five year land supply and planning the housing trajectory. The use of the word 'about' should be deleted. The targets should be treated as minimum targets, so if other suitable sites materialise over the plan period that satisfy the provisions of the Framework, these will enable the Councils to exceed the targets.</p> <p>Capacity and market constraints</p> <p>We do not accept the argument that a weak housing market justifies reducing the housing requirement. If there is an objective need for housing, then that need will need to be met somehow, despite the effects of the recession. It may mean that there is a need for a higher proportion of social and rental sector homes than those for owner occupation, but the basic housing need does not go away.</p> <p>We are also concerned that a housing requirement that is informed by a recessionary outlook will become self fulfilling: a plan that does not provide the optimum conditions to facilitate growth (by providing a range of sites in various locations to ensure competition in the land market) will guarantee that new housebuilding in the district will continue at moribund levels. Moreover, the relative scarcity of new supply provided for by the plan when measured against the objective housing assessment will serve to inflate land prices. Land owners recognising that they have a scarce and precious commodity that the Council needs to meet its plan objectives will not release this land for less than the top dollar.</p> <p>A reduced housing requirement will do nothing to improve affordability across the districts. As attractive districts, more affluent incomers, equity-rich retirees and second homes owners will price existing residents out. This will have adverse consequences for economic growth as land is increasingly valued for speculative purposes, rather than as a utility that provides homes or places of employment.</p> <p>The recently published European Commission report: Europe 2020 which considers the economic health of each of the EU members identifies housing undersupply as a one of the UK economy's major structural weaknesses. As the report summarises, the UK needs to:</p> <p>"Address the destabilising impact of high and volatile house prices and high household debt by implementing a comprehensive</p>					

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											<p>housing reform programme to increase housing supply and alleviate problems of affordability and the need for state subsidy of housing. Pursue further reforms to the mortgage and rental markets, financial regulation and property taxation to prevent excessive volatility and distortions in the housing market.”</p> <p>In citing the recession as a constraint on addressing the objective need the Councils are ignoring the Ministerial Planning for Growth statement which requires LPAs to make every effort to identify and meet the housing and other development needs of the district. This principle is reiterated in several places in the Framework but especially paragraphs 14 and 17.</p> <p>Housing trajectory The plan is unsound as it is inconsistent with the Framework since it does not include a housing trajectory or a housing implementation strategy that shows how the Councils will maintain delivery of a five year supply of housing. This is a requirement of the Framework (paragraph 47).</p>					
656692	Mr Robin Henderson	Ken Parke Planning Consultants	CSPS3627	Policy KS4	Yes	No	Yes	Yes	Yes	Yes	<p>The document fails to make positive provision for residential development necessary to secure the future of community services in Longham or the provision of housing to meet local needs during the life of the plan- please see attached statement.</p>	<p>The Core Strategy should be modified to include the expansion of the settlement boundary of Longham around the identified parcel of land to the rear of 122 Ringwood Road. This should feature as a district policy and map in chapter 10- please see the attached statement.</p>	<p>Yes, I wish to participate at the oral examination</p>	<p>The Oral Examination will facilitate discussion of the proposed change.</p>	149	2260313_01.pdf
359264	Mr Peter Atfield	Goadsby Ltd	CSPS3628	4.25	Yes	No	No	No	No	No	<p>Policy KS 5 of the Core Strategy (CS) sets out the approach to the provision of employment land at the strategic level in Christchurch and East Dorset. It is based on the Bournemouth, Dorset & Poole Workspace Study 2012 (BDP). In turn, the BDP Study uses forecasts of the demand for employment land provided by Experian and the South West Observatory. The baseline demand for the Bournemouth and Poole conurbation is set out in Tables 18 and 19 of the study, with the latter containing a prediction of industrial demand in two phases: Industrial Baseline 2011-2021 2021-2031 2011-2031 B'mouth & Poole SSCT* 51.4 ha 2.4 ha 53.8 ha (*Strategically Significant City or Town) Paragraph 2.16 of the BDP Study urges caution in the use of projections. Here, we would fully concur. The 2021 – 2031 projection for industrial demand is dramatically below the earlier phase from 2021 onwards. It means that only 0.24 hectares will be required across the conurbation on an annual basis in the second of these phases, which includes the last seven years of the CS. It is our submission that industrial demand will be higher than this. We do not see it falling to such low levels. As such the overall target for the provision of employment land to 2028 should be increased. In support of this submission we refer to Policies BA 1 – BA 3 of the CS, where 60 hectares of land is available for development at Bournemouth International Airport (BIA), with 30 hectares to be developed within the lifetime of the CS. However, the CS acknowledges that there are major infrastructure issues associated</p>	<p>Allocate land east of the Ferndown Industrial Estate for employment development – as shown on Plan 4.3.</p>	<p>Yes, I wish to participate at the oral examination</p>	<p>To critically analyse the timing of the likely delivery of land for employment development within the plan period.</p>	151	2260024_01.pdf

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359437	Ms Gill Smith	Dorset County Council	CSPS1957	4.26	Yes						The Core Strategy recognises that, due to shortages of land in Bournemouth, the area has a role to play in meeting the wider South East Dorset employment land requirements. Based on evidence in the Bournemouth, Dorset and Poole Workspace Study (2012), Policy KS5 makes provision for 80 hectares of new employment land across Christchurch and East Dorset. This level of provision is necessary to enable the development of strategic sites such as the Bournemouth Airport Northern Business Park and Ferndown Industrial Estate, which serve the wider area. The future economic growth requirements of Christchurch, East Dorset and the conurbation provide the exceptional circumstances for changes to the Green Belt boundary at the Airport and at Ferndown to accommodate this growth. There are insufficient brownfield sites within the plan area to meet demand. The County Council supports this approach. However the linkage to housing provision should be clarified to ensure that there is an appropriate balance with workforce projections. The delivery of the proposed amount of employment land alone will place significant demands on local infrastructure – particularly transport. The County Council will wish to continue to work closely with Christchurch and East Dorset Councils to ensure infrastructure needs are properly planned for and the necessary delivery strategies, including the use of CIL, are clearly set out.	Background evidence should be updated to explain the linkages between the latest household and workforce projections and policies derived from them, to clarify the relationship and ensure that there is an appropriate balance between them.	No, I do not wish to participate at the oral examination	Dorset County Council wishes to partake in any oral hearing on this matter in order to fulfill its role under the duty to cooperate and ensure that its interests are considered in the emerging Core Strategy	152	
359264	Mr Peter Atfield	Goadsby Ltd	CSPS3529	4.26	Yes	No	No	No	No	No	Policy KS 5 of the Core Strategy (CS) sets out the approach to the provision of employment land at the strategic level in Christchurch and East Dorset. It is based on the Bournemouth, Dorset & Poole Workspace Study 2012 (BDP). In turn, the BDP Study uses forecasts of the demand for employment land provided by	Allocate land east of the Ferndown Industrial Estate for employment development – as shown on Plan 4.3.	Yes, I wish to participate at the oral examination	To critically analyse the timing of the likely delivery of land for employment	152	2260024_01.pdf

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359437	Ms Gill Smith	Dorset County Council	CSPS1958	4.27	Yes						<p>The Core Strategy recognises that, due to shortages of land in Bournemouth, the area has a role to play in meeting the wider South East Dorset employment land requirements. Based on evidence in the Bournemouth, Dorset and Poole Workspace Study (2012), Policy KS5 makes provision for 80 hectares of new employment land across Christchurch and East Dorset. This level</p>	<p>Background evidence should be updated to explain the linkages between the latest household and workforce projections and policies derived from them, to clarify the relationship and ensure that there is an appropriate balance between them.</p>	<p>No, I do not wish to participate at the oral examination</p>	<p>Dorset County Council wishes to partake in any oral hearing on this matter in order to fulfill its</p>	153		

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											of provision is necessary to enable the development of strategic sites such as the Bournemouth Airport Northern Business Park and Ferndown Industrial Estate, which serve the wider area. The future economic growth requirements of Christchurch, East Dorset and the conurbation provide the exceptional circumstances for changes to the Green Belt boundary at the Airport and at Ferndown to accommodate this growth. There are insufficient brownfield sites within the plan area to meet demand. The County Council supports this approach. However the linkage to housing provision should be clarified to ensure that there is an appropriate balance with workforce projections. The delivery of the proposed amount of employment land alone will place significant demands on local infrastructure – particularly transport. The County Council will wish to continue to work closely with Christchurch and East Dorset Councils to ensure infrastructure needs are properly planned for and the necessary delivery strategies, including the use of CIL, are clearly set out.			role under the duty to cooperate and ensure that its interests are considered in the emerging Core Strategy		
359264	Mr Peter Atfield	Goadsby Ltd	CSPS3530	4.27	Yes	No	No	No	No	No	Policy KS 5 of the Core Strategy (CS) sets out the approach to the provision of employment land at the strategic level in Christchurch and East Dorset. It is based on the Bournemouth, Dorset & Poole Workspace Study 2012 (BDP). In turn, the BDP Study uses forecasts of the demand for employment land provided by Experian and the South West Observatory. The baseline demand for the Bournemouth and Poole conurbation is set out in Tables 18 and 19 of the study, with the latter containing a prediction of industrial demand in two phases: Industrial Baseline 2011-2021 2021-2031 2011-2031 B'mouth & Poole SSCT* 51.4 ha 2.4 ha 53.8 ha (*Strategically Significant City or Town) Paragraph 2.16 of the BDP Study urges caution in the use of projections. Here, we would fully concur. The 2021 – 2031 projection for industrial demand is dramatically below the earlier phase from 2021 onwards. It means that only 0.24 hectares will be required across the conurbation on an annual basis in the second of these phases, which includes the last seven years of the CS. It is our submission that industrial demand will be higher than this. We do not see it falling to such low levels. As such the overall target for the provision of employment land to 2028 should be increased. In support of this submission we refer to Policies BA 1 – BA 3 of the CS, where 60 hectares of land is available for development at Bournemouth International Airport (BIA), with 30 hectares to be developed within the lifetime of the CS. However, the CS acknowledges that there are major infrastructure issues associated with the development at BIA, including road improvements to the B3073, the A338 and associated junctions. Major scheme funding that has not yet been secured will be required. Without it, the delivery of the employment land at BIA cannot be guaranteed. Taking into account these matters, it is submitted that greater flexibility and choice should be introduced into the CS by allocating additional land for employment development to the east of the	Allocate land east of the Ferndown Industrial Estate for employment development – as shown on Plan 4.3.	Yes, I wish to participate at the oral examination	To critically analyse the timing of the likely delivery of land for employment development within the plan period.	153	2260024_01.pdf

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											<p>Ferndown Industrial Estate, as shown on the plan that accompanies this form of representation. The site is already well related to the strategic highway network, with direct access to the A31. It can incorporate a landscaped buffer to the residential properties to the east so as to maintain the amenity.</p> <p>The allocation of additional land for employment development within the CS will help to build a strong, competitive economy, as set out in Paragraphs 18 – 21 of the National Planning Policy Framework (NPPF). In particular, flexibility can be introduced so as to accommodate needs not currently anticipated in the CS. The land east of the Ferndown Industrial Estate is very well located to attract both inward investment and the expansion of existing local businesses without requiring the prior implementation of major infrastructure. The relative lack of constraints means that employment development on the site could be delivered early, in accordance with Objective 4 and Policy KS 5 of the CS.</p>					
359437	Ms Gill Smith	Dorset County Council	CSPS1959	4.28	Yes						<p>The Core Strategy recognises that, due to shortages of land in Bournemouth, the area has a role to play in meeting the wider South East Dorset employment land requirements. Based on evidence in the Bournemouth, Dorset and Poole Workspace Study (2012), Policy KS5 makes provision for 80 hectares of new employment land across Christchurch and East Dorset. This level of provision is necessary to enable the development of strategic sites such as the Bournemouth Airport Northern Business Park and Ferndown Industrial Estate, which serve the wider area. The future economic growth requirements of Christchurch, East Dorset and the conurbation provide the exceptional circumstances for changes to the Green Belt boundary at the Airport and at Ferndown to accommodate this growth. There are insufficient brownfield sites within the plan area to meet demand. The County Council supports this approach. However the linkage to housing provision should be clarified to ensure that there is an appropriate balance with workforce projections. The delivery of the proposed amount of employment land alone will place significant demands on local infrastructure – particularly transport. The County Council will wish to continue to work closely with Christchurch and East Dorset Councils to ensure infrastructure needs are properly planned for and the necessary delivery strategies, including the use of CIL, are clearly set out.</p>	<p>Background evidence should be updated to explain the linkages between the latest household and workforce projections and policies derived from them, to clarify the relationship and ensure that there is an appropriate balance between them.</p>	<p>No, I do not wish to participate at the oral examination</p>	<p>Dorset County Council wishes to partake in any oral hearing on this matter in order to fulfill its role under the duty to cooperate and ensure that its interests are considered in the emerging Core Strategy</p>	154	
359264	Mr Peter Atfield	Goadsby Ltd	CSPS3531	4.28	Yes	No	No	No	No	No	<p>Policy KS 5 of the Core Strategy (CS) sets out the approach to the provision of employment land at the strategic level in Christchurch and East Dorset. It is based on the Bournemouth, Dorset & Poole Workspace Study 2012 (BDP). In turn, the BDP Study uses forecasts of the demand for employment land provided by Experian and the South West Observatory. The baseline demand for the Bournemouth and Poole conurbation is set out in Tables 18 and 19 of the study, with the latter containing a prediction of industrial demand in two phases: Industrial Baseline 2011-2021 2021-2031 2011-2031 B'mouth & Poole SSCT* 51.4 ha 2.4 ha 53.8 ha (*Strategically Significant City or Town)</p>	<p>Allocate land east of the Ferndown Industrial Estate for employment development – as shown on Plan 4.3.</p>	<p>Yes, I wish to participate at the oral examination</p>	<p>To critically analyse the timing of the likely delivery of land for employment development within the plan period.</p>	154	2260024_01.pdf

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											<p>Paragraph 2.16 of the BDP Study urges caution in the use of projections. Here, we would fully concur. The 2021 – 2031 projection for industrial demand is dramatically below the earlier phase from 2021 onwards. It means that only 0.24 hectares will be required across the conurbation on an annual basis in the second of these phases, which includes the last seven years of the CS. It is our submission that industrial demand will be higher than this. We do not see it falling to such low levels. As such the overall target for the provision of employment land to 2028 should be increased.</p> <p>In support of this submission we refer to Policies BA 1 – BA 3 of the CS, where 60 hectares of land is available for development at Bournemouth International Airport (BIA), with 30 hectares to be developed within the lifetime of the CS. However, the CS acknowledges that there are major infrastructure issues associated with the development at BIA, including road improvements to the B3073, the A338 and associated junctions. Major scheme funding that has not yet been secured will be required. Without it, the delivery of the employment land at BIA cannot be guaranteed. Taking into account these matters, it is submitted that greater flexibility and choice should be introduced into the CS by allocating additional land for employment development to the east of the Ferndown Industrial Estate, as shown on the plan that accompanies this form of representation. The site is already well related to the strategic highway network, with direct access to the A31. It can incorporate a landscaped buffer to the residential properties to the east so as to maintain the amenity.</p> <p>The allocation of additional land for employment development within the CS will help to build a strong, competitive economy, as set out in Paragraphs 18 – 21 of the National Planning Policy Framework (NPPF). In particular, flexibility can be introduced so as to accommodate needs not currently anticipated in the CS. The land east of the Ferndown Industrial Estate is very well located to attract both inward investment and the expansion of existing local businesses without requiring the prior implementation of major infrastructure. The relative lack of constraints means that employment development on the site could be delivered early, in accordance with Objective 4 and Policy KS 5 of the CS.</p>					
359437	Ms Gill Smith	Dorset County Council	CSPS1960	4.29	Yes						<p>The Core Strategy recognises that, due to shortages of land in Bournemouth, the area has a role to play in meeting the wider South East Dorset employment land requirements. Based on evidence in the Bournemouth, Dorset and Poole Workspace Study (2012), Policy KS5 makes provision for 80 hectares of new employment land across Christchurch and East Dorset. This level of provision is necessary to enable the development of strategic sites such as the Bournemouth Airport Northern Business Park and Ferndown Industrial Estate, which serve the wider area. The future economic growth requirements of Christchurch, East Dorset and the conurbation provide the exceptional circumstances for changes to the Green Belt boundary at the Airport and at Ferndown to accommodate this growth. There are insufficient</p>	<p>Background evidence should be updated to explain the linkages between the latest household and workforce projections and policies derived from them, to clarify the relationship and ensure that there is an appropriate balance between them.</p>	<p>No, I do not wish to participate at the oral examination</p>	<p>Dorset County Council wishes to partake in any oral hearing on this matter in order to fulfill its role under the duty to cooperate and ensure that its interests are considered in the emerging Core Strategy</p>	155	

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359264	Mr Peter Atfield	Goadsby Ltd	CSPS3533	4.29	Yes	No	No	No	No	No	<p>Policy KS 5 of the Core Strategy (CS) sets out the approach to the provision of employment land at the strategic level in Christchurch and East Dorset. It is based on the Bournemouth, Dorset & Poole Workspace Study 2012 (BDP). In turn, the BDP Study uses forecasts of the demand for employment land provided by Experian and the South West Observatory. The baseline demand for the Bournemouth and Poole conurbation is set out in Tables 18 and 19 of the study, with the latter containing a prediction of industrial demand in two phases: Industrial Baseline 2011-2021 2021-2031 2011-2031 B'mouth & Poole SSCT* 51.4 ha 2.4 ha 53.8 ha (*Strategically Significant City or Town)</p> <p>Paragraph 2.16 of the BDP Study urges caution in the use of projections. Here, we would fully concur. The 2021 – 2031 projection for industrial demand is dramatically below the earlier phase from 2021 onwards. It means that only 0.24 hectares will be required across the conurbation on an annual basis in the second of these phases, which includes the last seven years of the CS. It is our submission that industrial demand will be higher than this. We do not see it falling to such low levels. As such the overall target for the provision of employment land to 2028 should be increased.</p> <p>In support of this submission we refer to Policies BA 1 – BA 3 of the CS, where 60 hectares of land is available for development at Bournemouth International Airport (BIA), with 30 hectares to be developed within the lifetime of the CS. However, the CS acknowledges that there are major infrastructure issues associated with the development at BIA, including road improvements to the B3073, the A338 and associated junctions. Major scheme funding that has not yet been secured will be required. Without it, the delivery of the employment land at BIA cannot be guaranteed. Taking into account these matters, it is submitted that greater flexibility and choice should be introduced into the CS by allocating additional land for employment development to the east of the Ferndown Industrial Estate, as shown on the plan that accompanies this form of representation. The site is already well related to the strategic highway network, with direct access to the A31. It can incorporate a landscaped buffer to the residential properties to the east so as to maintain the amenity. The allocation of additional land for employment development within the CS will help to build a strong, competitive economy, as</p>	Allocate land east of the Ferndown Industrial Estate for employment development – as shown on Plan 4.3.	Yes, I wish to participate at the oral examination	To critically analyse the timing of the likely delivery of land for employment development within the plan period.	155	2260024_0_1.pdf

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474462	Mrs Sheila Bourton		CSPS172	Policy KS5	Yes	No			Yes		I would suggest that very few people would want to live this close to their place of work.	Domestic living arrangements should not be within employment areas.	No, I do not wish to participate at the oral examination		156		
656249	Ms Gemma Care	Barton Willmore LLP	CSPS1089	Policy KS5	Yes	No	Yes	No	No	No	<p>Thank you for the opportunity to provide comments on the Christchurch and East Dorset Core Strategy (JCS) Pre-Submission document. On behalf of our client, Stour Valley Properties (Dorset) Ltd., we are pleased to provide the following response, which should be read in conjunction with the accompanying Consultation Response Forms.</p> <p>Background</p> <p>Barton Willmore LLP has been instructed to make representations to this document, on behalf of Stour Valley Properties (Dorset) Ltd. ('SVP')</p> <p>SVP have land interests within East Dorset and welcome the opportunity to contribute to the emerging Core Strategy (JCS). SVP are currently promoting the release of their land to the south of Wimborne for housing.</p> <p>Fundamentally, SVP have serious concerns over the level of overall housing provision identified within the draft JCS and the degree to which that which is proposed is sufficient to meet identified needs within the East Dorset and Christchurch locality. We submit, having regard to the evidence base material available that the level of housing proposed for East Dorset within the draft JCS is inappropriate and inconsistent with national planning policy, which states that each local planning authority should ensure that the Local Plan is based on adequate up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local planning authorities are expected to ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals.</p> <p>Consideration is given within the submitted representations to the strategic site allocations for Wimborne and Colehill identified within the JCS and the extent to which the proposed allocations fulfil the overall objectives and spatial vision for East Dorset and 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</p>		Yes, I wish to participate at the oral examination	To ensure our case is presented in full and to be party to discussions.	156		

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											<p>positively for the further housing growth we consider necessary in light of our appraisal of the Council's published JCS evidence base.</p> <p>In accordance with section 20 of the Planning and Compulsory Purchase Act 2004 (as amended) local plans must be 'sound': i.e. they must be positively prepared, justified, effective and consistent with national policy. We suggest that the housing strategy adopted within the JCS as it stands is (a) not the most appropriate (on the basis that it is not considered fully justified) and (b) it is not 'positively prepared' – i.e. it is not based on a strategy which in our view genuinely seeks to meet objectively assessed needs.</p> <p>Within these representations we do not comment on every aspect of the JCS; our intention is to comment on those sections where we non-compliance with tests of soundness is apparent, or where we are particularly supportive. To be clear, our primary concern in this instance is the content and justification of Policy KS4 and the proposed housing allocations for Wimborne and Colehill – specifically Policy WMC6.</p> <p>An alternative proposal for housing to the south of Wimborne is considered with specific reference to the SVP land shown on the concept plan attached at Appendix 1 to these submissions. Comments are also provided on a number of other policies within the JCS, on individual response forms, as requested. The full list of policies to which these representations respond are: Policy KS1, KS4, KS5, KS10 Policy WMC3, WMC6 Policy FWP3, FWP4, FWP6, FWP7, FWP8 Policy ME3 Policy HE4</p> <p>Copies of all Core Strategy Response Forms relating to each policy addressed within these representations are contained at Appendix 4.</p> <p>Appendices 1 – 3 to this cover letter are those referred to in the various consultation forms.</p> <p>I trust that all of the enclosed is clear and in order and we look forward to engaging with you further in the consultation process. We consider this policy broadly sound but question how well the identified sites relate to the proposed sites for new housing. We refer back to our comments in respect of Policy KS4 and whether sufficient housing requirement has been identified to meet future economic growth. We query whether there is an appropriate jobs : homes balance.</p>					
656493	Cllr Tony Gibb	Eastern Area DAPTC	CSPS1473	Policy KS5	No	No	No	No	No	No	<p>RURAL RESPONSE TO EAST DORSET AND CHRISTCHURCH CORE STRATEGY</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 & Shapwick, Sixpenny Handley with</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.			156	

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											<p>Pentridge, Sturminster Marshall. It does not include the conurbations along the A31 or Verwood and Three Legged Cross. 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. http://webarchive.nationalarchives.gov.uk/20110215111010/http://archive.defra.gov.uk/evidence/statistics/rural/rural-definition.htm . 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. "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> <p>All the points made in the latest CRC State of the Countryside Report 2010 are valid in East Dorset http://www.defra.gov.uk/crc/documents.state-of-the-countryside-report/sotc2010/ . 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, Crichel, 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</p>					

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											<p>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. 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. Generic policy statements are not sufficient to embrace them. 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. There is confusion of terminology within the document between Rural Service Centres and Key Settlements. 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. 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 the strategy or policies. 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. 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. 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. 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</p>					

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											<p>rural economy. 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"> • 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%. • 23.5% of people in rural areas are over state retirement age compared with 18.1% in urban areas. • 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. • Approximately 5% of rural households were using dial-up internet connections in 2009 compared with 2% in urban areas. • 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. • 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. • 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%. • 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. • 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. <p>The need for rural workshops serving various needs should be included.</p>					
359437	Ms Gill Smith	Dorset County Council	CSPS1954	Policy KS5	Yes						<p>The Core Strategy recognises that, due to shortages of land in Bournemouth, the area has a role to play in meeting the wider South East Dorset employment land requirements. Based on evidence in the Bournemouth, Dorset and Poole Workspace Study (2012), Policy KS5 makes provision for 80 hectares of new employment land across Christchurch and East Dorset. This level of provision is necessary to enable the development of strategic sites such as the Bournemouth Airport Northern Business Park and Ferndown Industrial Estate, which serve the wider area. The future economic growth requirements of Christchurch, East Dorset and the conurbation provide the exceptional circumstances for changes to the Green Belt boundary at the Airport and at</p>	<p>Background evidence should be updated to explain the linkages between the latest household and workforce projections and policies derived from them, to clarify the relationship and ensure that there is an appropriate balance between them.</p>	<p>No, I do not wish to participate at the oral examination</p>	<p>Dorset County Council wishes to partake in any oral hearing on this matter in order to fulfill its role under the duty to cooperate and ensure that its interests are considered in the emerging Core</p>	156	

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											Ferndown to accommodate this growth. There are insufficient brownfield sites within the plan area to meet demand. The County Council supports this approach. However the linkage to housing provision should be clarified to ensure that there is an appropriate balance with workforce projections. The delivery of the proposed amount of employment land alone will place significant demands on local infrastructure – particularly transport. The County Council will wish to continue to work closely with Christchurch and East Dorset Councils to ensure infrastructure needs are properly planned for and the necessary delivery strategies, including the use of CIL, are clearly set out.			Strategy		
359529	Mrs Lisa Goodwin	Sixpenny Handley with Pentridge Parish Council	CSPS2472	Policy KS5							The need for rural workshops serving various business and support activities should be included.				156	2248948_01.pdf 2248941_01.pdf 2248860_01.pdf
490823	Mr Ian Jones	Ferndown Town Council	CSPS2969	Policy KS5	Yes	No	No	No	Yes		The Town Council considers that the broad locations for land suitable for employment are Bournemouth airport area and Ferndown Industrial Estate. Although use of sustainable forms or transport (bus, cycle) will be encouraged, there is likely to be a net detrimental effect on the local highway network and beyond by the use of private cars and commercial vehicles, including HGVs which can have a major impact on highway surfaces.		No, I do not wish to participate at the oral examination		156	
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS3243	Policy KS5		No	No	No		No	The wording of the policy appears to seek environmental acceptability only for live/work units. This should be corrected to apply to all forms of development. Sustainability Appraisal SA Objective 1 Protect, enhance and expand habitats and protected species It is not only carbon emissions that are damaging: NOx emissions are also harmful. The opportunity to enhance and expand habitats, especially heathland, will be lost to development. The Moors River is particularly vulnerable. Score is negative not 0 SA Objective 8 Help make suitable housing available and affordable for everybody Increased demand for housing will lead to higher prices and will fuel the demand and need for more affordable homes – a vicious cycle. Cumulative effects and summary Careful balancing of housing and employment will be needed to avoid unsustainable growth.	Amend wording to ensure no confusion about application of policy on environmental acceptability.	No, I do not wish to participate at the oral examination		156	
498034	Mr Richard Cutler		CSPS3175	Policy KS5		No	No	No	No	No	Our representation on the Core Strategy Options, submitted on 11 January 2011, together with Stourbank Park, Wimborne: A Compelling Case – Part 1 (May 2010), resubmitted with our January 2011 representations, set out a detailed case for the allocation of Stourbank Park for employment purposes (with some residential, given the adjoining properties). This can be developed in conjunction with the adjoining Wessex Water Depot.	Policy KS5 can be made sound by East Dorset commissioning Stages 2 and 3 of the local Employment Land Review and then recasting its allocations and approach to employment based on the evidence that is made available. It should also identify more sites; and 5 hectares of employment land at	Yes, I wish to participate at the oral examination	East Dorset has failed to engage with us on our representations so a third party hearing is essential in order	156	2254009_01.pdf

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											We therefore fundamentally disagree with the strategy of allocating one very large site, and two small sites in the East Dorset area (as shown on Map 4.3). Blunt's Farm, in particular, is highly constrained, as evidenced by the constraints shown on Map 4.1. This approach does not provide the mix or balance of employment uses proposed by Policy KS5. Some additional dispersal would help in meeting local needs and in offering a range of locations and, most crucially, choice and competition on rent, cost and quality. These factors also act drive employment land take up. Blunt's Farm provides nothing new or innovative that might help create a 'step change' in the economy or, simply, just something different (eg to add diversity). Policy KS5 is therefore unsound. Not so much in the words proposed, but simply because (as argued elsewhere) it is not justified by up to date evidence in a local Employment Land Review. The policy is not positively prepared and it is unlikely to be effective as it is not founded on an analysis of local needs and local employment market dynamics	Stourbank Park should be included in the list.		to mediate our case. As a former Director of Arlington Securities Plc (now Goldman), the company that originated the business park concept in the UK, we have substantial experience in the delivery of employment and economic strategies, which ought to be of assistance to the examination.		
499532	Bournemouth Borough Council	Bournemouth Borough Council	CSPS3251	Policy KS5							Policy KS5: Provision of Employment Land Support Even though the provision of 80 hectares of employment land across the plan area is supported the most appropriate location in the sub-region for major B1 office development remains within the built up area of Bournemouth and Poole, in particular within the Lansdowne Employment Area of Bournemouth Town Centre. This area is identified as a location for B1 office development in the Bournemouth Core Strategy and Bournemouth Town Centre AAP. Such an approach to providing for the sustainable location of major office development is advocated in the NPPF paragraphs 23 to 27.				156	
359264	Mr Peter Atfield	Goadsby Ltd	CSPS3527	Policy KS5	Yes	No	No	No	No	No	Policy KS 5 of the Core Strategy (CS) sets out the approach to the provision of employment land at the strategic level in Christchurch and East Dorset. It is based on the Bournemouth, Dorset & Poole Workspace Study 2012 (BDP). In turn, the BDP Study uses forecasts of the demand for employment land provided by Experian and the South West Observatory. The baseline demand for the Bournemouth and Poole conurbation is set out in Tables 18 and 19 of the study, with the latter containing a prediction of industrial demand in two phases: Industrial Baseline 2011-2021 2021-2031 2011-2031 B'mouth & Poole SSCT* 51.4 ha 2.4 ha 53.8 ha (*Strategically Significant City or Town) Paragraph 2.16 of the BDP Study urges caution in the use of projections. Here, we would fully concur. The 2021 – 2031 projection for industrial demand is dramatically below the earlier phase from 2021 onwards. It means that only 0.24 hectares will be required across the conurbation on an annual basis in the second of these phases, which includes the last seven years of the CS. It is our submission that industrial demand will be higher than this. We do not see it falling to such low levels. As such the overall	Allocate land east of the Ferndown Industrial Estate for employment development – as shown on Plan 4.3.	Yes, I wish to participate at the oral examination	To critically analyse the timing of the likely delivery of land for employment development within the plan period.	156	2260024_01.pdf

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											target for the provision of employment land to 2028 should be increased. In support of this submission we refer to Policies BA 1 – BA 3 of the CS, where 60 hectares of land is available for development at Bournemouth International Airport (BIA), with 30 hectares to be developed within the lifetime of the CS. However, the CS acknowledges that there are major infrastructure issues associated with the development at BIA, including road improvements to the B3073, the A338 and associated junctions. Major scheme funding that has not yet been secured will be required. Without it, the delivery of the employment land at BIA cannot be guaranteed. Taking into account these matters, it is submitted that greater flexibility and choice should be introduced into the CS by allocating additional land for employment development to the east of the Ferndown Industrial Estate, as shown on the plan that accompanies this form of representation. The site is already well related to the strategic highway network, with direct access to the A31. It can incorporate a landscaped buffer to the residential properties to the east so as to maintain the amenity. The allocation of additional land for employment development within the CS will help to build a strong, competitive economy, as set out in Paragraphs 18 – 21 of the National Planning Policy Framework (NPPF). In particular, flexibility can be introduced so as to accommodate needs not currently anticipated in the CS. The land east of the Ferndown Industrial Estate is very well located to attract both inward investment and the expansion of existing local businesses without requiring the prior implementation of major infrastructure. The relative lack of constraints means that employment development on the site could be delivered early, in accordance with Objective 4 and Policy KS 5 of the CS.					
662954	Mr Neil White	Quantum Group	CSPS3622	Policy KS5	Yes	No	No	Yes	No	Yes	Quantum Group is a significant landowner in the Christchurch and East Dorset area. This includes the Former QinetiQ Site in Bailey Drive off Barrack Road, Christchurch. As a landowner and investor in the area, Quantum is please to provide the following representations and participate in the Strategy's preparation. Our representations relate to the following policies: Policy KS5 - Provision of Employment Land; Policy KS6 - Town Centre Hierarchy Policy CH3 - Christchurch Primary Shopping Area and Retail Cores. Policy KS5 - Provision of Employment Land / Map 4.3 - Provision of Employment Land (Christchurch) We note the former QinetiQ site is identified as part of the provision of Employment Land in Christchurch. Whilst the site was formerly in employment use it has been vacant for a prolonged period and will not be reoccupied for such purposes. This is particularly relevant following the 14th June Committee resolution to approve a planning application on this site for a Food Store (LPA ref: 8/12/0044) which will replace the B class accommodation present on the site. Paragraph 22 recommends that planning policies avoid the long	Accordingly, reference to the site should be removed throughout the Core Strategy particularly Map 4.3. Such a change is necessary as it will allow this part of the Core Strategy to achieve soundness by being consistent with the NPPF.	Yes, I wish to participate at the oral examination	The representations made relate to the soundness of the Plan and we require the opportunity to be heard.	156	2260025_01.pdf

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											term protection of sites allocated for employment uses where there is no reasonable prospect of a site being used for that purpose. The site's period of vacancy and the recent resolution demonstrate there is no reasonable prospect of re-use in accordance with paragraph 22.					
359264	Mr Peter Atfield	Goadsby Ltd	CSPS3534	Map 4.3	Yes	No	No	No	No	No	<p>Policy KS 5 of the Core Strategy (CS) sets out the approach to the provision of employment land at the strategic level in Christchurch and East Dorset. It is based on the Bournemouth, Dorset & Poole Workspace Study 2012 (BDP). In turn, the BDP Study uses forecasts of the demand for employment land provided by Experian and the South West Observatory. The baseline demand for the Bournemouth and Poole conurbation is set out in Tables 18 and 19 of the study, with the latter containing a prediction of industrial demand in two phases: Industrial Baseline 2011-2021 2021-2031 2011-2031 B'mouth & Poole SSCT* 51.4 ha 2.4 ha 53.8 ha (*Strategically Significant City or Town) Paragraph 2.16 of the BDP Study urges caution in the use of projections. Here, we would fully concur. The 2021 – 2031 projection for industrial demand is dramatically below the earlier phase from 2021 onwards. It means that only 0.24 hectares will be required across the conurbation on an annual basis in the second of these phases, which includes the last seven years of the CS. It is our submission that industrial demand will be higher than this. We do not see it falling to such low levels. As such the overall target for the provision of employment land to 2028 should be increased.</p> <p>In support of this submission we refer to Policies BA 1 – BA 3 of the CS, where 60 hectares of land is available for development at Bournemouth International Airport (BIA), with 30 hectares to be developed within the lifetime of the CS. However, the CS acknowledges that there are major infrastructure issues associated with the development at BIA, including road improvements to the B3073, the A338 and associated junctions. Major scheme funding that has not yet been secured will be required. Without it, the delivery of the employment land at BIA cannot be guaranteed. Taking into account these matters, it is submitted that greater flexibility and choice should be introduced into the CS by allocating additional land for employment development to the east of the Ferndown Industrial Estate, as shown on the plan that accompanies this form of representation. The site is already well related to the strategic highway network, with direct access to the A31. It can incorporate a landscaped buffer to the residential properties to the east so as to maintain the amenity.</p> <p>The allocation of additional land for employment development within the CS will help to build a strong, competitive economy, as set out in Paragraphs 18 – 21 of the National Planning Policy Framework (NPPF). In particular, flexibility can be introduced so as to accommodate needs not currently anticipated in the CS. The land east of the Ferndown Industrial Estate is very well located to attract both inward investment and the expansion of existing local</p>	Allocate land east of the Ferndown Industrial Estate for employment development – as shown on Plan 4.3.	Yes, I wish to participate at the oral examination	To critically analyse the timing of the likely delivery of land for employment development within the plan period.	157	2260024_01.pdf

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											businesses without requiring the prior implementation of major infrastructure. The relative lack of constraints means that employment development on the site could be delivered early, in accordance with Objective 4 and Policy KS 5 of the CS.					
654660	Anne Mason	Transition Town Christchurch	CSPS937	4.31		Yes	Yes	Yes	Yes	Yes	Add with reference to Mary Portas "My Vision for the High Street" "The new High Streets won't just be about selling goods. The mix will include shops, but could also include housing, offices, sport, schools or other social, commercial and cultural enterprises and meeting places. They should become places where we go to engage with other people in our communities, where shopping is just one small part of a rich mix of activities."				159	2259130_01.pdf
490823	Mr Ian Jones	Ferndown Town Council	CSPS2976	4.33	Yes	No	No	Yes	Yes		The Key facts at para 4.33 refers to the catchment population for major food shopping is 28,000 but there is a lack of evidence on this point. With regard to future retail provision the town council is unable to comment at this time as work on the Development Plan Document will not begin until progress has been made on the Core Strategy.		No, I do not wish to participate at the oral examination		161	
650761	Mr Anthony Ferguson	Peacock and Smith Limited	CSPS383	Policy KS6		No	No	No		No	Our client strongly objects to the emerging Core Strategy on the basis that it has not been positively prepared, it is not justified and is not consistent with national policy for the following reasons: The Morrisons store, surrounding commercial uses and associated car parking located on Pennine Way in Verwood should be governed by a District Centre allocation in the emerging Core Strategy and on the Proposals Map. The extent of the recommended boundary for the proposed District Centre is identified on the attached plan. Unquestionably the Morrisons store which incorporates a pharmacy and banking facilities, and the surrounding uses reflect the characteristics, scale, role and function of a District Centre. Paragraph 4.55 in the Core Strategy states "good accessibility to a range of facilities is an important element of planning sustainable communities". The proposed District Centre fully supports this principle, because local residents benefit from the reduced time and cost involved with travelling to centres and shopping facilities further field. This is particularly beneficial to those without access to a car, the elderly, the disabled and mothers with children. Furthermore, paragraph 11.21 in the Core Strategy explains that Morrisons is a major food store and, together with Verwood town centre, helps to serve the general needs of the community. These considerations are material to the plan making process and we believe they are compelling. Having regard to the advice in NPPF, the emerging Core Strategy is "unsound" in its current form.				166	2193054_01.pdf
654310	Mr Bryan Taylor	Savills Commercial Ltd	CSPS661	Policy KS6	Yes	No	No	Yes	No	No	This policy identifies Barrack Road as a District Centre Under the definitions of PPS4 a District Centre should contain a range of non-retail services such as banks, building societies and restaurants, as well as local public facilities such as a library. Barrack Road does not meet this definition of a district centre and more closely matches the definition of a Local Centre	Barrack Road to be removed from list of District Centres and reclassified as a Local Centre	No, I do not wish to participate at the oral examination		166	

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523627	David Lowin	WYG Planning & Design	CSPS1579	Policy KS6							<p>We write concerning your recently published Christchurch and East Dorset Core Strategy Pre-Submission document. As you are aware, Sainsbury's Supermarkets Ltd are taking an active interest in the formulation of the LDF and accompanying documents. On behalf of our client, we have considered in detail the policies set out in the Core Strategy and wish to make the following representations.</p> <p>Policy KS6 – Town Centre Hierarchy</p> <p>The National Planning Policy Framework (NPPF) requires local planning authorities define a network and hierarchy of centres that is resilient to anticipated future economic changes and although the NPPF does not provide a definition of District and Local Centres and their particular functions, practice guidance (“Planning for Town Centres”) does provide guidance on how and when the role of an existing centre should be elevated within a network.</p> <p>We would like to draw the Council’s attention to the future role of the proposed new centre at Roeshot Hill in Christchurch and the fact that in all likelihood this will function as a district centre, rather than as a local centre, for a number of reasons, including:</p> <ul style="list-style-type: none"> o Significant overtrading, congestion and overcrowding experienced at the existing Sainsbury’s Roeshot Hill store (factors acknowledged by the Inspector during a recent appeal into a proposed new Morrison’s store in the town) and the consequential need for Sainsbury’s to extend and update this store to address the deficiencies; o The availability of land and the opportunity for retail development at the site; o The significant level of new housing development proposed and resulting increase in local population in the area; and o The type, level and range of facilities proposed for the new centre (para.6.19 of the document) are, we would suggest, more in line with what would be expected in a district centre, as opposed to a local centre. 			166		
490823	Mr Ian Jones	Ferndown Town Council	CSPS2972	Policy KS6	Yes	No	No	Yes	Yes		<p>The Key facts at para 4.33 refers to the catchment population for major food shopping is 28,000 but there is a lack of evidence on this point.</p> <p>With regard to future retail provision the town council is unable to comment at this time as work on the Development Plan Document will not begin until progress has been made on the Core Strategy.</p>		No, I do not wish to participate at the oral examination		166	
662954	Mr Neil White	Quantum Group	CSPS3623	Policy KS6	Yes	No	Yes	No	No	Yes	<p>Quantum Group is a significant landowner in the Christchurch and East Dorset area. This includes the Former QinetiQ Site in Bailey Drive off Barrack Road, Christchurch. As a landowner and investor in the area, Quantum is please to provide the following representations and participate in the Strategy’s preparation.</p> <p>Our representations relate to the following policies:</p> <p>Policy KS5 - Provision of Employment Land;</p> <p>Policy KS6 - Town Centre Hierarchy</p> <p>Policy CH3 - Christchurch Primary Shopping Area and Retail Cores.</p> <p>Policy KS6 - Town Centre Heirarchy</p> <p>Quantum supports the identification of Barrack Road as a District</p>	<p>From our assessment, the most suitable location to accommodate such growth is the Former QinetiQ Site. This was effectively acknowledged in the 14th June Committee resolution to approve a planning application on this site for a Food Store (LPA Ref: 8/12/0044). This offers the only suitably sized site to accommodate a Food Store of sufficient scale to serve the District Centre / West Christchurch area and already benefits from pedestrian linkage with the Centre. Such linkage can be strengthened via</p>	Yes, I wish to participate at the oral examination	<p>The representations made relate to the soundness of the Plan and we require the opportunity to be heard.</p>	166	2260025_01.pdf

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											<p>Centre. This reflects the area's key role in supporting the population of West Christchurch with vital retail goods and services in a sustainable and locally accessible position plus its potential growth.</p> <p>We note that the extent of the District Centre will not be defined until the Site Allocations DPD. To accord with the NPPF (paragraph 23) and provide decision making certainty in the interim, we recommend that the extent of the District Centre is defined as part of the Core Strategy. This should include the existing commercial frontages on Barrack Road as well as the Christchurch Retail Park and the Former QinetiQ Site, the boundary of which is defined on the accompany plan. This will also provide clarity when this policy is read with Policy KS7 and KS8. The inclusion of the Former QinetiQ Site within the District Centre is sound for the following reasons:</p> <p>(i) There is a longstanding recognition that a District Centre consists of a group of shops which would include a Supermarket or Superstore and non-retail services and community facilities. Such a range of services is necessary in order to adequately serve a local residential area. This reflects the approach taken in the Joint Retail Study evidence base (based on then PPS6) and PPS4. Whilst the NPPF is silent on a definition for a District Centre, the principles remain unchanged in terms of the reasons for identifying a 'Centre'.</p> <p>(ii) The Centre fronting Barrack Road does not contain either a Supermarket or Superstore and is deficient in this form of retailing. Whilst it contains a range of commercial services and smaller scale top-up food retail (such as the One-Stop store), this aspect of its District Centre function is deficient when compared with the established definitions of a District Centre. The March 2012 Planning Permission for a mixed use scheme including a 371 sq.m retail store at 170-174 Barrack Road does not alter this position.</p> <p>To perform a District Centre role and ensure the needs of local residents in the Barrack Road / West Christchurch area are met, the Core Strategy should plan positively for the provision of a Supermarket or Superstore in the Barrack Road area. This will then provide a sustainable solution to address the identified outflow of convenience goods expenditure in our Retail Assessment. Such an outflow was identified in the Core Strategy evidence base (see the household survey of the Joint Retail Study) upon which our Assessment was</p>	<p>physical improvements which will be delivered as part of the eventual scheme. The provision of a Food Store will then ensure the Centre fulfils its potential for growth reflecting one of the reasons for its identification (see PCSC paragraph 4.35).</p> <p>(v) The identification of the site within the District Centre boundary would still complement Christchurch's Town Centre status in the hierarchy as this Centre would still contain additional and wider comparison, convenience and service retail choices to serve the wider CBC area. It is however appropriate to plan for enhanced local convenience provision in a District Centre location in preference to a Town Centre as this will ensure the District Centre fulfils its particular policy role and function. This then allows the Town Centre to increase its role in other forms of retailing (e.g. comparison goods) to ensure it performs effectively in that particular form of retailing. This is particularly appropriate for Christchurch as it seeks to improve its competitiveness and attraction for local residents compared with Bournemouth, Castlepoint and other sub-regional alternatives.</p> <p>9. Such a change is necessary as it will allow this part of the Core Strategy to achieve soundness by being positively prepared and consistent with the NPPF.</p>				

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											based. If this cannot be met on an identified existing site within the existing Centre boundary through improvements to existing facilities, following the principles of the sequential approach, the CS should identify a District Centre boundary that includes adequate provision to address the Centre's deficiency.					
524088	Mr Ken Parke	Ken Parke Planning Consultants	CSPS3625	Policy KS6	No	No	Yes	Yes	Yes	Yes	Please see attached representations document and appendices	Please see attached representations document and appendices	Yes, I wish to participate at the oral examination	The representation has a significant bearing on the distribution of housing within the district and will require detailed oral examination.	166	2260318_01.pdf
664634	C Benham		CSPS3831	Policy KS6		Yes					In terms of the town centre hierarchy, Christchurch is defined as 'town centre' and is above district and local centres (KS6). As such, Christchurch town centre is to be the primary focus for new retail development in the Borough. We support this approach given the strategic role of Christchurch town centre and as it is consistent with the town centre first policies advocated by national policy. Policy KS6 is therefore considered sound.				166	2267825_01.pdf 2267824_01.pdf 2267823_01.pdf 2267822_01.pdf
654310	Mr Bryan Taylor	Savills Commercial Ltd	CSPS662	Policy KS7	Yes	No	No	Yes	No	No	Policy CH2 identifies the Town Centre Boundary. The primary and secondary shopping core sits within the area to the west of the river Avon at Castle Street. The land to the east of The river Avon at Bridge Street at present can only be described as "Out of Centre" due to its distance from the existing retail core and the nature of the pedestrian journey. If this area to the east is now classified as Town Centre, the sequential test and impact assessment will no longer be required for any retail development in this area. As this area is now classified as "Out of Centre" it is clear that it is not considered feasible that a pedestrian will make a journey between the existing retail core and this area to the east of the River Avon. This clearly demonstrates that any retail development located in this eastern area will have negative impact upon the vitality and the viability of the existing retail core. PPS4 defines a Town Centre as "The primary shopping area and areas of predominantly leisure, business and other Town Centre uses within or adjacent to the primary shopping area". The area to the east of the river Avon at Castle Street is clearly not adjacent to the primary shopping area	The southern end of the eastern Town Centre Boundary should be drawn along the line of the River Avon that runs under the bridge at Castle Street.	No, I do not wish to participate at the oral examination		168	
654989	Tanner & Tilley	Tanner & Tilley Planning Consultants	CSPS950	Policy KS7	Yes	No	Yes	Yes	Yes	Yes	It is considered that some provision of an element of drinking establishments (Use Class A4) within Primary Shopping Cores can make a valuable contribution to the vitality and viability of those shopping cores and particularly contribute to keeping those areas	It is suggested that the policy be amended by the inclusion of the following wording:- "...1. At ground floor level, support will be given within the Primary Shopping Cores for	No, I do not wish to participate at the oral examination		168	

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											active and attractive at night. The exclusion of an element of those uses from the Primary Shopping Core and their restriction to Secondary Core Areas only could create dead Primary Shopping Cores during the evening.	retail stores (Use Class A1), financial and professional services (Use Class A2), food and drink premises (Use Class A3), non-residential institutions (Use Class D1) and leisure uses (Use Class D2). Non retail uses (other than class A1) will not cumulatively amount to more than 30% of all ground floor units within the Primary Shopping Cores. Additionally, the proposal should not result in more than three continuous frontages being non-retail or leisure uses and shop frontage appearances should be retained. Whilst concentrations of drinking establishments (Use Class A4) will be limited to Secondary Shopping Cores, consideration may exceptionally be given to drinking establishments (Use Class A4) within the Primary Shopping Core where this would not detract from the prime shopping function of the Primary Shopping Core and where such uses would contribute to the viability and vitality of the Prime Shopping Core during the day and where it would contribute to the vitality and viability of the Prime Shopping Core into the evening and at night. 2. In Secondary Shopping Cores the same uses will be supported as for Primary Shopping Cores along with drinking establishments (Use Class A4), hot food take-aways (Use Class (A5) and hotels (Use Class C1)."				
490823	Mr Ian Jones	Ferndown Town Council	CSPS2974	Policy KS7	Yes	No	No	Yes	Yes		The Key facts at para 4.33 refers to the catchment population for major food shopping is 28,000 but there is a lack of evidence on this point. With regard to future retail provision the town council is unable to comment at this time as work on the Development Plan Document will not begin until progress has been made on the Core Strategy.		No, I do not wish to participate at the oral examination		168	
656498	Mr Matthew Morris	GVA Planning Development	CSPS2907	Policy KS7	Yes	No	No	No	No		The Co-op finds much to support in the Key Strategy section of the Pre-Submission document, including the retail hierarchy in Policy KS6 and the role of town and district centres in KS7. In addition to our suggested amendment to KS7 we also note the lack of a specific policy in the Pre-Submission document to deal with retail development proposals located outside of primary shopping areas. Whilst the general attitude of both Councils to maintaining and enhancing the health of town centres is not in doubt, we consider that the introduction of a single policy (or an extension to KS7) to deal with edge of centre and out of centre retail proposals is required. This should outline all of the impact criteria (including any 'local impact' criteria which the Councils will expect proposals to comply with, along with the flexibility which is required in connection with the sequential approach to site	However, the Co-op urges to both Councils to reconsider the minimum floorspace threshold for requiring impact assessments. A threshold of 2,500sq m gross is considered far too high and we consider that many retail developments under this floorspace level have the potential to cause significant adverse impacts on existing town centres across East Dorset and Christchurch. We recommend that a much lower threshold of 500sq m gross is set for Policy KS7	Yes, I wish to participate at the oral examination	Given the detailed nature of the Co-op's representations and the need to interrogate the Council's evidence base.	168	

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											selection and also the retail impact assessment threshold (outline above).					
664634	C Benham		CSPS3832	Policy KS7		Yes					Policy KS7 sets out the sequential and impact tests as advocated by the National Planning Policy Framework (NPPF). Along with Policy CH1 (discussed below) the policy establishes a town centre boundary for Christchurch (for the first time) and provides strong support for the development of town centre uses to enhance the viability and vitality of the town centre. The policy is proactive and positively encourages development within Christchurch town centre. Policy KS7 is therefore also considered sound against the relevant test.				168	2267823_01.pdf 2267824_01.pdf 2267822_01.pdf 2267825_01.pdf
649505	Miss Dawn Leader		CSPS299	Policy KS8	Yes	No	Yes	Yes	No	Yes	4.41 talks about increasing retail floor space in Verwood town centre but the car 2 public car parks are already full most morning and the addition of more units will mean more staff parking in these car parks all day. Verwood's public car parks are not big enough to support any further growth of the centre for daytime use.	The strategy review should highlight not only floorspace but parking space too.	Yes, I wish to participate at the oral examination	I regularly used the potters wheel carpark and the car park at station road doctors surgery and often have trouble finding a space. even before any development is done to the town centre or the doctors	173	
654310	Mr Bryan Taylor	Savills Commercial Ltd	CSPS663	Policy KS8	Yes	No	No	Yes	No	No	Policy KS8 identifies the need for an additional 8000sq metres of comparison retail floorspace within Christchurch Town Centre. The evidence base for this was the Retail Study completed in 2008. Given the changes in the economic climate and since this time, and the vacancy rates of existing ground floor retail property currently within Christchurch, I believe this figure to be much higher than actual requirements.	Obtain further up to date evidence and revise this figure down to reflect a more realistic requirement.	No, I do not wish to participate at the oral examination		173	
359553	Mrs Linda Leeding	West Parley Parish Council	CSPS1642	Policy KS8		No				No	This policy is Unsound. It is not consistent with National Policy nor Justified. It is not consistent with National Policy on community engagement as set out in NPPF 77, nor with the EDDC evidence base in their Statement of Community Involvement. It is not Justified, in that although it establishes a need for 3600 sq meters of retail floor space in Ferndown, it goes on in Policy FWP6, without any further evidence or discussion, to site a 3000 sq. metre store in the separate community and administration of West Parley. The need for the store is not obvious to or supported by West Parley. The site chosen is an awkward one, with too little parking, and is severely hampered by severe traffic and an inadequate junction. It could also lead to a severe reduction of business at the existing shops on the West of New Road.		Yes, I wish to participate at the oral examination		173	
523627	David Lowin	WYG Planning & Design	CSPS1580	Policy KS8							We write concerning your recently published Christchurch and				173	

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											<p>East Dorset Core Strategy Pre-Submission document.</p> <p>As you are aware, Sainsbury's Supermarkets Ltd are taking an active interest in the formulation of the LDF and accompanying documents. On behalf of our client, we have considered in detail the policies set out in the Core Strategy and wish to make the following representations.</p> <p>Policy KSB – Retail Development</p> <p>Policies regarding retail development in Christchurch and East Dorset should accord with national policy, and in particular with National Planning Policy Framework in respect of the following matters:</p> <p>The National Planning Policy Framework requires development plans to set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth and which is based on an adequate, up-to-date and relevant evidence base for the area (para.158).</p> <p>In this respect, we seek clarification on how the convenience and comparison floorspace capacity figures have been identified and why they are significantly lower for some settlements in East Dorset than the retail capacity identified in the Options document and the Joint Retail Study 2008.</p> <p>In addition, it appears that the retail capacity figures given in Policy KS8 are inconsistent with capacity figures given elsewhere in the document, including area based policies. It is essential that the retail capacity figures given in the Core Strategy are consistent throughout and it is clear and transparent how they have been derived.</p>					
359553	Mrs Linda Leeding	West Parley Parish Council	CSPS2007	Policy KS8	No		Yes		Yes		<p>This policy is Unsound. It is not consistent with National Policy nor Justified.</p> <p>It is not consistent with National Policy on community engagement as set out in NPPF 77, nor with the EDDC evidence base in their Statement of Community Involvement.</p> <p>It is not Justified, in that although it establishes a need for 3600 sq metres of retail floor space in Ferndown, it goes on in Policy FWP6, without any further evidence or discussion, to site a 3000 sq metre store in the separate community and administration of West Parley.</p> <p>The need for the store is not obvious to or supported by West Parley. The site chosen is an awkward one, with too little parking, and is severely hampered by severe traffic and an inadequate junction. It could also lead to a severe reduction of business at the existing shops on the West of New Road</p>	Yes, I wish to participate at the oral examination		173		
359261	Mr Doug Cramond	DC Planning Ltd	CSPS2120	Policy KS8	Yes						<p>Improvement to the Plan would arise if some amendment were made to Policy KS8 (Future Retail Provision).</p>	<p>Policy KS8 could usefully have amendment of add clarity and reflect the Councils' approach within FWP6 whereby a convenience foodstore of about 3,000sq metres is endorsed. KS8 should thus mention West Parley as a place and this quantum of development as need which is to be met in this location. It is unhelpfully silent on the matter at the present time.</p>	Yes, I wish to participate at the oral examination	In connection with comments on FWP6.	173	

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359529	Mrs Lisa Goodwin	Sixpenny Handley with Pentridge Parish Council	CSPS2474	Policy KS8							The fact that it is limited to urban provision should be stated – Future Urban retail provision.				173	2248860_01.pdf 2248948_01.pdf 2248941_01.pdf
503395	Mr Ian Davis		CSPS2319	Policy KS8		No	Yes		Yes		Policy KS8 future Retail Provision. This policy is unsound and not consistent with National Policy nor Justified. It is not consistent, due to little or no community engagement as set out in NPPF 77, nor with the evidence base in their Statement of Community Involvement. It is not Justified as it establishes a need for 3600 sq metres of retail space in Ferndown, but want to site the store/retail space in West Parley. I would estimate that approx. 75% of the residents in West Parley, shop at Tesco Ferndown , or Sainsbury/Lidl at Tricketts Cross. One major shop per week, and a top up at one of the smaller shops/stores. The location of the proposed “New Retail Provision” is on an awkward “island”, pedestrian and vehicular access looks hampered by severe traffic, little parking and an inadequate junction.				173	
512459	Sandra Davis		CSPS2359	Policy KS8		No					Policy KS8 future Retail Provision. This policy is unsound and not consistent with National Policy nor Justified. It is not consistent, due to little or no community engagement as set out in NPPF 77, nor with the evidence base in their Statement of Community Involvement. It is not Justified as it establishes a need for 3600 sq metres of retail space in Ferndown, but want to site the store/retail space in West Parley. I would estimate that approx. 75% of the residents in West Parley, shop at Tesco Ferndown , or Sainsbury/Lidl at Tricketts Cross. One major shop per week, and a top up at one of the smaller shops/stores. The location of the proposed “New Retail Provision” is on an awkward “island”, pedestrian and vehicular access looks hampered by severe traffic, little parking and an inadequate junction.				173	
490823	Mr Ian Jones	Ferndown Town Council	CSPS2975	Policy KS8	Yes	No	No	Yes	Yes		The Key facts at para 4.33 refers to the catchment population for major food shopping is 28,000 but there is a lack of evidence on this point. With regard to future retail provision the town council is unable to comment at this time as work on the Development Plan Document will not begin until progress has been made on the Core Strategy.		No, I do not wish to participate at the oral examination		173	
656498	Mr Matthew Morris	GVA Planning Development	CSPS2906	Policy KS8	Yes	No	No	No	No		Within Policy KS8 the potential for additional retail floorspace across Christchurch and East Dorset is outlined. The Co-op supports (and agrees with) the prediction that no additional convenience goods retail floorspace will be required within Christchurch and Highcliffe up to 2028. The Co-op store lies within Saxon Square and it is noted that this is one of five strategic sites identified as being able to deliver the town centre vision. Whilst not all of these five sites actually lie within the town centre (i.e. there is a need to remove both Stony	However, the Co-op objects to the suggestion that 5,000sq m of convenience goods floorspace will be required across the East Dorset area up to 2028. This prediction is based upon an evidence base document which is now four years old and contains outdated information in relation to population, per capita expenditure growth rates, retailer sales density information and	Yes, I wish to participate at the oral examination	Given the detailed nature of the Co-op's representations and the need to interrogate the Council's evidence base.	173	

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											Lane sites), it will be important for Policy KS8 to state that these sites should deliver uses/development which is in lie with the retail and other land uses proposed by KS8.	shopping patterns. Based upon the data adopted within the evidence base for retailing in East Dorset, we consider that the additional capacity which has been identified is overly optimistic. We therefore recommend that a more up to date assessment of potential retail floorspace capacity in East Dorset is undertaken in order to support Policy KS8. The Co-op store lies within Saxon Square and it is noted that this is one of five strategic sites identified as being able to deliver the town centre vision. Whilst not all of these five sites actually lie within the town centre (i.e. there is a need to remove both Stony Lane sites), it will be important for Policy KS8 to state that these sites should deliver uses/development which is in lie with the retail and other land uses proposed by KS8.				
664634	C Benham		CSPS3833	Policy KS8	No		Yes				In terms of future retail provision (KS8), based upon the Joint Retail Assessment (JRA - 2008), Policy KS8 suggests that there is no quantitative requirement for any convenience retail floorspace over the plan period. However, there is a large amount of convenience expenditure (53%) out-flowing from Christchurch to other areas, particularly Bournemouth. It is therefore considered that a qualitative need exists to provide further convenience goods floorspace in Christchurch town centre in order to provide greater choice and competition and retain a greater amount of the available spend within Christchurch. Consequently, whilst we support the proposal to increase the amount of comparison goods retail floorspace in Christchurch town centre (8,000sq m), Policy KS8 should not preclude further convenience goods floorspace coming forward, particularly where such development could provide other significant benefits to Christchurch, by for example, providing a further anchor to the town centre, drawing further trade into the centre and increasing the potential for linked trips. Christchurch town centre retains only a limited proportion of overall trade and proposals should be pursued that seek to increase the town's market share in order to maintain and enhance its vitality and viability. Supporting this, the Planning Inspector determining the recent appeal at Meteor Retail Park (app ref APP/E1210/A/11/2153440 – December 2011) concluded that Christchurch would benefit from an anchor foodstore in the town centre. This would enable the claw back of lost trade, improving market share and encouraging linked trips to the town centre. A centrally located foodstore, such as at the Magistrates Court, would provide significant benefits to the town that other foodstores, particularly in out of centre locations will not. A foodstore in the town centre would support the policy objective of enhancing	Policy KS8 should instead support convenience retail provision in the town centre where such development would increase the market share of the town centre and help to achieve wider policy objectives of enhancing the vitality and viability of the town			173	2267825_01.pdf 2267824_01.pdf 2267822_01.pdf 2267823_01.pdf

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											Christchurch's vitality and viability. It would also help to address the Council's concern that the Bargates area is performing weakly and is in need of regeneration (paragraph 5.6). The Magistrate's Court site's development to include an anchor foodstore would help draw people into the Bargates area as part of a linked trip with the town centre. Against this background, Policy KS8 is not considered sound in that a moratorium on additional convenience goods retailing in the town centre is not justified.						
654730	Mr Luke Siemaszko		CSPS792	4.43	Yes	No	Yes	No	Yes	No	Public transport in the area is very poor away from the main centres of population and mainline railway. There are very few journeys that are actually possible or practical by public transport. Currently there is a complete absence of concrete proposals to address this and we only have vague statements of intent. What is needed are *bold* initiatives to significantly improve the public transport offering in the area. Road journeys in the area are often slow, so it would be comparatively easy to tempt people out of their cars - if there was anything at all to tempt them with.		No, I do not wish to participate at the oral examination		176		
653852	Mrs Susan Newman-Crane		CSPS647	4.44	Yes	No	Yes	Yes	Yes		No reference to buses, which are under-used and too few routes.	Provide a policy to favour bus travel and enable bus companies to extend their network.	No, I do not wish to participate at the oral examination		177		
359514	Mr Edward Gerry	New Forest District Council	CSPS3468	4.47	Yes	No	Yes	No	Yes	Yes	New Forest District Council (NFDC) considers the cumulative impact of development proposed in Christchurch and East Dorset's Core Strategy is likely to have a significant impact on the road network in New Forest District, including on the A31, the A35 (including through Lyndhurst) and the B3347 Avon Valley route. NFDC in its comments on the 'Options for Consideration' consultation outlined how it was important that authorities in South East Dorset work in conjunction with authorities in South West Hampshire and beyond to address cross boundary issues. To date it appears that background work on transport impacts has purely focused on impacts within South East Dorset. On this basis further work needs to be carried out to consider cross boundary transport issues. Development proposals in Christchurch and East Dorset must not result in unacceptable conditions on the transport network in New Forest District. Without background work being undertaken and it being proved that the impacts are acceptable, NFDC considers that the plan is unsound. Further to the impacts on Hampshire's road network, the roads close to the Hampshire boundary but within Dorset, including the Christchurch Bypass, are often congested. This has implications for residents of the New Forest District who travel on these roads. The Dorset Authorities should look to improve junction capacity at the roundabouts on the Christchurch Bypass with the aim of ensuring the urban extension does not add to congestion. Development of the Christchurch Urban Extension should not result in further congestion on the roads close to the county boundary between Dorset and Hampshire.	A Transport Assessment should be carried out to assess the cumulative impact of the proposed development in Christchurch and East Dorset on roads within the New Forest District. The proposed development should not be progressed if these impacts are shown to be unacceptable.	Yes, I wish to participate at the oral examination	In order to explain the Council's position.	180		

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474462	Mrs Sheila Bourton		CSPS173	Policy KS9	Yes	No			Yes		With regard to the Wimborne area I would suggest that any improvement to the B3073 Wimborne Road West and East-Ferndown and the A349 Poole to Wimborne will be insufficient to accommodate the extra traffic which would be generated by the new proposed developments in and around Wimborne. We are talking about the proposed new houses totalling 1300 plus 186 already approved for the Brook Road site. It is recognised that the major employment centres in South East Dorset are in Poole and Bournemouth (see the late Regional Spatial Strategy) and even taking into account the proposed improvement to bus services, there would still be a marked increase in road traffic from cars. There is no rail provision in Wimborne and the distance to Poole and Bournemouth makes cycling an untenable option. Furthermore, a new Sports Village, new Country Park, new Allotments (WMC6) and the proposed recreation area on the "By the Way" site owned by EDDC would all add to the B3073 from Wimborne to Canford Bottom where a new Hamburger junction is presently being installed. It should be noted from the East Dorset Housing Options Masterplan Report November 2010 by Broadway Malyan on page 133 of this report that the Consultants consider that this new Hamburger junction "would not release additional capacity to accommodate new development"	The high number of new housing around Wimborne should be reduced.	No, I do not wish to participate at the oral examination		186	
474490	Mrs Sheila Bourton	Keep Wimborne Green	CSPS211	Policy KS9	Yes	No		Yes	Yes		We agree that it is correct to site new development close to town centres and prime transport links but would dispute that improvements to the B3073 and A349 would be sufficient to accommodate the extra traffic which would be generated from the new housing developments proposed around Wimborne. The number of new homes proposed by East Dorset District Council in their Core Strategy is 1300 plus the already approved 186 new homes in the Brook Road area of Wimborne and of course, any new development to take place on brownfield sites. The now defunct Regional Spatial Strategy for the South West identified Bournemouth & Poole as being the main employment areas for South East Dorset and, as such, it is inevitable that new residents of working age will undoubtedly travel to Bournemouth and Poole to work from the Wimborne area notwithstanding any improvement in bus services. Not only would extra traffic be generated from "going to work" travel but extra traffic would be generated particularly on the B3073 between Wimborne and Canford Bottom due to the new Sports Village, the move of the Football and Rugby Clubs and an allotment of the area south of Leigh Road (WMC6) and the proposal of the land at By the Way (owned by the Council) being a SANG (Suitable Alternative Greenspace) and the associated parking. With regard to the so called improvements to Canford Bottom roundabout and the formation of a Hamburger Junction, Broadway Malyan, the consultants who produced a report for East Dorset District Council "East Dorset Housing Options Masterplan November 2010 said on page 133 that they consider that the new Hamburger junction "would not release additional capacity to accommodate new development."	Bearing in mind the statements and advice given in the Strategic Housing Market Summary Update for East Dorset 2012 and the views in the Broadway Malyan Masterplan Report for East Dorset, we would strongly suggest that the number of new houses proposed for the Wimborne and Colehill area should be substantially reduced	No, I do not wish to participate at the oral examination		186	
64950	Miss		CSPS30	Policy	Yes	No	Yes	Yes	No	No	KS9 makes no mention of improvements to the B3081 for cycling etc	a developer of VTS5 would need to fund a	Yes, I	walk and cycle up	186	

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5	Dawn Leader		0	KS9							yet surely this is vital if 50 homes are to be built 2 miles away from the town centre, shops and schools. Certainly VTSW5 shows Pedestian/cyclist access from VTSW5 straight onto the B3081 on a blind corner, yet there is no mention of how this will be mitigated.	path on the opposite side of the road which should include a cyclepath if possible.	wish to participate at the oral examination	and down to the centre of town regularly and there is no cyclepath and the exit is on a blind bend so would be endanger life		
650617	Mrs June Judd		CSPS329	Policy KS9							Ferndown-Victoria Road and A348 Thank you for your letter and Core Strategy leaflet. With regard to the traffic flow in Ferndown- The A348 is a two laned road passing through the residential area of Ferndown from the A31 bypass to Longham taking all the hGV traffic to and from Poole docks, causing pollution and traffic chaos. Victoria Road passes through the shopping centre of Ferndown. I hope this explains the traffic situation in Ferndown.		No, I do not wish to participate at the oral examination		186	
360271	Cllr Paul Timberlake		CSPS484	Policy KS9	Yes	Yes	Yes	Yes	Yes	Yes	I support the Transport Strategy as shown at KS9.		No, I do not wish to participate at the oral examination		186	
515938	Mr Frank Stevens		CSPS394	Policy KS9							The local roads were built for a horse and cart era and no way even suitable for for the traffic they are now forced to accommodate. this also means that they are no way suitable for pedestrian or cycle traffic that tries to use them. My own children used to cycle to school whereas their own children now feel that it is too dangerous to do so. I certainly do not like to walk along the local roads, much as I would like to, especially in the wintertime. The only way to avoid the traffic is to try to get out of the way onto wet verges. In addition, the bridges over or local rivers are not really man enough for the present traffic flows and lorries seem to be getting bigger and more numerous.				186	
652994	Mrs Kathleen Leader		CSPS542	Policy KS9	Yes	No	Yes	Yes	Yes	Yes	There are 280 proposed new homes in Verwood and yet the B3081 is not mentioned in this section ? The B3081 leading from the town centre up to the A31 is very busy road, there needs to be cyclepaths and footpath widening if this road is going to cope with Verwoods population in the next 20 years	plans for the B3081 to be improved especially that which falls in Dorset .	No, I do not wish to participate at the oral examination		186	
654026	ms bev miller		CSPS607	Policy KS9	Yes	No	Yes	Yes		No	Improvements will be made to Prime Transport Corridors to include junction improvements, traffic management, enhanced public transport services and improvements to walking and cycling. The following corridors are proposed for improvement: A35 Iford Bridge - Fountains roundabout - Stony Lane roundabout - Somerford roundabout - Roeshot Hill - Hampshire boundary. B3073 Christchurch town centre - Bargates - Fairmile - Blackwater Interchange. (A338 junction) This is far too vague....what is meant by 'improvements' ? Improvements to benefit whom ? Residents, pedestrians or motorists only passing through ?		No, I do not wish to participate at the oral examination		186	

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											We need to know exactly how the Fountains roundabout could possibly be 'improved', as all the other roundabouts/ junctions mentioned. I repeat this is much too vague to be adopted.					
654320	Mrs Meghann Downing	Highways Agency	CSPS749	Policy KS9	Yes	Yes					The Highways Agency are particularly supportive of the proposals in Policy KS9 which will enhance sustainable transport and which will contribute towards a reduction in congestion, thereby safeguarding the operation and safety of the Strategic Road Network.		No, I do not wish to participate at the oral examination		186	
359553	Mrs Linda Leeding	West Parley Parish Council	CSPS1643	Policy KS9		No					This policy is Unsound. Parts of the policy are cannot be said to be deliverable. Its proposed corridors for improvement include the Parley Cross – A348 junction. Improvements to Parley Cross are indeed desirable, but there is no funding in sight for this particular scheme and unlikely to be any in the current and forecast financial climate.		Yes, I wish to participate at the oral examination		186	
656493	Cllr Tony Gibb	Eastern Area DAPTC	CSPS1474	Policy KS9		No	No	No	No	No	<p>RURAL RESPONSE TO EAST DORSET AND CHRISTCHURCH CORE STRATEGY</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 & Shapwick, Sixpenny Handley with Pentridge, Sturminster Marshall. It does not include the conurbations along the A31 or Verwood and Three Legged Cross. 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. http://webarchive.nationalarchives.gov.uk/20110215111010/http://archive.defra.gov.uk/evidence/statistics/rural/rural-definition.htm . 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. "Rural communities are often proclaimed by those who live there as inclusive and neighbourly, but it seems they often prevent the</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.		186		

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											<p>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> <p>All the points made in the latest CRC State of the Countryside Report 2010 are valid in East Dorset http://www.defra.gov.uk/crc/documents.state-of-the-countryside-report/sotc2010/ . 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, Criche, 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. 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. 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. 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>					

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											<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 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"> • 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%. • 23.5% of people in rural areas are over state retirement age compared with 18.1% in urban areas. • 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. • Approximately 5% of rural households were using dial-up internet connections in 2009 compared with 2% in urban areas. • 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. • 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 					

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											<p>annual household incomes.</p> <ul style="list-style-type: none"> • 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%. • 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. • 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. <p>Lack of mention of rural workshops serving various needs should be included.</p>					
359547	Mrs V Bright	Verwood Town Council	CSPS1757	Policy KS9							The Town Council consider that the B3081 should also be designated as a prime transport corridor between the A31 and Blackhill junction.				186	
359437	Ms Gill Smith	Dorset County Council	CSPS1967	Policy KS9							The transport proposals in the Core Strategy are primarily guided by the South East Dorset Transport Strategy, the North Dorset and Northern East Dorset Transport Strategy and the Bournemouth, Poole and Dorset Local Transport Plan (LTP3) for the period 2011 – 2026. The LTP3 sets out the local transport investment programme over the next 15 years. The policies in the Core Strategy directly reflect the recommendations from the Transport Strategy of LTP3 and are supported	No proposed change to this policy			186	
359492	Mr Stuart Jarvis	Hampshire County Council	CSPS2033	Policy KS9	Yes	No		Yes	Yes		<p>As Highways Authority, Hampshire County Council notes that Paragraph 178 of the NPPF states that “Public bodies have a duty to cooperate on planning issues that cross administrative boundaries. The Government expects joint working on areas of common interest to be diligently undertaken for the mutual benefit of neighbouring authorities” Major development of Bournemouth Airport and Business Park will impact on Hampshire’s roads and the Core Strategy does not recognise this.</p>	The following text should be added policy KS9, after the first set of bullet points: It is recognised that several of the strategic development sites as identified in the Core Strategy including Bournemouth Airport and Business Park are likely to have an impact on neighbouring authority roads. This includes the B3347 and Avon Causeway as well as the A31/ A338 in Hampshire. There will need to be partnership working with relevant landowners, developers, statutory agencies, neighbouring and the local community to identify the forecast impact and potential measures required to mitigate the impact of the proposed development.	No, I do not wish to participate at the oral examination		186	
359553	Mrs Linda Leeding	West Parley Parish Council	CSPS2008	Policy KS9		No					This policy is Unsound. Parts of the policy are cannot be said to be deliverable. Its proposed corridors for improvement include the Parley Cross – A348 junction. Improvements to Parley Cross are indeed desirable, but there is no funding in sight for this particular scheme and unlikely to be any in the current and forecast financial climate.		Yes, I wish to participate at the oral examination		186	
360089	Ms Julie Goodman	Somerford Community Partnership	CSPS1985	Policy KS9							The Partnership supports Policy KS9 in seeking to maintain high quality, efficient and speedy bus connections between Somerford and Bournemouth, especially the hospital complex at Castle Lane				186	

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											East and the Christchurch Hospital site. noting that many of the residents of Somerford rely on public transport. The Partnership strongly supports Policy KS10 in so far as it seeks improvements to the road junctions at the Stony Lane and Somerford Roundabouts. However the Partnership notes that it does not support so-called improvements which claiming to improve facilities for walkers, cyclists and pedestrians actually result in deteriorations for motorists. The Partnership welcomes proposals for further cycle lanes, provided again that these are off-road. The Partnership is very concerned at the increasing problem of cyclists riding on pavements and believes that this should be discouraged.							
359261	Mr Doug Cramond	DC Planning Ltd	CSPS2094	Policy KS9		Yes							Yes, I wish to participate at the oral examination	In connection with comments on WMC3	186			
359529	Mrs Lisa Goodwin	Sixpenny Handley with Pentridge Parish Council	CSPS2420	Policy KS9							In Sixpenny Handley and Pentridge we still retain the basic ingredients of vibrancy – but only just and they are almost imperceptibly slipping away. We have to develop in order to meet the needs of Dorset’s increasing population and to continue to provide the necessary services to fulfil our role as a Rural Service Centre. To that end it is disappointing to note that the prime transport corridors up here in the far north - the A354 and B3081 – with their vital public transport services barely get a mention and we wonder at times if we really are best served by East Dorset and might be better off in the North with its predominately rural population and outlook. Our three Main Settlements are Blandford Forum, Shaftesbury and Salisbury all of which lie not only outside East Dorset and therefore the scope of this document but in the case of the City of Salisbury - outside the county. For us Wimborne and the other East Dorset Main Settlements - the Bournemouth and Poole dormitory towns - are a long way away. (from Annex to comments) Lack of mention of rural road system. The volume of HGV traffic to farms will increase as is the increase in traffic resulting from computer navigation systems, the existing road system barely copes with the current flows.						186	2248948_01.pdf 2248941_01.pdf 2248860_01.pdf
360082	Mr and Mrs K Healy		CSPS2422	Policy KS9	Yes	Yes	Yes	Yes	Yes	Yes	<ul style="list-style-type: none"> We highly commend your proposed strategy re travel plans and car sharing to reduce the need for parking provision at employment locations. The vast car parks at some locations are such a waste of precious land. We also commend the enhancement and protection of the existing rights of way network. We particularly agree with ‘protection’. Any developments affecting people’s perception of safety whilst using trailways could seriously damage and threaten their viability. Sustainable freight movement would be an excellent achievement. 		No, I do not wish to participate at the oral examination		186			
503395	Mr Ian Davis		CSPS2321	Policy KS9		No					Policy KS9 Transport Strategy and Prime Transport Corridors. This policy is Unsound.				186			

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											Parts of the policy are unlikely to be deliverable. Corridors for improvement include the Parley Cross – A348 junction. Minor improvements would be desirable, but there is no funding in sight for this particular scheme and unlikely in the current financial climate.					
512459	Sandra Davis		CSPS2361	Policy KS9		No					Policy KS9 Transport Strategy and Prime Transport Corridors. This policy is Unsound. Parts of the policy are unlikely to be deliverable. Corridors for improvement include the Parley Cross – A348 junction. Minor improvements would be desirable, but there is no funding in sight for this particular scheme and unlikely in the current financial climate.				186	
499596	Sir Roger Palin		CSPS2505	Policy KS9		No		Yes			The capacity of the roads and key junctions in and around Wimborne to cope with the increased traffic resulting from the developments proposed in the Core Strategy will be a significant factor in determining their viability or otherwise. Therefore Dorset County Council commissioned a study utilising a Wimborne Transport Model to assess a range of development scenarios based on the Core Strategy proposals. The results were said to be fully reported in the Options Test Summary Report, and a non Technical Report has been produced summarising the outcomes of the work for the layman. Both document have just (mid June) been released into the public domain. Unfortunately neither document assists this lay reader fully to understand the report or to test its conclusions. Neither includes the study Terms of Reference, the methodology employed, nor assumptions made. Furthermore the appendices which purport to demonstrate the results of each option studied are not titled and cannot sensibly be cross referenced to the text; nor is the symbology explained. While the general conclusion is sound, namely that the developments would lead to increased traffic flow to the point where certain key road junctions would become saturated and others close to saturation, some of the other results are less obvious and more difficult to understand. For example, the Base Case reveals an increase in traffic flow at the Stone Lane/Westborough junction but thereafter each option shows a decline despite the significant increase in numbers of vehicles in the area. This is counter-intuitive since the Walford Bridge/Eastborough/Stone Lane traffic light nexus is a notorious bottleneck even in today's conditions, and the addition of 900 cars east and west of the Cranborne Road as a result of WMC5 proposal in the Core Strategy (Option C and D in the study) would surely be expected to increase RFC flows rather than reduce them. There is no explanation for this apparent anomaly in the report.	The full study should be placed in the public domain so that its results can be tested by independent analysis.	Yes, I wish to participate at the oral examination	Inadequacy of the evidence supporting the conclusions of this important/key study.	186	
656560	Mrs Jean Heaton	British Horse Society	CSPS2826	Policy KS9	Yes	Yes	No	No	No	No	It is unsound never to mention safe routes for horseriders – 6 serious road accidents every day. There are about 2,000 in this area of very heavy traffic, 350 in Wimborne & District Riding Club + 130 children in Poole Pony Club with weekly events at Merley, beside Castleman Trailway which we cannot use!	Several maps show “green dash” pedestrian & cycle routes which are legally “Bridleways” & should be shown as such. Please ensure new estates & SANGs do not fragment our BR network but also provide extra safe	Yes, I wish to participate at the oral examination	The recreational needs & road safety requirements of horseriders are	186	2255945_0_1.pdf 2255942_0_1.pdf 2255943_0_1.pdf 2255944_0_1.pdf

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												routes for us, with new Pegasus Light crossing on main roads eg A348 north Longham by Angel Inn.		never considered although this provides very healthy exercise.		
490823	Mr Ian Jones	Ferndown Town Council	CSPS2977	Policy KS9	Yes	No	Yes	Yes	Yes		The town Council remains concerned about the use of roads through the town centre by Heavy Goods vehicles not making deliveries to local shops. The Town Council would ask that restrictions be introduced for such HGVs between Longham Roundabout and Tricketts Cross. The Bypass is a suitable alternative route.		No, I do not wish to participate at the oral examination		186	
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS3244	Policy KS9		No	No			No	Sustainability Appraisal Policy KS9 Prime Transport Corridors SA Objective 1 Protect, enhance and expand habitats and protected species "Improvements" to the B3073 will result in significant loss of and damage to sensitive habitats. ME1 cannot ensure no impact. Mitigation and compensation have not been identified SA Objective 5 Provide access to meet people's needs Although Prime Transport Corridors have been identified in LTP 3, poor bus services remain a significant barrier to ensuring sustainable transport is the preferred choice, particularly north of the A31. Habitats Regulations Assessment More explicit guidance on mitigation of light pollution is required than is covered by Policy HE3		No, I do not wish to participate at the oral examination		186	
557299	Mr Peter Weatherhead	DTZ Planning	CSPS3172	Policy KS9		No	Yes	Yes	Yes	Yes	The Malmesbury Estate objects to Policy KS9 Transport Strategy and Prime Transport Corridors because it is inconsistent with LTP3 and fails to make provision for a Bournemouth Airport strategic park and ride. This should be added to the policy which purports to list the proposals from LTP3 but excludes this one. See the written representations in the letter dated 22 June 2012.	The adjustment of the boundary between the airport and the Green Belt designation to provide sufficient land for the long-term implementation of the strategic park & ride on land to which there is full public access without the payment of the airport car parking charges. See the written representations in the letter dated 22 June 2012, together with the formal responses made on the Estate's behalf and included in the background documents.	Yes, I wish to participate at the oral examination	To explain our representations in full and to have the opportunity to comment on relevant topics and debates carried out during that part of the examination that deals with the airport and related policies.	186	2254182_01.pdf 2254183_01.pdf
490815	Mrs Trish Jamieson	Burton Parish Council	CSPS3670	Policy KS9							Burton Village is felt by those who live there to be a very special community. Despite the spurt of housing growth in the 1960s and 1970s the new development was confined to the area between Salisbury Road and Stony Lane and Burton's essential character as a rural village has been maintained. This is recognised by the establishment of the Burton Conservation Area, which protects the core of the old village and its essential features. The Parish Council, elected in May 2011, in commenting on these proposals has as its aim the preservation and enhancement of the character of the village and the lives of its residents by:				186	

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											<p>_ Preventing development inimical to the village _ Supporting and promoting appropriate developments To this end the Council supports the need for a new Local Plan and Core Strategy and acknowledges that without the new plan there is a considerable danger that developers will be able to seek to pursue development proposals which might not be in the best interests of the Village. The Parish Council also accepts that the new Core Strategy offers opportunities to protect services and facilities in the village, and to develop new ones - for example, to pursue extensions to public transport, to protect local shops and facilities, and to secure improvements to private transport. Aware of the difficulties facing young couples with roots in the village finding housing, the Council welcomes the commitment to allowing a development of 100% affordable housing and will seek the adoption of a Rural Exception policy for Burton. For these reasons the Council welcomes many of the new policies and proposals, but it has to be noted that it has serious concerns over proposed Policy CN2. The Council very strongly opposes the inclusion of housing for Burton in Policy KS9.</p>					
359614	Mr & Mrs McCammon		CSPS148	Policy KS10							<p>What about the Sainsbury's roundabout, prior to the Somerford? The roads that feed these roundabouts especially the Somerford roundabout, A35 need extending to cope with additional traffic. They are often congested and in poor repair. Just improving the roundabout is insufficient.</p>				188	
359615	Mr Burridge		CSPS99	Policy KS10							<p>Item 1,2 and 4 - A christchurch report some years ago said the bypass was often running at capacity, fiddling with roundabouts 1,2 and 4 will not change this. Item 6 - There was no money for A338 maintenance - so widening must not be feasible.</p>				188	
360149	Mr John Urguhart		CSPS81	Policy KS10							<p>No - There needs to be a new road link from the A338 to the airport - an 'A' class dual carriageway: tinkering with the B3073 is inadequate. The urban extension will add to the already high congestion on the A35. This document should at least refer to the need for a new by-pass for Christchurch. The existing road system is overloaded now.</p>				188	
360166	Mr TC Nicholson		CSPS103	Policy KS10							<p>Clearly if traffic congestion is to be avoided in central Christchurch there will be a need to improve junction points west of Christchurch. But in my view re-routing the A35 Christchurch bypass is still the main priority for the proposals to really succeed.</p>				188	
589997	Mrs Clarke		CSPS80	Policy KS10							<p>No you only talk about transport what about schools, doctors, hospitals, social services. Not mentioned in any of your proposals!</p>				188	

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647876	Mr Christopher Whitcher		CSPS118	Policy KS10							As with the decision made about the future of Druitt Hall this complete leaflet is irrelevant as it appears to me that the final decision has been made. I also begrudge even more money wasted on this leaflet as with the rise in Councillors expenses "austerity"?				188	
647898	Mr Derek Beasley		CSPS108	Policy KS10	Yes	Yes	Yes	Yes	Yes	Yes					188	
648788	Mr R Hewetson		CSPS161	Policy KS10							What does this mean? Once again, where will the money come from?				188	
648805	Mr John Cuming		CSPS165	Policy KS10							These transport improvements would be essential within the (2014-2019) period and not left within the Borough wide development plan to 2028!				188	
648918	Mrs M Ramsden-Fisher		CSPS198	Policy KS10							Provided these are considered reasonable. Sadly over use of this area already makes monitoring difficult and road speeds and usage too great. Woodland between Christchurch / Bournemouth / roads to Ringwood all needs careful development.				188	
649982	Mr and Mrs Edward and Marion Slade		CSPS278	Policy KS10							The proposed improvements at the Fountains Roundabout, Somerford Roundabout and Stony Lane will not solve congestion problems, merely moving them downstream to Iford Bridge and Bargates. Therefore a waste of money. Previous experience at Stony Lane have been ineffective.				188	
649998	Mr John Grainger		CSPS282	Policy KS10							Yes - In the last ten years alone DVLA Swansea has recorded a marked increase in the widths of vehicles in all classes. Particularly private cars add to that the increased and projected levels of Road vehicles and it is plain some of the locations of improvements will be intolerable unless these are dealt with under policy KS10.				188	
650390	Mr and Ms T and E J Lodge and Cox		CSPS318	Policy KS10							No objections.				188	
650644	Mrs C M Williams		CSPS335	Policy KS10							No. There is no plan to separate local and through traffic. Traffic needs to be split before Christchurch into through and local traffic. This is essential as the population of Christchurch will increase significantly and be counter-productive to borough revenue as people will avoid coming here.				188	
515938	Mr Frank Stevens		CSPS395	Policy KS10							It was a mistake to allow 6 roads to join at the Canford Bottom Roundabout. The A31 should have been dual carriageway along its whole length from the M27 to Bere Regis, as many of us said at the time, and it is a disgrace in its present form. Although I appreciate that this is not EDDC business but that of Dorset CC. I also remember that agreed proposals to improve the A31/A35 were shelved by John Prescott in anticipation of his "Joined up Transport Policy" that never seemed to materialise.				188	
651353	Mrs Janice		CSPS421	Policy KS10							No				188	

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	Targett															
518223	Mr Gary Lammers		CSPS729	Policy KS10				Yes			Not justified. No evidence that this will improve traffic flow. The alternative of a link road from Stony Lane to A338 Wessex Way is more effective.				188	
654046	Mr David Parady		CSPS631	Policy KS10	No	No	No	No	No	No	The road improvement proposals are unsound because they will be inadequate to deal with the traffic arising from the Christchurch Urban extension & the potential increase of up to 291 new dwellings in Highclife/Walkford (para 5.22) the main route through which is already severely congested. The so called Christchurch bypass is already congested for significant parts of the day, especially in summer. There seems to be little prospect of an outer relief route for Christchurch so other radical solutions must be considered. The only practical option would be to reduce the flow of traffic from the A35 into the Christchurch/Bournemouth urban area by introducing a park & ride scheme. The presence of Hinton Admiral Station on the eastern edge of the urban complex provides an ideal opportunity for such a scheme. A large car park on the land to the north of the station would be needed & the co-operation of SW Trains to arrange for more train services to stop at Hinton should make the scheme very attractive to motorists.	Include major road works & traffic reduction schemes to match the predicted expansion of housing in the area	Yes, I wish to participate at the oral examination	I believe the whole issue of traffic management in the area needs to be thoroughly examined in public	188	
654320	Mrs Meghann Downing	Highways Agency	CSPS750	Policy KS10	Yes	Yes					As with the Core Strategy Vision, we support the recognition of concerns on the Ameysford to Merley link, however we would add that the delivery mechanism for this proposal is yet to be clarified.		No, I do not wish to participate at the oral examination		188	
654341	Ms Chris Keats		CSPS668	Policy KS10							'Connectivity'? Not a word in my Oxford English. 'Improving Connections to Support Development' might make more sense. 'Improving' roads always brings traffic chaos. Think carefully before committing precious tax money on 'improvements'. Would these 'improvements' be necessary if these housing proposals are rejected?				188	
654400	Mrs J Williams		CSPS676	Policy KS10							'No' What is the point of widening existing roads just to funnel them into Bargates and be nose to tail on Fairmile and Barrack Roads. I don't agree with any more expansion until a proper bypass to Christchurch is in place.				188	
653576	Mrs Sue Ellis		CSPS1116	Policy KS10							No Insufficient. This does not go far enough. Christchurch Bypass is solid at rush hour. We need by 2020 another crossing of the River Avon. The old swing bridge and 1 other is insufficient. Tuckton Bridge and Iford are also blocked regularly now. More cars with extra houses so another bridge.				188	
653586	Mr Robert Stephen Homer		CSPS1127	Policy KS10							Policy KS10 might meet the test of soundness if managed with an intelligent, genuine consideration sensitive to the environment that is so sadly missing in the previous three policies. Not used with a cynical eye for infill development in the future or springboard for another bout of huge housing projects.				188	
654780	Ms Sharon		CSPS860	Policy KS10	Yes	No	Yes	Yes	Yes	Yes	Stony Lane junction from Burton is already highly congested with	By building on Brown Field sites with the	No, I do not wish		188	

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	Davis										very long tail backs of traffic, increased housing can only add to this traffic problem. The cycle path provided on the pavement is also already dangerous as it mixes pedestrians with cyclists who have to negotiate a very narrow pavement under the railway bridge with sometimes traffic only centimetres away. The proposal gives no natural links to Burton village centre and certainly the majority of people will always take the car option resulting in more unsustainable vehicle movements through to the village.	infrastructure of road access already in place.	to participate at the oral examination			
654704	Mrs J E John		CSPS10 48	Policy KS10							It depends on when, how and efficiently the work is carried out. To widen any route, to enhance proper road marking and improve road signage is obviously an improvement, as it always the improvement to pedestrian walkways and cycle routes. However road surface maintenance in most areas must continue,. Every Council after 2 hard and low reserves of "road" money knows that so the test of soundness will only be found if the Council will continue to maintain the existing roads to the standard every motorist and esp. cyclists (pedal and motor) can expect. In areas where it is not residential, road improvements should be done at night so that work can be carried out efficiently and non stop.				188	
654775	Mr David Monks		CSPS10 10	Policy KS10	No	No	Yes	No	No	No	This is my letter which covers the need for a "Real Christchurch Bye Pass" before many of the proposed plans are implemented. The Planning Policy Team Christchurch Borough Council Civic Offices Bridge Street Christchurch BH23 1BR Dear Sir Transport – in Particular - Roads for Emergency Vehicles, Buses & Private Vehicles. A Gridlocked Town Centre for want of a Real Bye Pass Core Strategy Pre-Submission Document Urban Extension - Additional Housing Core Strategy It is noted that any comments to this pre-submission document must be in by midnight 25th June 2012 and I am endeavouring to comply at this late stage but still find it hard to unveil all the current and archived facts of the case. There are many aspects I have an interest in but I shall restrict my comments to those of most importance to all residents of (and future viability of) Christchurch and the nearby towns that are also affected. Urban Extension - Additional Housing KS3 Says - 3020 new homes will be provided in Christchurch by 2028, including the 90+45 in Burton and 850 at Roeshot Hill. Assume that just for the latter 850 homes, each will have on average 2 cars, that's a further 1700 cars trying to get onto our already very crowded roads plus the extra buses that will be needed. CN1 In mentioning Roeshot Hill, the plan to move the allotments to north of the Railway against the plot holder's wishes is well out of order and Statutory Requirements.	See the letter in Q4 above	Yes, I wish to participate at the oral examination	There could be information available from previous attempts at providing a viable and effective REAL bye pass for Christchurch and I am willing to assist in achieving an effective plan if mine needs amendment.	188	2255781_01.pdf

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											<p>KS10 & CH1 Christchurch Town Centre, often Gridlocked for want of a Real Bye Pass</p> <p>Local maps show A35 as a “Christchurch Bye Pass”!! It should be renamed “Somerford Bye Pass” as that is what it is. It must be the only Bye Pass in the world that ends in the middle of an ancient town at the infamous Fountains Roundabout. Let us be honest for once; no amount of money spent on this roundabout can overcome the congestion.</p> <p>Summer warm weather, the air show, other special events, locals from further east are trying in-vain to get to Bournemouth or the airport. Not only from towns as far as Lymington and beyond but even all of London and towns between. Knowing that the spur Road A338 is always busy at these times, people think wrongly that they can miss all that by using the A35 through Christchurch. It is a known fact that there are insufficient and inadequate crossings of the River Avon South of Salisbury. More than 40 years ago plans were made for a Christchurch Relief Road. It is either cancelled or still pending!!! The only good crossings are the dual carriageways A31 at Ringwood and A35 at Christchurch and yet they cannot cope. The only other (single carriageways) are Avon Causeway and Bridge Street in the town and whereas these are useful, they can only be considered as a joke for moving volume traffic.</p> <p>At times of mass congestion on these roads, for those who live East of the River Avon, Heaven Help anyone who has a heart attack or a house fire, as emergency vehicles cannot get to you in time.</p> <p>BA2 A Real Christchurch Bye Pass</p> <p>Thankfully there is a solution and one that must be put in place ahead of any more housing and certainly long before 2028!! A new road must be built linking A35 (North of the railway and Roeshot Hill) and in an almost straight line to the Hurn village roundabout and on to Bournemouth International Airport. It should start with a two lane large roundabout on A35 in way of the entrance to the existing Pick-Your-Own farm. It should have no further access until the A338 Spur Road and have flyovers for the 3 road crossings including B3347 where it also crosses the River Avon. See the attached map. At Hurn and the adjacent Moors River there should likewise be a flyover and maybe access to the new road. Even without the new road, the Hurn roundabout and Moors River bridge are long overdue for a major widening and upgrade.</p> <p>Note: - Most town Bye Passes have to be of a circuitous nature with many curves. As this road is virtually straight, it is thankfully a very cost effective solution at 5.5 miles long.</p> <p>This scheme is of major importance to the whole of Dorset and Hampshire and that is why I have addressed it not just to Christchurch but also I have copied it to East Dorset & New Forest District Councils and the Dorset County office. I am also copying it to our MP and to the Bournemouth Echo so the local people can know of my suggestion and have their say. I see that in March 2011, they ran an article “Battling for Christchurch bypass plan”. Whereas it has great benefit potential for many, I can foresee</p>					

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											<p>objections for some, such as the people of Burton/Winkton and Hurn and also the land owners, especially Meyrick Estates. Of further interest, I see that in March 2009 the Echo also did an article "Christchurch residents urged to fight gravel extraction". I am not sure but I guess if this was to go ahead, I expect this would be north of the Railway Line on Meyrick Estate land. I also believe Meyrick own and wish to sell the land of the large field and the allotment at Roeshot Hill where the urban extension for 850 houses are to be built.</p> <p>Question: - If the gravel extraction scheme where to go ahead, would it be bang in the middle of the new road I am now proposing???</p> <p>I look forward to your acknowledgment and subsequent reply Yours sincerely</p> <p>Note: - The attached map showing the route of the new bye pass would not copy here but it has been delivered by hand and email</p>					
654839	Miss Karen Mason		CSPS10 06	Policy KS10	Yes	No	Yes	Yes	Yes	Yes	<p>I was totally unaware of this development and proposal and as a resident of Burton I question why is this so; surely it is imperative that ALL RESIDENTS of our village are given the opportunity to consider. I have various objections as follows CN2 I strongly believe we should save and preserve our Green Belt and Conservation Areas. CS2/KS10 the additional traffic this will create will cause even more delays on Stony Lane which is already unable to cope with the current traffic generated from Burton and surrounding areas. CS2/KS10 The development will create more unsustainable vehicles in and around the village.</p>		No, I do not wish to participate at the oral examination		188	
65526	Mr Paul Morrison		CSPS10 31	Policy KS10							<p>Think about it. Another 2 million private vehicles in 10 years time. No amount of inventive improvements will make the slightest difference. People who insist on solo travel in their private space on wheels will have to accept gridlock to be the norm.</p>				188	
656249	Ms Gemma Care	Barton Willmore LLP	CSPS10 30	Policy KS10	Yes	No	Yes	Yes	No	Yes	<p>Thank you for the opportunity to provide comments on the Christchurch and East Dorset Core Strategy (JCS) Pre-Submission document. On behalf of our client, Stour Valley Properties (Dorset) Ltd., we are pleased to provide the following response, which should be read in conjunction with the accompanying Consultation Response Forms.</p> <p>Background Barton Willmore LLP has been instructed to make representations to this document, on behalf of Stour Valley Properties (Dorset) Std. ('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</p>	Amend policy to state A31 dualling may occur beyond the plan period.	Yes, I wish to participate at the oral examination	To ensure our case is presented in full and to be party to discussions.	188	

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											<p>JCS is inappropriate and inconsistent with national planning policy, which states that each local planning authority should ensure that the Local Plan is based on adequate up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Local planning authorities are expected to ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals.</p> <p>Consideration is given within the submitted representations to the strategic site allocations for Wimborne and Colehill identified within the JCS and the extent to which the proposed allocations fulfil the overall objectives and spatial vision for East Dorset and Christchurch. On the premise that insufficient housing requirements are identified in the Pre-Submission JCS we submit that additional strategic allocations or an increase in the specified number of required new dwellings are required in order to plan positively for the further housing growth we consider necessary in light of our appraisal of the Council's published JCS evidence base.</p> <p>In accordance with section 20 of the Planning and Compulsory Purchase Act 2004 (as amended) local plans must be 'sound': i.e. they must be positively prepared, justified, effective and consistent with national policy. We suggest that the housing strategy adopted within the JCS as it stands is (a) not the most appropriate (on the basis that it is not considered fully justified) and (b) it is not 'positively prepared' – i.e. it is not based on a strategy which in our view genuinely seeks to meet objectively assessed needs.</p> <p>Within these representations we do not comment on every aspect of the JCS; our intention is to comment on those sections where we non-compliance with tests of soundness is apparent, or where we are particularly supportive. To be clear, our primary concern in this instance is the content and justification of Policy KS4 and the proposed housing allocations for Wimborne and Colehill – specifically Policy WMC6.</p> <p>An alternative proposal for housing to the south of Wimborne is considered with specific reference to the SVP land shown on the concept plan attached at Appendix 1 to these submissions. Comments are also provided on a number of other policies within the JCS, on individual response forms, as requested. The full list of policies to which these representations respond are: Policy KS1, KS4, KS5, KS10 Policy WMC3, WMC6 Policy FWP3, FWP4, FWP6, FWP7, FWP8 Policy ME3 Policy HE4</p> <p>Copies of all Core Strategy Response Forms relating to each policy addressed within these representations are contained at Appendix 4.</p> <p>Appendices 1 – 3 to this cover letter are those referred to in the various consultation forms.</p> <p>I trust that all of the enclosed is clear and in order and we look</p>					

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											forward to engaging with you further in the consultation process. Concern is raised regarding the deliverability of the A31 dualling between Merley and Ameysford. We understand that Highway Agency evidence shows that this scheme is dependent on Government funding and may not be brought forward in the plan period, certainly not within 20 years and we understand that there is no funding allocated to such works.					
35953	Mrs Linda Leeding	West Parley Parish Council	CSPS1644	Policy KS10		No					This policy is Unsound. KS10 is a statement of ambition rather than a deliverable policy. There is an alarming funding gap, unlikely to be closed in presently foreseeable circumstances, for all the improvements cited in KS10. This applies particularly to the A31(T) dualling, which is fundamental to the success of nearly all the proposed new housing schemes.		Yes, I wish to participate at the oral examination		188	
359437	Ms Gill Smith	Dorset County Council	CSPS1970	Policy KS10							The transport proposals in the Core Strategy are primarily guided by the South East Dorset Transport Strategy, the North Dorset and Northern East Dorset Transport Strategy and the Bournemouth, Poole and Dorset Local Transport Plan (LTP3) for the period 2011 – 2026. The LTP3 sets out the local transport investment programme over the next 15 years. The policies in the Core Strategy directly reflect the recommendations from the Transport Strategy of LTP3 and are supported	No proposed change to this policy			188	
656861	Mr Adrian Turner		CSPS1787	Policy KS10	No	No	No	No	No	No	CN2 - planning policy relating to building 45 properties on Green Belt land, which would result in loss of conservation area, loss of Burton Farm and would impact on traffic on Salisbury Road and Stony Lane. Burton is a village NOT a suburb of Christchurch - it has its own Civil Authority.		No, I do not wish to participate at the oral examination		188	
35953	Mrs Linda Leeding	West Parley Parish Council	CSPS2010	Policy KS10		No					This policy is Unsound. KS10 is a statement of ambition rather than a deliverable policy. There is an alarming funding gap, unlikely to be closed in presently foreseeable circumstances, for all the improvements cited in KS10. This applies particularly to the A31(T) dualling, which is fundamental to the success of nearly all the proposed new housing schemes.		Yes, I wish to participate at the oral examination		188	
359824	Mrs Carol Hellicar		CSPS2090	Policy KS10							Doesnt even hope to address current transport problems. We need a proper by pass north of the railway line linking the A35 to B'mth airport. Not as at the present where the by-pass dumps all its traffic in the middle of Christchurch causing dead lock!				188	
360089	Ms Julie Goodman	Somerford Community Partnership	CSPS1986	Policy KS10							The Partnership supports Policy KS9 in seeking to maintain high quality, efficient and speedy bus connections between Somerford and Bournemouth, especially the hospital complex at Castle Lane East and the Christchurch Hospital site. noting that many of the residents of Somerford rely on public transport. The Partnership strongly supports Policy KS10 in so far as it seeks improvements to the road junctions at the Stony Lane and Somerford Roundabouts. However the Partnership notes that it does not support so-called improvements which claiming to				188	

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											improve facilities for walkers, cyclists and pedestrians actually result in deteriorations for motorists. The Partnership welcomes proposals for further cycle lanes, provided again that these are off-road. The Partnership is very concerned at the increasing problem of cyclists riding on pavements and believes that this should be discouraged.					
524723	Mr John Worth	Wimborne Civic Society	CSPS1904	Policy KS10							With the likelihood of a significant increase in traffic volume arising from housing and other developments in Wimborne and Colehill, we think it important to give priority to the dualling of the A31(T) from the Amysford to Merley roundabouts, in conjunction with a better route from the A31 to Poole and Wessex Way. If Policy WMC6 goes ahead we recommend a spur from the new development directly to the A31 between the Canford Bottom and Merley roundabouts.				188	
657055	Mr and Mrs Gavin and Daf Kewley		CSPS1936	Policy KS10							Stony Lane roundabout: From Stony Lane / Burton / Sopley must have 2 lanes with full access to the roundabout as current T/L only option does not work. Tail back can reach the end of Footners Lane. CN1 current plan shows no road improvement - slip roads / traffic calming will be essential due to pedestrian use concentration.				188	
657057	Mrs C Moss		CSPS1907	Policy KS10							Only in conjunction with a Christchurch relief road.				188	
657059	Mr and Mrs T R Beaumont		CSPS1895	Policy KS10							Does meet the test of soundness. These improvements are required to overcome current traffic conditions. If the number of dwellings in the Borough is to be further increased they will become even more important regardless of either the quantity of additional dwellings or their locations.				188	
657039	Mrs Pat Brookes		CSPS2108	Policy KS10							Will your strategy include a by pass as opposed (for Christchurch to Bmth link) to widening which attract more traffic. Pollution, etc in the areas identified. Have you any plans for Highcliffe highstreet if appropriate.				188	
657048	Mr Ian David Kirchin		CSPS2086	Policy KS10							No mention of public transport. All the road widening and junction improvements in the world are not going to make the slightest difference. There are simply far too many vehicles on the roads.				188	
503395	Mr Ian Davis		CSPS2322	Policy KS10		No					Policy KS10 Strategic Transport Improvements. This policy is Unsound. KS10 appears to be a statement of ambition rather than a deliverable policy. There is a huge funding gap for all the improvements cited in KS10, the gap is unlikely to be closed in the present financial climate. This applies particularly to the A31(T) dual carriageway which is fundamental to the success of nearly all the proposed housing schemes.				188	
512459	Sandra Davis		CSPS2362	Policy KS10							Policy KS10 Strategic Transport Improvements. This policy is Unsound. KS10 appears to be a statement of ambition rather than a				188	

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											<p>deliverable policy. There is a huge funding gap for all the improvements cited in KS10, the gap is unlikely to be closed in the present financial climate. This applies particularly to the A31(T) dual carriageway which is fundamental to the success of nearly all the proposed housing schemes.</p>					
655852	Mr Mark Ambler	Yellow Buses	CSPS2267	Policy KS10	Yes	No			Yes		<p>Insufficient emphasis and detail on developing and supporting public bus transport network improvements and infrastructure within the core strategy itself especially in reference to the Airport and Airport Business Parks Expansion (Policies BA 1 and BA 2) and Urban Extensions (Policies CN1, CN2 and CN 3).</p>	<p>Developments at Bournemouth Airport (Policies BA 1 and BA 2) must clearly reflect and demonstrate comprehensive public transport network improvements in both the local and wider area. These should include but are not limited to, the addition of bus priority measures at junctions and segregated bus lanes along the main link roads ensuring sustainable access to the site. Sufficient consideration also needs to be given to the wider impacts on routes and junctions further away from the airport beyond the above list. Measures should demonstrate clear mitigation strategies around increased private car and freight traffic to the airport and business parks and positive benefits to passenger transport. The core strategy should give due consideration to financially supporting bus services to the Airport and business park, to positively encourage use of public transport and reducing reliance on private transport. Improvements will also need to be made to bus stop and passenger waiting facilities nearby and inside the Airport Estate and Business Parks along with suitable and safe areas for buses to enter and exit the site, lay-over and where necessary turn around. More emphasis should be given within the core strategy to the Local Authorities and Developers working in partnership with local passenger transport providers to achieve a sustainable and accessible bus network and bus passenger facilities for the airport and business park. It is desirable that above should be referenced more robustly within the core strategy and not just cross referencing with other LTP 3 policies and support documents. The same consideration and detail on supporting and improving passenger transport needs to be demonstrated in regards to Policies CN 1, CN 2 and CN 3 which detail strategies for the urban</p>	No, I do not wish to participate at the oral examination		188	

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												<p>extensions (Christchurch Urban Extension, Land south of Burton village and Land east of Marsh Lane). In particular providing safe access for buses through the developments to increase accessibility, minimise social exclusion and reduce walking distances to bus stops. Bus priority measures should be considered at both site access and nearby junctions and where appropriate segregated bus lanes along the main link roads in the vicinity of the sites.</p> <p>The core strategy should give due consideration to financially supporting bus services to the urban extension development sites, to positively encourage use of public transport and reducing reliance on private transport.</p> <p>Improvements will also need to be made to bus stop and passenger waiting facilities nearby and inside the developments sites along with suitable and safe areas for buses to enter and exit and where necessary lay-over.</p> <p>More emphasis should be given within the core strategy to the Local Authorities and Developers working in partnership with local passenger transport providers to achieve a sustainable and accessible bus network and bus passenger facilities for the developments.</p>				
656228	Mr Adrian Dwyer		CSPS24 64	Policy KS10							No Christchurch needs a bypass.				188	
656650	Mrs Patricia Fear		CSPS24 36	Policy KS10							No. We have had enough road works in Christchurch thank you. Do not spoil Staple Cross and Somerford roundabout. They have been there for years, un-spoilt. Don't make them Canford Bottom roundabout thank you. Why do you want to spoil Christchurch? We have lived here all our lives and are very angry that you want to spoil it for a few houses.				188	
656664	Mr Glen Morrison		CSPS24 53	Policy KS10							Strategic transport improvements need to be addressed in amanner that will not have negative effects on the roads that will be interdependent of the proposed changes. Traffic flow enhancements need to be focused on current bottlenecks and road pressure points or the so called 'strategic transport improvements' will only aid in providing relief to the junctions 1 - 7 and have negative profound effects on adjoining roads.				188	
510796	Mr Rollo Reid		CSPS27 13	Policy KS10							No. We need a sensible circulation pattern to reduce hold ups and increase access to the town.				188	
656369	Mr Timothy Peter	John Reid and Sons (Strucsteel	CSPS27 57	Policy KS10							No because it does not seem to address the matter of traffic				188	

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	Cook) Ltd									congestion in the centre of Christchurch. Queues of traffic along Christchurch Bypass are in-consistent with teh shared objectives for Christchurch town centre vision. Town centre will only thrive if it is easy to go there, park and leave as a pleasant experience.					
656567	Mr Michael D Chappell		CSPS2853	Policy KS10							What about a new relief road from the A338 through to the dual carriageway between the Stony lane roundabout and Fountain roundabout.				188	
360099	Mr John Foskett		CSPS3348	Policy KS10							Main problem here - not addressed is access into Christchurch - Bargates/Jumpers. Almost impossible to achieve without VAST expense and compulsory purchase on a large scale. - Who will pay ? Pity the poor people on that route ! - will be like the entrance routes to LONDON				188	
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS3245	Policy KS10		No	No	No		No	Sustainability Appraisal SA Objective 1 Protect, enhance and expand habitats and protected species It is not only designated sites that are at risk but direct habitat loss and connectivity as a result of B3073 improvements and A31 dualling. Congestion will be transferred to Merley. (Policy derives from LTP3.) Score negative SA Objective 2 Make sustainable use of resources Resources required for road construction particularly minerals indicate that this should score negatively. SA Objective 3 Minimise pollution Available evidence indicates some aspects score positively: others are neutral or negative Principle concerns are employment sites and housing development adjacent to sensitive habitats (particularly aquatic habitats) and landscapes (AONB and AGLV). GHG emissions will increase as a result of • embodied energy in road construction • increasing the desire to travel to and from employment sites (particularly HGVs) and the airport (including air travel) • moving points of congestion. New roads increase light pollution and there may be an increased risk of accidental spillages. Mitigation will not be provided simply by monitoring traffic rises. Habitats Regulations Assessment More explicit guidance on mitigation of light pollution is required than is covered by Policy HE3		No, I do not wish to participate at the oral examination		188	
499532	Bournemouth Borough Council	Bournemouth Borough Council	CSPS3248	Policy KS10							Policy KS10: Strategic Transport Improvements (and Map 4.6) Comment KS10 sets the time periods and locations for a number of transport improvements. Within the medium term (2014-2019) the B3073 road widening from Chapel Gate roundabout to Blackwater Junction and along the A338 to the Cooper Dean junction, in Bournemouth Borough, is anticipated to occur. In principle we				188	

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											<p>recognise the need for the widening of the A338 to Cooper Dean Roundabout as necessary to alleviate the demand between the Blackwater and Cooper Dean intersections and as such we will be working towards delivering this scheme. We appreciate the need for the B3073 road widening from Chapel Gate roundabout to Blackwater Junction and along the A338 to the Cooper Dean junction scheme. This is established in the South East Dorset Multi-Modal Transport Study (SEDMMTS), and subsequent additional work undertaken by Peter Brett Associates, and refined by Buro Happold, although the SEDMMTS and the LTP3 both suggest this is post 2026.</p> <p>The SEDMMTS includes the A338 widening as a separate scheme to that of B3073 road widening and the Blackwater Junction improvements. SEDMMTS refers to this scheme occurring post 2026. We would therefore suggest that the text within the Core Strategy is amended to reflect this delivery timetable.</p> <p>The junction improvements at Parley Cross referred to in Policy KS10 and Policy FWP5, the West Parley Village Centre enhancement scheme, differ from those recommended by the SEDMMTS, see paragraphs 8.61 and 8.62, which promotes the provision of a gyratory. The enhancement scheme may have a significant impact on the flows between Bournemouth and Ferndown. This scheme does not appear to have been referred to at the Preferred Options stage and there are concerns that it will not fully address the predicted traffic problems in the area although it may form part of a phased programme subject to detailed analysis.</p> <p>Currently long delays are evident during the peak periods leading into and out of Bournemouth along A347 New Road. Whilst the enhancement scheme will improve the situation for east-west movements and provide significant relief this should not be at the cost of the north-south movements between Ferndown and Bournemouth.</p>					
656638	Mrs E A Waugh		CSPS3375	Policy KS10							I strongly object to the proposed building of houses and moving of allotments to Burton under the Local Plan. I object on Planning Grounds as set out in the leaflet I received from you. These are – CN1, CN2, CS2 and KS10. Also there will be a considerable impact on Burton Primary School and the Medical Centre. The loss of this Green Belt land will affect all who live in Burton and want it to stay apart from Christchurch.				188	
656642	Mr Mike East		CSPS3381	Policy KS10							I am writing to oppose part of the Core Strategy Planning Grounds KS10 regarding Burton housing development on the farm in the south of the village. The roads and lanes infrastructure in the village and at the Stony Lane roundabout will be stretched to beyond capacity by having many additional residents with cars in the village. The Stony Lane roundabout is a bottleneck and means cars already cut through the village to avoid the queues and delays.				188	
656655	Kate East		CSPS3383	Policy KS10							I wish to register my opposition to the Core Strategy Planning Grounds KS10 regarding Burton housing development on the farm				188	

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											<p>in the south of the village. The additional residents created by the proposed housing developments will mean that the existing lanes and road infrastructure in the village and at the Stony Lane roundabout will be stretched to beyond capacity. The Stony Lane roundabout is already a bottleneck and creates queues and delays. Traffic cuts through the village already and the extra housing will increase the traffic. Please consider this an official objection by a resident of the village and the impact it will have on my village life here.</p>					
656803	A M Atkins		CSPS33 56	Policy KS10							<p>CS2 and KS10 present serious traffic problems, particularly for Footners Lane which has a 20mph restriction which is hardly ever observed.</p>				188	
654775	Mr David Monks		CSPS34 73	Policy KS10							<p>KS10 & CH1 Christchurch Town Centre, often Gridlocked for want of a Real Bye Pass Local maps show A35 as a "Christchurch Bye Pass"!! It should be renamed "Somerford Bye Pass" as that is what it is. It must be the only Bye Pass in the world that ends in the middle an ancient town at the infamous Fountains Roundabout. Let us be honest for once; no amount of money spent on this roundabout can overcome the congestion. Summer warm weather, the air show, other special events, locals from further east are trying in vain to get to Bournemouth or the airport. Not only from towns as far as Lymington and beyond but even all of London and towns between. Knowing that the spur Road A338 is always busy at these times, people think wrongly that they can miss all that by using the A35 through Christchurch. It is a known fact that there are insufficient and inadequate crossings of the River Avon South of Salisbury. More than 40 years ago plans were made for a Christchurch Relief Road. It is either cancelled or still pending !!! The only good crossings are the dual carriageways A31 at Ringwood and A35 at Christchurch and yet they cannot cope. The only other (single carriageways) are Avon Causeway and Bridge Street in the town and whereas these are useful, they can only be considered as a joke for moving volume traffic. At times of mass congestion on these roads, for those who live East of the River Avon, Heaven Help anyone who has a heart attack or a house fire, as emergency vehicles cannot get to you in time.</p>				188	
521508	Ms Lisa Jackson	Jackson Planning Ltd	CSPS36 51	Policy KS10	Yes	No	Yes	Yes	Yes	Yes	<p>The policy is not justified as it is not based on evidence. The reference to Christchurch urban extension is inappropriate as the strategic network and junction improvements are required due to general traffic growth. The site specific requirements for Roeshot are dealt with in policy CN1. Please note this representation is substantiated by additional evidence in a supporting statement submitted with the representations by MEM Ltd.</p>	<p>Remove reference to Christchurch Urban Extension. The strategic network and junctions need upgrading even without the development of the urban extension. The specific requirements for development related improvements are included in policy CN1. Alternative wording recommended for second sentence in policy: 'In Christchurch improvements to junctions on the strategic and local highway network</p>	<p>No, I do not wish to participate at the oral examination</p>		188	2267120_01.pdf

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												are required to accommodate Borough wide development to 2028. Junctions that may require improvement include:....'				
656731	Joan M Luck		CSPS3850	Policy KS10							It must be assumed that most of the new residents will wish to travel to Bournemouth of Christchurch and Stony Lane roundabout is already at capacity. The proposals give non natural links to the village centre. It is beyond normal walking distance and it is unrealistic to expect that people will walk or cycle. This will result in more unsustainable vehicle movements to the centre. Object on planning grounds:- How many of the 45 houses do you plan to be low - cost affordable houses for the young people of our village? thus ensuring a continuity of energy in our village. The wealthy, older in-comers would not care about the village, and it would die.				188	
665027	Malcolm Panton		CSPS3864	Policy KS10							Stoney Lane and the roundabout are already a major problem and a headache for anyone trying to travel that way, especially at peak times. What on earth is the sense in adding to that with yet more cars? We do not want this development in our village. I am also unhappy that this proposal has not been widely published by the local or county councils. I only find out about it when a flyer produced by local residents is put through my door. Are those who are supposed to represent the local people frightened their real plans will be revealed?				188	
665050	Rosemary Panton		CSPS3869	Policy KS10							Stoney Lane and the roundabout are already a major problem and a headache for anyone trying to travel that way, especially at peak times. What on earth is the sense on adding to that with yet more cars?				188	
654320	Mrs Meghann Downing	Highways Agency	CSPS751	4.57	Yes	Yes					We are particularly supportive of section 4.57 and endorse the need for robust Transport Assessments for those development proposals which have significant transport implications. We will work with the Councils to ensure that the transport impact of development is mitigated, primarily through measures which reduce the need to travel.		No, I do not wish to participate at the oral examination		194	
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS3252	4.57		No				No	While supporting the general intent we consider the wording should be strengthened to achieve its aim. While welcoming the apparent intention of the policy we suggest that there should be mitigation and/or compensation for all adverse impacts on the natural environment and that the wording should be strengthened (NPPF para 118).	Change second sentence to, The Councils will require the transport impact of any development to be fully mitigated, principally through reducing and managing the need to travel, especially by single occupancy car. Damage to the natural environment should be avoided or mitigated: where this cannot be achieved compensation will be required.	No, I do not wish to participate at the oral examination		194	
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS3253	4.58		Yes					Support This is essential to ensure maximum use of sustainable transport modes.		No, I do not wish to participate at the oral examination		195	

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360271	Cllr Paul Timberlake		CSPS485	Policy KS 11	Yes	Yes	Yes	Yes	Yes	Yes	I support the proposals as shown at KS10.		No, I do not wish to participate at the oral examination		198	
360245	Mr Richard Burden	Cranborne Chase & West Wiltshire Downs AONB	CSPS1561	Policy KS 11							<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 ANOB 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</p>			198	2239336_0_1.pdf 2239337_0_1.pdf	

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											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. 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 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. However, in relation to transport, development, and parking (Policies KS11 and 12) the AONB is concerned that the provision of affordable parking to facilitate the use of public transport, a matter promoted in the AONB Management Plan, is not included.						
359437	Ms Gill Smith	Dorset County Council	CSPS1971	Policy KS 11							The transport proposals in the Core Strategy are primarily guided by the South East Dorset Transport Strategy, the North Dorset and Northern East Dorset Transport Strategy and the Bournemouth, Poole and Dorset Local Transport Plan (LTP3) for the period 2011 – 2026. The LTP3 sets out the local transport investment programme over the next 15 years. The policies in the Core Strategy directly reflect the recommendations from the Transport Strategy of LTP3 and are supported	No proposed change to this policy			198		
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS3254	Policy KS 11		Yes					Support This is essential to ensure maximum use of sustainable transport modes.		No, I do not wish to participate at the oral examination		198		
359546	Mrs K. Bradbury	Vale of Allen Parish Council	CSPS387	4.61	Yes	Yes					Fully support the intention that sufficient car parking is to be provided for development in rural areas		No, I do not wish to participate at the oral examination		199		
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS3255	4.61		Yes					Support Parking provision for both cars and cycles is a key consideration in assessing the sustainability of any development proposal.		No, I do not wish to participate at the oral examination		199		
359546	Mrs K. Bradbury	Vale of Allen Parish Council	CSPS386	Policy KS 12	Yes	Yes					Fully support the intention that sufficient car parking is to be provided for development in rural areas.		No, I do not wish to participate at the oral examination		200		
360271	Cllr Paul Timberlake		CSPS486	Policy KS 12	Yes	Yes	Yes	Yes	Yes	Yes	I support KS11 proposals.		No, I do not wish to participate at the oral examination		200		
360245	Mr Richard	Cranborne Chase &	CSPS1562	Policy KS 12							Thank you for consulting the AONB on this important policy				200	2239337_01.pdf	

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	Burden	West Wiltshire Downs AONB									<p>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 ANOB 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</p>						2239336_01.pdf

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											<p>other, undesignated, areas of 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>However, in relation to transport, development, and parking (Policies KS11 and 12) the AONB is concerned that the provision of affordable parking to facilitate the use of public transport, a matter promoted in the AONB Management Plan, is not included.</p>					
656493	Cllr Tony Gibb	Eastern Area DAPTC	CSPS1478	Policy KS 12	No	No	No	No	No	No	<p>RURAL RESPONSE TO EAST DORSET AND CHRISTCHURCH CORE STRATEGY</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 & Shapwick, Sixpenny Handley with Pentridge, Sturminster Marshall. It does not include the conurbations along the A31 or Verwood and Three Legged Cross. 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. http://webarchive.nationalarchives.gov.uk/20110215111010/http://archive.defra.gov.uk/evidence/statistics/rural/rural-definition.htm . 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. “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> <p>All the points made in the latest CRC State of the Countryside</p>	<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.</p>			200	

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											<p>Report 2010 are valid in East Dorset http://www.defra.gov.uk/crc/documents.state-of-the-countryside-report/sotc2010/ . 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, Crichel, 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. 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. 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. 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</p>					

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											<p>are as important as the streets in the towns yet they are not recognised within 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"> • 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%. • 23.5% of people in rural areas are over state retirement age compared with 18.1% in urban areas. • 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. • Approximately 5% of rural households were using dial-up internet connections in 2009 compared with 2% in urban areas. • 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. • 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. • 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%. 					

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											<ul style="list-style-type: none"> • 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. • 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. Parking provision in the rural communities needs to recognise that the lack of public transport infrastructure results in more vehicles per household.					
359437	Ms Gill Smith	Dorset County Council	CSPS1972	Policy KS 12							The transport proposals in the Core Strategy are primarily guided by the South East Dorset Transport Strategy, the North Dorset and Northern East Dorset Transport Strategy and the Bournemouth, Poole and Dorset Local Transport Plan (LTP3) for the period 2011 – 2026. The LTP3 sets out the local transport investment programme over the next 15 years. The policies in the Core Strategy directly reflect the recommendations from the Transport Strategy of LTP3 and are supported	No proposed change to this policy			200	
359529	Mrs Lisa Goodwin	Sixpenny Handley with Pentridge Parish Council	CSPS2475	Policy KS 12							Parking provision in the rural communities needs to recognise that the paucity of public transport infrastructure results in more vehicles per household.				200	2248941_01.pdf 2248860_01.pdf 2248948_01.pdf
360082	Mr and Mrs K Healy		CSPS2424	Policy KS 12	Yes	Yes					This policy is to be highly commended. Nothing degrades a community more than cars parked on every available street space, including grassy areas. The only comparable blight is wheely bins dumped everywhere. However brilliant the design and layout of the housing the poorly parked cars will drag the estate down.		No, I do not wish to participate at the oral examination		200	
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS3257	Policy KS 12		Yes					Support Parking provision for both cars and cycles is a key consideration in assessing the sustainability of any development proposal.		No, I do not wish to participate at the oral examination		200	