

Christchurch and East Dorset Local Plan Part 2 - Site Allocations and Development Management Policies

Regulation 18 (1)

Responses to the Consultation on the Scope of Local Plan

All Comments received



Prepared by Christchurch Borough Council and
East Dorset District Council

May 2015 (Updated May 2017)

Person ID	903815
Full Name	Mr Andrew Chapman
Organisation Details	Godfirst Christchurch
Agent ID	
Agent Name	
Agent Details	
Comment ID	LP2SC1

Godfirst Christchurch

We have been invited to comment on the forthcoming Local Plan Review and we are pleased offer our comments below.

Topic Area - Community and Recreation

Godfirst Christchurch is a local main stream Church that currently meets at The Regent Centre in Christchurch High Street, and is a member of Christchurch Fellowship of Churches and also a member of The Evangelical Alliance

One of our purposes is to serve and bless the local community.

We own and occupy premises at Hope House in Jumpers Road Christchurch but only use it for office accommodation and small events such as 'Rhyme Time' Parent and Toddlers group etc. For all other uses we have totally outgrown the accommodation and now have to resort to hiring other premises for meetings, Youth Groups, and other activities, around the town, as and when needed

We gather approx. 300 people on a normal Sunday meeting at The Regent Centre but this can increase to 400 or more for special events.

We are established as a Company Limited by Guarantee and that Company is a Registered Charity.

For the last number of years we have been seeking new premises that can accommodate all our activities and become the new home for Godfirst. The Council has been aware of our searches and has been supportive in our efforts.

We are looking to provide a building, either new build or the conversion of an existing structure, which would include a 500 seater main auditorium and other ancillary spaces for youth and children's work plus other meeting areas and church office accommodation, all on a site that would provide sufficient space for adequate parking. It is unlikely that a building less than 15000 sq. ft. floor area would be able to accommodate our needs.

It is our intention that the buildings should be multi-purpose and available for use by the local community and other local organisations. The new facility would be fully funded by the Church and would not at all be dependent on public funding.

Specifically we have recently investigated and pursued for example:

The Cornfactor site on the High Street where, after an attractive and exciting scheme was prepared, we were unable to compete with the vendors value aspirations and eventual residential values

The Dreams Building in Somerford. Here we fully investigated the site and agreed terms with

the vendors. However in the last few days before exchange of contracts a cash buyer stepped in and we were gazumped leaving us considerable sums out of pocket which we were unable to recover.

Land at Somerford Road Roundabout in the ownership of CBC and Meyrick Estates. Here despite strenuous efforts we were unable to get any interest in a sale or long term lease out of Meyrick Estates.

They clearly wish to retain control of all their existing land and have said that by treating with us they would be left exposed by the Places of Worship Act 1920 which would give us the right to acquire the freehold after 20 years occupation. This they wish to avoid. This land is unproductive at this time and has not been in use for several years but we feel a community development would benefit both the existing area and the proposed new development at the Urban Extension to the rear of Sainsburys.

We are currently pursuing other opportunities in Christchurch area

Our searches have been extensive and to date we have not found a suitable location that is available to us.

As a Registered Charity we are a not-for-profit organisation that is reliant on the generous giving of our people for funds it is obvious that this makes it very difficult for us to compete with house builders and commercial developers in the open market for land. However all that we do has Public Benefit as recognised by the Charity Commission.

We are concerned that there is no specific allocation of land for uses such as ours within the Core Strategy of the Local Plan and call on the Council Planning Authority to make such an allocation. The designation of land for Community Purposes would result in it being valued as such and not at Commercial Value. This would benefit the Community by allowing a facility such as the one we propose to be provided

May we suggest one or more of the following courses of action:

CBC and Meyrick Estates Land at Somerford Road be designated as Community Use land in the Part 2 changes to the Local Plan and that CBC take steps to facilitate its release. Market Garden land at 1 Blackwater be changed from Green Belt land and designated as Community Use Land in the Part 2 changes to the Local Plan

A provision be made for Community Use land as part of the next Beagle site Planning Permission on Stony Lane in the Part 2 changes to the Local Plan

A policy be introduced to approve in principle any change of use to existing retail or commercial warehouses for Community Uses within the Christchurch Area

We have appreciated the support we have received to date from CBC in our searches for a site and our belief is that this is an opportune time for our unmet need for Community Facilities to be included in the Part 2 Plan review

We would be very willing to meet CBC representatives as required in order to further develop these thoughts and progress matters towards the meeting of our needs.

Person ID	903254
Full Name	Mr Nick Thorne
Organisation Details	
Agent ID	
Agent Name	
Agent Details	
Comment ID	LP2SC2

I refer to Christchurch and East Dorset Local Plan circular - March 2015, inviting members of the public to submit potential development sites for inclusion within the Local Plan Part 2; and in this respect please find enclosed herewith a series of development sites, which I would be grateful if the Local Authority would be willing to consider.

I trust the enclosed are self explanatory, however should you require any further information, please do not hesitate to contact me,

Development sites

- 1 Land off Daggons Road; Alderholt. SP6 3DL;
- 2 Land at Blackwater Grove, Alderholt, SP6 3AD;
- 3. Land at Crossroads plantation, Blackwater Grove, Alderholt. SP6 3AD;
- 4. Land off Brickyard lane, Verwood. BH31 7LG

I would be grateful if you could acknowledge receipt of the enclosed - I look forward to hearing from you

(See attched files)

Person ID	359483
Full Name	Mr Mike Holm
Organisation Details	Planning Liaison Officer Environment Agency
Agent ID	
Agent Name	
Agent Details	
Comment ID	LP2SC3

Thank you for consulting the Environment Agency on the above mentioned document, we have the following advice.

Flood Risk

We note that the document identifies both to review the need for further detailed flood risk policy and to facilitate the regeneration of parts of Christchurch and East Dorset. We would anticipate that these two policy areas are likely to overlap significantly in Christchurch, especially given the identified flood risk in your Authorities Strategic Flood Risk Assessment Level 2.

Sequential Test

We would first of all refer you to the National Planning Policy Framework Flood Risk Sequential Test which need as to be considered at the earliest stage of strategic planning. Flood Risk Management

If there is a need to change from your current policy position to promote development in current or future flood risk areas, and the Sequential Test will need to be passed. Then we would anticipate that further flood risk evidence would need to be brought forward to support the plan. This evidence we would anticipate to be in the form of a Flood Risk Management Strategy to identify any future improvement to flood defences to ensure that development is safe for its lifetime. This would need to consider the risk and necessary improvements, including costs for delivery and maintenance and delivery plan and mechanism. This we would expect to then be incorporate into your Infrastructure Delivery Plan and Community Infrastructure Levy.

Coastal Change Management

We support that the document identifies the coastal zone as need for further consideration. This should be both the open coastal and the harbour.

It may be that your Authority needs to consider the uses of this area strategically, to ensure that the long term aspirations are appropriate for both economic and biodiversity drivers. This should also be done in conjunction with Bournemouth and Poole who have an influence as the adjacent coastal protection authorities.

Habitat Regulations Assessment / Coastal Squeeze

You may need to consider any change in policy position in regards to both the habitat regulations and the need to compensate for maintaining flood risk management infrastructure from naturally receding.

Green Infrastructure

We support the recognition for review of your current green infrastructure position, and that you may consider whether there is a need for a stronger policy position within the document.

This would be beneficial to consider the delivery of the necessary Suitably Alternative Natural Greenspaces against the other aspirations for delivering green infrastructure (e.g. biodiversity gains for protect species, flood risk management, etc).

Given the river corridor along the River Stour forms the boundary between adjacent local Authorities you should engage with them to deliver maximum benefits along the rivers and floodplains in your plan.

This we would anticipate needs to be considered within your updated Habitats Regulation Assessment.

Further to the previous response regarding Green Infrastructure we wish to add the following additional comments.

The requirements of the Water Framework Directive need to be considered in the plan, and opportunities to improve the classification of watercourses in the plan area should be identified and taken where possible.

This has particular relevance to the Bournemouth Airport Employment site and relates to the commitment by the Airport Group in their Masterplan to provide a new sewer to Holdenhurst Sewage Treatment Works. This is considered necessary to reduce the impact on the Moors River where the current discharge is occurring, and something that we would wish to be included in any site allocation work in this area.

Please contact us if you have any queries and we look forward to liaising on the evidence to support any changes to you current policy position.

Person ID	654456
Full Name	Ms Elliot Marx
Organisation Details	
Agent ID	
Agent Name	
Agent Details	
Comment ID	LP2SC4

Town Centres and Retailing

Consider the need for any detailed development management policies arising from the town centre vision policies in the Core Strategy.'

Comment:

Any benefit from considering and agreeing development management policies for Local Plan Part 2 will be negated by the failure to enforce planning conditions in keeping with such policy. Decision-making behind closed doors and the obvious failure of the Council to objectively scrutinise its own Officers and Councillors-- as happened with Druitt Gardens and the Cornfactor Development--will leave the way clear for corruption and incompetence. Policies need sanctions.

Review all existing open space designations and consider the need for new areas of open space. Develop new Green Infrastructure and Suitable Alternative Natural Greenspace.' Comment:

As above.

Consider the need for additional community facilities. '

Comment:

In the last round of Local Planning Policy the then Leader of the Council saw fit to propose an amendment to the Core Strategy to delete the long-standing aspiration for a Town Centre Community Facility. This was implemented by officers with the acquiescence of many councillors, despite strong public opposition in the consultation on the Schedule of Proposed Changes.

It appears that the ambition for lucrative developments near Druitt Gardens-- as evidenced in the Cornfactor development-- over-rode community needs, despite huge public support for a replacement Druitt Hall on its current site and an Outine Planning design which received much praise and the near- unanimous approval of the Planning Committee.

The public has been 'invited to comment on what matters should be included in Local Plan Part 2 and any matters which have not been identified or if there are particular issues which require policies.' It is clear from previous 'consultations' that no weight will be given to responses which do not echo the views of senior officers and lead councillors.

For the record I will voice mine.

Green Belt

Consider the need for detailed Development Management policies for certain forms of development.

Comment:

Roeshott Hill is a warning about the loss of Green Belt with such 'Development Management

policies for certain forms of development.'

Since in Christchurch unused brownfield sites exist, and permission for many new homes has been granted, why is the unnecessary development at Roeshott Hill being pursued, with the loss of Green Belt and allotments and the consequences of virtual transport gridlock? Natural Environment Review of designations e.g. SSSI, SNCI, LNR, Coastal Zone to check boundaries and relevance.

Comment:

These designations are crucial to preventing the erosion of relevant environmental protection policies for important local habitats. It is a concern that their 'boundaries' and 'relevance' are being questioned.

Consider the need for detailed Development Management policies for climate change, renewable energy and flood risk.

Comment:

The Core Strategy cites visual amenity as a potential material consideration in the planning of renewable energy installations. We have already seen this used in an attempt to block these essential developments. The stark reality of climate change is the biggest challenge facing the UK and Christchurch in the next two decades, and will test the resilience of its infrastructure and communities. Detailed management policies will be needed to transcend 'Nimby-ism' and they must be proactive and robust if they are to create effective strategies for climate change, renewable energy and flood risk.

The loss of ever-increasing numbers of mature trees in the town centre, along verges, in gardens and in small pockets of green space, adds to the threat of flooding. Recognition of this needs to be reflected in the local plan as an extension of the current Tree Policy. I suggest that the local plan must specifically protect and enhance those 'Nature Services' which are crucial to our physical and economic survival. These include the air quality function of 'Green Lungs,' the services of pollinators, and the water cycling function of sustainable drainage.

612430
Mr Nick Squirrell
Natural England, Dorset and Somerset Team
LP2SC5

Thank you for your consultation on the above dated 16 March 2015 which was received by Natural England on 16 March 2015.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is not aware of the outcome of recent housing market assessment but is aware of the need for the neighbouring authorities to consider housing need strategically. This may lead to consideration of strategic urban extensions and consequently SANG provision. Natural England would be pleased to provide advice to pertinent aspects of the authorities considerations such as capacity, functionality and location of heathland avoidance/mitigation measures and any consequent policy revision required.

Natural England advises that there are a number of policy areas which the planning authorities should address as part of the process.

The authorities should consider additional policy support for areas of guidance in the National Planning Policy Framework 2012 (2012) which have not been fully addressed in the Core Strategy.

Recent work initiated by the Dorset Local Nature Partnership relating to ecological networks will support requirements in the NPPF para 117:

• identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation;

The existing policies should be revised to address this requirement, considering both mapping networks and providing for suitable policy protection.

Whilst there is only a small area within the district the Nature Improvement Area is not currently considered as is required by the NPPC para 157.

contain a clear strategy for enhancing the natural, built and historic environment, and supporting Nature Improvement Areas where they have been identified.

The authorities in Dorset have been progressing work relating to facilitation of biodiversity

mitigation and compensation where avoidance is not possible. The existing policies require revision in the light of these initiatives so that the Biodiversity Protocol is both identified and supported as a method for delivering gains in a manner which does not delay developments. The same applies for the Compensation Framework which is now being used in planning cases across the two authority areas.

Since the Local Plan Part 1 was brought forward a significant number of solar farms have come forward in the authorities areas. Consideration should be given to the current policies relating to this temporary land use and if necessary policy should be updated to better guide best practice and hi-light particular adverse effects and biodiversity gains. These may include consideration of landscape amelioration, biodiversity enhancements, soils, fragmentation of the countryside, support for local communities etc.

The authority is advised to seek specific advice from Natural England about the need to consider adverse effects on the European designated sites in the Avon Valley as well as designated European sites and areas currently under consideration in the Solent. We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact Nick Squirrell. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Person ID	359550
Full Name	Mr Dave Ogborne
Organisation Details	Planning Liaison Manager Wessex Water
Agent ID	
Agent Name	
Agent Details	
Comment ID	LP2SC6

Please see the comments made below on behalf of Wessex Water acting as the sewerage undertaker. Wessex Water are not responsible for water supply in this area.

These policies are reproduced below for your consideration. We hope that you will be able to review these and use where appropriate.

1. Proximity Consultation Zones

Development proposals in close proximity to existing operational wastewater or water supply infrastructure should be subject to consultation with the infrastructure provider to ensure that the residential or commercial amenity of the proposed development will not be adversely affected by the continued operation of the existing wastewater or water supply infrastructure.

Where necessary the applicant will agree arrangements with Wessex Water to prepare and complete supporting impact assessments to demonstrate that development proposals are unaffected from odour emissions, noise or vibration with or without mitigation.

2.1 Outline Policy Suggestion:

3. Wastewater Infrastructure Policy

Development proposals will only be permitted where:

Adequate sewage treatment facilities are available or where suitable arrangements are made for their provision. Developments which may result in increased nutrient load to sensitive watercourses should incorporate adequate mitigation measures agreed with Wessex Water and the Environment Agency/Natural England so as to secure compliance with the requirements of the EU Water Framework & Habitats Directives.

Adequate surface water disposal systems are available or where suitable arrangements are made for their provision. Development proposals must demonstrate satisfactory disposal of surface water and that Sustainable Urban Drainage Systems have been incorporated where appropriate. Separate systems of drainage with points of connection or outfalls should be agreed with Wessex Water.

Adequate foul drainage/sewerage facilities are available or where suitable arrangements are made for their provision. New developments will be expected to connect to the public sewer system. New sewers and associated infrastructure will be constructed to a standard

Person ID	359550
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adoptable by Wessex Water.

4.1 Outline Policy Suggestion:

Development proposals will not be permitted which would adversely affect the quality or quantity of water resources. Robust assessments should be carried out to support applications affecting Groundwater Source Protection Zones, Safeguard Zones and Drinking Water Protection Areas, as defined by the Environment Agency.

Development should explore the potential to implement water efficiency measures in all developments to reduce demand on water resources.

If any further information is required, please call me to discuss.

Person ID	654046
Full Name	Mr David Pardy
Organisation Details	
Agent ID	
Agent Name	
Agent Details	
Comment ID	LP2SC7

I wish to make the following comments on the Local Plan Part 2:-

The central issue affecting most of the topic areas listed in the Plan is that of Transport because, until a coherent plan to solve the traffic congestion problem in Christchurch is agreed, some other topics cannot be properly addressed. In particular, Housing, Employment, Community and Recreation (especially schools), will be critically dependent on the ability for workers & businesses to move freely around the area. There must therefore be a long term commitment to fully bypass the town centre & until that is implemented, there should be a ban on major developments which would exacerbate traffic congestion.

However, I believe that there must be a firm commitment to the early provision of Social Housing using brownfield sites; this should not be affected by the proposed development ban (above) because we need this type of accommodation to keep and attract young families to re-adjust the demographic and social balance in our community. This is important to house the workers needed for the development of industry in the area.

There are however some Transport matters which are in need of urgent attention in the Town Centre. Bus traffic through the High Street should be reduced & No Loading restrictions extended and actively enforced. Bus bays should be provided behind Saxon Square (Millhams Mead?) and all buses should travel via the bypass and Stoney Lane so relieving High Street & Castle/Bridge Street congestion not to mention the reduction in wear and tear on the Avon Bridges.

An urgent re-evaluation of the Town Centre Strategy should be instigated to include the Magistrates/Police/Magdalene site before proceeding with other town centre matters.

Person ID	360382
Full Name	Ms Vikki Parry
Organisation Details	Chief Exceutive Meyrick Estate Management
Agent ID	521508
Agent Name	Ms Lisa Jackson
Agent Details	Managing Director Jackson Planning Ltd
Comment ID	LP2SC8

I write on behalf of Meyrick Estate Management Ltd whose clients have significant land holdings in Christchurch Borough and are currently working on the two strategic sites within the Borough and are actively developing land and therefore take an active interest in land use matters.

The consultation on the scope of the review is welcomed, however, the initial scope of the Local Plan Part 2 seems limited given the pace of change in the development, energy and land use markets. MEM believes a more radical rethink of the plan is required to reflect the challenges ahead and that what is required is a partial review of the Core Strategy to deliver the housing targets set out. MEM firmly believes this means a review of green belt boundaries to accommodate development.

The main issues in delivery of the Core Strategy as currently planned arises from the change to National Planning Practice Guidance made on 28 November 2014 where schemes of less than 10 dwellings no longer contribute to affordable housing delivery. This means that the Councils can no longer deliver any affordable housing on more than half the sites in Local Plan Part 1 as 55% of all housing delivery was anticipated from sites of less than 10 units. CBC and EDDC have accepted this guidance and adjusted the Community Infrastructure Levy charging schedule accordingly to compensate for this. However, new sites to physically accommodate this must be found to allow affordable housing to be delivered as required in both boroughs. This is particularly important given the poor/ nil delivery rates of affordable housing in last recession.

The NPPF recognises (paragraph 83) that Local Plan Review is an appropriate mechanism to bring about alterations to Green Belt boundaries. Given the fundamental affordable housing delivery problem created by the planning practice guidance change in November there is an opportunity now to make sure the revised green belt boundary can endure through the life of the plan by ensuring that there are enough sites outside the green belt to deliver the affordable housing requirement, especially given that delivery of affordable housing is one of the key objectives of the Core Strategy, and a top priority for both Councils. Other development allocations may also require a green belt change, it is therefore wrong to rule out green belt change at this early stage, as this may not result in the best planning outcome for the area.

The overall planning framework and strategy should be more progressive and should seek to deal with the following more positively:

• The national housing crisis and affordability –consider creative provision of affordable dwellings through Trusts and Charities

- Review policies to assist with the provision of self build and starter homes and market discount homes to diversify market provision
- Review of Green Belt to allow the development of affordable housing, but delivered with other market products to achieve mixed communities.
- Review of Green Belt policy in line with the NPPF to support business enterprise and tourism
- Review of the Green Belt to allocate site(s) for the development of renewable/ clean and low carbon energy production
- Detailed policies to assist with a move to a low carbon economy, supporting renewable energy development, biofuels and low and zero carbon development.
- Policies to support the forthcoming domestic technical standards for dwellings in terms of size and thermal performance.
- Detailed policies and proposal for linked Green Infrastructure with a view to integrating SANG provision as a network with other open spaces
- Climate change considerations to deal with more frequent extreme weather events especially dramatic coastal change
- · Changing employment patterns with digital technology and flexible work patterns
- Cross-boundary opportunities with neighbouring authorities to accommodate their growth
- Reducing the impact of the car and promoting alternatives electric vehicle support / further support for cycling infrastructure as a means to achieving modal shift
- Planning for an increasingly elderly population and the longevity revolution, including generational change in housing provision and the growth of intergenerational living arrangements
- Provision of additional facilities for woodland burial within the Borough
 I have attached an early list of possible site allocations for inclusion in the Local Plan Part 2 on land within the control of MEM's client. This list is not exhaustive and Meyrick Estate
 Management would welcome continued involvement in the development of the Local Plan
 Part 2 and discussion on the sites below and others you may wish to consider.

Where :Land south of site CN2 Burton village

Use Mixed tenure housing

Policy Change Required Release from green belt and allocate as site for mixed tenure housing with open space

WhereWest of Staple Cross/ east of Sewage works

UsePotential for heating / cooling low carbon or renewable energy development to serve urban area east of R.Avon based on opportunity arising from undergrounding 132KV overhead power line at Roeshot and availability of grid gas connection

Policy Change RequiredRelease from green belt and allocate for heating / cooling low carbon or renewable energy development

Where Chewton Common

UseSANG and other habitat mitigation

Policy Change Required Allocate sites for habitat mitigation

WhereCranemoor Common

UseSANG and other habitat mitigation

Policy Change RequiredAllocate sites for habitat mitigation

Where East of Burton village

UseWoodland burial

Policy Change Requiredpotential to extend existing allocated site

Where East of Burton village

UseLeisure uses

Policy Change RequiredPotential release form green belt and allocate for active recreation uses

Where Hawthorn Dairy & Hawthorn Farm Buildings

Person ID	360382
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UseEmployment Use

Policy Change RequiredRe-use of farm buildings WhereWinkton, rear of Homefield

UseNot specified

Policy Change RequiredConsider uses appropriate to site/available access

Person ID	663588
Full Name	Mr Roger Street
Organisation Details	Chairman Christchurch Conservation Trust
Agent ID	
Agent Name	
Agent Details	
Comment ID	LP2SC9

COMMENTS REGARDING CHRISTCHURCH AND EAST DORSET LOCAL PLAN PART2 (SITE ALLOCATION AND DEVELOPMENT MANAGEMENT POLICIES) SUBMITTED BY THE CHRISTCHURCH CONSERVATION TRUST

The Christchurch Conservation Trust (CCT) submits the following statement with respect to the categories which have been listed

- 1 "Need for detailed management policies for conservation, listed buildings...."
 Reference to the Christchurch Town Plan, 2001, Chapter 4, gives details of the 12 designated Conservation Areas within the Borough and the policies which are aimed at conserving all aspects of the built heritage and cover the following topics
 - i) Conservation Areas
 - ii) Listed Buildings
 - iii) Ancient Monuments and Archaeology

This Town plan lists 21 detailed policies, to underpin the above conservation topics, and are detailed as policies BE1-BE21. Policies BE1-BE6 apply to all conservation areas whereas the remainder apply to specific conservation areas or topics. Additionally the Council has adopted detailed "expert" Conservation Area Appraisal and Management Plans for the individual conservation areas

CCT expresses concern that of these 21 policies 12 have been excluded from the adopted core strategy document. CCT has been informed that there is no requirement to "save" these policies as core strategy policy HE1 embraces and includes the essence of these deleted policies.

CCT points out that policy HE1 consists of 100 words of generalised comment on conserving local heritage. Nowhere is there mention of the Christchurch adopted detailed Conservation Area Appraisal and Management Plans . Assessment of heritage value requires detailed and specific policies as defined in the previous Town Plan.

CCT requests that account be taken of the former policies and that the detailed Conservation Area Appraisal and Management Plans previously adopted be included within statements of site allocation.

CCT considers that the value of the heritage of Christchurch has been virtually ignored in the core strategy. There is no mention within the "Core Strategy Vision" and the 7 stated objectives fail in this matter.

CCT raises concern that the deletion of Town Plan policies BE20 and BE21 which are concerned with Ancient Monuments and Archaeology is detrimental to the necessity of carrying out archaeological evaluations when developments are proposed in areas of archaeological potential or significance. With the deletion of BE 21 the core strategy offers

no requirement for archaeological evaluations of development sites.

2 "Town Centre and Retailing"

CCT considers that the timing of submissions to Part 2 of this local plan is, to state the least unfortunate and inappropriate Last autumn Christchurch Council hired a firm of consultants to produce ideas for a new Town Centre Strategy. The consultants produced their ideas which were the subject of public consultation. Since the receipt of public comment nothing further has been heard. Thus CCT is unable to comment upon the future of town centre development and its impact on heritage in the absence of any information on this new Town Centre Strategy. Additionally the core strategy, at item4, comments that 2 significant sites, The Magistrates Court Site and The Lanes, have been identified as strategic sites and will play a pivotal role in delivering the Town Centre Strategy and Key Strategy. CCT points out that no decision has been taken with respect to the redevelopment of the Magistrates Court site. In the matter of the Lanes development saved Town Plan policy ES 5 identifies this land to be allocated for development/redevelopment for mainly shopping, class A1, but to include residential plus class A2,A3,D1 and D2 uses. There is an existing approved Council document entitled "Planning, Design & Development Framework for the Land west of High Street including Druitt Gardens, the Lanes and Cornfactor sites". This document deals with the issues of the Lanes. Given the past acceptance of these policies plus the core strategy acceptance of the Lanes as part of the Town Centre Primary Shopping area then CCT recommends that the development proceeds but with due heed to the minor relevance of residential development and to the Town Centre Conservation Area Appraisal and Management Plan.

3 "Natural Environment" and "Community and Recreation"

CCT is mainly concerned with the conservation of the built environment but feels compelled to make comment upon two matters affecting the natural environment. Firstly Druitt Gardens is mentioned at item 5 of core strategy policy CH1 as an area to be enhanced to provide an attractive area of high quality urban space to benefit tourism and to contribute to the promotion of healthy lifestyles.

CCT contends that this statement is contrary to the covenants pertaining to the sale of the Gardens from Dorset County Council to the Borough Council. The covenant states that the Borough Council is to use and maintain the the gardens as a town centre woodland, a nature reserve and public open space for the enjoyment of the general public. Given the above CCT proposes that the Druitt Gardens be more appropriately listed as a Local Nature Reserve, LNR. Core strategy policy ME1 aims to protect maintain and enhance habitats including local nature reserves.

Secondly the undeveloped foreshore from Friars Cliff to Highcliffe is within the coastal zone as identified in the proposals plan of the Town Plan with Policy ENV11. This policy concerns proposals for development which will adversely affect an SSSI. The cliffs to the rear of the foreshore are a designated SSSI and are designated on a geological basis. However policy ENV 11 is not a saved policy within the core strategy .However at item 3.22, page 15 of the Town Plan there is statement that "The Council is concerned to conserve the natural environment of the coast and in particular the 3 SSSI sires which exist. In 2013 The Borough Community Services Committee agreed in principle to a number of clusters of beach huts to be constructed along this beach between Friars Cliff and Highcliffe using the the method of permitted development which translates into no requirement for a planning application where public comment may be heard. CCT considers that this stretch of undeveloped beach should remain as undeveloped and the status of the SSSI to the rear of the beach fully respected.

Person ID	662364
Full Name	Mr Peter Fenning
Organisation Details	
Agent ID	
Agent Name	
Agent Details	
Comment ID	LP2SC10

I wish to submit my personal comment on the above subject as follows GREEN BELT.

I fail to understand why the allotments at Roeshot Hill cannot remain in place and not form part of the proposed urban extension. Given the increase in planning permissions granted over the last 18 months for conversions of offices to flats and the continuing infill of housing within existing residential developments it appears that the 80-90 new houses which are proposed to be built over the allotments need not be built as the total number of houses required by the core strategy can be met elsewhere in the Borough. I ask that this be investigated. Green belt policy should be to resist single residence development within the green belt. It is important that "ribbon" development from Christchurch along connecting roads into surrounding villages does not occur. It should not be forgotten that allotments are hosts to a wide variety of birds and insects and make a valuable contribution to local wildlife. NATURAL ENVIRONMENT

A review of the many and varied designations for areas of nature interest and nature conservation needs great care. You quote SSSI, SNCI, ,LNR, Coastal Zone but there are others, for example greencorridor, the relevance of open space and public open space to nature.

SANG

The concept of SANG, (Suitable Alternative Natural Greenspace) has been introduced and it is unclear as to the relevance of SANG to the natural environment. Is it designed to be a nature reserve (LNR) or a recreation ground?

Core Strategy policy ME3 states that a SANG performs the function of attracting people away from the heaths. It is to be perceived as a semi natural space. (I have no idea what a semi natural space is supposed to be). Apart from one mention of semi natural space there is no mention whatsoever of nature in the one and a half page description of policy ME3 and SANG. Dogs will be allowed to exercise freely and off the lead.

To my mind the SANG performs exactly the role of a local recreation ground and an example of this is the recreation ground adjacent to Stanpit Marsh. Indeed heathland mitigation funds have been received by Christchurch Council for enhancement of this recreation ground. GREEN CORRIDORS

Of concern to me is to read in Policy CN1, The Christchurch Urban Extension at the section "Protection of Sensitive Habitats and Species" that a SANG will be provided north of the railway line and will link to a wider green infrastructure with a southern link to the Mude Valley to the coast. There is also a section entitled "On Site Ecology" Here it is stated that a "River Buffer" will be established within the Urban Extension along the River Mude to

conserve natural habitats and protected species The introduction of a new term "River Buffer" is misleading and not required. I refer to Town Plan Policy ENV15 and section 3.38 "Green Corridors" The River Mude , south of Somerford Bridge is depicted as a Green Corridor. The above mentioned "River Buffer" should become the northern extension of the River Mude green corridor. Section 3.26 ,page 16 of The Town Plan entitled "River Corridors" is also relevant. Green Corridors situated along rivers and streams which lead to the sea are important to migration of many species, especially birds. Bure Brook is an example of a 2.5 km long well established Green Corridor I do not understand why the Town Plan Policy ENV15 has been deleted from incorporation into the Core Strategy I request that it be reinstated as an essential policy

LOCAL NATURE RESERVES (LNR)

Currently the term LNR is used by Christchurch Council and for habitats of significance and one is designated for Stanpit Marsh. In many parts of the UK the term LNR is used to denote much smaller areas of nature interest. Currently Christchurch Borough has no designation for small parcels of Council owned land which are of nature significance. I suggest that such area be termed LNRs It is recognised widely that household gardens play a significant role in conserving nature and I consider that Councils must step up to the plate in protecting the nature of small parcels of land in their ownership. In fact The Town Plan, at 3.37, page 21, describes these non-designated sites of nature conservation interest with the words "The Borough contains numerous habitats, for example, hedgerows and small copses are essential for particular species of fauna and flora" As an example I draw attention to Druitt Gardens, a small parcel of land situated in the centre of Christchurch, which to my mind is a non designated site. of nature conservation. In The Town Plan it had the designation of L1,(protection of Open Spaces and Public Open Spaces) and L4 (Druitt Gardens and adjoining land shall be designated as public open space). Policy L1 has been deleted from the Core Strategy. However Druitt Gardens is subject to restrictive covenants which oblige the Council to use and maintain the property as a town centre woodland, a nature reserve and public open space for the enjoyment of the general public. As such Druitt Gardens should be considered as a Local Nature Reserve I am concerned that Core Strategy, Policy HE4, Open Space Provision, is aligned purely towards sport and recreation

SITES OF NATURE CONSERVATION INTEREST (SNCI)

The Town Plan ,at 3.36, page 20/21 deals with SNCI status and comments that government guidance suggested local plans should include policies for areas identified as of local conservation importance. The accompanying Policy ENV14 gives protection to an SNCI from development but this policy has been deleted from the core strategy and replaced by Policy ME1. However the Dorset Wildlife Trust and presumably the County SNCI panel has withdrawn SNCI status from Millhams water meadows and also a part of Rossiters Boatyard, both located in Christchurch Town Centre, on the grounds of insufficient funds to maintain these sites. This is a loss to nature in Christchurch..

SURVEYS FOR WILDLIFE IN CHRISTCHURCH

Current NPPF advice under section 117 ,page 27 states that planning policies should identify components of the local ecological networks including international, national and locally designated sites of importance for biodiversity , wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation. I submit that the core strategy fails to take account of this advice

FORESHORE BETWEEN FRIARS CLIFF AND HIGHCLIFFE

The Town Plan at pages 16/17 item 3.22 states that the Council is concerned to conserve the natural environment of the coast and in particular the 3 SSSI sites which exist. Policy ENV9 underpins this statement. However ENV9 has been deleted from the core strategy and replaced by objective 1 of the core strategy vision which states that important natural features such as Christchurch Harbour, the coast ,rivers and beaches will be protected and

enhanced .The area between Friars Cliff and Highcliffe is the sole remaining natural beach area unspoiled by any development and is an SSSI selected for the Geological importance of the cliffs behind the beach. Relevant NPPF guidance at item 114, page 26 states that local planning authorities should maintain the character of the undeveloped coast, protecting and enhancing its distinctive landscapes, particularly in areas defined as Heritage Coast, and improve public access to and enjoyment of the coast.

Objective 1 of the Core Strategy Vision clearly states that important natural features such as Christchurch Harbour, the coast , rivers and beaches......will be protected and enhanced. It is therefore regrettable that in 2013 the Borough Councils Community Services Committee decided to recommend a plan to place a series of beach hut clusters along the section of the foreshore between Friars Cliff and Highcliffe. This will be a yearly progressive beach hut installation and with a small enough number of huts to allow development to proceed under "permitted development" thus avoiding the need for planning permission with the consequent opportunity for public consultation I submit that this proposed development is contrary to the above planning guidance and should be stopped.

FLOOD RISK

The increasing risk of flooding particularly in the Stanpit area is being increased by the erosion of the natural barrier associated with Blackberry Point within Christchurch Harbour. This increasing erosion threatens the ecology of the mudflats at the South Marsh area of the SSSI at Stanpit Marsh.

Additionally increased water levels and wave action threaten to expose the buried waste deposits underneath Stanpit Recreation ground plus the margins of another waste deposit lying underneath the Two Riversmeet Gold Course. The potential for hazardous leachate leaking into the Harbour and the SSSI is of serious concern. A first step must be to effect a natural rebuild of the eroded parts of Blackberry Point

Person ID	359540
Full Name	Mrs Anne Jacobs
Organisation Details	Clerk St Leonards & St Ives Parish Council
Agent ID	
Agent Name	
Agent Details	
Comment ID	LP2SC12

We welcome the opportunity to take an active role in this stage of the compilation of the Local Plan Part 2 and note its scoping boundaries. We would like to stress the need for policies on the following areas:-

- Green Belt firm policies which also allow for changes in use provided they contribute and enhance the objectives of the green belt and its openness
- Natural Environment Strengthening SSSI designations
- Built Environment We believe that in areas such as ours it is essential to have detailed policies to ensure that the unique identity and character of the area is protected and maintained for generations to come. Therefore policies on Special Character Areas which include the detail of the specific characteristics such as boundary treatments, trees, hedging, spatial quality and design are crucial.
- Housing policies which will ensure that the core infrastructure has sufficient capacity to cope with any additional housing, such as drainage, sewerage, roads prior to an increase in density. Capacity for health and schooling requirements must also be considered.
- Transport policies to ensure that transport links enabling travelling between housing and employment centres take into account adequate parking provision where public transport is unavailable.
- Employment travel routes to employment centres cutting through housing areas should have policies which ensure safe travel speeds and adequate road access to ensure the safety of the communities through which they pass.
- Community and Recreation open spaces and recreational areas are vital to take the pressure off our SSSI's. Increase in housing density should take this into account and funding to improve such things as sports areas, play areas and cycling links should be made available perhaps through Community Infrastructure levy charge. Suitable burial land provision should also be identified.

Person ID	359461
Full Name	Mrs Nicki Brunt
Organisation Details	Urban & East Dorset Living Landscapes Manager Dorset Wildlife Trust
Agent ID	
Agent Name	
Agent Details	
Comment ID	LP2SC13

We support the need to review the topics outlined in your consultation letter and have a particular interest in topics relating to the natural environment, on which we would be pleased to be consulted further. In particular we consider that there is a need for Review and update of natural environment designations, species information and other environmental datasets. We would wish to ensure data is updated annually via Dorset Environmental Records Centre (DERC) who will be able to advise on the availability of different datasets.

Detailed development management policies for climate change, renewable energy and flood risk

Natural Environment guidance to replace the nature conservation SPG to further interpret national policy and policy/processes in Chapter 13 of Core Strategy Part 1 and work towards new habitats, re-creation and restoration for biodiversity gain.

Clear commitment to and guidance on achieving coherent local ecological networks, through identifying key ecological corridors, 'stepping stones' and linkages and potential areas for habitat restoration. This could include use of the Dorset Nature Map and information from DERC and mapping such as the RSPB's 'heathland extent and potential maps'.

Development of new Green Infrastructure and Suitable Alternative Natural greenspace (SANG): We would like to see guidance on Green Infrastructure and SANGs, taking a strategic approach with aspirations explored such as the Stour Valley as a strategic Green Infrastructure corridor. Open space may serve more than one function and include biodiversity enhancements.

Explanation of ecosystem services and guidance on ways in which ecosystem services can be supported and enhanced through development.

As a member of East Dorset Environment Partnership (EDEP), DWT have contributed to and fully support the recommendations of the Partnership made in their letter of 27 April which gives further detail on the above points.

Additionally, DWT supports the comments made by EDEP on East Dorset saved policies. Regarding the Christchurch Borough Local Plan saved policies we have the following comments:

we support the retention of the saved policies from Chapter 3 'Conservation of the Natural Environment', especially ENV 15 Protection of Green Corridors and ENV 21 Landscaping in New Development, both of which contribute to the protection and enhancement of wildlife and people's access to nature; supporting recreation, health and wellbeing. We request that saved transport policies such as T4 are reviewed against current

Person ID	359461
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environmental policy (NPPF) and the Local Transport Plan. We support retention of policy that encourages enhancement of the quality of the environment (T2).

We support retention of saved policies relating to areas of open space, recreational provision and protection of undeveloped riversides and harbour banks (Chapter 8 Leisure and Community Needs).

Person ID	654297
Full Name	Mrs Jean Pardy
Organisation Details	Chairperson Labour Party Christchurch Branch
Agent ID	
Agent Name	
Agent Details	
Comment ID	LP2SC14

We would like to add some specific items to the scope as outlined in the March 2015 document Notification and \consultation on scope of local plan to be considered in production of the plan.

Most of our specific issues fit within the topic areas within the above document and are shown below under the appropriate topic below. We would also like to add a topic, which is Quality of Life for residents, visitors and employees in and around the town of Christchurch and initial content for this section. We hope that, over time, others will wish to add to this section.

Topic Area	Specific Issue(s)
1 Green Belt	Reconsider the Core Strategy's use of the allotments at Roeshot hill for housing by unlocking brown field sites as per 4 Housing below and by the likelihood of greater housing content at Bailey Bridge site due to market conditions for large retailers having changed to minimise loss of green belt.
2 Natural Environment	Consider the replacement of eroded "in Harbour" areas such as Blackberry Point to act as a natural barrier to assist in preventing flooding in areas such as Stanpit and Mudeford and the erosion of the Stanpit Marsh LNR. Additionally the essential works must be made to prevent the release by flooding of contaminants buried beneath Stanpit recreation ground and the Two Riversmeet Golf Course
3 Built Environment	Consider processes to ensure that planning policy decisions are respected in practice and can be enforced including listed building consents. Consider policy to ban 'Party Houses' in the borough of Christchurch. In view of the problems in Christchurch with rainwater drainage at times consider making

Person ID		654297	
	Sustainable Urban Drainage standard compliant schemes the only acceptable drainage solution for new development in the borough unless erosion concerns prevent this type of drainage solution.		
4 Housing	Consider ways to unlock land for housing, especially social housing, on Brownfield sites throughout the borough of Christchurch including those currently zoned as employment land. Give specific consideration to allowing housing development on the six sites along Somerford Road that are derelict or out of use and where housing amenities such as bus services and local shops already operate and would be rendered less vulnerable by increased housing in the area. Consider housing as the only appropriate use for the Magistrates Court site. Consider quality standards to set as minima for developers in the borough of Christchurch to assure residents of low heating costs and good indoor air quality. Adopt local policies to ensure that developments have adequate parking to avoid stress on on-street parking nearby. Set a clear policy on when affordable housing contribution money by developers must be spent such as within 5 years of the developers		
5 Employment	Consider the benefits of Technology park for esta businesses, the latter wit accommodation, in collal partners such as Bourne and/or Manchester Airpo	establishing a Science and ablished and start-up the low cost boration with suitable mouth University, DLEP	
6 Town centres and Retailing	levels of parking provision	icy to retain at least current on in Christchurch town the South end of the town.	
7 Transport	and a bridge over the Mi attractiveness of this are enhanced by the remova noisy buses. Consider a Shopmobility services be route all buses directly to	that a walking zone uld be attractive to d proposed better signage llstream. The a would be considerable al of the large number of a bus station with	

Person ID		654297	
	street and to allow bus passengers to wait inside a building. Consider appropriate delivery time restrictions for large vehicles in the High Street bridge Street to be only allowed early in the day to reduce congestion and consider methods of effective enforcement.		
8 Community and recreation	Consider the need for a replacement Community Hall in the Christchurch High Street area to replace the ageing Druitt Hall.		
9 Quality of Life	regarding pollution from		

Person ID	903654
Full Name	Mr Craig Barnes
Organisation Details	Planner Strategic Land Team Gladman Developments Ltd
Agent ID	
Agent Name	
Agent Details	
Comment ID	LP2SC15

Gladman Developments specialise in the promotion of strategic land for residential development with associated community infrastructure. We understand that the Council are currently inviting comments on the scoping stage of Part 2 of the Christchurch and East Dorset Local Plan. This letter is in response to the above consultation and provides Gladman Developments' representations.

Gladman, who operate on a national basis, have considerable experience in contributing to the plan preparation process; making representations on various local planning documents around the country as well as participating in local plan examinations. It is with this experience in mind that our comments and recommendations are made within this representation.

Noting the early stage in the preparation of this document, comments made by Gladman in this representation will focus on broad issues that we consider to be at the heart of the soundness of the Christchurch and East Dorset Development Plan as defined by §182 of the Framework and therefore necessary to be addressed through Part 2 of the Local Plan. In addition to the topics outlined in the Councils' published scoping paper, Gladman believe that there is potentially a need for the reconsideration of the overall housing requirement and spatial strategy. Gladman note that work to update the Bournemouth and Poole SHMA has recently been commissioned by the authorities alongside its remaining partners within the Bournemouth and Poole HMA. Although it may have been a little over a year since the Core Strategy was adopted, it is important nevertheless to ensure that the strategy and policies of the adopted development plan are kept up-to-date and are reflective of the Councils' latest evidence.

Should the latest housing evidence demonstrate the need for an uplift to the adopted housing requirement, then there will be a need for the Councils to review the adopted Spatial Strategy. Building on this, Gladman consider that the Councils should also be open to a review of the spatial strategy should any authority within the Housing Market Area demonstrate that they are unable to accommodate their objectively assessed needs under the Duty to Cooperate.

A further area that is in need of review from the Core Strategy is Policy LN3. Policy LN3 currently requires contributions to be made towards affordable housing provision from any development proposal delivering a net gain in housing, with schemes of 1 to 4 dwellings required to provide a financial contribution and schemes of 4 dwellings and over providing an on-site contribution with flexibility to allow for financial contribution if necessary. This approach does not comply with the latest national policy published in March 2015 through Planning Practice Guidance [1] that prevents affordable provision being sought from sites of

10 dwellings or less, unless the location of the scheme is demonstrated to be located within an area defined as rural under section 157(1) of the Housing Act 1985. In locations found to be rural, financial contributions may be sought from developments of 6 to 10 dwellings in the form of commuted sums collected following completion of the development. Policy LN3 must be revised to ensure its compliance with this change to national policy.

As part of the review of Policy LN3, and in accordance with PPG [2], the Council may wish to consider a revision to the overall housing requirement in context of the implications that the revision of Policy LN3 will have upon the amount of affordable dwellings delivered within the authority areas. As the Councils will no doubt be aware such an approach was recently applied by the Inspector at the Examination of the North Dorset Local Plan. With a change in approach of the Council's affordable housing policy to ensure compliance with PPG resulted in a significant drop in the number of affordable homes being delivered within the District, especially within rural areas. Noting the implications of this, the Inspector has set the Council further work to explore ways in which affordable housing provision could be boosted including a revision to the overall housing requirement. The District Council are now working on this, with Main Modifications proposed for further consultation in early May 2015. I hope that the Councils take on board the comments made by Gladman in moving forward with Part 2 of the Local Plan. We look forward to commenting on future iterations of the plan and its supporting evidence. I thank both East Dorset and Christchurch Councils for the opportunity to comment on this consultation, and would like to remain informed on future news regarding the production of development plan documents for both Councils in the future.

Person ID	359437
Full Name	Mr Richard Dodson
Organisation Details	Dorset County Council
Agent ID	
Agent Name	
Agent Details	
Comment ID	LP2SC16

While we have no comments on the topics to be covered in your Plan we would draw attention to the forthcoming publication of 1) the Bournemouth, Dorset and Poole Draft Waste Plan and 2) the Bournemouth, Dorset and Poole Draft Minerals Sites Plan for consultation in mid July 2015, which may have implications that you will need to consider in your Plan.

These are the comments of officers of Dorset County Council and should not prejudice the views of Council members in later stages of the planning process.

Person ID	549174
Full Name	Mr Justin Milward
Organisation Details	Local Government Affairs Officer (Local) Woodland Trust
Agent ID	
Agent Name	
Agent Details	
Comment ID	LP2SC17

Green Belt

Site allocations should reflect the rural identity of local surroundings, whilst also seeking to enhance Green Infrastructure. Therefore, well used local community green assets should not be put forward as development proposals, instead, key development opportunities should continue to be focussed where possible within your main settlements, where they can contribute a lot to local character and distinctiveness, whilst also achieving a sustainable pattern of development.

Significant constraints which limit potential land for development should also be identified and as well as nature conservation and landscape designation it should also take into account flood zones. All new site allocations should seek to enhance Green Infrastructure provision and well used local community green assets. New development opportunities should continue to be focussed within existing settlements, where they can contribute a lot to local characters and distinctiveness, whilst also achieving sustainable patterns of development across Christchurch and East Dorset.

Whilst monitoring is being taken into account with your adopted Core Strategy, effective monitoring also needs to be put in place with your Development Management Policies, so as to highlight any effective delivery. As a Local Planning Authority you are required to publish an Annual Monitoring Report (AMR) to assess the effectiveness of polices and guidance that forms part of the local development plan. The NPPF supports the need for more habitat creation by stating that: `Local planning authorities should: set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure', (DCLG, March 2012, para 114). Also para 117 states that: `To minimise impacts on biodiversity and geodiversity, planning policies should:....promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan'.

Therefore, maintaining a high quality natural environment should be defined as a measurable objective of site allocations and development management policies as well, such as woods and trees and canopy cover. Local Planning Authorities should identify suitable indicators for monitoring the plan, and 'net gain' should be identified as something that should be measured with a Charging Schedule. Therefore, measuring indicators such as development within the Green Belt; planning decisions that effect climate change; and the impact of a development on the landscape; should also be taken into account with the monitoring and implementation of your planning policy guidance relating to sustainable

building in your main settlements, district centres, suburban centres and rural service centres, as well as villages and hamlets in Christchurch and East Dorset.

The Woodland Trust believes that trees and woods can deliver a wide range of benefits for placemaking for local communities, in both a rural and urban setting, and this is strongly supported by current national planning policy. The Woodland Trust believes that woodland creation is especially important because of the unique ability of woodland to deliver across a wide range of benefits – see our publication Woodland Creation – why it mattershttp://centrallobby.politicshome.com/fileadmin/epolitix/stakeholders/4117WoodlandCreationbro.pdf. These include for both landscape and biodiversity (helping habitats become more robust to adapt to climate change, buffering and extending fragmented ancient woodland), for quality of life and climate change (amenity & recreation, public health, flood amelioration, urban cooling) and for the local economy (timber and woodfuel markets). We also consider that the Council has a statutory duty to protect trees and promote tree planting in an Open Space Study. Section 197 of the Planning Act (1990) states: 197. Planning permission to include appropriate provision for preservation and planting of trees.

'It shall be the duty of the local planning authority –

to ensure, whenever it is appropriate, that in granting planning permission for any development adequate provision is made, by the imposition of conditions, for the preservation or planting of trees'.

The National Planning Policy Framework (NPPF) also supports the need for more habitat creation by stating that: `Local planning authorities should: set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure', (DCLG, March 2012, para 114). Also para 117 states that: `To minimise impacts on biodiversity and geodiversity, planning policies should:....promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan'.

The England Biodiversity Strategy which makes it clear that expansion of priority habitats like native woodland remains a key aim - `Priority action: Bring a greater proportion of our existing woodlands into sustainable management and expand the area of woodland in England', (Biodiversity 2020: A strategy for England's wildlife and ecosystems services, DEFRA 2011, p.26).

A reading of these two policies in the National Planning Policy Framework together with the England Biodiversity Strategy indicates that habitat expansion, like native woodland creation, should form a high priority for this new Allocations Plan.

Woodland creation also forms a significant element of the Government Forestry Policy Statement (Defra Jan 2013): `We believe that there is scope for increasing England's woodland cover significantly to deliver economic, social and environmental benefits. We want to see significantly more woodland in England. We believe that in many, although not all, landscapes more trees will deliver increased environmental, social and economic benefits. We particularly want to see more trees and woodlands in and around our towns and cities and where they can safeguard clean water, help manage flood risk or improve biodiversity'.

Other benefits of tree planting include -

Urban heat island: Trees and woods can reduce the impact of the `urban heat island effect' which occurs when hard surfaces in summer act as giant storage heaters, absorbing heat during the day and releasing it at night. Dramatic summer temperature differences of as much as 10°C between London and its surrounding areas have been recorded, which in turn exacerbate the symptoms of chronic respiratory conditions. Projections suggest this problem will get markedly worse. A study by the University of Manchester has shown that increasing

tree cover in urban areas by 10% could decrease the expected maximum surface temperature in the 2080s by up to 4°C.

Air quality: Trees further improve air quality through the adsorption of particulates from vehicle emissions and other sources - such that it has been estimated that doubling the tree cover in the West Midlands alone would reduce mortality as a result of poor air quality from particulates by 140 people per year. (Stewart, H., Owen S., Donovan R., MacKenzie R., and Hewitt N. (2002). Trees and Sustainable Urban Air Quality. Centre for Ecology and Hydrology, Lancaster University). The Woodland Trust has also published a new report on how trees can specifically help improve air quality - see our Urban Air Qualitypublication - http://www.woodlandtrust.org.uk/publications/2012/04/urban-air-quality/.

Water management - flooding: Throughout the UK winter is predicted to be wetter and summers drier and there is also a predicted increase in the frequency of very heavy rainfall. Trees can reduce the likelihood of surface water flooding, when rain water overwhelms the local drainage system, by regulating the rate at which rainfall reaches the ground and contributes to run off. Slowing the flow increases the possibility of infiltration and the ability of engineered drains to take away any excess water. This is particularly the case with large crowned trees. Research by the University of Manchester has shown that increasing tree cover in urban areas by 10 % reduces surface water run-off by almost 6%. This is particularly relevant to your two headings 'Our Water – Flood Risk (p.9) and 'Our Water Quality' on p.10. see the Woodland Trust's Trees in our Townspublication - http://www.woodlandtrust.org.uk/publications/2012/12/trees-in-our-towns/ Natural Environment

As brought to your attention already in previous consultation phases, it is critical that the irreplaceable semi natural habitats of ancient woodland and ancient trees are specifically protected. Whilst mature trees are identified as a natural feature of landscape quality in your Christchurch and East Dorset Local Plan Core Strategy (Policy HE2 Design and New Development and HE3 Landscape Quality) the need for providing ancient woodland protection is still also not being acknowledged.

Ancient woodland, together with ancient/veteran trees, represents an irreplaceable semi natural habitat that still does not benefit from full statutory protection, therefore again the Woodland Trust would like to see this being taken into account with site allocations being put forward and development management policies given that East Dorset has an above average proportion (as a % of land area) of ancient woodland compared to a Great Britain average.

The Woodland Trust believes that woodland creation is especially important because of the unique ability of woodland to deliver across a wide range of benefits – see our publication Woodland Creation – why it matters(http://www.woodlandtrust.org.uk/en/about-us/publications/Pages/ours.aspx). These include for both landscape and biodiversity (helping habitats become more robust to adapt to climate change, buffering and extending fragmented ancient woodland), for quality of life and climate change (amenity & recreation, public health, flood amelioration, urban cooling) and for the local economy (timber and woodfuel markets).

Climate change adaptation within a development strategy through the development of interconnected Green Infrastructure networks should also be acknowledged as being highly relevant to protecting and buffering ancient woodland. Woodland can help adaptation strategies cope with the high profile threats to water quality and volume resulting from climate change. The Forestry Commission's publication, The Case for Trees in development and the urban environment(Forestry Commission, July 2010), explains how: 'the capacity of trees to attenuate water flow reduces the impact of heavy rain and floods and can improve the effectiveness of Sustainable Urban Drainage Systems'.

In their current state, key habitats such as ancient woodland are simply not sustainable given their fragmented character and the immobile nature of many of their characteristic

species, which frequently "locked in" by a surrounding environmentally hostile landscape, exacerbated by the anticipated effects of climate change.

To this end we would like to see creation of new natural habitats around existing valuable conservation habitats such as ancient woodland, together with a reduction in intensity of agricultural practice, so that species are better able to move around – or 'permeate' - into other natural habitats. This 'landscape scale' approach can deliver significant benefits as it enables both 'structural' (ie physical connectivity) and 'functional' (ecological connectivity) linkages to develop, particularly to the benefit of native woodland under pressure from climate change. A useful example of this approach is Forest Research's BEETLE model (http://www.forestry.gov.uk/fr/INFD-69PLA5). This 'Biological and Environmental Evaluation Tools for Landscape Ecology' (BEETLE) comprises a suite of tools developed to model and analyse fragmentation and connectivity using GIS (Geographic Information Systems). Under section 40 of the Natural Environment and Rural Communities Act 2006, all public authorities now have a statutory duty to conserve biodiversity under the definition of 'Conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat'. Given that individual habitats like ancient woodland continue to be threatened by fragmentation and isolation, exacerbated by climate change effects, it is important that we deliver an increase in wider linked areas of conservation management in the landscape as a whole.

Built Environment

Given that woodland in Christchurch and East Dorset can help adaptation strategies cope with the high profile threats to water quality and volume resulting from climate change we would like to see the role of woodland and water included with your site allocations and development management policies and also:-

Greater recognition that natural processes and in particular trees and woodland, in should play a role Catchment Flood Management plans, alongside any measures for increased engineering solutions.

The full value of trees in urban areas recognised in the development by local authorities in flood risk assessments

Urban tree cover playing a central role in SUDS. Clear responsibility for ownership and maintenance of SUDS

The role of native trees and woods fully recognised in the development of Local Surface Water Management plans by local authorities.

Therefore, ancient woodland in East Dorset and ancient trees should be protected from development and acknowledged with your site allocations and development management policies.

As well as open space standards, site allocations and development management policies for Christchurch and East Dorset could take into account the Woodland Trust Access Standard as a complimentary tool. In both urban and rural areas, the Woodland Trust believes that proximity and access to woodland is a key issue linking the environment with health and other social and economic issues that are addressed by green infrastructure provision. Recognising this, the Woodland Trust has researched and developed the Woodland Access Standard (WASt) for local authorities to aim for. We believe that the WASt can be an important policy tool complimenting other access standards used in delivering community services and facilities for improving peoples' quality of life.

The WASt is complimentary to Natural England's ANGST+ and is endorsed by Natural England. The Woodland Trust Woodland Access Standard recommends:

- that no person should live more than 500m from at least one area of accessible woodland of no less than 2ha in size
- that there should also be at least one area of accessible woodland of no less than 20ha within 4km (8km round-trip) of people's homes.

Applying this standard in East Dorset and Christchurch, with a comparison against Dorset

County Council and the South West as a whole, gives the following figures (see table below). It shows that East Dorset exhibits above average access to all sizes of woodlands, whilst Christchurch – reflecting its more urban character – is below average by comparison. This presents an excellent opportunity for using existing accessible woodland in order to drive robust green infrastructure delivery for attractive neighbourhoods in the Coalition Government's 'Big Society'. The data used can be supplied free of charge by the Woodland Trust both in map and in numerical/GIS form.

'Space for People' is the first UK-wide assessment of any form of greenspace and, while the targets may seem challenging, they represent the result of detailed analysis. The full 'Space for People' report can be found at http://www.woodlandtrust.org.uk/en/about-us/publications/Pages/ours.aspx.

Employment

Trees and woodland are important for both urban and rural ecosystems and provide a wide range of economic and social benefits.

Eftec has published a review, on behalf of Defra and Natural England, which assesses whether investment in Green Infrastructure increases economic growth. It is urban in focus – taking Green Infrastructure (GI) to mean "a planned approach to the delivery of nature in the city in order to provide benefits to residents" through provision of features such as "street trees, gardens, green roofs, community forests, parks, rivers, canals and wetlands". The report highlights six logic chains, to assess the extent to which investing in GI can have a positive impact on the economy. The following diagram shows these logic chains, their relationship to benefits provided by GI and the relationship between them. It provides a useful visual summary of the value of investing in GI.

The evidence indicates that Green Infrastructure can play a major role in delivering a range of economic outcomes:

- 1) Inward investment: The evidence shows clearly that increasing the attractiveness of an area through investment in high-quality parks, increases inward investment, new business growth and also property values in the surrounding area. The report quotes a Forestry Commission evaluation which found that " enhanced property values in the area surrounding Bold Colliery Community Woodland in St Helens, Merseyside amounted to about £15 million, and that it had also stimulated new development worth a further £75 million. This in turn contributes to increased local taxation revenue.
- 2) Visitor spending: The attractiveness of the area and the quality of parks impacts on the number of visitors attracted to, and spending in, the local area. This has a knock on to business expansion and the development of business start-ups.
- 3) Environmental cost-saving: GI provides important regulatory services such as pollution filtration, flood risk reduction and the mitigation of temperature extremes. There is good evidence that GI can therefore reduce damage costs and is often a more cost-effective way to meet environmental targets than mechanical solutions. Reduced damage and costs should allow greater investment in productive activities.
- 4) Health improvement: Mental ill-health and stress are significant health issues in the UK and there is strong evidence that access to green space has a positive impact on these issues. The UK also suffers from a significant burden of ill-health due to people not meeting recommended levels of activity. The evidence is strongly suggestive of the quality of the outdoor environment being an important factor in encouraging daily exercise. There is also good evidence that health improvements feed through into increased productivity.
- 5) Market sales: Increased building occupancy rates due to enhanced attractiveness of area.
- 6) Employment generation: Developing and maintaining GI provides jobs, and it is estimated that 5% of all the jobs in England are the Green Space sector. It also delivers growth in direct and indirect employment from provision, maintenance and associated services, and local multiplier effects of increased income and spending.

Also, a very recent report for the Woodland Trust seeks to identify the economic benefits of green infrastructure, because sometimes the broad range and nature of the benefits associated with woodland is not always being taken into account effectively. Woodland is identified as a policy tool for housing development, mitigating flooding and also rural regeneration and the fact that this can raise the quality of life and the environment in rural areas. See the Woodland Trust publication The Economic Benefits of Woodland - http://www.woodlandtrust.org.uk/publications/2015/03/the-economic-benefits-of-woodland/ Community and Recreation

Whilst developing new Green Infrastructure and Suitable Alternative Natural Green Space is included as a matter which is likely to be included with Part 2 of your Local Plan, it is important that woodland creation is included as a GI delivery tool. Deforestation of wooded heathland sites, such as within the Dorset Heathland in particular offers the opportunity to promote compensatory woodland creation elsewhere in East Dorset and Christchurch. Trees and forests are crucial to life on our planet. They stabilise the soil, generate oxygen, store carbon, play host to a spectacular variety of wildlife, and provide us with raw materials and shelter. They offer us respite, inspire our imagination, creativity and culture, and refresh our souls. A world without trees and forests would be barren, impoverished and intolerable. Woods bring many benefits, and people appreciate them in all sorts of ways. But for everyone to enjoy them, visit them or indirectly gain from them, they need to be located near to where people live.

The Trust can also help with delivery of woodland creation for green infrastructure – The Trust has a flexible woodland creation delivery tool called

MOREwoods (http://www.woodlandtrust.org.uk/en/plant-your-own-

wood/morewoods/Pages/freewoods.aspx) that can be tailored to the requirements of individual landowners – private, public or corporate. We can promote, advise, manage and deliver a woodland creation scheme for you, creating vital areas of new woodland for your community. We can also help with flagship educational or community tree planting events. One example of a successful local authority woodland creation partnership is the Essex Worksprogramme in 2008/09 with Essex County Council. Prompted by a vote from residents, Essex pledged to plant 250,000 trees to enhance ecology and improve quality of life. Working with the Woodland Trust and a range of partners including district and parish councils, 421,000 trees were planted – far exceeding the original target and helping attract additional funding – see http://www.woodlandtrust.org.uk/en/plant-your-own-wood/being-planted/pages/public-sector-businesses.aspx .

Another example of a successful local authority woodland creation partnership is an ongoing partnership scheme developed in South Hams District Council/Plymouth City Council - http://www.woodlandtrust.org.uk/en/news-media/releases/Pages/south-hams-planting.aspx . The project will see more than 30,000 native trees create 50 acres of new native woodland. Therefore, we would like to see the need for, and benefits from, native woodland creation reflected with your Local Plan Part 2 and incorporated into the new Green Infrastructure and Suitable Alternative Natural Green Space. Also, establishing a separate contributions policy for green infrastructure should be put in place as it is crucial that green infrastructure is funded up-front of commencement of key development taking place.

Person ID	359553
Full Name	Mrs Linda Leeding
Organisation Details	Clerk West Parley Parish Council
Agent ID	
Agent Name	
Agent Details	
Comment ID	LP2SC18
Details of the Comments	

Following receipt of your recent initial scoping publicity I confirm that West Parley Parish Council has no comments to make on this but would like to be involved in any relevant targeted consultation planned until August 2015..

Person ID	654320
Full Name	Mr Andrew Roberts
Organisation Details	Asset Manager Highways England
Agent ID	
Agent Name	
Agent Details	
Comment ID	LP2SC19

Thank you for providing Highways England with the opportunity to comment on the initial scoping stage of the development of Part 2 of the Locl Plan covering the period up to 2028. Our understanding is that Part 2 is intended to build upon the general development strategy and major site allocations set out in the Core Strategy Part 1 and to contain more detailed development management policies, smaller allocations and designations.

As you may already be aware the Highways Agency became Highways England on 1 April. Although the policies and guidance related to our involvement in the local planning process will change, the priniciples will remain the same. In the meantime our comments below reflect the current guidance contained within DFT Circular 02/13 Planning and the Strategic Road Network (SRN) and the NPPF.

Highways England is responsible for operating, maintaining and improving the strategic road network which in this instance comprises the A31 which runs through East Dorset District and to the north of Christchurch Borough and our comments below are made in the light of these responsibilities.

Whilst we have no specific comments to make at this early stage in the process in general terms we would expect site allocations to be supported by an appropriate level of transport assessment. This should identify any impact on the SRN and potential need for mitigationworks including where appropriate the possible type and scale of mitigation required. As part of the plans transport evidence base you will alos want to consider the work Highways England has undertaken with Dorset County Council on the SE Transport Study.

Person ID	717728
Full Name	Mrs Jean Pardy
Organisation Details	
Agent ID	
Agent Name	
Agent Details	
Comment ID	LP2SC20

HOUSING

I am very concerned that there is no mention of Social Housing in the plan. At the local hustings Councillors only mentioned Affordable Housing, which is a non-starter for Christchurch residents on low incomes. What they need is good rental accommodation at a reasonable rent. In the 1950s Christchurch built just such properties on the Somerford Estate; the present Council should promote a similar development instead of large blocks of expensive flats for the elderly. Our care facilities for the elderly are stretched to the limit with care workers having at best half an hour with each client before having to rush off to the next. Social Housing is essential to maintain a social balance in the local population, otherwise there will be no carers for the predominately ageing population. There are several disused sites in the area which could be used for Social Housing e.g. the depot site at Grange Road.

TRAFFIC

Traffic congestion in the High Street is another problem which must be addressed, in particular the No Loading Restrictions MUST be enforced to ensure that deliveries are made outside busy periods. I believe that the destruction of the subway at the Fountain Roundabout would be disastrous, the number of pedestrians waiting to cross the road would build up and they would become frustrated and tempted to cross without signals in their favour. The temptation to cross in this way would be even greater in bad weather and I can foresee serious accidents there. Congestion in the High Street could be further alleviated if bays for buses were provided at the back of Saxon Square (possibly Millhams Mead?) and if the buses were routed along the bypass and Stoney Lane the damage to the road surface in Castle Street and Bridge Street would be much reduced. I believe that, until the traffic problems in the town centre are properly dealt with by a new relief road such as the route along the old railway to join the A338, there should be a moratorium on major housing developments in the Borough.

POLICE

It seems extraordinary that the front office of the Police Station was closed before an alternative contact point had been arranged.

SCHOOLS

I know that the County Council are responsible for education and school building but the delay in providing new school accommodation in Christchurch could have been avoided if Christchurch Council had used their local knowledge to warn Dorset County Council of the impending crisis.

All Responses to the Consultation on the Scope of Local Plan Part 2

Person ID	359555
Full Name	Mr L Hewitt
Organisation Details	Town Clerk Wimborne Minster Town Council
Agent ID	
Agent Name	
Agent Details	
Comment ID	LP2SC21

Further to the above and specifically the document that was issued in March 2015, Wimborne Minster Town Council would request that the following be included in Part 2 of the Local Plan:

- a) review of car parking provision in the Town to meet growing demand;
- b) assessment and provision of employment opportunities in Wimborne Minster to meet demands of the increased population arising from new residential developments;
- c) review of highway infrastructure to meet demands of increased traffic arising from new residential developments.

Person ID	523421
Full Name	
Organisation Details	Campaign for the Protection of Rural England
Agent ID	717053
Agent Name	Mrs Janet Healy
Agent Details	Dorset CPRE
Comment ID	LP2SC22

THE GREEN BELT

We are pleased to see that no further Green Belt release is proposed through Local Plan Part 2. The following saved policies from the Local Plan 2002 should be carried forward and vigorously applied.

GB3 - EXTENSIONS AND REPLACEMENT DWELLINGS IN THE GREEN BELT.

GB5 - REUSE OLD EXISTING BUILDINGS IN THE GREEN BELT.

GB6 - PERMITTED DEVELOPMENTS.

THE NATURAL ENVIRONMENT

We fully endorse everything put forward by the East Dorset Environment Partnership relating to the environment.

General - One topic that was discussed at our last meeting, attended by James Smith, was the importance of highly accurate mapping of all environmental designations, possibly including types of vegetation the designations covered. It may make it easier for developers, or anyone wanting to take any action that could impact on the environment from overlooking any vital information. The Planning Committee may also benefit. The current Dorset Explorer does seem far superior to the old one, though the accuracy of the information needs to be confirmed.

ME6 - FLOOD MANAGEMENT, MITIGATION, AND DEFENSE.

This policy sets out in some detail the framework to be followed in order to prevent any increase in flood risk. However, we think that a supplementary policy is required to cover the procedures for designing the type of drainage systems most suited to an individual development.

The Lead Local Flood Authority is now Dorset County Council, but who is responsible for the design of individual drainage systems?

In October 2014, DEFRA and DCLG ran a joint consultation on 'Delivering Sustainable Drainage Systems'. Once they have reported their findings and developed a national policy, this then should be incorporated into a supplementary planning policy.

We are quite concerned that no-one seems to look at the cumulative effect of so much planned building along the Stour and Allen river valleys. We realise that the presumption is that each development has drainage systems that hold the run-off at pre development levels. We feel that even a slight error may upset the balance.

COMMUNITY AND RECREATION: OPEN SPACE

Cannon Hill and Uddens Plantation, managed by the Forestry Commission, is the largest open space serving as an informal recreational area for the peoples of Wimborne, Colehill, Hayes, Stapehill, Ferndown and Longham. It never seems to figure as an open space in any

of the policies, yet the Cannon Hill woodlands have all weather tracks providing a large population with walking, horse riding and cycling tracks.

The saved policy WIMCO12 needs to be expanded and carried forward. When it was saved in 2002, the use of this area was far less than it is now. When all the new developments around Wimborne have been completed, it will become more important than ever, especially if the heathlands are to be protected from extra foot falls. The policy mentions maintaining the present levels of public access if for any reason it was withdrawn. The area has to be kept open and access not restricted or compromised in any way.

The saved policy also mentions that this area serves Colehill and Hayes. It serves a far larger area now and so this should be modified.

CYCLE WAYS TO OPEN SPACES

Although the Cannon Hill and Uddens Plantations are only a couple of miles from Wimborne, it would not be safe for a young family to cycle there as the roads are so busy. Even the country lanes are far too busy to provide safe cycling and walking. Cycle tracks need to be created somehow so people can reach the open areas without having to drive.

FERNDOWN, STOUR AND FOREST TRAIL

This trail way is probably not suitable for cyclists, only walkers. It seems to have been over looked in recent years, in fact there is some suggestion that it is now obsolete. It is possible to pay 10p at the Tourist Office for a copy of their one remaining leaflet. However, it still appears on the Ordnance Survey maps and it only uses existing bridle ways so it cannot be closed. It could be resurrected and would add interest to the area.

There seems to be a lack of suitable housing for older people. Although the housing policies cover the need for a good mix of housing types there is an absence of apartments and bungalows for those wishing to downsize but not move into sheltered accommodation.

Person ID	718952
Full Name	Ms Kelly Webb
Organisation Details	Operations Manager Wimborne BID Ltd
Agent ID	
Agent Name	
Agent Details	
Comment ID	LP2SC23

Please see below some input, as requested in the Local Plan Part 2 Scoping Paper March 2015, about specific aspects of the 'Town Centres and Retailing' topic that we would like to see included.

The Wimborne Minster Chamber and Trade and Commerce and the Wimborne Business Improvement District both solicit input from businesses in Wimborne. The two biggest issues raised are 1/ Parking and 2/ Signage.

Parking

It is felt that the current car parking arrangements are less than optimal, with visitors/tourists potentially being 'discouraged' from spending time in the town because of the fixed-period parking. The current discussions around the closure of the EDDC offices in Furzehill and the uncertainty around any additional pressures this might put on parking in Wimborne are also causing concern.

Signage

It is also felt that signage around the town could be improved, to aid mobility and to encourage visitors to 'explore' wider aspects of the town than just the Square and the Minster. Signage improvements could also be made to help direct visitors to the appropriate car parks for different areas of the town, and to alternatives where their selected car park is full.

There are other things that could be considered in the planning - for example whether additional areas of the town could be used to stage events or whether we could try to target specific areas of town with 'themes'.

Person ID	360184
Full Name	Mr Mark Hinsley
Organisation Details	Arboricultural Consultants
Agent ID	
Agent Name	
Agent Details	
Comment ID	LP2SC24

Within your review of Environmental factors I feel you should consider an overhaul of your existing Tree Preservation Orders, with the revoking of many of the large old 'Area' orders and replacing them with better targeted specific trees or group orders; this would have the long tern benefit of reducing the amount of Officer hours committed to dealing with applications to undertake works to trees that should never have been in a TPO in the first place and strengthen the protection on those trees specifically identified for inclusion. To help combat the effects of climate change, you could look at allowing developers to offset tree loss on new development site by contributing to the planting of shelterbelts in green belt areas or edge of community sites to help manage the predicted increased occurrence of high winds in the future. Such shelter belts are one of the few effective measures we have at our disposal to manage wind-speed, our ancestors knew this, but we seem to have forgotten it. Such planting areas could be identified within district wide tree policy documents that would assist in decision making regarding tree retention and new tree planting, or be the result of a stand alone village and town high wind protection policy.

Person ID	359539
Full Name	Mr Owen Neal
Organisation Details	Planning Manager Sport England (South West)
Agent ID	
Agent Name	
Agent Details	
Comment ID	LP2SC25

Sport England is the Government agency responsible for delivering the Government's sporting objectives. Maximising the investment into sport and recreation through the land use planning system is one of our priorities. You will also be aware that Sport England is a statutory consultee on planning applications affecting playing fields.

The new Sport England Strategy 2012-17 sets a challenge to:

- · See more people taking on and keeping a sporting habit for life
- Create more opportunities for young people
- Nurture and develop talent
- Provide the right facilities in the right places
- · Support local authorities and unlock local funding
- Ensure real opportunities for communities

Sport England has assessed the Part 2 Plan in the light of Sport England's Planning for Sport: Forward Planning guidance. A copy is enclosed with this letter and it can be found on our Planning for Sport section of the website http://www.sportengland.org/facilities-planning/planning-for-sport/

The overall thrust of the statement is that a planned approach to the provision of facilities and opportunities for sport is necessary, new sports facilities should be fit for purpose, and they should be available for community sport. To achieve this, our objectives are to:

PROTECT sports facilities from loss as a result of redevelopment

ENHANCE existing facilities through improving their quality, accessibility and management PROVIDE new facilities that are fit for purpose to meet demands for participation now and in the future.

Sport England believes that sport has an important role in modern society and in creating sustainable and healthy communities. Sport and physical activity is high on the Government's national agenda as it cuts across a number of current topics that include health, social inclusion, regeneration and anti social behaviour. The importance of sport should be recognised as a key component of development plans, and not considered in isolation.

The following comments are provided within the context of

- The National Planning Policy Framework (DCLG, 2012).
- Sport England's Planning for Sport webpages (2015).
- 1. Local Plan & Evidence Base

The National Planning Policy Framework (NPPF) published in March 2012 (replacing PPS12 & PPG17) states:

Paragraph 73 – Access to high quality open spaces and opportunities for sport and

recreation can make an important contribution to health and well-being of communities. Planning policies should be based on up-to-date assessment of the needs for open space, sport and recreation facilities and opportunities for new provision. The assessments should identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. Information gained from the assessments should be used to determine what open space, sports and recreational provision is required.

Sport England's view is that, in order to meet the requirements of the National Planning Policy Framework (NPPF) (formerly PPS12 and PPG17), this should include a strategy (supply and demand analysis with qualitative issues included) covering the need for indoor and outdoor sports facilities, including playing pitches.

We raise concern that there does not appear to be a robust and up to date evidence base for sport and recreation in Christchurch and East Dorset.

It is crucial that the Council have an up-to-date and robust evidence base in order to plan for the provision of sport both playing fields and built facilities. Sport England would highly recommend that the Council undertake a playing pitch strategy (PPS) as well as assessing the needs and opportunities for sporting provision. Sport England provides comprehensive guidance on how to undertake both pieces of work.

Playing Pitch Strategy

http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/playing-pitch-strategy-guidance/

This guidance document provides a recommended step by step approach to developing and delivering a playing pitch strategy (PPS). It covers both natural and artificial grass pitches. Sport England believes that to ensure there is a good supply of high quality playing pitches and playing fields to meet the sporting needs of local communities, all local authorities should have an up to date PPS. By providing valuable evidence and direction a PPS can be of significant benefit to a wide variety of parties and agendas.

Assessing needs and opportunity for sports provision (Indoor and Outdoor) http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-quidance/assessing-needs-and-opportunities-quidance/

This guide is complimentary with the PPS guidance providing the recommended approach for assessing the need for pitch provision. Sport England believes that providing the right facilities in the right place is central to enabling people to play sport and maintain and grow participation. An assessment of need will provide a clear understanding of what is required in an area, providing a sound basis on which to develop policy, and make informed decisions for sports development and investment in facilities.

The evidence base for sport and recreation should directly link into the development of an Infrastructure Delivery Plan

Action – complete the sport and recreation evidence base and devise a strategy for the delivery or sport and recreational land and buildings as per the NPPF.

2. Planning Obligations/Community Infrastructure Levy (CIL) to Sport Sport England supports use of planning obligations (s106)/community infrastructure levy (CIL) as a way of securing the provision of new or enhanced places for sport and a contribution towards their future maintenance, to meet the needs arising from new development. This does need to be based on a robust NPPF evidence base (as set out above in comment no.1). This includes indoor sports facilities (swimming pools, sports halls, etc) as well as playing fields and multi use games courts.

All new dwellings in Christchurch and East Dorset in the plan period should provide for new or enhance existing sport and recreation facilities to help create opportunities for physical activity whilst having a major positive impact on health and mental wellbeing. Sporting and recreation facilities' are included within the definition of Community Infrastructure Levy (CIL) infrastructure in the 2008 Planning Act (section 216) which means

money raised can be used to fund new or enhanced sports facilities.

For sport and recreation, Sport England would advise that generally it may be more effective if the contributions are sought through planning obligations rather than CIL, unless there is a specific project identified. If such a project is deliverable, then it may be more appropriate to fund through CIL and consequentially should on the Regulation 123 List.

In removing 'playing fields' from the Regulation 123 List and focussing on the use of Section 106 Agreements the Council should be aware that after April 2015, no more than five planning obligations can be used to pool funds for any one piece of infrastructure/project. Therefore the Council will need to think quite strategically and plan effectively for sports infrastructure delivery in the future linking development sites with specific projects to meet identified sporting needs. This will enable the Council to take a proactive approach and ensure the most effective use of planning obligations and CIL together to help deliver this/meet the needs of the population.

Any planning obligations must also pass the following tests as set out in paragraph 204 of the NPPF:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development.
- 3. Protection of Sport & Recreation including playing fields

Sport England acknowledges that the NPPF is promoting "sustainable development" to avoid delays in the planning process (linked to economic growth). Thatsaid, the NPPF also says that for open space, sport & recreation land & buildings (including playing fields) paragraph 74:

Paragraph 74. Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- •• an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- •• the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- •• the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.

Sport England would be very concerned if any existing sport and recreation facilities or land including playing pitches would be affected by these proposals without adequate replacement in terms of quality, quantity, accessibility, management & maintenance and prior to the loss of the existing facility.

4. Active Design

Sport England believes that being active should be an intrinsic part of everyone's life pattern. The master planning of new housing proposal has a vital role in providing easy access to a choice of opportunities for sport and physical activity to suit all age groups for making new communities more active and healthy.

Sport England commissioned David Lock & Associates to investigate the contribution that masterplanning can make to create new environments that maximise opportunities for participation in sport and physical activity. This work including a developer's checklist has been completed and can be accessed via http://www.sportengland.org/facilities-planning-for-sport/planning-tools-and-guidance/active-design/

Through an analysis of the current health agenda and urban design principles and good practice, the term ACTIVE DESIGN has been adopted to describe ways in which master planning can promote healthy environments through creating healthy environments through creating conditions for participation in sport and physical activity and the use of active travel modes (walking and cycling). Three overlapping Active Design objectives have been identified that should be promoted by master plans: improving accessibility; enhancing amenity and increasing awareness.

Sport England would encourage new development be designed in line with the Active Design principles to secure sustainable design.

The Active Design work is currently under review with possibly a new 'version' to be considered when published that meets the health / physical activity agenda too.

5. Sport in the Green Belt

The NPPF covers what the Government Policy is on acceptable uses of land in the Green Belt (paras 79-92 of the NPPF). By virtue of its location adjoining urban areas and comprising essentially open land, the Green Belt makes an ideal location for outdoor sports facilities and can accommodate a wide range of sports close to major centres of population. The NPPF recognises outdoor sport as an appropriate land use in the Green Belt and advises that new buildings which provide essential facilities for outdoor sport, including changing rooms and small spectator accommodation, may be developed. Sport England will promote policies and practices that:

- encourage the provision of outdoor sport facilities in the Green Belt which help to sustain community life;
- identify suitable sites for outdoor strategic sports facilities where there is a clearly identified demand for such facilities and where no suitable site exists elsewhere in the locality;
- set out criteria against which ancillary built facilities will be considered; and
- recognise that there may be circumstances where floodlit facilities are appropriate in the Green Belt subject to satisfactory management arrangements.

As pressure increases on open land in urban areas, many sports clubs which have outgrown their current homes are looking to the Green Belt for space to expand. Sports which require extensive areas of land, such as golf, have little chance of finding large enough sites in built up areas. In many parts of England the Green Belt offers the nearest available open land. Outdoor sport can also play a part in keeping the Green Belt open, act as a buffer between urban uses and agricultural land and help to regenerate brownfield land.

Whilst there is a general presumption against built development in the Green Belt a special exception is made for essential ancillary facilities. They should be acceptable as long as they are unobtrusive, small in scale and do not conflict with the purposes of including land within the Green Belt.

Sport England would encourage new sport facilities and uses in the Green Belt in line with Government Policy and Sport England objectives.

Person ID	360509
Full Name	Mr Ross Anthony
Organisation Details	Planning Adviser Theatres Trust
Agent ID	
Agent Name	
Agent Details	
Comment ID	LP2SC26

The Theatres Trust is The National Advisory Public Body for Theatres. The Theatres Trust Act 1976 states that 'The Theatres Trust exists to promote the better protection of theatres. It currently delivers statutory planning advice on theatre buildings and theatre use through the Town & Country Planning (General Development Procedure) (England) Order 2010 (DMPO), Articles 16 & 17, Schedule 5, para.(w) that requires the Trust to be consulted by local authorities on planning applications which include 'development involving any land on which there is a theatre.'

Comment:

While the Trust supported Policy LN7 of the adopted Joint Core Strategy, we found the definition for community facilities and services unclear and suggested a description for clarity that would obviate the need for specific examples being: community facilities provide for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community.

The description was not changed and therefore it is unclear if Core Strategy Policy LN7 includes cultural facilities.

Item 70 in the National Planning Policy Framework states that to deliver the social, recreational and cultural facilities and services that the community needs, planning policies and decisions should plan for the use of shared space and guard against unnecessary loss of valued facilities. Also to ensure that established facilities and services are retained and able to develop for the benefit of the community.

Recommendation:

As the description in the Joint Core Strategy can no longer be modified, The Trust recommends inclusion of a development management policy to protect and promote your cultural facilities to ensure the joint local plan reflects guidance in the NPPF. We recommend wording along the lines of:

- A) Existing cultural facilities will be safeguarded and sustained by resisting their loss or change of use unless replacement facilities are provided on site as part of a new development or within the vicinity which meets the need of the local population, or it has been clearly demonstrated that there is no longer a public need or demand for that facility (Item 70 NPPF).
- B) The council will encourage the provision of new cultural facilities in accessible locations, particularly in town and district centres (Item 70 NPPF).
- C) New development adjacent to a cultural facility (such as theatres, music venues and pubs) must be designed to ensure that adequate noise and vibration mitigation measures are provided within the new development's building envelope (Item 123 NPPF).

All Responses to the Consultation on the Scope of Local Plan Part 2

Person ID	359295
Full Name	Mrs Maria Humby
Organisation Details	Clerk Alderholt Parish Council
Agent ID	
Agent Name	
Agent Details	
Comment ID	LP2SC27

The Parish Council are happy with the scope of the Local Plan Part 2 and do not wish to add anything further to its content.

With regards to suggestions for potential local plan allocations, Alderholt Parish Council has none at this stage. Membersconsider that the village already has planned developments at the Surplus Stores site (89 homes) and Ringwood Road (7 homes) and that Alderholt's infrastructure would be unable to cope with any further rise in the village population and traffic.

Person ID	640463
Full Name	Mr. Tim Edwards
Organisation Details	
Agent ID	
Agent Name	
Agent Details	
Comment ID	LP2SC28
Details of the Comments	

I would like to suggest that if more houses are being considered, then better transportation is required,

A. to Emergency services, B. Bus services, C. Railway branch lines/Tramways etc.

Person ID	648805
Full Name	Mr John Cuming
Organisation Details	
Agent ID	
Agent Name	
Agent Details	
Comment ID	LP2SC29

The topics outlined in Local Plan Part2 do not seem to specifically address the affect the plan will have on

- 1) Increased demand on Medical Services (already under considerable pressure)
- 2) Education need for additional school places.
- 3)Pressure on infrastructure (drainage and sewerage services)

I note that Transport is one of the topics raised but I seem to recall that Part 1 Plan was not very clear of the effect on local traffic management adjacent to housing development next to the Christchurch By Pass and A35 Main Route

I would be interested to know that these matters are considered in some detail.

Person ID	684868
Full Name	
Organisation Details	Office of Rail and Road
Agent ID	
Agent Name	
Agent Details	
Comment ID	LP2SC30
Dotails of the Comments	

I can confirm that at this stage we have no comment to make on the proposed plans. We may however become involved at a later stageif any of the proposed developments have the potential to affect the risk profile of level crossings or if any part of the proposed developments are within 10 metres of a railway.

Person ID	665698
Full Name	Mr Brian Sheasby
Organisation Details	
Agent ID	
Agent Name	
Agent Details	
Comment ID	LP2SC31

One initial site crosses my mind immediately re housing.

As far as I understand there is a large engineering works in Purewell opposite Priory Vets – am I right in thinking that this site cannot be developed for new housing due to some "flood plain" restrictions in the area? Surely this would be a prime position for a new build? It's an eyesore at the moment. Can't something be done to improve the "town-scape" here - something which the council so sorely sought to protect a few years ago?

Person ID	663701
Full Name	Mr Guy Peirson-Hagger
Organisation Details	Head of Planning and Development Burry & Knight Ltd
Agent ID	523319
Agent Name	Mr Ryan Johnson
Agent Details	Turley Associates
Comment ID	LP2SC32

I noted there was consultation on the scope of the emerging Local Plan Part II. Whilst not at the draft policy stage, I thought it would be useful to confirm that Burry & Knight Ltd endorse the inclusion of Phase 9 of the Hoburne Estate as a SHLAA site that should be considered for potential allocation (see attached). I would be happy to share the information we have gleamed on this site from the project team in due course, including SANG matters which are now reaching an advanced stage of negotiations I understand.

The second site I suspect is one for the next review of the Local Plan Part I, possibly aligned to the emerging new SHMA in due course. I attach what we submitted a couple of years ago on this as a reminder of the masterplan proposed, which at the time was well received by the Parish Council. Again, happy to discuss in more detail at the appropriate time. I suspect you have your hands full on part II matters for the foreseeable future. (See attachments)

Person ID	360302
Full Name	Mrs Hilary Chittenden
Organisation Details	Chairperson East Dorset Environment Partnership
Agent ID	
Agent Name	
Agent Details	
Comment ID	LP2SC33

Thank you for the opportunity to contribute at this stage. Because of the relatively tight time-scale, our comments are not as thorough as we would have wished and much is in note form. However, we note your advice that this is very much a first stage in the development of Local Plan Part 2 and confirm our willingness to contribute as much as we can throughout the process. In particular, we would wish to be involved in the scoping and development of SPDs and any relevant planning design briefs that may impact on nature conservation interest and the wider environment.

Core Strategy

WMC4 The Allendale Potential Area of Change and WMC1 Wimborne Town Centre The detailed design brief for the redevelopment of the Allendale Area and other parts of Wimborne Town centre should ensure enhancement of the setting of the R Allen (BAP habitat, ME1)

reduced light pollution impact including plane polarised light (NPPF 125, Planning Guidance and see further comments on light pollution below).

ME1 - Supporting guidance required

A Natural Environment SPG , "Nature Conservation and the Planning Process in East Dorset" was produced in 2009 but no longer appears to be available on-line. It should be updated to reflect all current legislation. There is potential for this to be a Dorset-wide document to ensure a uniform approach across all LPAs. This could be combined with a succinct explanation of the legislative requirements of NPPF regarding Biodiversity Duty (part of the NERC Act) https://www.gov.uk/government/publications/the-biodiversity-duty-for-public-authorities (13.10.2014), perhaps with a comprehensive check list to ensure nothing has been overlooked in a planning application. It should not be left to chance that developers and council Officers and Members will follow all links required to fully understand the requirements. This would reduce the workload of the Natural Environment Team in confirming compliance with the Dorset Biodiversity Protocol, and reviewing Biodiversity Appraisals and Biodiversity Mitigation Plans required for planning applications of all sites over 0.1ha https://www.dorsetforyou.com/article/401489/Biodiversity-Appraisal-in-Dorset . EDEP would wish to be consulted on the scoping of the document and prior to its adoption.

Need to explain more clearly and in more detail the requirements of NPPF regarding moving from net loss to net biodiversity gain (NPPF 9)

connectivity of all habitat types on a landscape scale (NPPF 113,114,117)
Priority habitats and species (possibly cross reference to BAP action plans to clarify http://jncc.defra.gov.uk/page-515 (update 7.1.2015) and Dorset Biodiversity Strategy)

Para 2 of Policy includes a commitment to meet targets for maintenance, restoration and recreation of priority habitats and species and linking habitats to create more coherent ecological networks resistant to climate change. This requires an assessment of existing and potential components of ecological networks (NPPF165).

An outline of the relevant evidence required to identify and map local ecological networks is provided on the Planning Guidance Portal at

http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/biodiversity-ecosystems-and-green-infrastructure/

Relevant evidence in identifying and mapping local ecological networks includes:

the broad geological, geomorphological and bio-geographical character of the area, creating its main landscapes types;

key natural systems and processes within the area, including fluvial and coastal; the location and extent of internationally, nationally and locally designated sites; the distribution of protected and priority habitats and species;

areas of irreplaceable natural habitat, such as ancient woodland or limestone pavement, the significance of which may be derived from habitat age, uniqueness, species diversity and/or the impossibilities of re-creation;

habitats where specific land management practices are required for their conservation; main landscape features which, due to their linear or continuous nature, are important for the migration, dispersal and genetic exchanges of plants and animals, including any potential for newhabitat corridors to link any isolated sites that hold nature conservation value, and therefore improve species dispersal;

areas with potential for habitat enhancement or restoration, including those necessary to help biodiversity adapt to climate change or which could assist with the habitats shifts and species migrations arising from climate change;

an audit of green space within built areas and where new development is proposed; information on the biodiversity and geodiversity value of previously developed sites and the opportunities for incorporating this in developments; and

areas of geological value which would benefit from enhancement and management. Local Nature Partnerships can be a useful source of information for existing ecological networks.

The high level policies of Core Strategy cover the first three bullet points. Local Plan Part 2 should ensure that the remainder are addressed and also look at local detail.

Inaccuracies in mapping in the Dorset Nature Map should be corrected eg Dewlands Common SSSI and some SNCIs omitted. Mapping should be updated annually using digitised DERC data which include:

- Priority Habitat mapping layer (mostly from SNCI survey detailed, accurate and more up to date than other data sources),
- species data (Wildlife layer) which includes all protected and BAP species (updated annually),
- boundary data for SNCIs, LNRs, Local Geological Sites, Monitored Conservation Verges
- other datasets include DWT Reserves, Veteran Trees (Dorset Greenwood Tree Project), Habitat Restoration Sites when available/updated.

Other mapping available and which should be taken into consideration is

- The Great Heath
- RSPB heathland extent and potential,
- new native woodland supported under Forestry Commission (FC) grant system
- FC species data from Biological Records Centre (need to confirm that they are included in DERC records).

This should be used to inform the impact of proposed development both within a proposed site and as part of a coherent ecological network and should be taken into consideration as part of the Rigorous testing process in short listing of sites coming forward in SHLAA II.

Strategic gaps between designated sites should be safeguarded from development to ensure the potential for ecological links to be restored is retained.

Monitoring

Base-line data are required to demonstrate the effectiveness of ME policies: without them it is not possible to demonstrate the extent or nature of change.

Light pollution and artificial lighting design

We recommend this should be included in Supplementary Planning Documents. The recognised experts on the subject are the BAA Campaign for Dark Skies. With the help of Bob Mizon, Co-ordinator for Campaign for Dark Skies and some of his colleagues, and advice from Buglife, ETAG submitted a paper on Light Pollution for consideration in the development of Core Strategy (27.9.2012). It includes information on all relevant legislation and recommendations of what should be included in Supplementary Planning Guidance (now SPDs). This was updated in our response to Planning Application3/14/0871/FUL St Leonards Hospital (Core Strategy Policy VTSW7) submitted 9.11.14. Please see main text and appendices. Bob Mizon has confirmed that he will be happy to help with an SPD.

The lighting consultant recommended by the Institute of Lighting Professionals is Alistair Scott, Designs for Lighting Ltd, 17 City Business Centre, Hyde Street, Winchester, Hampshire SO23 7TA. 01962 855080/ 07790 022414 alistair@designsforlighting.co.uk Website: http://www.designsforlighting.co.uk .

Please advise if further information is required at this stage.

Identification of land that might contribute to coherent ecological network and Strategic SANGs

SHLAA I sites that are not being taken forward for development (including those in the Green Belt) should be reviewed for their potential to contribute to ecological networks and Strategic SANGs. This includes areas where there is no long term potential (ie post 2028) for housing development because of proximity to heathland, so developers are sitting on land holdings that are worth no more than relevant agricultural land value.

Review recreational needs of settlements where there has been considerable infilling development (see planning application lists and annual monitoring data) and, because of larger than average curtilage areas, it is reasonable to assume there will be further growth eg St Leonards and St Ives, Alderholt, Colehill.

Review recreational needs of rural settlements. Although surrounded by countryside much is inaccessible.

SHLAA II sites should be reviewed for potential loss of biodiversity.

Identify DCC and EDDC land holdings.

Land identified both for SANG (Policy ME2) and Open Space Provision (Policy HE4) should be multifunctional and take advantage of the opportunity to enhance biodiversity and ecosystem services and, on hills, open up views. There are relatively few semi-natural open spaces with high spots that offer views in East Dorset. A destination such as a hill-top and view provides a target for walkers and encourages informal recreation.

The South East Dorset Green Infrastructure Strategy should also inform site selection. Expansion of the Verwood school campus to include the new upper school will lead to loss of moderate biodiversity of the grassland site overgrazed by horses (walkover survey JW and LH, 2011) and risks increased recreational pressure on Dewlands Common, particularly the section closest to the school. Possible need for a Strategic SANG here.

Increase accessibility to land with views eg open up long distance views from Cannon Hill. Identify areas in potential SANGs that offer opportunities for habitat recreation and linkages including restoration of mire/wet woodland, semi-improved grassland

Riverside SANGs should be multi-functional greenspace and designed to hold water back in the catchment. It must be recognised that existing footpaths across areas such as those adjacent to the R Stour, Wimborne are impassable for several months of the year because of wet ground conditions. Soil structure would be destroyed if over-used. [Opportunites should be taken to create/re-establish wet woodland and other native woodland and re-establish ancient hedgerows (see historic mapping on EDDC version of Dorset Explorer) – this may be on existing/new SANGs or encouraged on other private land holdings.] The Forestry Commission may consider future SANG projects/sites in East Dorset where development is very closely spatially linked to the potential SANG site.

Ecosystem Services – Objective 3

SPD could clarify how ecosystem services can be better understood and quantified (NPPF 109): it would link all ME policies. The Water Framework Directive, the work of the Stour Catchment Initiative and the Forestry Commission's programme of grants for new native woodlands to hold water back in the catchment are key components. Planning Guidance provides the link to Biodiversity 2020, A strategy for England's biodiversity and ecosystems services https://www.gov.uk/government/publications/biodiversity-2020-a-strategy-forengland-s-wildlife-and-ecosystem-services and refers to the DEFRA introductory guide and practice guide to valuing ecosystems services which could, where appropriate, inform planmaking and decision-taking on planning applications.

ME3

Soil carbon issues were documented by ETAG in a paper submitted for the development of Core Strategy (5.6.11) and discussed at EiP. Although it was then included in Policy ME3 it needs greater clarity on what is required and why it is necessary.

ME4/ME5

It will be difficult to be prescriptive on types of RE that may be acceptable because of the rate of change in the technology available. To date, proposals for on-site RE in New Neighbourhood planning applications appear to have been left to the Reserved Matters stage.

The final para. of ME5 commits to further work to identify suitable areas for renewable and low carbon energy sources subject to the policy criteria. This might be included in the call for sites for SHLAA II? Any short-listing will need to be linked to the work on Landscape Sensitivity to wind and solar energy development (see comments under HE3) but should also identify biodiversity considerations. EDEP would wish to contribute to any SPD that may

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be proposed.

More detailed guidance/ policy should address orientation of commercial industrial buildings and opportunities for solar panels on roofs. Greater emphasis should be placed on passive solar design (see http://planningguidance.planningportal.gov.uk/blog/guidance/design/what-planning-objectives-can-good-design-help-achieve/#paragraph 013) in all developments.

The SE Dorset Green Infrastructure Strategy

https://www.dorsetforyou.com/greeninfrastructure includes a requirement for street trees to offer shade, advocating 80 trees per kilometre of road to reduce heat island effect (Biodiversity by Design: A guide for sustainable communities, TCPA, 2004 pg 18.).

Allied to this but also forming part of SuDS design is the potential incorporation of green walls and roofs.

ME6

Flood Risk Assessment completed for DCC Minerals work is more recent and included Wimborne. Need to take on board Water Framework Directive, Stour Catchment Initiative and the Forestry Commission's programme of grants for new native woodlands to hold water back in the catchment. Water quality issues must be addressed as well as quantity.

New policy may be required to set out responsibility for design of SUDs and maintenance. It is essential that policy addresses the cumulative impact of developments particularly smaller ones that have come forward prior to adoption of Core Strategy and those identified in SHLAA II. In the combined LPAs, the required housing provision in the existing urban areas of Christchurch and East Dorset is 59% of the total ie 5000 homes. Assuming 30 dph this equates to 167 ha of newly developed land within urban areas mostly within the Stour catchment.

HE1 Where they do not already exist, criteria should be established for the Dorset Historic Environment Record, Conservation Area appraisals (why should these change from when they were designated?) and the Local List.

HE2 Where they do not exist, criteria should be established for the Countryside Design Summary and Urban Design Guide. There should be guidance for the design and layout of new commercial and industrial development.

HE3 Landscape quality. The East Dorset Landscape Character Assessment (2008) http://www.dorsetforyou.com/media/pdf/p/h/landscape_character_assessment_2008.pdf is an excellent document, well illustrated to highlight the landscape characteristics that should be considered in assessing the impact of development. It formed the basis for the report, Landscape Sensitivity to Wind and Solar Energy Development in East Dorset District (LUC, April 2014) https://www.dorsetforyou.com/416989

Dorset for You notes that it is intended that the study will initially be used to provide guidance to inform the development of design proposals, though in the future the councils may look to use it to develop policies in future planning documents or prepare a supplementary planning document . The study relates to landscape sensitivity only, and does not address other areas of potential environmental impact or other non-landscape

considerations which might affect the feasibility of this form of renewable energy development. [Note: In 2003, LUC was commissioned by GOSW to undertake a broad brush landscape appraisal of the SW Region of monocultures of Miscanthus and short rotation coppice. If biomass crops were to be promoted in C&ED, landscape and other environmental considerations would need to be assessed.]

SPGs on landscape (AONB and AGLVs) in East Dorset are similarly thorough and evidence-based. Both should be retained.

HE4 Open Space Provision

Provision should be updated to take account of new housing built since the 2007 study and to include sites likely to come forward in SHLAA II.

Green Infrastructure provided as Open Space should be multi-functional and seek to include opportunities for enhancement of biodiversity, ecosystem services and mitigation of impacts of climate change (eg urban heat islands, flood management) and cycling and walking for health, social and environmental benefits

Rather than carrying forward individual saved policies for Open Space provision, it might be better to identify but still commit to each one within a new SPD. Please see also comments under saved policy WM4.

.....

Saved Policies

LCT = Councils' Landscape and Countryside Team

FC = Forestry Commission

6.44. Policy WENV4

Development should be sited and designed to protect or enhance the visual and physical quality and natural history interest of rivers or their tributaries, and their landscape settings. The policy will apply to the following rivers:

Allen

Ashford Water

Avon

Crane / Moors River

Stour

Uddens Water

North Winterbourne

Revision of policy should be informed by Water Framework Directive and Stour Catchment Initiative (SCI). Amendment should cover rivers AND their tributaries.

Recommend seek guidance from:

Ben Rayner, EA ben.rayner@environment-agency.gov.uk

Lydia O'Shea, Wessex Water lydia.oshea@wessexwater.co.uk

Doug Kite, NE douglas.kite@naturalengland.org.uk and

Sarah Williams, DWT SWilliams@dorsetwildlifetrust.org.uk

Consider how policy might also include requirement to manage invasive non-natives?

6.72. Policy CSIDE7

Outdoor sport, recreation and allotment uses will be permitted in the countryside where the site proposed is enclosed by boundaries which will prevent or substantially deter trespass onto neighbouring farmland, commercial woodland, sites of nature conservation importance or residential areas. Golf courses will be expected to include facilities for the storage of rainwater or stream flows for use for summer irrigation unless adequate alternative sources are available.

Policy still valid and necessary. Need to ensure no increase in noise levels from eg "extreme sports" or increased light pollution. Saved Policy DES2 may be adequate to cover this? Check extent to which other Core Strategy policies can control.

Need to control artificial fertiliser and pesticide impact on catchment. Again refer back to Water Framework Directive and SCI and contacts as above. .

JS to check what policies have been referred to in relevant planning applications.

6.75. Policy CSIDE8

Development of land for the keeping of horses, for the erection of stables, or for commercial equestrian uses such as riding schools and arenas, stud farms and racing or livery stables should not:

- (a) lead to regular use of local highways or public rights of way which will result in an identifiable threat to the safety of their users; nor
- (b) lead to a predictable requirement for supporting development which would be contrary to Green Belt policy; nor
- (c) be likely to lead to unacceptable damage and erosion of public rights of way, unacceptable harm to wildlife and to designated areas of nature conservation interest.

Still relevant. Retain.

6.104. Policy GB3

Within the Green Belt, extensions to or replacements of existing dwellings will only be allowed where:

- (a) the extension or the replacement dwelling does not materially change the impact of the dwelling on the openness of the green belt, especially through its height or bulk; and
- (b) the size and scale of a proposed extension does not dominate the existing dwelling; and
- (c) the size of any garage building must be commensurate with the replaced or extended property. Any space above ground floor should be limited solely to storage use. Such space should not be capable of later conversion to residential use.

Still relevant. Retain.

6.108. Policy GB5

To avoid abuse of permitted development rights, the re-use of agricultural buildings in the green belt will not be permitted where:

- (a) they were constructed under permitted development rights; or
- (b) any agricultural use for which they were appropriate has been accommodated in a building constructed under permitted development rights; and
- (c) in either case the new buildings were substantially completed less than

four years previously without any clear agricultural justification for their original construction.

6.109. Policy GB6

To avoid abuse of permitted development rights, permission for the re-use of an agricultural building in the green belt may be subject to a planning condition or legal agreement withdrawing permitted development rights for further new agricultural buildings within the same group or in the vicinity of the re-used building where:

(a) the new buildings could be required to accommodate any uses capable of being housed by the building which it is proposed should be re-used; and(b) any new buildings could have a seriously detrimental effect on the openness of the Green Belt or be damaging to its visual amenity.

Both GB5 and 6 are still relevant. Retain.

6.205. Policy LTDEV1

Proposals for development that require external lighting will need to demonstrate that;

- a) the lighting is the minimum required for the specified use;
- b) light spill is minimised;
- c) lighting fixtures, including generators, columns and junction boxes are located to prevent visual intrusion.

It is expected that applicants should submit lighting plots, and column and luminaire details to demonstrate that the scheme does not cause significant light spill. Conditions may be used to limit the hours of operation.

To be updated to comply with current legislation as detailed in ETAG Light Pollution document submitted for Core Strategy. SPD required to provide guidance for planners and developers.

Contact Bob Mizon, Co-ordinator for Campaign for Dark Skies bob.mizon@yahoo.co.uk.

6.264. Policy TEDEV3

On all new housing, commercial and industrial sites of 0.5 ha or more, the developer will be required to provide underground ducting for telecommunications cables, suitable for common use by a number of operators.

Explore potential to design all services to be provided in single run eg under pavements and not roads. DCC requirement?

6.273. Policy TODEV2

New sites or extensions to sites for static or touring caravans, tents, chalets or cabins for holiday use will not be permitted within the Green Belt, or where it would cause harm to the landscape character of the AONB, or Area of Great Landscape Value. Elsewhere, such development will be permitted if the following criteria are satisfied:

- a) the site is well screened from external views by means of landform or landscaping;
- b) the development would not harm residential amenity;

- c) any additional traffic can safely be accommodated on the local highway network;
- d) the proposal would not harm an important wildlife habitat;
- e) there would be no detrimental impact upon a site of archaeological importance, listed building, or conservation area;
- f) the site is well laid out to provide adequate room for pitches and will allow for generous landscaping;
- g) it is established that any risk of flooding is acceptable.

To be updated to reflect other policies in Core Strategy and SUDs requirement.

6.280. Policy DES2

Developments will not be permitted which will either impose or suffer unacceptable impacts on or from existing or likely future development or land uses in terms of noise, smell, safety, health, lighting, disturbance, traffic or other pollution.

Still valid. See comments on CSIDE7.

6.294. Policy DES6

Landscaping schemes in rural areas and on the edge of settlements should be comprised of indigenous species.

Good policy. Still relevant but SPG on Design Requirements for Landscaping New Residential Areas may need updating. EDEP members are concerned that the policy has not been applied to development in Colehill: compliance with policy should be a matter of routine and actively promoted by EDDC.

6.296. Policy DES7

Where express consent is needed, the felling of any tree or trees will only be permitted where the loss to public amenity is outweighed by one or more of the following:

- a) the benefits arising from the development that requires the removal of the tree or trees,
- b) the tree or trees are proven to be adversely affecting the structural condition or safety of a building,
- c) the tree or trees should be replaced as a matter of good sylvicultural practice, or
- d) the tree or trees present an unacceptable risk to the safety of the public. Where trees of amenity value are unavoidably lost, then, where the opportunity Exists, they should be replaced nearby.

Policy should be applied to all development allocations agreed in principle in Core Strategy and Local Plan Part 2.

6.313. Policy DES11

Development will only be allowed where the form, materials, lighting, landscape planting and means of enclosure of roads, cycleways, footpaths and parking areas, together with the relationship of buildings and property boundaries to these spaces, respect or enhance their surroundings.

Policy still valid. Retain. [NB This policy is specific to design of roads, cycle and pedestrian routes. The supporting paras should be retained also].

9.23. Policy FWP1

Land at Green Worlds between Wimborne Road East and Ringwood Road is identified as a housing site. The following requirements must be met:

- a) a range of dwelling types should be provided, at a density in the order of 30 dwellings per hectare;
- b) the site should contribute an element of affordable housing;
- c) a treebelt of at least 20 metres in width must be retained or established around the edges of the site;
- d) the woodland character of the site must not be undermined. To that end any scheme should provide for the retention of a substantial proportion of the existing tree cover.

Remove allocation. Site no longer deliverable and largely wooded. The land here is partly owned by the Erica Trust: it has LNR potential.

9.35. Policy FWP2

Land east of Cobham Road and north of Wimborne Road West and extending to approximately 8.48 hectares (20.9 acres) will be developed for B1, B2 and B8 Uses as defined in the Schedule to the Town and Country Use Classes Order 198771 subject to:

- a) access being provided from Cobham Road only;
- b) uses falling within Classes B1 and B8 being restricted to the southern border of this site, where no uses falling in Class B2 will be permitted;
- c) the provision and maintenance of a substantial tree belt 20 metres in width along the southern and eastern boundaries of the site. Along the southern boundary of the site this tree screen will incorporate a continuous earth mound 1.5 metres in height. The tree screen will be outside the curtilage of any individual property;
- d) no development being permitted except as part of a comprehensive design which must include the details of parking areas and structural landscaping within the site. In addition within the landscaping proposals will be a small area of landscaped open space along the banks of the stream. The materials, siting, landscaping and design of buildings must be co-ordinated and be compatible with each other;
- e) no development being permitted until new proposals for the A31 to Poole Link Road has been approved and committed for implementation or the transport situation has been reassessed through a corridor, traffic impact analysis or other studies, unless it were shown, by means of a traffic impact analysis, that the traffic generated by the development of the site could be accommodated in advance of the Link Road without significant traffic problems.

The allocation has planning consent but it has not been implemented. If it lapses it would need reconsideration. Site is adjacent to known contaminated land. Likely to support good

acid grassland if over grazing ceases (BAP habitat).

9.52. Policy FWP10

Land to the east of the Ford Lane recreation ground, which forms part of the Parley Common Site of Special Scientific Interest, will be designated a Local Nature Reserve and used for nature conservation.

Delete policy.

Erica Trust owns the SSSI. There will be some heathland restoration, potentially with a link through to the open heath of Parley Common. They will certainly allow, rationalise/slightly improve public access, but it is unlikely that they would wish to promote it as a LNR or allow increased public access to the land between the SSSI and the Moors River because of an agricultural tenancy.

LCT comment: EDDC completed dirt jumps and a new footpath on behalf of FTC and their role finished at that stage. All the adjacent land is owned by FTC the area marked with a yellow dotted boundary is scrub with potential SNCIs eg woodland? EDDC has no scheme for this land and unless FTC indicate a desire to develop the site in a specific way then they have no view on this site or its future worth at the moment.

9.54. Policy FWP11

Land at Bracken Road extending to approximately 15 hectares (38 acres) will be used for public open space.

Remove allocation.

Fulfils planning obligation to local residents to buffer homes from impact of industrial estate. History of asbestos problem in soil. Good biodiversity which would be lost if open access.

LCT comment: Site owned and managed by EDDC – they have grazed this site and taken a hay crop from it in the previous 2 years - EDDC having acquired the site in 2012. They will continue this arrangement.

10.17. Policy SL1

Existing workshop buildings at the military vehicle testing ground north of Boundary Lane and the compound in which they stand, extending to 1.1 ha (2.7 acres), may be re-used for employment uses. Vehicular access to the site must be from the A338 Spur Road with a pedestrian and cycle access from Boundary Lane.

When the map showing the Heathland 400 m Exclusion Zone was adopted, some properties in Wayside Road were within 400 m as the crow flies, but not included within the 400 m zone. The reason given was that the presence of the Military Testing Ground and the private road on the western flank boundary to Barnsfield Heath would prevent development. However, if the status of the Military Land changed this would not be so and the exclusion map would need to be amended.

This anomaly should be corrected so that all mapping of 400m exclusion zone across the District is totally accurate.

10.27. Policy SL3

The St Leonards and St Ives area has other sites of heathland interest and potential. To reflect heathland restoration targets in the Structure Plan, conservation will be sought through management and restoration, with the owners and interested organisations, of suitable sites in the area. These may include:

- (a) land west of Wayland Road
- (b) land between Grange and Foxbury Roads
- (c) to the south-east of St Leonards Hospital
- (d) the Shamba complex south of Lions Hill
- (e) Matchams SSSI, and
- (f) Wattons Ford Common.
- a) There appears to be a typo. it should read 'Wayside Road'.
- b) Grange and Foxbury Roads are on opposite side of Boundary Lane. Is there 'any land between'?

As none of these proposals for heathland restoration has been brought forward, the Policy should be replaced with something that is achievable in the parish.

10.29. Policy SL4

Other than the existing workshop compound, and its access from the A338, the two military vehicle testing grounds at Boundary Lane and Barnsfield Heath will be used for nature conservation, should the protection given by the current military use cease.

There is no information on the current use or plans for the site.

LCT comment: Continue to save policy

10.42. Policy SL6

The council will continue to support improvements to facilities at Matchams Stadium provided that they do not result in a marked increase in vehicular traffic attending the site, the heathlands are positively managed to prevent their deterioration and the openness of the green belt is not diminished. Any proposal for alternative use or redevelopment would be subject to green belt policy and the prior submission of plans for the restoration and management of the heathland, prepared in conjunction with English Nature and other interested bodies.

Update to "Natural England" and to reflect Heathland Policies and SPD.

11.32. Policy WM3

Land extending to 3.6ha (8.9 acres) between the existing Fryer Field and Riverside Road will be developed for public open space, including sports pitches. A new pavilion will be developed to serve the extended sports field area. Other than the land required for the Bypass, the existing public open space will remain in that use, with Hatchard's Copse and the meadowland on the east bank of the Mannington Brook being used as a Local Nature Reserve.

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The Bypass has been removed from Policy.

LCT comment: This is private land. We own a very tiny block (which is grazed) next to the nursing home. There isn't any reason for EDDC to acquire the land – if we did it would be managed as acid grassland, but it doesn't have any designation, does it?

Recommend acid grassland areas are included in DERC records.

11.35. Policy WM4

Land north-east of Oakhurst Road, West Moors, extending to approximately 4 hectares (10 acres) will be used for public open space. Parking will be provided for a small number of cars within the site.

This is part of West Moors Plantation and is owned by the Forestry Commission. The whole FC freehold estate was dedicated under the CRoW Act and public access, on foot, is a right here.

The FC have worked with West Moors PC and have co-funded picnic tables and benches for the area which is well used. The FC have ideas for extending the use of the area as community space/natural play area but recognise that this would need commitment from local "champions" to manage this with FC support. It is essential that there is no risk of adverse impact on the SNCI. They prefer to leave the number of parking spaces unspecified.

Apart from parking, the policy itself has been achieved. As noted above in comments above under HE4, rather than saving each individual policy for general open space provision it might be better to identify but still commit to each one within a new SPD. Mapping could then identify footpath and cycleway links to them, including those that are DDA compliant to accommodate both wheelchairs and children's buggies.

12.30. Policy WIMCO4

Any development or redevelopment on the land between Parmiter Road, Parmiter Way and Brook Road should:

- (a) be for B1 type industrial uses as defined in the 1987 Use Classes Order or alternatively for housing; and
- (b) be accessed from Brook Road; and
- (c) be designed and landscaped (including planting and earth modelling if the development is for industry) to protect the amenities of adjoining housing

Superseded by Core Strategy proposals associated with WMC8 (South of Leigh Road) which it is understood will come forward shortly.

LCT comment: EDDC does not own any of the development land, although it will acquire the SANG once this scheme is developed.

12.54. Policy WIMCO9

An area of land to the east of the Canford Bottom area, extending to 2.5 hectare (6 acres) in size, will be developed as a Neighbourhood Equipped Area for Play. Unachievable at present.

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LCT comment: We would look at the need, but I suspect we would try to retain the allocation whilst the landowner probably will not wish this to happen.

12.60. Policy WIMCO12

If the present levels of public access to the Cannon Hill Plantation are withdrawn, the Council would seek reinstatement by means of an Access Agreement. If forestry operations cease and uses are proposed for which planning permission is required, permission will be granted only if public access is safeguarded.

LCT comment: we fully support the retention of this FC site (and Uddens Plantation further east) for public access, and therefore this saved policy

Retention of Policy is supported by the Forestry Commission.

EDEP members would wish to restore views from this site and others. It could be achieved jointly with heathland restoration. Opportunity for more creativity in implementing landscape policies throughout the District linked to Core Strategy Policy HE3.

13.83. Policy V16

To reflect heathland restoration targets in the Bournemouth, Dorset and Poole Structure Plan, conservation will be sought through management and restoration, with their owners and interested organisations, of suitable sites in the Verwood area. These may include;

- (a) land to the south, south west and west of Dewlands Common;
- (b) land to the south of Noon Hill;
- (c) land to the east of Stephens Castle; and
- (d) land at Horton Common.

13.85. Policy V17

Land south east of the junction of Dewlands Road and Doe's Lane extending to 0.8 hectares (2.0 acres) at present used as grazing land will be used to re-create an area of heathland. It will then be used in common with the remainder of Dewlands Common for the purposes set out in Policy V15 (para 13.81).

As none of the proposals for heathland restoration in V16 or V17 has been brought forward, the Policy should be replaced with something that is achievable in the parish.

13.88. Policy V18

Where land adjoining the Bugdens Copse and Meadows Site of Special Scientific Interest and the Site of Nature Conservation Interest is developed, secure fencing must be installed and no direct access will be allowed from adjoining developed sites into the woodland area.

Policy achieved. However, there remains a small area between Bugden's Meadow and the supermarket that was never managed and reverted to scrub and woodland. It did support the BAP species Marsh Fritillary http://butterfly-conservation.org/679-862/marsh-fritillary.html and was regularly monitored by Butterfly Conservation. The potential for restoration of this area should be considered.

16.19. Policy SM3

Land at Station Road, Sturminster Marshall extending to 3.5 ha (8.6 acres) will be developed as public open space for sports pitches. The site is also capable of accommodating a small building containing changing rooms and pavilion together with car parking to serve the sports area. Substantial tree and shrub planting will be required as part of the development to provide a screen to the Industrial Estate from the south.

LCT comment: Probably of worth to the PC but we hold no land here: presumably if the industrial Estate is developed as suggested and funding for green space arises this would be the priority. This is not to be confused with Walnut Tree Field at the northern edge of town adjacent to the Stour.

17.51. Policy GBV4 Shapwick

An area of public open space for recreation extending to 1.4 ha (3.4 acres) will be provided on land between High Street and Stewards Lane.

Land in National Trust ownership. Retain policy.

Person ID	903812
Full Name	Mr David Underhill
Organisation Details	DUA Architecture
Agent ID	
Agent Name	
Agent Details	
Comment ID	LP2SC34

On behalf ou our clients Mr & Mrs Carr we recently submitted a pre application planning enquiry concerning the site at 2 Martins Hill Lane, Burton BH23 7NJ we received a helpful response from Mr Kevin Chilvers which included a suggestion that consideration might be given to removing the site from the green belt. We understand that the scoping stage for consideration in the Local Plan Part 2 is currently out for consultation hence this representation.

There are good reason for seeking rezoning of our clients land

It abuts the parcel now zoned by the Council for new housing under Policy CN2 (refer to enclosed drawing 1513.03A)

Development as proposed by policy CN2 would render it untenable as green belt since it would have width of a mere 50m and be bounded on 3 sides by housing.

It it were to be included with the land noted under Policy CN2 then the latter would have a connection to Martins Hill Lane.

Inclusion of our cleints land would provide a clearer and more robust northern boundary to the green belt than is presently proposed.

We trust when read in conjunction with drawing 1513.03A the reasons noted above provide your authority with sufficient justification to remove the site from green belt.

Person ID	485678
Full Name	Mr Pete Errington
Organisation Details	Strategic Planning Manager Hampshire County Council
Agent ID	
Agent Name	
Agent Details	
Comment ID	LP2SC35

The County Council wishes to draw the district and borough councils' attention to the fact that there are a number of safeguarded minerals and waste sites which lie close to the administrative borders of East Dorset District Council and Christchurch Borough Council. All of these sites identified are safeguarded through either Policy 16: Safeguarding – Minerals Infrastructure or Policy 26: Safeguarding – Waste Infrastructure of the Hampshire Minerals and Waste Plan (2013) (HMWP).

Policy 16 is in place to protect existing minerals infrastructure operations from nearby developments which may be prejudicial or jeopardise their ability to operate effectively and to ensure the supply of aggregates within Hampshire is not interrupted.

Policy 26 protects existing strategic waste infrastructure from inappropriate encroachment and to safeguard important minerals infrastructure and services for Hampshire to meet its long-term needs.

The table below identifies the sites which lie close to the two authorities administrative boundaries. They have been identified in order that the two councils are aware of their potential to affect new development if it is allocated nearby and in order that new development is not allocated nearby which might prejudice the sites' abilities to realise their potential for minerals ad waste uses.

A map is attached showing the locations of these sites.

Some of the sites identified contain infrastructure which is time limited. This information is provided in the schedule below in order to inform decisions about future phasing of potential non minerals development in the vicinity of these sites.

Existing safeguarded sites

Site ref Site name Process

NF091 Bleak Hill Sand and Gravel, Landfill (inert) Aggregates

Ellingham Harbridge and Recycling

Ibsley

NF101 Ringwood Pit Sand and Gravel

Person ID		485678	
Ellingham Harbridge and Ibsley			- Minerals
NF232 Avon Tyrell Reservoir Land North of Ripley	Agricultura	al Irrigation Reservoir	Policy 16: S – Minerals
NF255 Land at Plumley Wood and Farm, Burnt Hill, Nea Farm, Blue Haze and Blashford Quarries, Near Ringwood	Sand and	gravel; Concrete batching	Policy 16: \$ - Minerals
NF002 Caird Avenue New Milton		Gravel (processing); Waste Processing; manufacturing	Policy 16: S – Minerals
NF177 Downton Manor Farm Milford on Sea	Sand and	gravel	Policy 16: S
NF260 Double H Nurseries Ltd Gore Road, New Milton	Waste Re	covery	Policy 26: S – Waste inf
NF248 Ringwood WTW	Wastewat	er Treatment Works	Policy 26: S – Waste inf
NF105 Chatsworth Blue Haze Somerley	Landfill (n	on-inert), IBA recycling	Policy 16: \$ - Minerals
NF021 Verwood Road, Ringwood Forest Somerley (HWRC)	I HWRC (A	ctive),Landfill (closed)	Policy 26: S – Waste inf
have been defined as 'allocated sites' expected development will occur with These sites have been assessed as minerals requirements of the HMWP	s' within the hin the plan being the modern these the last to be subproper.	authorities administrative boundaries which HMWP 2013. These are areas where it is period (1 January 2011 to 31 March 2030). nost acceptable options for the delivering the hree sites and the approximate time in which omitted. sosed land use ential soft sand / sand and gravel extraction	

otential sand and gravel extraction
otential sand and gravel extraction
otential soft sand / sand and Gravel extraction
nerals and waste planning authority for y to encourage continued engagement
1

regarding the locations of potential site allocations with both Christchurch and East Dorset Councils to enable potential impacts to be assessed and if required, appropriately mitigated. The County Council advises that, should development be proposed in close proximity to allocated and/or safeguarded sites, the potential impacts are addressed by the developer and that the County Council is consulted at the earliest possible stage. Pre-application

discussions are strongly encouraged in such situations.

Hamp come

Person ID	892162
Full Name	
Organisation Details	Ken Parke Planning Consultants
Agent ID	
Agent Name	
Agent Details	
Comment ID	LP2SC36
	·

The following statement has been prepared to promote the subject land for the purposes of residential development and allocation within the forthcoming Allocations Development Plan Document (DPD).

The Council's development plan is primarily based on a two stage process. In terms of housing needs, the strategic Core Strategy document identified the overall required levels of housing to be provided and land that needs to be provided. The rural context of East Dorset and the level of housing required resulted in the need for large scale Greenfield allocation, most of which is to be sited within the Green Belt. Land can only be released from the Green Belt by way of strategic allocation in a Core Strategy document. The Core Strategy therefore confirms specific allocations for the amount of housing that is to be provided on land released from the Green Belt with the remainder of housing delivery to be set out in a further document the Site Allocations DPD. The Council have begun preparation of the document and this submission is to feed in to the DPD preparation process. Essentially we wish the subject land to be an allocation within the DPD.

The land is contiguous to the existing built settlement and is the best candidate for the provision of additional housing land. The site was assessed within the East Dorset SHLAA (2012) as land suitable for the purposes of a rural exceptions site; the following paragraphs set out why the site is considered suitable for the delivery of open market housing as well as affordable housing in accordance with Policy LN3 of the Christchurch and East Dorset Local Plan: Core Strategy (2014).

To provide some background on the site locale, as shown on the appended location plan; the land is sited to the western fringe of the small self-contained suburban settlement of Alderholt. Alderholt lies to the far North-East corner of the district close to the boundary with the neighbouring New Forest District. The settlement lies 3.6km from, and within the catchment area of, Fordingbridge which is considered to be the next higher level service centre for the residents of Alderholt. The settlement is also proximate to Verwood, approximately 4.3km from its local amenities, which is identified by the Council as being a key settlement where additional development, including improvements to the established town centre, is proposed.

The Parish Council website describes the settlement as a large village with late Victorian origins. The Parish Council however have also provided a village plan which provides a more detailed description of the origins of the settlement and the facilities which it can provide. There are a few character buildings within the village in the form of a number of historic cottages and a number of Victorian and Edwardian dwellings and later inter war suburban style dwellings. The majority of the settlement is however characterised by post

war phased suburban housing estates and infill residential development.

Blackwater Grove is a small residential access road to the south of Station Road close to the junction with Ringwood Road; which is essentially the village centre. Blackwater Grove is the main access to a small modern residential development with Blackwater Close being a small cul-de-sac spurring off of it. Existing development within Blackwater Grove is of a mix of two storey semi-detached and detached dwellings to its North facing side. The South side, leading into the cul-de-sacs, is of a mix of two storey semi-detached and detached housing; with single storey dwellings located towards the top of the hill.

The site is regarded as countryside because it is outside of the defined urban area; notwithstanding this, the site is contiguous to the settlement and bounded by residential development along its northern and eastern sides. To the south and west of the site lies open countryside. Access to the site is to be gained from Blackwater Close; the established development was designed with the prospect of further extension into the proposed site in mind with a clear ability to extend the existing highway through the current gated access to the site

At present the site is unoccupied, with its use pertaining to an unkempt field. The land in this location is not considered to be suitable for use as arable farm land and is classified by DEFRA as heath/moorland only suitable for at most rough grazing. As such, it is considered that the site is most suited for development in order to preserve surrounding land of better qualities.

The site slopes with the surrounding topography in a relatively uniform manner from South to North, with the highest point located within the south-western corner of the site. The site itself is fairly open to the surrounding countryside but is obscured from the public highway by the existing patterns of built development within the settlement which run along its north and eastern edges. The land is sparsely timbered with the sole grouping of trees located along its southern edge and culminating in the South

West corner; the rest of the site is covered by a mix of gorse and bracken type vegetation which is growing in an unrestrained manner.

The site lies outside of the Green Belt and outside of the 400m buffer zone of the Dorset Heathlands Special Protection Area (SPA) of Cranborne Common. However, the site does lie within the 5km designation and hence will be required to contribute towards mitigation of impacts upon the heathland. The Core Strategy and Natural England require urban extensions of a certain size to provide mitigation through the provision of Suitable Alternative Natural Greenspaces (SANGs). The site owners are aware of this requirement and SANGs land is to be provided.

Green Belt land covers approximately half of the East Dorset District and in tandem with the European protected Dorset Heathlands Special Protection Area (SPA), Special Areas of Conservation (SACs), and Dorset Heathlands Ramsar there is a clear limitation in the number of strategically developable sites. Under the superseded East Dorset District Local Plan (2002) between the years of 1994-2009 roughly 2100 homes, which accounted for 32% of all housing development within the district, was sited on Greenfield land. It is an established fact that there is not enough available land within existing settlement boundaries in order to fulfil the housing demand across the plan period and as a result the Council have proposed to introduce several new neighbourhoods within the existing Green Belt as set out within the Christchurch and East Dorset Local Plan: Core Strategy (2014). It has been agreed that the Green Belt boundary be amended in order to facilitate this development. The superseded East Dorset District Local Plan (2002) was reliant of 64% of the overall housing figure emanating from unidentified windfall sites. Much of the residential development in East Dorset historically has occurred on garden sites as a result of the natural constraints faced by the district in the form of the Green Belt and Dorset Heathlands. The Council have an expectation that development in this form will continue however there is no substantive proof that housing numbers will be deliverable at the same rate going

Person ID	892162

forward.

This is particularly the case where there is a strong desire not to alter the direction of the Council's approach to the delivery of the housing required, which was not to be delivered by way of the release of land from the Green Belt, to be set out within a separate Site Allocations DPD. The amount of housing required, which is more than half of the total amount, is to be provided through identified brownfield allocations, windfall sites and greenfield sites where appropriate. There will be no opportunity for further Greenfield allocation within Green Belt areas. The subject site therefore represents one of the few opportunities for a decent sized allocation in a position already considered acceptable and lying adjacent to an existing settlement which is identified for some growth.

The Core Strategy (2014) being a strategic document does not set out an approach with respect to windfall development within the existing urban and suburban areas; Paragraph 5.33 of the SHLAA (2012) makes clear that the housing land supply should be based upon specific sites but that as per Paragraph 5.35 where the Local

Authority cannot identify enough specific sites a windfall allowance may be justified. There are of course no guarantees that even the identified sites will be delivered through to completion and hence the expectation is that the Council will ensure that there are a surplus number of deliverable sites.

It would seem logical that where a Greenfield site is deliverable; located outside of the Green Belt and European protected sites, and contiguous to the existing settlement, it should be prioritised for development over releasing land from the Green Belt and an expectation for unidentified windfall sites to come forward. The Council will be unable to release further land from the Green Belt without a strategic review of their adopted Core Strategy.

The Inspector's Report on the Examination into the Christchurch and East Dorset Local Plan: Core Strategy states within Paragraph 32 that the Council have undertaken detailed assessments to establish the quantum of development that could possibly be accommodated within urban areas and previously developed sites... driving down to a level of detail which included the examination of very small sites. This examination included an assessment of sites below the agreed minimum 0.15ha in site area which was set out within the SHLAA Methodology (2008); which could only be justified as a result of insufficient supply. As a result of the scope of their analysis the Council have somewhat limited their ability to depend on sufficient quantities of windfall sites within urban areas in order to make up any shortfall in housing numbers. This is confirmed by the Inspector within Paragraph 73 of her report. Therefore any shortfall will likely need to be accommodated by further identification of Greenfield development sites.

The initial housing target of 8200 homes put forward by the Council's was not considered to be based on any sound evidence by the Inspector whom stated categorically within Paragraph 52 that she saw no reason why the figure should not accord with that which was stated within the 2012 revision of the Bournemouth and Poole Strategic Housing Market Assessment (SHMA) (2011) of 8325; with an additional allowance for vacant and second homes. As such the housing target was revised by the Inspector to 8490.

During the course of the examination the Council recalculated the housing supply which it considered could be provided, and a revised supply of 8386 dwellings was identified. The Inspector states within Paragraph 74 that this falls short of the amended housing target of 8490 dwellings and leads to the question of whether any further sites are capable of contributing to the housing supply . Therefore there is a clear requirement for the council to identify further deliverable sites in order to meet their housing demand particularly towards the latter years of the plan period.

There is a significant reliance on the ability of the identified new neighbourhood sites within the Green Belt to provide the indicated housing numbers across the plan period through phasing of the development. These new neighbourhood sites are expected to provide 3465 houses towards the main housing target. At this stage in the life of the Development Plan it

is uncertain whether these figures will be met. The Council is expected to monitor the levels of delivery annually within their Annual Monitoring Report (AMR); the Inspector identified within Paragraph 129 of her report the heavy reliance upon AMRs for the purpose of monitoring the housing supply. If annual residential completions are not meeting the expected figures then the Council will require further land to be identified for development in order to make up for the shortfall in provision. There are to date no figures which set out whether the projected completion figures are likely to be met.

Paragraph 85 of the National Planning Policy Framework (2012) required that Green Belt Boundaries be clearly defined and consistent with the Local Plan strategy in order to meet identified requirements for sustainable development; Paragraph 84 furthers that Local Authorities should consider the consequences of reviewing Green Belt boundaries and should look to channel development where possible to urban area and towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. The fundamental purpose of the Green Belt is to prevent urban sprawl by retaining open land; where this can be retained and development is sustainable elsewhere it is clearly the intention of Governmental policy that this be prioritised.

East Dorset have a significant demonstrated shortfall in their affordable housing provision as set out within the Strategic Housing Market Assessment (SHMA) update (January 2012). This is confirmed by the Inspector in Paragraph 83 of her report where it is stated that the established affordable housing need exceeds the entire projected housing supply for the plan period. Objective 5 of the Christchurch and East Dorset Local Plan: Core Strategy (2014) sets out a desire for approximately 35% of all dwellings to be delivered to be affordable; however it is clear that this will merely make a dent in the shortage and is not guaranteed to any extent.

Developments which will contribute to the affordable housing stock should therefore be considered favourably; the Council are expecting that roughly 2866 of the 8490 houses required across the plan period will be affordable homes; this is based on a calculation of 40/50% (brownfield/greenfield) of the supposed housing projected for each site. The actual ability for a site to be able to deliver affordable housing is indeed significantly more complex than a standard percentage provision; viability has to be taken into account and certainly in the case of smaller sites it will often not be viable to provide any affordable housing at all. The Strategic Housing Market Assessment (SHMA) update (January 2012) states that 426 affordable homes were required per annum over the period between 2011 and 2016 in order to get on top of the current shortfall in affordable housing supply. This does not take account of the new demand which would arise across this period and would simply look to make up the numbers which should have already been delivered. The Council are predicting an ability to provide approximately 40% of all new housing as affordable going forward; significantly above the level which they have been able to provide historically with no definitive answers as to whether this is achievable.

The SHMA predicts that the future housing need across East Dorset alone across the plan period will amount to approximately 6,700 new homes, not taking into account the severe shortfall in affordable housing and without taking in to account a housing buffer. This equates to 336 homes per annum of which 134 are expected to be affordable. Given the projected future requirement the Council may struggle to tackle the existing affordable housing shortfall, particularly if placing a reliance on sites within existing urban areas which are invariably small.

Evidently maximising the delivery of affordable housing upon available greenfield sites, where it is viable to do so, is key to the Council's ability to balance Objectives 1 and 5 of the Core Strategy (2014); preventing a requirement for numerous additional exceptions housing sites within the designated Green Belt in order to deliver a suitable range of housing in order to meet local needs and to make up for the identified shortfalls.

Core Strategy Policy KS4 sets out that the lion's share of housing across the plan period is

to be provided within existing urban areas, roughly 5000 homes; 2,740 of these in East Dorset. It is clear that there is not the capacity to provide housing of this volume without further urban extensions to those which are proposed within the Green Belt. The Council, as part of their Core Strategy have amended the Green Belt boundary in order to facilitate the creation of a number of what it has labelled 'new communities'; in accordance with NPPF Paragraphs 82 and 83. Green Belt boundaries should only be amended in exceptional circumstances and only through the preparation or review of the Local Plan and the reviewed boundaries should have regard to long term permanence and be capable of enduring beyond the plan period. It is implied therefore that the Council should not seek to review the established boundaries again within the scope of the plan period and must look elsewhere in order to fulfil their housing demand. Housing therefore should be delivered upon all available brownfield sites, and sustainable Greenfield sites which are contiguous to existing settlements, as per our Clients site, and which are outside of the Green Belt. Policy LN4 of the Core Strategy (2014) sets out the Council's approach to affordable housing exception sites, stating that land adjoining the defined rural and urban settlements which would otherwise be considered inappropriate for development may be developed to facilitate affordable housing in accordance with securing any affordable housing as just that, in perpetuity, and the development having an acceptable impact upon the character of the settlement and wider landscape. Alderholt is cited as being a settlement which would accommodate this type of development. The policy makes no assumption of the affordable housing provision which should be provided, as such, it would be reasonable to turn to Policy LN3 which stipulates a provision of up to 50% on Greenfield sites.

The Council's Affordable Housing SPD (2014) states that exceptions development should be small scale and reflect the setting, form and character of the settlement and surrounding landscape. Within this context the Council define 'small scale' as a scheme of no more than 10 dwellings. The proposed site clearly has the capacity to deliver substantially more than this volume and it would not be financially viable to deliver development on such a small scale. The site is suitable for development, is

contiguous to the settlement and would contribute to relieving the significant affordable housing shortfall alongside open market housing.

Policy LN7 of the Core Strategy sets out the Council's intentions with regards to the provision of new community facilities and services in order to support existing and enable further population growth. Alderholt is listed as one such settlement where new facilities should be concentrated where they may be accessed by public transport, bike and foot. As such, the expansion of the existing settlement in terms of new housing development at Alderholt is clearly supported.

Notwithstanding the above, the application site is outside of the Green Belt and does not require a formal strategic allocation as such. That is to say that the Council could reasonably grant planning permission for the development of the site on the basis of a requirement for housing during the plan period. Indeed at the time of the previous application the council did suggest that the matter would be better dealt with as an allocation through its DPD process. The allocation of the proposed site, which is currently unused, for the purposes of housing development; both open market and affordable, is considered to be demonstrably in the interests of meeting housing needs in a manner which preserves the wider protected natural landscape of the Green Belt and the green corridors which it provides. The proposal is thus both logical and acceptable and the District Council should reasonably and justifiably consider the formal adoption of the site as a preferred site for housing development. I would appreciate confirmation of your receipt of this letter of correspondence and formal affirmation that you will take the proposal in to due consideration during the preparation of the Allocations DPD.

Due to the nature of the site and the volume of housing which could be provided, there will be a requirement to provide SANGs. Land is in the process of being procured for this

purpose and, as such, the discretion of the Authority is requested at this time due to the sensitive nature of these negotiations.

There are three potential options for the SANGs land as shown on the enclosed plan. A suitable provision of SANGs land will be provided, in relation to the level of development proposed, from these options. Once again however I must make clear that the land has yet to be procured and hence the location of the potential SANGs is submitted in confidence. I would also request to be kept informed as to the process of the Allocation DPD and if any questions arise regarding our Client's land I would appreciate the chance to formally respond.

Person ID	521734	
Full Name		
Organisation Details	Hall & Woodhouse	
Agent ID	359284	
Agent Name	Miss Lynne Evans	
Agent Details	Consultant Southern Planning Practice	
Comment ID	LP2SC37	

Thank you for notifying me of the start of work on Local Plan Part 2.

On behalf of Hall & Woodhouse Ltd, I am instructed to submit five sites with potential for residential development in response to your request. Two of these sites have been considered suitable for residential development as part of an earlier SHLAA exercise (Dorset Soldier PH at Corfe Mullen, and Land at the Red Lion, Sturminster Marshall).

We would be pleased to meet with you to discuss these sites in further detail, and in that

We would be pleased to meet with you to discuss these sites in further detail, and in that regard please contact me in the first instance, or please contact me if you need any further information.

I also confirm that I would be grateful to be kept on your consultation database. Sites are:

001 Land to rear of Red Lion Sturminster Marshall

002 The Horns Inn Colehill

003 The Rising Sun Inn Wimborne

004 The Dorset Soldier Corfe Mullen

005 Churchill Arms Alderholt

Person ID	503554
Full Name	Mr D Verguson
Organisation Details	
Agent ID	
Agent Name	
Agent Details	
Comment ID	LP2SC38

I like many residents am concerned at the way Wimborne and Colehill is being developed under the Core Strategy as I feel insuficient attention has been paid to the Localism Act in particular the giving of due weight to local residents concerns and to the protection of landscape, heritage and local amenities in particular the destruction of the green belt around Wimborne.

I am therefore interested in the proposed review and revision of the Statement of Community Involvement which unfortunately was lacking in the Core Strategy process. I conceed that EDDC frequently asked for residents opinions but all to often failed to heed or act n them. In particular I am concerned that insufficient attention has been paid to the inevitable consequences of the vast building programme in the area, a programme that now seems likely to fall short of its main objective the resloving of the affordable housing needs of East Dorset.

No explanation has been given to justify the resulting 40% increase in population around Wimborne or address the obvious consequences of such expansion.

Wimborne and Colehill are only capable of providing work for one third of its existing population of qorking age so that it would seem inevitable that all the newcomers of working age will be joining the commuter morning and evening congestion. The area lacks the jobs, lacks sufficient school places, amenities and services will have to be seriously expanded and roads already congested and car parking will become even bigger problems.

These are all matters that should have been addressd and resolved before the number of houses proposed and the minimum of 50% affordable was agreed with the developers in the Core Strategy document, a figure now in extreme doubt.

I also question the value of the mitigating schemes such as SANGs on inaccessable and inappropriate sites such as the SANG south of Leigh Road which will straddle the A31 with all its noise and pollution. In particular I question the wisdom of puting the relocation of the rugby and football club ahead of the need for affordable homes especially when said need is unlikely to be fulfilled beacuse of the escalating costs of such mitigating schemes.

Finally I question the validity of any proposed park and ride schemes which will be of little or no value to local residents but will demand a further erosion of our green belt.

Person ID		779551	
Full Name		Mr B Pliskin	
Organisation Details		Clemdell Lim	ited/Etchtree Limited
Agent ID		359272	
Agent Name		Mr Jonathan Kamm	
Agent Details		Town Plannir	ng Consultant
Comment ID		LP2SC39	
Details of the Comments			
Jonathan KammTown Planning Consultant779551Mr B PliskinClemdell Limited/Etchtree Limited359272Mr Jonathan KammTown Planning ConsultantLP2SC39Green Belt Natural Environment Built Environment Housing Employment Town Centres and Retail Transport Community and Recreation Other (not listed)Topic Area	included in Local Plan Part 2		Clemdell Comments
Green Belt	Consider the need for detailed development management policies for certain forms of development		
Natural Environment	Review of designations eg SSSI, SNCI, LNR coastal zone to check boundaries and relevance. Consider the need for detailed		Consider eabling development to conserve and enhance designated areas

Person ID		779551	
	development management policies for climate change, renewable energy and flood risk.		
Built Environment	Consider the need for detailed development management policies for conservation, listed		Review conservation area and the development required to maintain and enhance their viability (such as in the town centre areas)
Housing	strategy hor targets. Con to unlock m sites in Chr town centre the need fo detailed dev manageme or housing l	livery of core using nsider ways ixed use istchurch c. Consider r any velopment nt policies fm layout or	Define policy boundaries and non strategic site allocations on the basis of the provision of opportunity and encouragement to meet the sustainable development needs of settlements.
Affordable Housing	i di di j		Allocation of non strategic affordable housing sites within the main towns and small settlements. Ensure all settlements play a role in delivering sustainable development for local need in rural areas per PPG. Pro active encouragement of exception sites if monitoring identifies LN4 not bringing forward sites to meet identified local need. Supporting sites which have RSL funding. Encourage innovative means of generating the delivery of affordable housing.

Person ID		779551	
			Consider the need for defined starter home locations.
Employment	Consider the need for detailed development management policies for employment sites and uses. Review need for smaller employment allocations. Consider need for airport safeguarding policies and local development order		Review development management policies particularly by reference to changes to the GPDO in respect of Change of Use affecting commercial and agricultural buildings and starter homes. Consider the need for detailed development management policies for rural employment sites and uses.
Town Centres and Retailing	policies in the Strategy. De allocations in Christchulother centre Dorset. Develocations retail floor services in the strategy of the strategy	nt nt policies n the town centre vision he Core evelop for key sites urch and es in East velop tail to deliver the space ts set out in	
Transport	Consider th any detailed development	ne need for d nt nt policies or detailed ith Dorset	Consider support for modal shift
Community and Recreation	space designed consider the new areas of space. Dev	gnations and e need for of open elop new structure and ernative	Allocate SANG sites. Develop management policies for SANG and integration of SANG into coherent strategic green infrastructure links. Consider policies for the enabling of modal shift from the car

Person ID		779551	
	Consider the additional of facilities		when using green infrastructure. Consider equine related leisure and commercial uses.
Development Management Policies			In addition to the development management policies already set out by the topic the LPA should consider holistic management policies that link LP1 with LP2 identifying appropriate adjustments between LP1 and non strategic LP2 allocations.
Monitoring			Monitoring the policies in LP2. Produce and regularly update needs surveys for localised housing need. Using the monitoring information to manage and enable delivery.
Neighbourhood Planning			Identify the policy hooks between the local plan and neighbourhood plans. Produce and regularly update needs surveys for neighbourhood/parish areas. Ensure all settlements play a role in delivering sustainable development in rural areas per PPG. Consider neighbourhood and local development orders for wider topics than that referenced in the LA list.
Non Strategic Allocations in rural areas			Consider non strategic employment diversification and housing opportunities to enable rural settlements to enhance sustainability by meeting local need and supporting local employment and home working. Consider policies for the extension of broadband to extend the

Person ID	779551	
		opportunities for employment and home working.

524338
Mr Kenneth Brooks
LP2SC40

Thank you for your letter dated 16 March 2015 notifying me of your intention to commence preparation of Part 2 of the Christchurch and East Dorset Local Plan. I note you hold my personal details on your local plan consultee database because, as Chairman of the St Leonards and St Ives Parish Plan Monitoring Committee, I submitted written comments on various planning issues in response to the Core Strategy" Options for Consultation" in October 2010 and again in response to the "Pre-Submission Consultation Document" in May 2012. In particular we proposed the designation of Special Character Areas should be extended to include the central area of the Parish of St Leonards, which is totally unprotected from inappropriate development. Indeed, at our special parish Council Meeting on the 17 th July 2014 you personally highlighted the "creation of a corridor of pressure in the centre of our village".

I note that a review of the designations of Special Character Areas is included in the "Built Environment" topic area and I wish to be personally involved in your consultations in this matter.

Under the topic area "Transport" I wish to highlight the issue of Dorset County Council Development Liaison Engineers raising NO OBJECTION to over 99% of Planning Applications in East Dorset. As a direct consequence, potentially dangerous highway problems are arising because of totally inadequate on site car parking provision on new planning approvals. In my correspondence with Mr Colin Graham and Mr Wayne Sayers it is clear that the only reason Dorset Highways are not objecting is because "there are aware of few, if any, successes in recent years of Appeals won on grounds of insufficient parking". Dorset County's Transport Development Management Team's real fear is the probability of the Planning Inspectorate awarding costs against them for so-called "unreasonable behaviour", which I agree is very wrong and this penal Policy requires urgent correction. In the meantime we are left with the ridiculous policy of allocating car parking spaces on narrow residential roads such as Peveril Close and Laurel Lane, which is certainly not "in the interests of highway safety".

Your letter also states that work on the Local Plan Part 2 will comprise a review and revision of all existing "old style" Supplementary Planning Guidance. I understood most Supplementary Planning Guidance had been either incorporated in the National Planning Policy Framework introduced in 2012, or apparently deleted as unnecessary in the desire to reduce the pages of planning policy. However, I would suggest that PPS25, which required a sustainable drainage system as a condition for planning approvals, should be updated and strictly adhered to in order to prevent the overdevelopment of residential sites causing completely inadequate drainage in many localities.

I also note that you are proposing a revision and review of the Statement of Community Involvement. Since I was previously involved in the drafting of this Document, including taking part in the Public Inquiry held at Furzehill on the 4 th May 2006. I would welcome being included in the consultations on this review.

I very much appreciate you sending me the details and proposed timetable for the production of our Local Plan Part 2. I confirm my interest and willingness to be involved in the various Topic areas and all the consultation stages up to Adoption in 2017.

Person ID	507536
Full Name	South West HARP Consortium
Organisation Details	South West HARP Planning Consortium
Agent ID	903658
Agent Name	Mr Sean Lewis
Agent Details	Assistant Planner Tetlow King Planning
Comment ID	LP2SC41

We represent the South West HARP Planning Consortium which includes all the leading Housing Association Registered Providers (HARPs) across the South West. Our clients' principal concern is to optimise the provision of affordable housing and to ensure the evolution and preparation of consistent policies throughout the region.

This document outlines the Consortium's response to the Christchurch and East Dorset Partnership's public consultation on the scoping of the East Dorset Local Plan Part 2 – Site Allocations and Development Management Policies. We have historically made representations on behalf of the Consortium relating to the preparation of Local Authority documents including the Housing and Affordable Housing Supplementary Planning Document (SPD), the Core Strategy and CIL Charging Schedule.

Due to the recent adoption of the Christchurch and East Dorset Local Plan Part 1 – Core Strategy, and the adoption of the Housing and Affordable Housing SPD in April 2014, it is expected that the existing policies and guidance in these documents will be closely aligned to the site allocations and new policies presented in the Local Plan Part 2.

Provision of Affordable Housing

The Scoping Paper states that a matter likely to be included in the Local Plan Part 2 is the development of housing allocations in urban areas to assist delivery of Core Strategy housing targets. This is especially relevant to the level of affordable housing that will be provided on the sites.

Adopted Core Strategy Policy KS4 sets out the overarching policy for the provision of new homes in Christchurch and East Dorset which envisages the provision of 8,490 new homes by 2028, of which 35% will be affordable. In reality, these percentage requirements differ on specific sites identified in the Core Strategy, with Policy LN3 ("Provision of Affordable Housing") stating that "all greenfield residential development which results in a net increase of housing is to provide up to 50% of the residential units as affordable housing" and "all other residential development which results in a net increase of housing is to provide up to 40% of the residential units as affordable housing"

The policy explanation in the Housing and Affordable Housing SPD (paragraph 4.8) is that 35% represents a "baseline viability minimum" of affordable housing provision across the districts. Paragraph 4.17 of the adopted Core Strategy recognises that some sites may be prevented from achieving the 35% "due to financial viability".

As previously discussed in our comments on that SPD (in our representation dated September 2013, M5/0103-10), it is unclear from reading the relationship between these differing housing targets in Policy KS3 and Policy LN3 what is expected of developers and landowners when investigating the potential of development sites. We trust that the

necessary clarity will be provided by clearly stating the percentage requirement as part of the housing allocations to be made in the Local Plan Part 2.

Size of New Dwellings

It is important that the new Local Plan Part 2 is compliant with the Planning Practice Guidance (PPG) and the adopted Core Strategy Policy LN1, which concerns the size and type of new dwellings. This policy notes that "all new housing will be required to be built to meet minimum living space standards for both internal and external areas. Further consideration will be given to bespoke standards in a Supplementary Planning Document" These minimum standards are set out in Table 4 of the Housing and Affordable Housing SPD

Since the adoption of the Core Strategy and SPD, the joint authorities will be aware that, as part of the Planning Practice Guidance (PPG), the Government has recently published Optional Technical Standards through the National Described Space Standard (March 2015). The PPG states:

"Local Planning Authorities have the option to set additional technical requirements exceeding the minimum standards required by Building Regulations in respect of access and water, and an optional nationally described space standard. Local Planning Authorities will need to gather evidence to determine whether there is a need for additional standards in their area, and justify setting appropriate policies in their Local Plans" (PPG, Housing – Optional Technical Standards Paragraph 002 Reference ID: 56-002-20150327). "Where a Local Planning Authority (or qualifying body) wishes to require an internal space standard, they should only do so by reference in their Local Plan to the Nationally Described Space Standard" (PPG, Housing – Optional Technical Standards Paragraph 018 Reference ID: 56-018-20150327).

"Where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local Planning Authorities should take account of the following areas:

Need – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example to consider any potential impact on meeting demand for starter homes.

Viability – the impact of adopting the space standard should be considered as part of a plan's viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local Planning Authorities will also need to consider impacts on affordability where a space standard is to be adopted.

Timing – There may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions."

(PPG, Housing – Optional Technical Standards Paragraph 020 Reference ID: 56-020-20150327).

Whilst it is commended that the joint authorities have created a minimum internal space standard, the new guidance has superseded Core Strategy Policy LN1. If the joint authorities wish to set new space standards, they should do so by reference to the PPG and ensure this is in accordance with the three topic areas of need, viability and timing. For the purposes of clarity for land owners and developers, it is essential that this change is acknowledged by some form of revision to the current policy position presented by LN1 in the new Local Plan Part 2.

Person ID	904546
Full Name	Mr D Smith
Organisation Details	
Agent ID	359261
Agent Name	Mr Doug Cramond
Agent Details	DC Planning Ltd
Comment ID	LP2SC42

I refer to the above generally, and to the landholding of Mr Smith at Colehill as defined in your SHLAA documents as site 3/03/0092.

The Topic Areas to be covered in the LP2 document are all logical. However, there is one omission – the issue of how community supported development which does not easily fit into any of the 'standard' policies, and on the face of it might be further discouraged by Green Belt annotation, is to be dealt with.

The Localism Bill sets the clear agenda that LPAs should 'keep the door open' for local initiatives and requirements. Unfortunately the Scope for the emerging plan does not look hopeful on this front and the stance on Green Belt appears to be already heading for casting in stone. The Scoping consultation letter says as much. The Catch 22 that some of us were predicting at the time of the Local Plan Part 1 (LP1) is looking unavoidable unless efforts are made now.

The LP1 supposedly set out new fixed Green Belt boundaries but only looked at releasing large strategic sites because it was an over-arching document. Nothing below 'strategic' release was considered. The effect has been to make it virtually impossible, unless encouragement is now given, for small sites in Green Belt to be deemed suitable for development even if strongly supported by local people.

With this in mind it is suggested that a policy along the following lines should be embodied in the LP2:

Policy X: Community Led Development

Community led development, within or adjoining settlements including on Green Belt land, will be permitted if:

- 1. It is demonstrated that the proposal is supported by the community;
- 2. the proposal, if including residential use, accords with the affordable housing requirements set out in Policy LN4 of the Local Plan Part 1 and the National Planning Policy Framework; and
- 3. should any development not fall within the not inappropriate development criteria for Green Belt land, and very special circumstances have to be demonstrated, then the views of the representative, locally elected, body will weigh significantly in the assessment process. Policies supporting community-led development are increasingly to be found in development plans and the most recent we have noted are in Test Valley Borough Council and West Dorset /Weymouthareas.

Such policies need to be flexible as communities can seek new development through formal mechanisms such as Neighbourhood Plans or Neighbourhood Development Orders or can

merely show clear support for an individual proposal brought forward by a landowner on a specific site.

On a slightly different tack there should also be explicit recognition of NPPF para 89 wherein "limited affordable housing for local community needs" is deemed to be not inappropriate development in Green Belt subject to Local Plan policies. This is an often forgotten provision. Locally, the LP1 provides for Colehill to have Affordable Housing Exception Sites at Policy LN4. This would seem to fit the NPPF para 89 requirements but given the LP2 is to be more detailed it would be helpful to have this spelled out.

It would also be helpful to all stakeholders to have reference to the fact that affordable housing on an exception site can include market housing to support the delivery of affordable housing. The NPPF underlines that this is clearly acceptable where sufficient public subsidy is not available.

The above suggestions would help to make the LP2 a useful document and, as NPPF para 157 puts it, plan positively for the development to meet the objectives, principles and policies of the Framework.

Turning to more detailed matters; the landowner and agents for SHLAA site 3/03/0092 are in preliminary discussions with the Parish Council and this is set to intensify post the elections. We would therefore wish to convene meetings with EDDC after this and such discussions would clearly fit into your timetable as we note your 'evidence gathering and targeted consultations' run until August 2015. Current initial shared thoughts include allotments and a small number of affordable houses with minimal enabling cross-subsidy homes. We would certainly like to explore with you the scope for, and content of, a specific policy wording relating to Mr Smith's landholding.

Person ID	359547
Full Name	Mrs V Bright
Organisation Details	Town Clerk Verwood Town Council
Agent ID	
Agent Name	
Agent Details	
Comment ID	LP2SC43
Details of the Comments	

The Verwood Town Council Plans Consultative Committee have considered the above at their metting on 15 april 2015. Members agreed that no comments would be made.

Person ID	904551
Full Name	
Organisation Details	Ringwood Waldorf School
Agent ID	657138
Agent Name	Mr Mike Hirsh
Agent Details	Intelligent Land
Comment ID	LP2SC45

Further to your email of the 16 th March 2015, I act for the Ringwood Waldorf School. It is noted that the Local Plan Part 2 will consider certain development management policies including those for some forms of development in the Green Belt.

In general terms there is clearly a tension between paragraph 72 0f the NPPF, which is enormously pro schools and the restrictive policies of the Green Belt. East Dorset's approach recently to the proposed extension to the school suggests that either site specific school policies and/or a clearly explained policy approach should be considered to avoid future confusion. It was noted that arbitrarily some public sector schools were removed from the Green Belt during the Part 1 process, which seemed to be inconsistent.

Will you please note that the Ringwood Waldorf School is now a trust in its own right and is no longer part of the Sheiling complex which has been devolved to its individual parts. In this context the most equitable solution would be for the school to be removed from the Green Belt.

Person ID	360908
Full Name	Mr Philip Pollard
Organisation Details	Symonds and Samspon
Agent ID	
Agent Name	
Agent Details	
Comment ID	LP2SC46

We advise clients who own land at Alderholt and we enclose a plan showing their land edged in red and would like to put this land forward for assessment as part of this process. The land immediately adjoins residential development and is a well-contained site adjacent to the main residential conurbation of Alderholt.

We therefore believe that this area of land which we show edged in red on the plan accompanying this proposal has many of the attributes necessary for it to be considered as a future site for the provision of housing in East Dorset District Council, and we would therefore like to put it forward for ongoing assessment as part of the provision of housing in East Dorset.

Person ID	496473
Full Name	Mr Brian Morgan
Organisation Details	
Agent ID	
Agent Name	
Agent Details	
Comment ID	LP2SC47

Thank you for your letter of 16.03.15. By way of site allocation for housing, I would like to suggest the land to the north of Ferndown Forest Golf Club, including the site of the Wayfarers Sports Club; this would effectively serve as an extension of West Moors, and could be a substitution for the presently allocated land at Parley Cross, where, notwithstanding the Core Strategy as confirmed, the infrastructure (especially transport) is clearly unsuitable, and the environmental problems (especially aircraft noise) are serious and substantial.

In writing this letter, I should perhaps disclose to you that I used to be a member of Wayfarers S.C., but I am not a member now, and I do, of course, have no financial interest on the club. Such an allocation would, however, enable the club to reap the rewards of enhanced land value, which would then hopefully be re-invested in upgraded sports facilities elsewhere, for the benefit, not only of its members, but also the District as a whole. Equally, infrastructure could be easily provided there, with few, if any, environmental problems.

Person ID	904048
Full Name	Mr C Bulstrode
Organisation Details	
Agent ID	
Agent Name	
Agent Details	
Comment ID	LP2SC48

Land at Lymington Road and Jesmond Avenue, Highcliffe

Steve Cox arboriculturist will undertake an ecological survey on the central, northern and southern sections as you advise. We are reluctant to accept the loss of the northern section as we think it rather persumptuous and irregular this designation was imposed before the highway was formally abondoned in 2002 by the DCC highway authority. We will take advice on this aspect in view of the Crichel Down rules applying to the re acquistion of the site, but in the mean time will concentrate our efforts on the sections here before mentioned as you suggest.

We will keep you informed of our progress or otherwise but would also welcome the opportunity of maing our representations to have the land consdered as housing allocation in part 2 of the local plan during the consultation period in autumn 2015.

Person ID	501500
Full Name	Mrs E Chinn
Organisation Details	
Agent ID	
Agent Name	
Agent Details	
Comment ID	LP2SC49

Thank you for consulting me on the scoping report of the Local Plan Part 2.

At this initial stage, I have little comment to make. The only think I would say is that I hope the protection given to Green Belt land and the natural environment in general, will be as robust as it was in the 2002 Local Plan.

With the development of the new "neighbourhoods" on former Green Belt land – as set out in the Core Strategy (Local Plan Part 1) – it is crucial that the remaining undeveloped areas are strongly protected for both wildlife and public recreation.

I note that the main public consultation runs from August to October 2015.

Person ID	904561
Full Name	Mr Philip Freeman Bentley
Organisation Details	National Town Planner NHS Property Services Ltd
Agent ID	
Agent Name	
Agent Details	
Comment ID	LP2SC50

NHSPS manages, maintains and improves NHS properties and facilities, working in partnership with NHS organisations to create safe, efficient, sustainable and modern healthcare and working environments. NHS Property Services has a clear mandate to provide a quality service to its tenants and minimise the cost of the NHS estate to those organisations using it. Any savings made are passed back to the NHS. Healthcare facilities are essential strategic infrastructure. New facilities must be delivered alongside additional housing units to mitigate the impact of population growth on the existing infrastructure. The Christchurch and East Dorset Local Plan Part 2 – Site Allocations and Development Management Policies should, therefore, consider the location of healthcare facilities that would be required to ensure that new housing sites are sustainable. The Councils should work with NHS commissioners to plan for healthcare facilities.

Person ID	359953
Full Name	Mrs D Still
Organisation Details	
Agent ID	
Agent Name	
Agent Details	
Comment ID	LP2SC51
Details of the Comments	

Land at The Oaks, Daggons Road, Alderholt SP6 3DL

Please see copy letter attached - My intention is that the points I raised in 2013 to be taken into consideration during any deliberations with regard to the revised develoment plan and in particular any re allignment of the village envelope and development curtilage.

Person ID	656816
Full Name	Mr P C Bamborough
Organisation Details	
Agent ID	
Agent Name	
Agent Details	
Comment ID	LP2SC52
Details of the Comments	
What is the point? You do not listen to what the Public tell you. Your Council just overide public opinion.	

Person ID	521383
Full Name	Ms Katie Van Zyl
Organisation Details	Network Development Planner Scottish and Southern Energy
Agent ID	
Agent Name	
Agent Details	
Comment ID	LP2SC53
Details of the Comments	

I have reviewed the document referred to in this e-mail; there are no particular comments I need to make.

Person ID	892162
Full Name	
Organisation Details	Ken Parke Planning Consultants
Agent ID	524088
Agent Name	Mr Ken Parke
Agent Details	Ken Parke Planning Consultants
Comment ID	LP2SC54

The following is a formal submission in relation to the Local Plan Part 2 – Site Allocations DPD which is currently being prepared.

The submissions are in respect of the Mostyns Factory, the former Avon Works, accessed off Bridge Street and Stony Lane.

The site is identified within Policy CH1 as being a strategic site destined to play a pivotal role in delivering the town centre vision and key strategy. The policy states that the site is located out of centre for retail purposes and within an area of high flood risk. The site is considered appropriate for town centre uses including employment, retail, leisure and entertainment, offices, arts and culture and tourism subject to compliance with other policies.

Paragraph 5.14 of the Core Strategy states that there is opportunity for higher residential development within the town centre as it is located near to local shops, facilities and public transport. Paragraph 6 of Policy CH1 states that high density residential development will take place alongside the projected requirement for retail to provide a balance, mixed use environment in areas outside those affected by high flood risk.

The site owners have been in discussion with the Council and there have been positive discussions in relation to a mixed use development which will provide a built form along the edges of the street block creating new street frontages and a sense of place. The Council's intentions, as set out within Policy CH1, are to deliver the strategic sites by way of site specific allocations within the DPD.

The following submission therefore seeks to provide a site specific allocation for inclusion within the DPD. The submission is accompanied by a sketch illustration showing how a comprehensive mixed use development can be accommodated on the site in a manner which meets the aspirations of both the Council and the landowner, which is appropriate to character, which does not result in harm and which responds to the constraints of the site. The main constraints to the site are flood risk due to location within flood zone 2/3 and trees along the southern boundary.

The Council and landowners have already discussed the issue of flood risk. The site is one of a number of strategic sites which are to play a pivotal and key role in the regeneration and delivery of the town centre vision. Of the 5 strategic sites identified all but two are within the main element of the town centre that is, not considered out of centre. The sites which are out of centre are in areas of high flood risk but are also appropriate for high density residential development. The Council have confirmed that the strategic role of the site means that it along with the other identified strategic sites can together deliver a strategy to mitigate flood risk thus enabling an element of residential development.

In this particular instance the proposal is to provide commercial development at ground floor level. It is envisaged that the main commercial element will be a large format restaurant / bar type use situated within the corner unit which will open out onto a landscaped public space. Council Officers identified a lack of any real facilities for this part of Christchurch. It was identified that a development could create a hub with a sense of place that would benefit the local community, any redevelopment of the area generally and which would be attractive and appropriate in townscape terms. The site is adjacent a main car park and the leisure centre and such a use if carefully provided would be appropriate. Other appropriate uses for the ground floor would include a small format convenience store, soft play café, other A Class Uses, A2 or B1 office uses.

The provision of commercial development at ground floor level will of itself be sufficient to mitigate any flood risk.

The proposal is for the upper floors to be residential. There is no issue with residential in this location in terms of the Sequential Test because the site will be subject to a specific allocation and strategic flood risk assessment/mitigation.

The sketch proposals show a building of a certain size and presence addressing the street front, providing a corner feature and continuing with a street front towa that development will continue of a certain size along adjoining sites towards the site of the Council Officers. It is also considered that development around the perimeter of the street block is an appropriate urban design response rather than smaller scale development across the site which will not be able to efficiently respond to flood risk and which will be less able to create a sense of place.

The adjoining recently redeveloped street corner does contain a building of a certain scale and it is appropriate to the street block that development of a certain scale on the subject site is also provided. The subject site does sit opposite large areas of open space including the public car parks and thus development of the scale shown is considered to be appropriate.

It is acknowledged that there are a number of protected trees along the southern boundary. These trees are of low quality in arboricultural terms but as a group have amenity value. The trees should not be regarded as a constraint to development. The tress, due to their age and species, would only have at the most 50 years of life left. The land owner's arboriculturalist considers that a better solution is to remove the trees to facilitate the regeneration of the site. Discussions have already taken place with the Council's Tree Officers and Planning officers have acknowledged that the trees can be felled and replaced for strategic purposes. Any regeneration proposals will need to be accompanied by a re-planting scheme. Such will not necessarily involve planting trees in the same position on the site but in other locations either on or within the vicinity of the site to ensure sufficient future amenity value.

The submission therefore seeks to formally propose the following to be including within the Site Allocations DPD.

The site of the former Avon Works are allocated for a mixed use commercial and residential development. The ground floor will be suitable only for commercial town centre uses including employment, retail, leisure and entertainment, offices, arts and culture and tourism. Any such uses will be subject to compliance with other policies.

Town centre uses will also be appropriate on the upper floors along with high density residential uses.

The development will follow a set of design principles agreed with the Council including a detailed landscaping scheme for the site and immediately adjoining area.

I would be grateful if you could confirm receipt of this formal submission. During our previous meeting the Council indicated that it would be prudent to engage in early discussions with the Environmental Agency. The landowners would welcome an early meeting with the EA and Council and other landowners if possible to discuss such matters.

Person ID	892162
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The landowners would also welcome feedback on the merits of the submission in the context of the formulation of the Plan, i.e. are the proposals acceptable and whether or not any further information is required at this stage.

Person ID	908675
Full Name	Mr Brian Twigg
Organisation Details	Brian Twigg Planning
Agent ID	
Agent Name	
Agent Details	
Comment ID	LP2SC55
Details of the Comments	

Person ID	899012
Full Name	Mrs Brown
Organisation Details	
Agent ID	
Agent Name	
Agent Details	
Comment ID	LP2SC56
Details of the Comments	

Person ID	905337
Full Name	Mr J D Draycott
Organisation Details	
Agent ID	
Agent Name	
Agent Details	
Comment ID	LP2SC57

I wish to apply for planning permission to construct a new bungalow in the grounds of the above property.

My wife and I have lived in Church Mead for over 30 years and having now retired would like to downsize but remain in the village where we have many friends and where we actively contribute to village life eg helping with the up keep of the church grounds and organising the village fete.

Having made some initial enquiries I understand that our property is currently outside the village envelope which presents an obstacle to planning permission being granted. However according to your official James Smith this status expired last year and is now due for reappraisal.

I have an early plan showing extent of the village envelope. Whilst I believe our property existed at that time the plan does not show this, showing the outline of fields instead. This is an indication that the council were unaware of the existance of the property and a likely reason for its exclusion from the village envelope. A more recent plan does show Church Mead. If the plan actually pre-dates the building of Church Mead planning permission should never have been given and yet it was. Either way I feel that it follows that the Church Mead plot should sit within the village envelope.

The extent of our current property and gardens extends to approx 3 acres. The proposed new bungalow would take up a small fraction of this area and would not be visible from the road.

In recent years planning consent has been granted to my neighbours that reside either side of Church Mead. Specifically approx 7 years ago permission was granted to Fountain Cottage for a 4 bedroomed dwelling (the Old Orchard) my other neighbour Cow Leaze was granted permission 30 years ago for a bungalow (Hickory Wood) and earlier this year for a 4 bedroomed house which is currently under construction.

I realise the village envelope issue does need to be addressed but as indicated above want to bring to your attention that the earlier decision to exclude the Chucrh Meaed Pplot may have been out of ignorance of the property's existance rather than a deliberate decision to do so. I also hope you will look upon my application favourably given the Council's recent approval for the building of 4 social houisng properties at the western end of the village, in a formally designated area of outstanding natural beauty, permission being granted to my neighbours plots and the fact that the ooriginal planning permissin for Church Mead allowed for the building of two properties one more than currently exists.

The northern boundary of my property forms the logical, dicernable and defensible edge of the settlement. Having regard to the Council's recetly adopted settlement strategy the

revision of the boundary of settlement to reflect the extent of the conservation area would facilitate a characteristic form of infill development that will contribute positively to the function and sustainability of the settlement of Hinton Martell.

I look forward to hearing from you in due course.

Person ID	925179
Full Name	Mr & Mrs K.J Stroud
Organisation Details	
Agent ID	
Agent Name	
Agent Details	
Comment ID	LP2SC58

As discussed we would like to explore the possibilities of selling off a portion of our garden for building as we now find it more difficult to maintain such a large garden. Our property has a total road frontage of 35.5 metres and the whole of this road frontage is to the right of the property so severng off a piece of garden 12 to 15 metres wide would still leave us with plenty of garden space of some 20 to 23 metres in width.

There is also a good depth to the garden of some 30 metres so any plot severed would have more than adequate space around it.

On the attached map enlcosed you will see that the shaded area of our garden to the east is what we are hoping to reduce it by as this is largely unkept and overgrown. It would be very helpful to us if the planning department could let us have a view on whether we could obtain planning permission on this piece of our land now or when in the future if possible.

Person ID	926600
Full Name	Mr Cliff Lane
Organisation Details	Director Planning Savills
Agent ID	
Agent Name	
Agent Details	
Comment ID	LP2SC59

We have previously had discussions with officers of the Council with regard to the redevelopment of the above for housing and we received a sympathetic response, with the site being with the settlement boundary.

Our clients who owns the land edged red in the attached plan have instructed Savills to market their site. As part of this process, we will be talking to housing developers and making them aware of our previous discussions with the Council regarding redevelopment of the whole site.

The purpose of me writing to you now is that we are aware you are preparing Part 2 of the Christchurch and East Dorset Local Plan, which includes site allocations and development management policies. In your deliberations we would encourage you to consider allocating this land for residential development, just as you have done with other industrial sites in Part 1 of the Plan.

Person ID	1097064
Full Name	Mr M Jackson
Organisation Details	
Agent ID	
Agent Name	
Agent Details	
Comment ID	LP2SC60
Details of the Comments	
Form submitted for residential development (30-50 units)	

Person ID	1097083
Full Name	Ms Alice Skinner
Organisation Details	
Agent ID	
Agent Name	
Agent Details	
Comment ID	LP2SC61

I am contacting you on behalf of my father Mr J Skinner with regards to his estate at Barthelemy and Co (The Pines).

The estate owned by my father is protected by Green Belt legislation which in turn severely restricts any residential development opportunities. As you will be aware the neighbouring Stapehill Abbey and its surrounding ground has recently been sold for building, despite also being protected by Green Belt legislation. As well as residential properties being place on the Abbey site I believe there are also speculative plans to use fields towards the back for recreational purposes.

The sale of the Abbey and its grounds has triggered our correspondence to yourselves; we wish to enquire as to the likelihood of the green belt restricting the sale of my father's estate for residential development being lifted.

I have consulted section 9 of the National Planning Policy Framework whereby it is stated that the Local Authority should regard the construction of new buildings inappropriate in green belt with certain exceptions. Considering the exception that limited infilling in villages and limited affordable housing for local community needs under policies set out in the Local Plan we propose that this could be a suitable site for future affordable community housing. While this is merely an initial enquiry my fathers standing on the matter is that the potential sale of the land for residential development is something he wishes to explore further. Please find attached a cop of the boundary lines of my fathers estate for your information.

Person ID	1096628	
Full Name	Ms Charlotte Johnston	
Organisation Details		
Agent ID		
Agent Name		
Agent Details		
Comment ID	LP2SC62	
Details of the Comments		
Form submitted for residential development (20 units)		

Person ID	1097112	
Full Name	Mr John Beauchamp	
Organisation Details	John Beauchamp & Co Ltd	
Agent ID		
Agent Name		
Agent Details		
Comment ID	LP2SC63	
Details of the Comments		
See attached letter and plan – propose residential use on the land submitted.		