



Core Strategy Submission

Consultation Response Analysis by Topic

ENVIRONMENT



Prepared by Christchurch Borough Council and
East Dorset District Council

May 2013

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1 Introduction

1.1 This document sets out a consolidated summary and analysis of the Core Strategy responses received in relation to the issue of Environment at Pre-Submission stage (Consultation period 2nd April to 25th June 2012) and at the Schedule of Proposed Changes stage (consultation period of 5th November - 21st December 2012.). The analysis relates to chapters 3 and 13.

1.2 The Councils have set out responses to the representations received at the Pre-submission stage which also include where changes have been made to the Core Strategy as a result of representations received. Where changes have not been made to the Core Strategy as a result of representations the reasons for this are explained.

1.3 In response to representations received to the Schedule of Proposed Changes to the Pre-Submission Core Strategy, the Councils have set out their position following this consultation stage. No changes have been made to the Core Strategy following this consultation stage for the purposes of the Submission Core Strategy.

2 Analysis of Responses

Pre-Submission Core Strategy

The Core Strategy Vision

The natural environment of Christchurch and East Dorset and their historic and thriving towns and villages are, and will continue to be, the most important assets for the area. This special environment will be used to sustain the growth of the local economy, and the welfare of its local communities, rather than being used as a reason to turn our back on growth which can be achieved sustainably.

The Dorset Heathlands, the Cranborne Chase and West Wiltshire Downs Area Of Outstanding Natural Beauty, Christchurch Harbour, the coast, beaches and rivers will be protected and enhanced for their intrinsic value and to ensure that recreation and commercial activity sustains these areas.

The area will adapt to the emerging demands of climate change through clear strategies to reduce risk of flooding, and through encouraging high standards of building design and construction.....

Consultation Response (Response figures to vision as a whole)

Legally Compliant		Sound		Core Strategy is unsound because it is not:								No Indication of legal compliance or soundness
				Positively Prepared		Justified		Effective		Consistent with National Policy		
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
12	6	6	28	16	11	13	18	16	14	13	14	21

Table 2.1

2.1 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
220620	Miss S Thorpe	Gleeson Developments Ltd	CSPS902
359277	Mr Jamie Sullivan	Tetlow King	CSPS2655
359461	Mrs Nicola Brunt	Dorset Wildlife Trust	CSPS1305
359478	Mr Rohan Torkildsen	English Heritage	CSPS2732
359529	Mrs Lisa Goodwin	Sixpenny Handley with Pentridge Parish Council	CSPS2467
359546	Mrs K. Bradbury	Vale of Allen Parish Council	CSPS391
360245	Mr Richard Burden	Cranborne Chase & West Wiltshire Downs AONB	CSPS1557
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS3216
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS3217
360949	Mr Stuart Goodwill	Barratt David Wilson Ltd	CSPS2706
510796	Mr Rollo Reid		CSPS2712
523531	Mr Tim Hoskinson	Savills	CSPS2109

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
524723	Mr John Worth	Wimborne Civic Society	CSPS1890
612430	Mr Nick Squirrel	Natural England, Dorset and Somerset Team	CSPS1909
653603	Mr Malcolm Edmund Parsons		CSPS573
653852	Mrs Susan Newman-Crane		CSPS716
654320	Mrs Meghann Downing	Highways Agency	CSPS747
654456	Mr Elliot Marx		CSPS957
654686	Mrs J E Francis		CSPS773
654688	Mr Paul Newman	Paul Newman Property Consultants Limited	CSPS826
654704	Mrs J E John		CSPS1047
655432	Mr Andy Davies		CSPS1017
655526	Mr Paul Morrison		CSPS1029
656228	Mr Adrian Dwyer		CSPS2466
656369	Mr Timothy Peter Cook	John Reid and Sons (Strucsteel) Ltd	CSPS2756
656493	Cllr Tony Gibb	Eastern Area DAPTC	CSPS1466
656567	Mr Michael D Chappell		CSPS2851
656650	Mrs Patricia Fear		CSPS2438
656664	Mr Glen Morrison		CSPS2452

Summary of Responses

- ***Nature Conservation and ecology***

- The vision expresses protection for the natural environment in a negative way, and that the emphasis should be on the intrinsic value of these natural assets.

- There should be mention of other priority habitats and species.
- The importance of connecting networks of habitats should be mentioned in the vision.

Councils' Response

2.2 In respect of nature conservation and ecology, the wording of the first paragraph of the Vision has been amended to indicate that the quality of the natural environment will be secured to sustain economic growth and community development, and hence word this element of the Vision in a more positive way. References to protection of habitats and landscapes will now refer to their intrinsic landscape and biodiversity value, and reference will be added to enhancing their connectivity.

Proposed Changes to the Pre-Submission Core Strategy

The Core Strategy Vision

The natural environment of Christchurch and East Dorset and their historic and thriving towns and villages are, and will continue to be, the most important assets for the area. The **quality of this ~~is~~** special environment will be **used secured to sustaining** the growth of the local economy, and the welfare of its local communities, rather than being used as a reason to turn our back on growth which can be achieved sustainably.

The **intrinsic landscape and biodiversity value of the** Dorset Heathlands, the Cranborne Chase and West Wiltshire Downs Area Of Outstanding Natural Beauty, Christchurch Harbour, the coast, beaches and rivers will be protected **and their connectivity enhanced. Improving our special environment and its green infrastructure or their intrinsic value and to will** ensure that recreation and commercial activity sustains these areas.....

Consultation Response (Response figures to vision as a whole)

Legally Compliant		Sound		Core Strategy is unsound because it is not:				No Indication of legal compliance or soundness
				Positively Prepared	Justified	Effective	Consistent with National Policy	
Yes	No	Yes	No					
14	25	2	39	33	37	36	35	6

Table 2.2

2.3 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Organisation Details	Comment ID
359461	Mrs Nicola Brunt	Urban & East Dorset Living Landscapes Manager Dorset Wildlife Trust	PCCS309
359571	Mr Renny Henderson	Conservation Officer Royal Society for the Protection of Birds	PCCS245
360302	Mrs Hilary Chittenden	Chairperson Environment TAG (East Dorset)	PCCS440
476036	Mr Colin Jamieson		PCCS160
490815	Mrs Trish Jamieson	Clerk Burton Parish Council	PCCS477
612430	Mr Nick Squirrell	Natural England, Dorset and Somerset Team	PCCS256
653852	Mrs Susan Newman-Crane		PCCS98
654046	Mr David Pardy		PCCS139
654456	Mr Elliot Marx		PCCS223
654660	Ms Anne Mason	chair Transition Town Christchurch	PCCS166
654962	Mr Christopher Chope		PCCS374

Contact Person ID	Contact Full Name	Contact Organisation Details	Comment ID
656832	Mr Paul Ramsey		PCCS283
662364	Mr Peter Fenning		PCCS317
662364	Mr Peter Fenning		PCCS281
662668	Mr & Mrs A Atkins		PCCS169
663076	Mrs Sheila Richards		PCCS123
691333	Mr B.F Sherry		PCCS314
718880	Mr Stephen Robson		PCCS222
718913	Mr Denis Daly		PCCS181
719393	Mrs Kathleen Roberts		PCCS287
719400	Terry Tuck		PCCS290
719401	Mrs Maureen Fisher		PCCS291
719409	Jacquetta Morris		PCCS292
719411	Mrs Jane Low		PCCS293
719418	S Rogers		PCCS296
719435	Mr Peter Smith		PCCS301
719463	Mrs B Mullins		PCCS305
719475	Mrs Eileen Ward		PCCS306
719483	Mr James Cain	Planning Consultant Coles Miller Solicitors	PCCS312
719484	Peter Mark Fisher		PCCS310
719490	Mrs Eileen Gay		PCCS311
719499	Mr Nigel Morris		PCCS313

Contact Person ID	Contact Full Name	Contact Organisation Details	Comment ID
719516	Liz Evans		PCCS325
719520	Mrs Georgina Sherry		PCCS328
719569	Mr Rob Evans		PCCS339
719572	Mr Paul Roberts		PCCS346
719575	Mrs Emily Graves		PCCS352
719579	Mrs Rosemary Hacker		PCCS353
719597	Mr Gerald Hacker		PCCS357
719606	Mrs Karen Pigott		PCCS360
719610	Ms Jane Susan Fitzpatrick		PCCS361
720046	Mrs Stephanie King		PCCS421
720136	Mr Roger Theodore Crispin Street		PCCS426

Summary of Responses

2.4 The RSPB, Dorset Wildlife Trust and others commented that, even with amendments proposed, the wording in respect of the natural environment still linked protecting the natural environment with enabling growth. They suggested that the vision should state that environment should be protected for its own sake.

2.5 Natural England suggest reference to rivers and priority habitats and species.

Councils' Position

2.6 The Vision now refers to protecting and enhancing the intrinsic landscape and biodiversity value of the natural environment. However it remains important to make the link between the quality of the natural and built environment, and the benefits this has on economic growth.

The Objectives

Pre-Submission Core Strategy

Objective 1

To manage and safeguard the natural environment of Christchurch and East Dorset.

The **Green Belt** will be retained and protected, except for strategic release of land to provide new housing, and for employment development in East Dorset and at Bournemouth Airport. Impact **on designated sites** will be avoided, and residential development will contribute to mitigation of development on Heathland habitats. New **greenspace** will be provided as part of major housing proposals. Important **natural features** such as Christchurch Harbour, the coast, rivers and beaches and the Wiltshire Downs and Cranborne Chase Area of Outstanding Natural Beauty will be protected and enhanced.

Consultation Response

Legally Compliant		Sound		Core Strategy is unsound because it is not:								No Indication of legal compliance or soundness
				Positively Prepared		Justified		Effective		Consistent with National Policy		
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
2	6	3	10	5	3	6	4	8	3	5	3	4

Table 2.3

2.7 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
359461	Mrs Nicola Brunt	Dorset Wildlife Trust	CSPS1307
359529	Mrs Lisa Goodwin	Sixpenny Handley with Pentridge Parish Council	CSPS2408
359571	Mr Renny Henderson	Royal Society for the Protection of Birds	CSPS3705

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
360245	Mr Richard Burden	Cranborne Chase & West Wiltshire Downs AONB	CSPS1559
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS3218
490815	Mrs Trish Jamieson	Burton Parish Council	CSPS3610
523319	Mr Ryan Johnson	Turley Associates	CSPS3291
523319	Mr Ryan Johnson	Turley Associates	CSPS3771
523531	Mr Tim Hoskinson	Savills	CSPS2111
523531	Mr Tim Hoskinson	Savills	CSPS3182
612430	Mr Nick Squirrell	Natural England, Dorset and Somerset Team	CSPS2062
650714	Mr Norman Bethell		CSPS896
652710	Mr Gary Balmer		CSPS468
652994	Mrs Kathleen Leader		CSPS538
653852	Mrs Susan Newman-Crane		CSPS644
654026	Ms Bev Miller		CSPS604
654822	Mrs Marion Crumpler		CSPS837
654823	Mr Joe Burke		CSPS830

Summary of Responses

- **Protection of the Green Belt**

- Green Belt around the north east Verwood site should be protected as it separates Verwood from Hampshire. The Objective does not make sense as it refers to protecting the Green Belt except where development is needed.

Nature Conservation

- The Objective should make it clear that residential development should mitigate the impact of development near (not just on) Heathland. New greenspace should be provided generally and not just in relation to major housing proposals. The objective should aim to protect all priority habitats and species.

New policies for the Area of Outstanding Natural Beauty.

- The NPPF suggests that local plans should provide detailed policies for areas such as AONBs. The Core Strategy should include such policies, especially those previously contained in the Regional Spatial Strategy.

Representations on policy for rural areas.

- These generic representations considered that there was a lack of vision for the rural areas and that the impact of housing and in-migration of urban dwellers was changing the character and community in rural areas.

Councils' Response

2.8 The wording on Green Belt is felt to be quite clear. The presumption will be to protect it, other than the strategic release as set out elsewhere in the Core Strategy. No change to wording is proposed on this issue.

2.9 It is accepted that the Objective should refer to avoiding impacts "close to designated sites" to reflect the principles of the Heathland Interim Planning Framework, and an amendment is proposed to the second sentence. The third sentence has also been amended to indicate that new housing proposals should provide new greenspace and biodiversity enhancements, to reflect representations from Natural England and Dorset Wildlife Trust.

2.10 The Objective already refers to protecting and enhancing the AONB. The provision of detailed policies for development in this area will be considered in the Development Management Policies Development Plan Document. Wording on the AONB is considered adequate in the Objective.

2.11 The representations on policy for rural areas do not make a specific request for amendment of this Objective. Protection of environment and landscape will remain important to any strategy for the rural areas, and as such no amendment is proposed to this objective in response to these representations.

Proposed Changes to the Pre-Submission Core Strategy

Objective 1

To manage and safeguard the natural environment of Christchurch and East Dorset.

The **Green Belt** will be retained and protected, except for strategic release of land to provide new housing, and for employment development in East Dorset and at Bournemouth Airport. Impact **close to or on designated sites** will be avoided, and residential development will contribute to mitigation of development on Heathland habitats. New **greenspace and biodiversity enhancements** will be provided as part of major housing proposals. Important **natural features** such as Christchurch Harbour, the coast, rivers and beaches and the Wiltshire Downs and Cranborne Chase Area of Outstanding Natural Beauty will be protected and enhanced.

Consultation Response

Legally Compliant		Sound		Core Strategy is unsound because it is not:				No Indication of legal compliance or soundness
				Positively Prepared	Justified	Effective	Consistent with National Policy	
Yes	No	Yes	No					
3	4	1	7	7	8	8	8	0

Table 2.4

2.12 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Organisation Details	Comment ID
359461	Mrs Nicola Brunt	Urban & East Dorset Living Landscapes Manager Dorset Wildlife Trust	PCCS315
359571	Mr Renny Henderson	Conservation Officer Royal Society for the Protection of Birds	PCCS243
360302	Mrs Hilary Chittenden	Chairperson Environment TAG (East Dorset)	PCCS441

Contact Person ID	Contact Full Name	Contact Organisation Details	Comment ID
612430	Mr Nick Squirrell	Natural England, Dorset and Somerset Team	PCCS262
653852	Mrs Susan Newman-Crane		PCCS423
654962	Mr Christopher Chope		PCCS375
656626	Mr Michael Madgwick	Rural Surveyor The National Trust	PCCS97
719394	Ms Jade Ellis	Assistant Planner Turley Associates	PCCS288

Summary of Responses

2.13 The RSPB, Dorset Wildlife Trust and others commented that, even with amendments proposed, the wording in respect of the natural environment still linked protecting the natural environment with enabling growth. They suggested that the vision should state that environment should be protected for its own sake.

2.14 Natural England suggest reference to rivers and priority habitats and species.

Councils' Position

2.15 The Vision now refers to protecting and enhancing the intrinsic landscape and biodiversity value of the natural environment. However it remains important to make the link between the quality of the natural and built environment, and the benefits this has on economic growth.

Pre-Submission Core Strategy

Objective 3

To adapt to the challenges of climate change.

The impact of **carbon emissions from transport** will be reduced by more sustainable patterns of development in accessible locations, and by encouraging travel by bike, on foot, or by public transport. Developments will be expected to incorporate **carbon reduction, water and energy efficiency measures** as part of measures to reduce impact on climate change. At least 15% of total energy used on developments of 10 or more dwellings or 1,000m² of non-residential floorspace will come from decentralised, renewable or low carbon sources. Development will be located in areas at lowest **risk of flooding**. A Supplementary Planning Document for Flood Risk will be produced on how the sequential and exception tests will apply locally.

Consultation Response

Legally Compliant		Sound		Core Strategy is unsound because it is not:								No Indication of legal compliance or soundness
				Positively Prepared		Justified		Effective		Consistent with National Policy		
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
1	1	0	4	1	1	1	1	2	1	0	3	2

Table 2.5

2.16 List of Consultee Reference Numbers

Summary of Responses

2.17 The comments from key stakeholders and the general public in respect of this Objective have been grouped together into various themes and are as follows:

2.18 North Eastern Verwood new neighbourhood.

- Objections that consider that this location for development is poorly served by public transport and lacks any facilities and services and thus will create the need for people to drive to access any services.

2.19 Nature conservation.

- The objective should make reference to the benefits of ecosystem services in supporting habitats and species. The objective should also include reference to carbon sequestration, reducing greenhouse gas emissions, and improving water and energy efficiency.

Councils' Response

- The site at North East Verwood has been selected as a sustainable location for a relatively small amount of new housing, and is in reasonable proximity to services, facilities and employment opportunities.
- A reference to important ecosystem services is proposed in response to representations from Natural England and the Dorset Wildlife trust. Wording on carbon reduction and greenhouse gas emissions is considered adequate.

Proposed Changes to the Pre-Submission Core Strategy

Objective 3

To adapt to the challenges of climate change.

The impact of **carbon emissions from transport** will be reduced by more sustainable patterns of development in accessible locations, and by encouraging travel by bike, on foot, or by public transport. Developments will be expected to incorporate **carbon reduction, water and energy efficiency measures** as part of measures to reduce impact on climate change **and support important ecosystem services**. At least **105%** of total energy used on developments of 10 or more dwellings or 1,000m² of non-residential floorspace will come from decentralised, renewable or low carbon sources. Development will be located in areas at lowest **risk of flooding**. A Supplementary Planning Document for Flood Risk will be produced on how the sequential and exception tests will apply locally.

Consultation Response

Legally Compliant		Sound		Core Strategy is unsound because it is not:				No Indication of legal compliance or soundness
				Positively Prepared	Justified	Effective	Consistent with National Policy	
Yes	No	Yes	No					
3	0	1	5	3	3	4	6	0

Table 2.6

2.20 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Organisation Details	Comment ID
359461	Mrs Nicola Brunt	Urban & East Dorset Living Landscapes Manager Dorset Wildlife Trust	PCCS316
359571	Mr Renny Henderson	Conservation Officer Royal Society for the Protection of Birds	PCCS226

Contact Person ID	Contact Full Name	Contact Organisation Details	Comment ID
360302	Mrs Hilary Chittenden	Chairperson Environment TAG (East Dorset)	PCCS442
612430	Mr Nick Squirrel	Natural England, Dorset and Somerset Team	PCCS263
654817	Mr Alan Spencer		PCCS132
717890	Angela Pooley	Co-ordinator Eastdorset Friends of the Earth	PCCS121

Summary of Responses

2.21 The comments from key stakeholders and the general public in respect of this Proposed Change have been grouped together into various themes and are as follows:

2.22 Friends of the Earth and others raise concern at the decision to reduce the requirement for renewable energy provision in new developments from 15% to 10%, and state that this fails to demonstrate a commitment to carbon reduction and does not reflect the Bournemouth, Dorset and Poole Renewable Energy Strategy.

2.23 There is support for the reference to important ecosystem services, but additional references are sought relating to carbon sequestration, heathland and grassland management, watershed protection and other matters.

Councils' Position

2.24 The decision to reduce the target for energy from renewables has been based on the need to maintain viability of new development. Whilst the Renewable Energy Strategy maintains an overall target of 15% of energy to come from renewable sources in Dorset, the target for local sources is 7.5%.

2.25 In terms of additional references, the text on ecosystem services is considered adequate and the additional text suggested is considered too detailed for this objective.

Chapter 13, Managing the Natural Environment

Pre-Submission Core Strategy

Policy ME 1

Safeguarding biodiversity and geodiversity

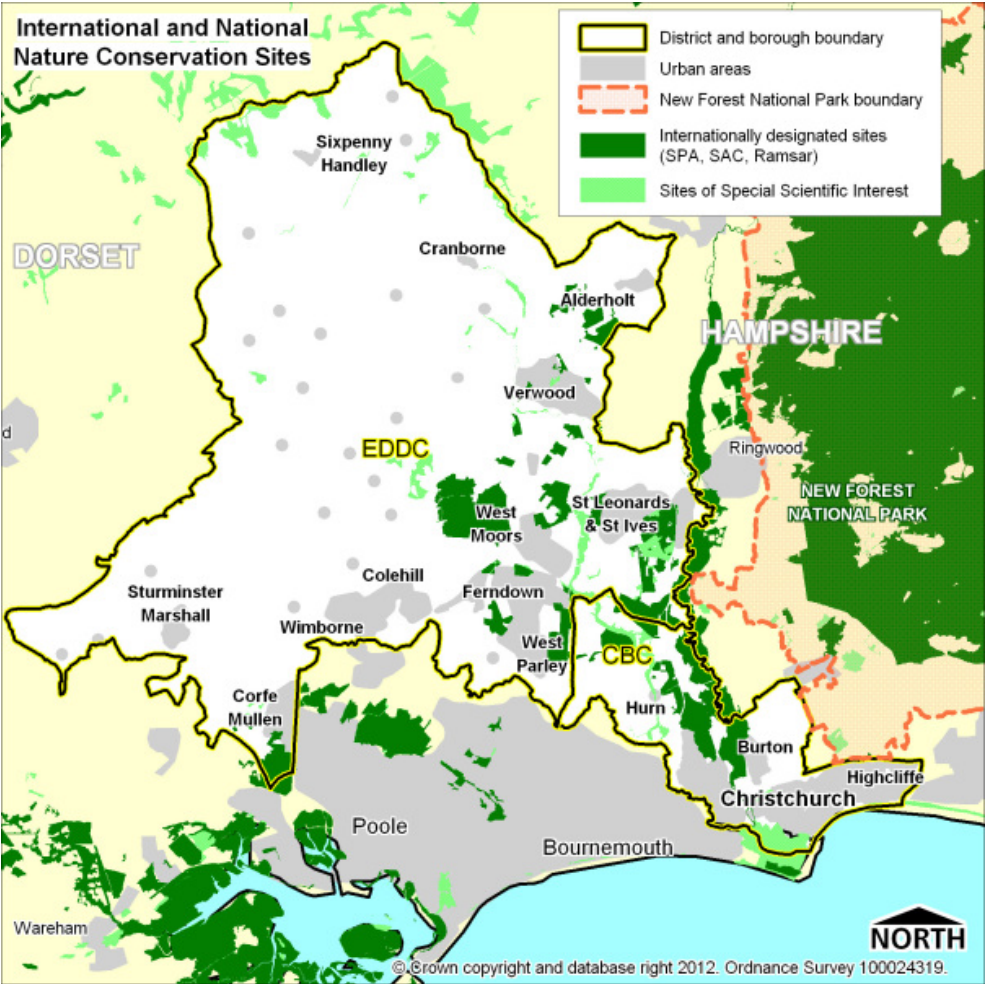
The Core Strategy aims to protect, maintain and enhance the condition of all types of nature conservation sites, habitats and species including:

- Internationally designated sites (SPA, SAC, Ramsar)
- Sites of Special Scientific Interest (SSSI)
- Strategic Nature Areas.
- Sites of Nature Conservation Interest (SNCI)
- Local Nature Reserves.
- Identified priority species and habitats.
- Important geological and geomorphological sites.
- Suitable Alternative Natural Greenspace.

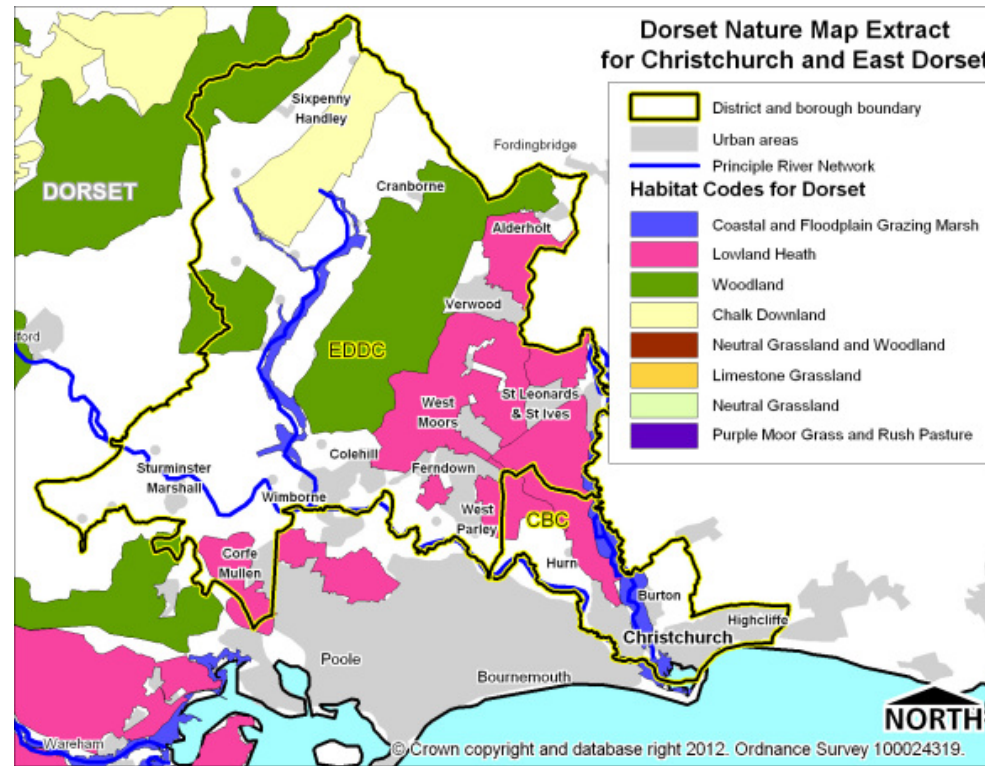
Where development is considered likely to impact upon particular sites, habitats or species as set out within the Dorset Biodiversity Protocol, it will need to be demonstrated that the development will not result in adverse impacts. To determine the likelihood of harm occurring, there should be an assessment of effects on any existing habitats, species and/or features of nature conservation importance, and the results of this assessment documented. The method of survey and level of detail will vary according to the size and type of development and whether any priority species and habitats exist on site. The survey should involve consultation and advice from Natural England, the Dorset Wildlife Trust, and Dorset County Council. Based on this assessment, the following criteria should be addressed when development is proposed:

- Avoidance of existing sensitive habitats and species through careful site selection, development design and phasing of construction and the use of good practice construction techniques.
- Retention of existing habitats and features of interest, and provision of buffer zones around any sensitive areas.
- Enhancement of biodiversity where possible through improving the condition of existing habitats or creation of new ones. Particular attention should be paid to priority habitats referred to in the Dorset Biodiversity Strategy, and the Strategic Nature Areas identified on the Dorset Nature Map.
- Where harm is identified as likely to result, provision of measures to adequately avoid or mitigate that harm should be set out. Development may be refused if adequate mitigation cannot be provided.
- Provision of adequate management of the retained and new features.
- Monitoring of habitats and species for a suitable period of time after completion of the development to indicate any changes in habitat quality or species numbers, and put in place corrective measures to halt or reverse any decline.

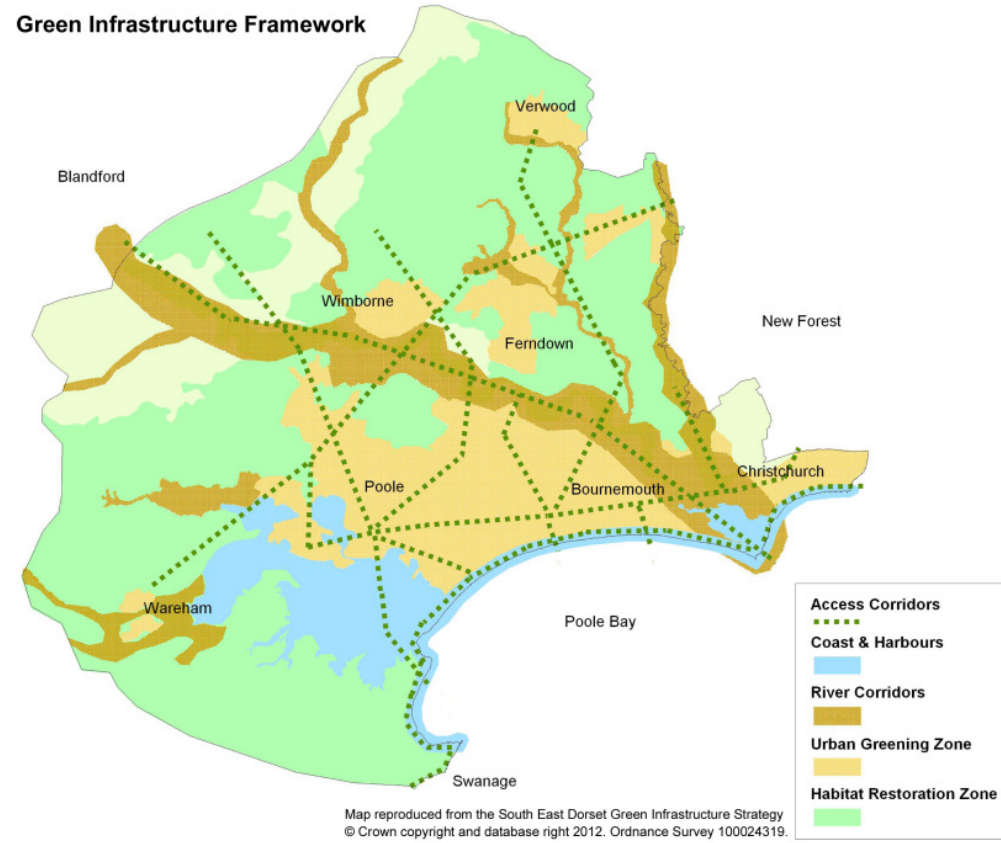
In addition, and in recognition of the function of the New Forest National Park, the Core Strategy will carefully consider any adverse impacts on the New Forest as a result of development.



Map 13.1 International and National Nature Conservation sites in Christchurch and East Dorset



Map 13.2 Dorset Nature Map extract for Christchurch and East Dorset



Map 13.3 South East Dorset Green Infrastructure Framework

Consultation Response

Legally Compliant		Sound		Core Strategy is unsound because it is not:								No Indication of legal compliance or soundness
				Positively Prepared		Justified		Effective		Consistent with National Policy		
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
6	3	4	7	3	2	4	1	4	1	7	9	8

Table 2.7

2.26 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
359261	Mr Doug Cramond	DC Planning Ltd	CSPS2095
359461	Mrs Nicola Brunt	Dorset Wildlife Trust	CSPS1502
359483	Ms Ellie Challans	Environment Agency	CSPS3934
359571	Mr Renny Henderson	Royal Society for the Protection of Birds	CSPS3752
360082	Mr and Mrs K Healy		CSPS2503
360271	Cllr Paul Timberlake		CSPS488
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS3339
361028	Ms Helen Patton	New Forest National Park Authority	CSPS3789
474462	Mrs Sheila Bourton		CSPS187
474490	Mrs Sheila Bourton	Keep Wimborne Green	CSPS217
521508	Ms Lisa Jackson	Jackson Planning Ltd	CSPS3649
524723	Mr John Worth	Wimborne Civic Society	CSPS1931

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
549174	Mr Justin Milward	Woodland Trust	CSPS799
612430	Mr Nick Squirrell	Natural England, Dorset and Somerset Team	CSPS2069
652710	Mr Gary Balmer		CSPS478
652994	Mrs Kathleen Leader		CSPS547
663588	Mr Roger Street	Christchurch Conservation Trust	CSPS3747

Summary of Responses

- **Environment**

- **Cranborne Chase and West Wiltshire Downs AONB** - We note that Chapter 13 focuses entirely and in some considerable detail on wildlife matters. Whilst we support the attention given to wildlife we note that many of the sites are not nationally designated. The AONB advises that concentrating on just these limited aspects of landscape, rather than the more holistic concept in the standard landscape character assessment guidance works and the AONB Management Plan, un-balances the Core Strategy
- **RSPB** – we would recommend this chapter be titled ‘managing and enhancing the natural environment’ which would better demonstrate the Councils’ environmental commitments made in the Core Vision and strategic objective 1. We support paragraph 13.7. We also support para 13.8 which recognises and supports the role of Suitable Alternative Natural Greenspaces (SANGs) in larger developments as appropriate. We would also suggest the addition of the Dorset Heathlands Interim Planning Framework Supplementary Planning Document and forthcoming Development Plan Document within the ‘Relevant Evidence’ section on page 152. The RSPB support policy ME1, and wish to be included in the ‘monitoring group’ which will consider the delivery of the policy.
- **Transition Town Christchurch** – Para 13.1. This omits the important function of the natural environment in stabilising climate, acting as a carbon store, providing pollinators, cycling water and other natural services upon which human and economic life is dependent. Add to ‘Relevant Evidence’ section the DEFRA Biodiversity Offsetting guidance.
- We welcome the recognition of the areas’ special and rare natural environment, and the need to protect it, particularly with respect to the Dorset Heathlands.
- **ETAG** – Paragraph 13.7 fails to recognise the requirement for the Core Strategy to include all three strands of sustainability (social, economic and environmental) and to be proactive in protecting and enhancing the natural, built and historic environment (NPPF para 7-9). Paragraph 13.8 – where impacts are unavoidable, mitigation should be put in place to minimise the harm caused. There should be an overall net increase in biodiversity (NPPF para 9 and 109). Policy ME1 is not compliant with the NPPF in terms of biodiversity gain. The document should add to biodiversity not simply minimise impact: opportunities for increasing biodiversity should be realised. It should be amended to comply with paras 109,113,114, and 117 of the NPPF. ETAG supports the changes proposed by Dorset Wildlife Trust.

- **Keep Wimborne Green** – We note that habitats and species are to be monitored after completion of development, but wonder what can be done if there are found to be adverse affects. Once houses are built, there is no going back – the land cannot be returned to its natural state.
- **Cllr P Timberlake** – considers that the first sentence of policy ME1 needs to be re-worded in order to protect the natural environment, in particular areas with special designations.
- **Woodland Trust** – We would like to see Policy ME1 contain an additional 9th bullet point to make it clear that national policy (para 118 of the NPPF) is being followed with ancient woodland to be protected, maintained and enhanced. East Dorset has a high proportion of ancient woodland compared to the national average (4.76% compared to 2.40%) and it is vital that the Council does all it can to protect this above average resource.
- **Wimborne Civic Society** – We feel that these two policies should provide adequate safeguards for heritage protection and historic buildings.
- **Natural England** – Natural England have raised a number of considerations, however we consider that the incorporation of modifications may best be achieved through discussion with the local planning authorities. The proposed text modifications made by the Dorset Wildlife Trust are supported by Natural England.
- **New Forest National Park Authority** – It is a statutory duty to have regard to the statutory National Park purposes. The Core Strategy should be amended to include a clear, succinct reference to the Section 62(2) of the Environment Act 1995 duty to have regard to the two statutory park purposes to: conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park; and to promote opportunities for the public understanding and enjoyment of the special qualities of the National Park in making decisions that could affect the National Park. This is an important material planning consideration in considering proposals in Christchurch and East Dorset. Other Core Strategies prepared locally have included reference to the duty and in some instances (for example Core Policy 15 of the South Wiltshire Core Strategy adopted Feb 2012) have included a specific policy which only permits development where it does not have a negative impact on the National Park purposes.

Biodiversity

- Please include a reference to ecosystem services in paragraph 13.7. A simple explanation could make reference to the importance of ecosystem services to both humans and flora and fauna in protecting the ability of the ecosystem to regulate healthy soils, clean air and water.
- **Dorset Wildlife Trust** – supports the inclusion of policy safeguarding biodiversity and geodiversity but considers that this policy requires amendment to meet the requirements of the NPPF. Dorset Wildlife Trust provided a detailed list of policy changes required to comply with the NPPF as well as amendments to Map 13.2 Strategic Nature Areas.
- **Jackson Planning Ltd**, on behalf of clients – the impact and pressures of the Dorset Urban Heathlands are to be addressed in the forthcoming Heathland Development Plan Document, however, it must be for the Core Strategy to properly reflect this thinking in terms of SANGs, making use of less pressured green assets (the coast) and acknowledgement of current patterns of use. Both the coast and the New Forest have significant influence on the urban population of Christchurch and the Core Strategy should acknowledge this and plan for it spatially. The policy should reflect the Dorset Green Infrastructure Strategy. The green infrastructure network must be shown on the key diagram and be supported by narrative text. The policy must also address cross boundary issues in relation to mitigation for potential impact on the New Forest and the requirements for buffering from the urban population.

- **Environment Agency** – This policy implies that conservation and enhancement of biodiversity will only apply to species and habitats that have some kind of official designation attached to them. We would wish to encourage you to make it clear within the policy that all established natural habitats should be protected and enhanced. We would like to see reference to riverine and coastal habitats within this policy. The ‘blue’ corridors within East Dorset and Christchurch are a valuable asset and should be acknowledged as such, with a view to improving and extending them. Improved public access should be encouraged where feasible, which can improve health and welfare, and take pressure off the Dorset heaths. The European Water Framework Directive should be referred to within the policy. This is an important Directive as it specifies a certain level of improvement for rivers within a set time frame.
- **Christchurch Conservation Trust** – it is noted that the Christchurch Local Plan policy ENV15 has been incorporated into Policy ME1, however the policy now contains no mention of wildlife corridors. The Local Plan devotes nearly a page to this subject, which although described as non-designated sites are increasingly seen as vital to nature conservation.

Councils' Response

2.27 The policy together with those that cover landscape issues in chapter 14 of the Core Strategy are designed to complement each other to ensure all aspects of the landscape are appropriately managed and/or improved.

2.28 Based on the requirements of the NPPF and the responses received through the consultation including those from Dorset Wildlife Trust, Natural England and Environment Agency, greater clarity is required with:

- Reference to priority habitats and species
- Inclusion of reference to riverine and coastal habitats within the hierarchy of habitats in the first bullet point list.
- Greater emphasis on the overall net increase in biodiversity
- The role of Strategic Nature Areas and how they will be treated in the Core Strategy, including corresponding amendments to the accompanying map.
- The hierarchy of habitats and level of protection afforded commensurate with their status
- Further textual amendments in accordance with the NPPF

2.29 The policy will be amended to include reference to habitats and species referred to in Section 41 of the Nerc Act 2006, the Dorset Biodiversity Strategy. On this basis there is not a requirement to include an exhaustive list of habitats and species in the policy.

2.30 To support the revised wording of the policy in respect of all types of nature conservation sites functioning as an ecological network, it is proposed to add an additional map that shows the local designated sites of nature conservation.

2.31 The policy as currently worded considers the potential impacts on the New Forest National Park as a result of development.

Proposed Changes to the Pre-Submission Core Strategy

2.32 Add text to Paragraph 13.8

2.33 **Priority habitats and species are those species and habitats of principle importance included in the England Biodiversity List published by the Secretary of State under Section 41 of the Natural Environment and Rural Communities Act 2006.**

2.34 Paragraph 13.10

2.35 Protection of habitats and species will be undertaken through the Council's own work programmes, working with partners and the local community, and through implementing the initiatives and proposals within the Dorset Biodiversity Strategy, South East Dorset Green Infrastructure Strategy and the emerging Local Nature Partnerships and Nature Improvement Areas. This will also provide an approach that looks to create an expanded and more connected ecological network giving greater resilience to the natural environment against the pressures from climate change and development. **Strategic Nature Areas, identified on the Dorset Nature Map (Map 13.2), are a positive tool for coordinating activities that secure the retention and enhancement of features of interest as well as activities for the benefit of locally important species.**

Policy ME1 Safeguarding biodiversity and geodiversity

The Core Strategy aims to protect, maintain and enhance the condition of all types of nature conservation sites, habitats and species **within their ecological networks** including:

- Internationally designated sites (SPA, SAC, Ramsar)
- Sites of Special Scientific Interest (SSSI)
- **Strategic Nature Areas**
- Sites of Nature Conservation Interest (SNCI)
- Local Nature Reserves
- **Identified** Priority species and habitats
- Important geological and geomorphological sites
- **Riverine and coastal habitats**
- Suitable Alternative Natural Greenspace

Within Strategic Nature Areas identified on map 13.2, specific action will be taken towards meeting targets for the maintenance, restoration and recreation of priority habitats and species, and linking habitats to create more coherent ecological networks units that are resilient to climate change.

Where development is considered likely to impact upon particular sites, habitats or species as set out within the Dorset Biodiversity Protocol, it will need to be demonstrated that the development will not result in adverse impacts. To determine the likelihood of harm occurring, there should be an assessment of effects on any existing habitats, species and/or features of nature conservation importance, and the results of this assessment documented. The method of survey and level of detail will vary according to the size and type of development and whether any priority species and habitats exist on site. The survey should involve consultation and advice from Natural England, the Dorset Wildlife Trust, and Dorset County Council.

In considering the acceptability of proposals, the Council will assess their direct, indirect and cumulative impacts relative to the significance of the features' nature conservation value. National policy will be applied to ensure the level of protection afforded international, national and locally designated sites and species is commensurate with their status.

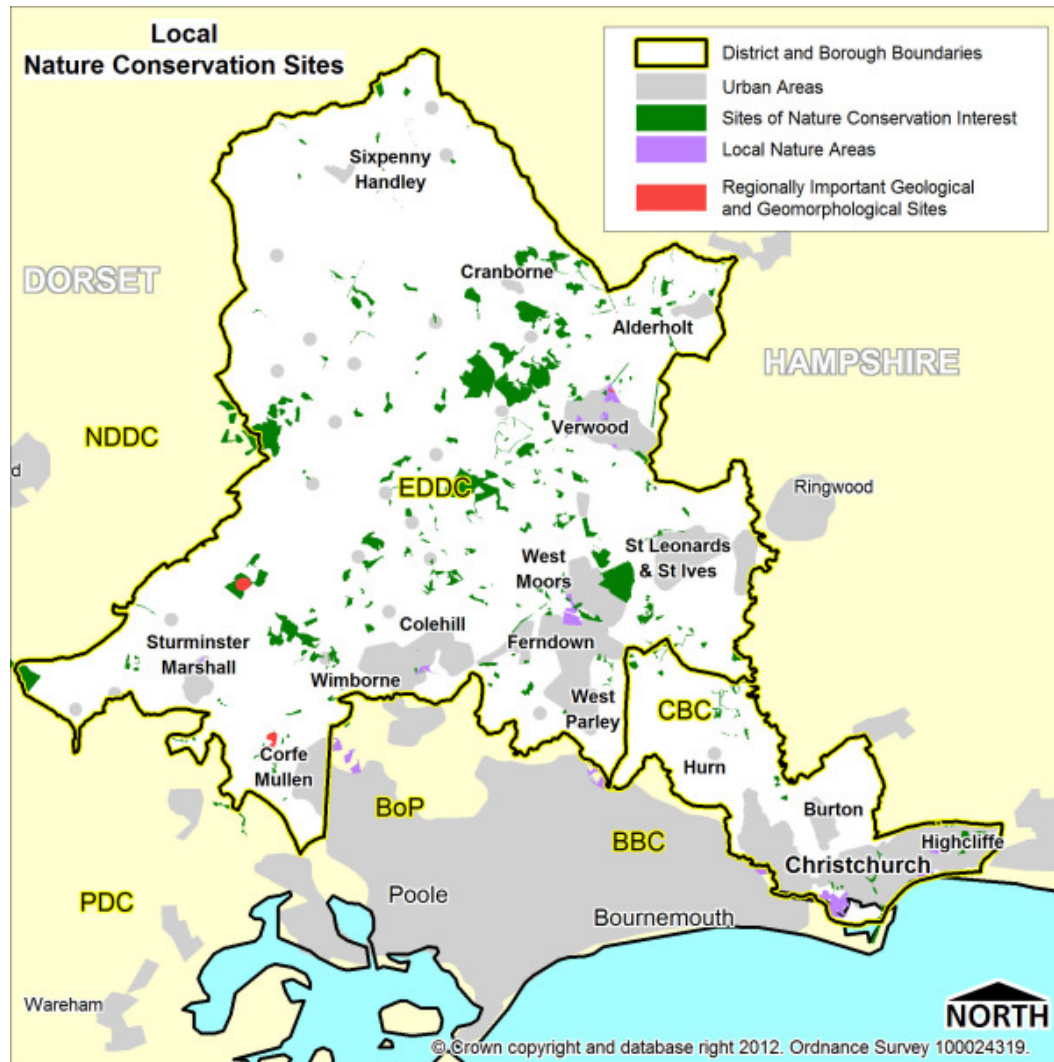
Based on this assessment, The following criteria should be addressed when development is proposed:

- Avoidance of **harm to** existing **priority sensitive** habitats and species through careful site selection, development design and phasing of construction and the use of good practice construction techniques.
- Retention of existing habitats and features of interest, and provision of buffer zones around any sensitive areas.

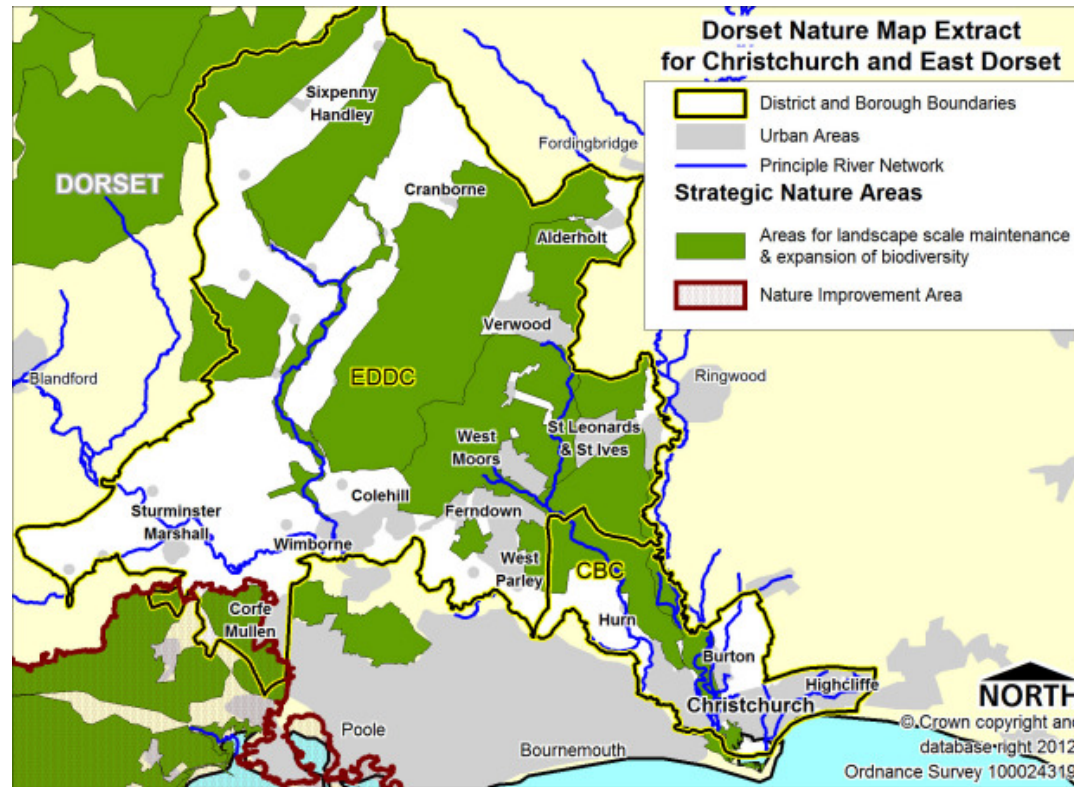
Enhancement of biodiversity **where possible** through improving the condition of existing habitats **and achieving or net gains in biodiversity, where possible creation of new ones.** Particular attention should be paid to priority habitats **and species** referred to in **Section 41 of the NERC Act 2006 and** the Dorset Biodiversity Strategy, and the Strategic Nature Areas identified on the Dorset Nature Map.

- Where harm is identified as likely to result, provision of measures to adequately avoid or **adequately** mitigate that harm should be set out. Development may be refused if adequate mitigation **or, as a last resort compensation cannot be** provided.
- Provision of adequate management of the retained and new features.
- Monitoring of habitats and species for a suitable period of time after completion of the development to indicate any changes in habitat quality or species numbers, and put in place corrective measures to halt or reverse any decline.

In addition, and in recognition of the function of the New Forest National Park, the Core Strategy will carefully consider any adverse impacts on the New Forest as a result of development.



Map 13.5 Local Nature Conservation Sites in Christchurch and East Dorset (PROPOSED CHANGE)



Map 13.2 Dorset Nature Map extract for Christchurch and East Dorset (PROPOSED CHANGE)

Consultation Response

Legally Compliant		Sound		Core Strategy is unsound because it is not:				No Indication of legal compliance or soundness
				Positively Prepared	Justified	Effective	Consistent with National Policy	
Yes	No	Yes	No					
4	1	3	5	2	2	4	3	0

Table 2.8

2.36 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Organisation Details	Comment ID
359461	Mrs Nicola Brunt	Urban & East Dorset Living Landscapes Manager Dorset Wildlife Trust	PCCS345
359461	Mrs Nicola Brunt	Urban & East Dorset Living Landscapes Manager Dorset Wildlife Trust	PCCS343
359571	Mr Renny Henderson	Conservation Officer Royal Society for the Protection of Birds	PCCS244
360302	Mrs Hilary Chittenden	Chairperson Environment TAG (East Dorset)	PCCS457
360302	Mrs Hilary Chittenden	Chairperson Environment TAG (East Dorset)	PCCS458
549174	Mr Justin Milward	Regional & Local Government Officer Woodland Trust	PCCS130
612430	Mr Nick Squirrell	Natural England, Dorset and Somerset Team	PCCS266
654817	Mr Alan Spencer		PCCS135
717053	Mrs Janet Healy		PCCS87

Summary of Responses

- **Avoidance of Harm to Existing Habitats and conformity with the NPPF**

Ms Nicola Brunt, Dorset Wildlife Trust

- Dorset Wildlife Trust strongly supports all the amendments to this policy except the following paragraph amendments to ME1; Dorset Wildlife Trust does not consider that the following paragraph reflects guidance in NPPF (118).

“Where harm is identified as likely to result, provision of measures to adequately avoid or adequately mitigate that harm should be set out. Development may be refused if adequate mitigation or, as a last resort compensation cannot be provided.”

NPPF (118) states

- If significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused. We consider that there is no need for the word ‘adequately’ in front of ‘avoid’ as either harm will be avoided, or it won’t. Also a comma is required after ‘resort’. We also strongly consider that development ‘may’ be refused here weakens ME1, is vague and does not reflect the ‘should’ be refused in NPPF 118. It does not give us confidence that this policy will be applied.

We consider the supported amendments more accurately reflect the types of nature conservation sites, habitats and species which the Core Strategy aims to protect, maintain and enhance within their ecological networks. We also support the changes to the first two amended criteria that should be addressed when development is proposed as these increase clarity and seek biodiversity gains in line with NPPF.

The inclusion of a map of local nature conservation sites is supported and welcomed. Dorset Wildlife Trust have the following comments on this map: The purple shaded sites are 'Local Nature Reserves' (not areas). We suggest to avoid later confusion that the title is changed to state the date the map was produced and clarify that it is updated annually by Dorset Environmental Records Centre so that as new sites are identified or existing sites deleted this is the information against which planning applications are assessed. Reference to the map is required within Policy ME1.

Dorset Wildlife Trust supports the amendment to map 13.2 which reflects our comments made on the Pre-Submission Core Strategy.

2.37 Mr Nick Squirrel, Natural England

- Natural England supports the modification made to this policy. A minor modification is proposed to one bullet point relating to the assessment criteria:

...Where harm is identified as likely to result, provision of measures to adequately avoid or adequately mitigate the harm should be set out. Development WILL be refused if adequate mitigation or, as a last resort compensation cannot be provided.

This approach is consistent with the NPPF which seeks to move from a net loss of biodiversity to achieving net gains. Natural England supports modifications proposed by Dorset Wildlife Trust.

Mr Renny Henderson, RSPB

- Generally support the amendments made to this policy. However, the amendments in our view are not consistent with paragraph 118 of the NPPF.

2.38 Mrs Hilary Chittenden, Environment TAG

- While welcoming and supporting most of the changes that have been made to this policy there are several issues that have still not been addressed/understood making it unsound as it stands. These exceptions to our support are as follows:
 - i) Under the heading of “criteria to be addressed when development is proposed”
 - Bullet Point 3. The text shows an incorrect change from “adequately avoid or mitigate” to “adequately avoid or adequately mitigate” – the first “adequately” should be deleted for this to make sense. Previous responses by ETAG and DWT made it clear what was needed.
 - Bullet Point 3. There is a world of difference between “Development may be refused” and “Development will be refused”. To ensure certainty we advise the change to “will be refused” is essential.

2.39 The Policy in relation to Ancient Woodland

2.40 Mr Justin Milward, Regional & Local Government Officer, Woodland Trust

- ME1 – Safeguarding biodiversity and geodiversity (p.153)
- We are objecting to the proposed new bullet point text under the paragraph heading ‘The following criteria should be addressed when adequately avoid or mitigate that harm development is proposed’: ‘...net gains in biodiversity, where possible...’ (2nd bullet point).

- 'Net biodiversity gain' is not applicable to ancient woodland. It is not possible to minimise the impact of new development on irreplaceable semi natural habitats like ancient woodland or ancient trees. In terms of compensatory measures, it is impossible to replace ancient woodland in Christchurch and East Dorset as this habitat has evolved over centuries and it is not possible to replicate hundreds of years of ecological evolution by planting a new site or attempting to translocation. This does not conform to current national policy.
- Whilst the Dorset Biodiversity Strategy seeks to 'conserve' ancient woodland, this is not as strong as promoting absolute protection. Government policy is increasingly supportive of absolute protection of ancient woodland and ancient trees. The new National Policy Planning Framework clearly states: "...planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss " (DCLG, March 2012, para 118). This NPPF wording should be considered in conjunction with other national policy on ancient woodland.

Responsibility for Ecological Surveys

Mrs Janet Healey, CPRE

- The wording is fine and the intention to protect both biodiversity and geodiversity is implicit in the text. However, the failing is in the final stages when planning permission is applied for. It is the developer who submits the ecological survey. This of course presents a conflict of interest as the ecologist is paid by the developer. All too often surveys are carried out only once and at the wrong time of year so a true picture is not presented.

Mr Alan Spencer, Local Resident

- Even before development proposals were considered for this Core Strategy the Council should have requested ecological, environmental and bio diverse surveys to be undertaken, made them public and had them examined by its advisors, so that any issues could have been highlighted, and alternative sites been offered in the this phase of the process.

2.41 Strategic Nature Areas

2.42 Ms Nicola Brunt, Dorset Wildlife Trust

- We welcome the additional text on Strategic Nature Areas and the additional paragraph relating to the level of protection afforded to sites of different status and the assessment of impacts relative to a features' nature conservation value. We consider this brings this policy in line with NPPF.

2.43 Nature Maps

2.44 Mrs Hilary Chittenden, Environment TAG

- There is no reference in the text to map 13.5 or any date. It is essential to make clear that the map is a snapshot in time (with date) and that local nature conservation, geological and geomorphological designations are likely to be updated and change during lifetime of Local Plan. We suggest that a reference to the map is inserted after the reference to the Dorset Nature Map on p92 of the Schedule of Proposed Changes.

Councils' Position

2.45 *Avoidance of Harm to Existing Habitats and conformity with the NPPF*

2.46 The comments made by stakeholders have been noted. However, the way that the policy is written the criteria relates to the whole hierarchy of habitats and so it cannot be stated categorically that permission will be refused in all circumstances.

2.47 *The Policy in relation to Ancient Woodland*

2.48 Whilst the detailed comments relating to ancient woodland and veteran trees are noted, it is considered these are adequately protected by extensive national legislation, including the NPPF, paragraph 118.

2.49 *Responsibility for Ecological Surveys*

2.50 Natural England advise on the level of information they wish to be submitted to support the proposed development scheme. A Stage 1 Habitat Survey is undertaken as an initial basic requirement. A number of developers undertake, as a matter of course, an Environmental Impact Assessment (EIA) Regulation Screening Option, to assess environmental concerns. Natural England are closely involved in this work, and we look to them for guidance on these matters.

2.51 *Strategic Nature Areas*

2.52 The support is noted.

Pre-Submission Core Strategy

Policy ME 2

Protection of the Dorset Heathlands

In accordance with the advice from Natural England, no residential development will be permitted within 400m of protected heathland.

Any residential development within 400m and 5km of these areas will provide mitigation through a range of measures as set out in the Dorset Heathlands Joint Development Plan Document, including:

- Provision of on-site alternative natural greenspace. (also see Policy ME3 below).
- Contributions to off-site greenspace or recreation projects.
- Contributions to Heathland management projects.

On development proposals of up to 50 dwellings, where adequate mitigation measures cannot be provided on-site as part of the development, a financial contribution to the Councils will be required.

The Dorset Heathlands Joint Development Plan Document will set out the type of development circumstances, a list of projects which will be funded by developer contributions and the calculated contribution amounts as they apply to different types of development. Projects delivered through the Development Plan Document will include Suitable Alternative Natural Greenspace (SANG), heathland access and management, wardening, education, habitat re-creation and other appropriate measures.

Consultation Response

Legally Compliant		Sound		Core Strategy is unsound because it is not:								No Indication of legal compliance or soundness
				Positively Prepared		Justified		Effective		Consistent with National Policy		
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
6	0	4	8	3	1	3	3	3	2	1	3	6

Table 2.9

2.53 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
359261	Mr Doug Cramond	DC Planning Ltd	CSPS2096
359461	Mrs Nicola Brunt	Dorset Wildlife Trust	CSPS1507
359571	Mr Renny Henderson	Royal Society for the Protection of Birds	CSPS3761
360271	Cllr Paul Timberlake		CSPS490
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS3340
474462	Mrs Sheila Bourton		CSPS188
474490	Mrs Sheila Bourton	Keep Wimborne Green	CSPS218
496919	Mrs Nicola Shaw	Hurn Parish Council	CSPS3656
523319	Mr Ryan Johnson	Turley Associates	CSPS3778
523531	Mr Tim Hoskinson	Savills	CSPS2125
523531	Mr Tim Hoskinson	Savills	CSPS3203
524338	Mr Kenneth Brooks		CSPS251
549174	Mr Justin Milward	Woodland Trust	CSPS800
612430	Mr Nick Squirrell	Natural England, Dorset and Somerset Team	CSPS2070
619967	Mr James Stevens	Home Builders Federation (South West)	CSPS3679
649505	Miss Dawn Leader		CSPS295

Summary of Responses

- **Dorset Heathlands**

- **RSPB** – we support the text presented in paras 13.13 – 13.19 on the Dorset heathlands. We support policy ME2, although would comment that it would be advantageous if policies on Suitable Alternative Natural Greenspaces (SANGs) across SE Dorset authorities are similarly drawn
- **Keep Wimborne Green** – SANGs are untested and we do not know if they will compensate for the proposed loss of Green Belt and rise in local population from development.
- **Mr K Brooks** – I propose the arbitrary 400m limit should now be increased to a more realistic 1km limit and based on a wider and more individual criteria, supported by the local planning authorities being statutorily committed to approving a detailed written assessment of adverse effects before approving any increased residential occupancy.
- **Cllr P Timberlake** – general support for ME2 but query *‘on development proposals of up to 50 dwellings’ – why 50 dwellings?*
- **Woodland Trust** – in order to comply with national and local planning policy (paras 114 and 117 of the NPPF) we would like to see the first mitigation bullet point of the policy amended to read *‘Provision of on-site alternative natural greenspace including native woodland’*.
- **Dorset Wildlife Trust** – supports this policy, subject to continued alignment with the forthcoming Dorset Heathlands Joint Development Plan Document.
- **Natural England** – NE advise that the policy is not sound. It should state *‘protected European and internationally designated heathlands’*. The policy should make it clear that measures are to be delivered in advance of the development and must provide for mitigation in perpetuity. Natural England has not advised that contributions may be made to manage heathlands. This approach is not compatible with the Habitats Regulations for reasons of certainty and the requirement to provide for mitigation in perpetuity. It should be deleted. The policy should reference the advice in the Dorset Heathlands Supplementary Planning Document as well as the Development Plan Document which will set out guidance in the intervening period. The final sentence could be re-worded to indicate *‘visitor management’* and *‘appropriate avoidance measures’*. This policy forms an important part of the avoidance and mitigation measures approach in SE Dorset. Reference should be made in the supporting paras to the role it plays in enabling development in the 400m-5km area and in supporting the specific policy protection for European and international sites which we have advised is needed in policy ME1.
- **Savills, on behalf of clients** – object as the policy does not represent the most appropriate strategy when considered against the reasonable alternative, based on the evidence available. The need to provide mitigation to ensure that residential development does not have an adverse impact on the Dorset Heathlands is recognised and supported. However policy ME2 would benefit from greater flexibility in relation to requirements for on-site or off-site mitigation and financial contributions, which should be sought at a level sufficient to address the impact arising from the proposed development. A cross-reference to guidance on SANGs should also be included.
- **ETAG** – supports this policy but we wish to review our position if there are fundamental changes to the evidence and recommendations in the emerging Dorset Heathlands Development Plan Document.
- **Hurn Parish Council** - the policy is incomplete and does not meet the test of soundness. To be effective it needs to include the promotion of ‘robust areas’ for use by the general public as an alternative to heathland. Whilst new neighbourhoods will include SANGs, other smaller urban developments will not, which will increase the pressure on heathlands. The following wording should be included in the last paragraph of the Policy – ‘identifying and encouraging greater access to more robust areas.’

- **Home Builders Federation** - The policy is not sound as it is unjustified. The Councils have not taken the costs of the required mitigation measures into account for their impact on development viability. The NPPF requires plans to be deliverable and this means ensuring that development is not subject to a scale of obligations and policy burdens that jeopardises delivery.
- **Turley Associates, for clients** - the policy is insufficiently flexible to be effective in its current form. A requirement that all developments over 50 units provides an on-site SANG is unrealistic and insufficiently flexible to endure the plan period. It would also potentially undermine the Councils' housing delivery objectives, as provision on site may render some urban sites unviable, thereby putting pressure on the release of greenfield sites instead of urban ones. The 50 unit threshold was removed from the draft Dorset Heathlands Supplementary Planning Document to allow greater flexibility for negotiations on a site by site basis. Referencing the Supplementary Planning Document also avoids the need for the Core Strategy to be revised every time the Supplementary Planning Document is updated.

Councils' Response

2.54 Natural England support the approach of SANGs provision as an accepted form of mitigation to reduce the recreational pressure on the heathlands. Ongoing monitoring of heathland mitigation projects and SANGs will provide further assessment of their effectiveness.

2.55 This Policy, which seeks to protect the European and internationally designated heathlands within the Plan area, is generally welcomed by the nature conservation bodies, but there are concerns from some representing the development industry that the policy is too inflexible.

2.56 Christchurch and East Dorset, along with the rest of South East Dorset, contain significant areas of lowland heathland which are protected by European and international legislation and are given the highest level of protection for their nature conservation importance. The South East Dorset authorities are working together to produce a joint Development Plan Document to ensure that no additional residential development takes place within 400m of European heaths, and that development 400m to 5km from these protected areas mitigates the harm of additional human activity within the vicinity of these sites. Natural England, the Government's advisors on nature conservation matters, has given guidance to all local planning authorities in South East Dorset regarding this matter, and the situation has been recently considered in some detail at the Examination into Purbeck District Council's Core Strategy. The policies proposed within the Christchurch and East Dorset Core Strategy are similar to those recently found sound in the Purbeck Plan.

Proposed Changes to the Pre-Submission Core Strategy

Policy ME2 Protection of the Dorset Heathlands

In accordance with the advice from Natural England, no residential development will be permitted within 400m of protected **European and internationally designated** heathlands.

Any residential development within 400m and 5km of these areas will provide mitigation through a range of measures as set out in the Dorset Heathlands Joint Development Plan Document, **and the Dorset Heathlands Joint Supplementary Planning Document which sets out guidance in the intervening period prior to the adoption of the Development Plan Document**, including:

- Provision of on-site alternative natural greenspace. (**provided in accordance with guidelines set out in Appendix 5**).
- Contributions to off-site greenspace or recreation projects.
- **Contributions to Heathland management projects**.

Such The avoidance or mitigation measures are to be delivered in advance of the developments being occupied and must provide for mitigation in perpetuity. Suitable Alternative Natural Greenspaces (SANGs) will be secured by way of a legal agreement between the developer and the relevant council. Heathland mitigation measures will be secured through CIL in the majority of cases. The authority will ensure that mitigation measures to avoid harm are given priority as required by this policy.

On development proposals of **up to approximately** 50 dwellings, where adequate mitigation measures cannot be provided on-site as part of the development, a financial contribution to the Councils will be required.

The Dorset Heathlands Joint Development Plan Document will set out the type of development circumstances, a list of projects which will be funded by developer contributions and the calculated contribution amounts as they apply to different types of development. Projects delivered through the Development Plan Document will include Suitable Alternative Natural Greenspace (SANG), heathland access and **visitor** management, wardening, education, habitat re-creation and other appropriate **avoidance** measures. **The combination of the 400m exclusion zone with the heathland mitigation measures set out above function together as an effective package avoiding the harmful effects of additional residential development on the European and internationally designated heathlands.**

Consultation Response

Legally Compliant		Sound		Core Strategy is unsound because it is not:				No Indication of legal compliance or soundness
				Positively Prepared	Justified	Effective	Consistent with National Policy	
Yes	No	Yes	No					
12	0	3	15	3	6	15	7	0

Table 2.10

2.57 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Organisation Details	Comment ID
359291	Mr Jeremy Woolf	Woolf Bond Planning	PCCS362
359461	Mrs Nicola Brunt	Urban & East Dorset Living Landscapes Manager Dorset Wildlife Trust	PCCS351
359461	Mrs Nicola Brunt	Urban & East Dorset Living Landscapes Manager Dorset Wildlife Trust	PCCS350
359571	Mr Renny Henderson	Conservation Officer Royal Society for the Protection of Birds	PCCS239
360235	Mr Christopher Undery	Christopher D Undery	PCCS71
360302	Mrs Hilary Chittenden	Chairperson Environment TAG (East Dorset)	PCCS459
474462	Mrs Sheila Bourton		PCCS20
474490	Mrs Sheila Bourton	Chairman Keep Wimborne Green	PCCS31
474490	Mrs Sheila Bourton	Chairman Keep Wimborne Green	PCCS30
521508	Ms Lisa Jackson	Managing Director Jackson Planning Ltd	PCCS493
521508	Ms Lisa Jackson	Managing Director Jackson Planning Ltd	PCCS488

Contact Person ID	Contact Full Name	Contact Organisation Details	Comment ID
523531	Mr Tim Hoskinson	Savills	PCCS204
523531	Mr Tim Hoskinson	Savills	PCCS196
523893	Miss Lindsay Thompson	Senior Planner Terence O'Rourke Ltd	PCCS212
612430	Mr Nick Squirrell	Natural England, Dorset and Somerset Team	PCCS267
654618	Mr Peter Tanner	Tanner & Tilley Planning Consultants	PCCS475
717053	Mrs Janet Healy		PCCS88
718577	Mr Richard Terry		PCCS137

Summary of Responses

2.58 Effectiveness of SANGS

2.59 Mrs Sheila Bourton, Keep Wimborne Green

- We are encouraged that the protection of Dorset Heathlands by way of avoidance or mitigation measures are to be delivered in advance of the occupation of new housing development however, we are concerned that SANGS have yet to be tested as to their ability to attract the public to them and away from internationally protected heathland.

2.60 Ms Lisa Jackson, Jackson Planning Ltd.

- MEM Ltd object to the addition of the phrase that 'SANG will be secured by way of a legal agreement between the developer and the relevant council.' This addition to the policy is not sound and it is not effective as it does not allow for SANG ownership / provision being made by third parties who would be signatory to a legal agreement as part of any planning permission granted where SANG was required to mitigate potential harm from the development.
- MEM object to the phrase "mitigation in perpetuity" as this suggested degree of permanence does not allow for a flexible approach to a 'mobile SANG' which may be used at Roeshot where the temporary use the land for minerals extraction may require alterations to SANG arrangements over time.
- A direct cross reference to policy DH2 from the Dorset Heathland DPD is also needed.

2.61 SANG Provision and CIL

2.62 Ms Lisa Jackson, Jackson Planning Ltd.

- The policy needs to be revised to resolve the issue of potential for double counting of the mitigation for a development being funded both through CIL and s106.

2.63 Mr Tim Hoskinson, Savills

- The revised text states that SANGs will be secured by way of a legal agreement, and that heathland mitigation measures will be secured through CIL in the majority of cases. As currently worded, there is a risk that the larger sites of about 50 or more dwellings which are expected to provide SANGs through a legal agreement would also be required to fund wider heathland mitigation measures through CIL. This would place an unreasonable burden on such sites. The policy wording should therefore be amended to clarify that sites that provide SANGs through legal agreements will not be required to contribute heathland mitigation through CIL.

2.64 Mrs Hilary Chittenden, Environment TAG

- There should be clarity on the circumstances under which heathland mitigation measures will not be secured by CIL.

2.65 Mr Jeremy Woolf, Woolf Bond Planning

- The revisions proposed to policy ME2 suggest heathland mitigation will be delivered either through SANG or through CIL in the majority of cases. There is a risk of double counting in CIL is charged for heathland mitigation for those sites that provide mitigation in the form of SANG. With the above exceptional costs and strategic infrastructure requirements in mind and the potential for double counting, it is considered that the requirement for CIL payments on this site would not be necessary, practicable or appropriate, in effectively delivering the required infrastructure. Further the inevitable confusion and concerns as to double counting that would arise would serve to delay the delivery of the urban extension.

2.66 SANG Phasing

2.67 Miss Lindsay Thompson, Terence O'Rourke Ltd

- The new wording of policy ME2 currently requires SANGs to be in place prior to the occupation of development. On larger schemes in Christchurch and East Dorset, where SANGs will be provided on site, it would be more appropriate and provide greater flexibility to allow SANGs to be phased on the delivery of the new homes. As it stands the current additional wording requires mitigation measures to be in place prior to occupation. This approach is not sound because it is ineffective in that it could unnecessarily restrict the delivery of development, is therefore not in accordance with the NPPF. The policy wording should be amended to provide flexibility and allow a pragmatic approach to be adopted on a site-by-site basis, to enable phasing of the areas of SANGs to be agreed with Natural England and the Council as part of the Section 106 negotiations.

2.68 Mr Peter Tanner, Tanner and Tilley

- The proposed alteration to the wording of the policy to require "...The avoidance or mitigation measures... to be delivered in advance of the development being occupied and must be provided for mitigation in perpetuity...", requires further clarification. As contributions under CIL will be pooled it would be reasonable for development to be allowed to proceed once the requirements of the CIL Charging Schedule have been met, including allowing for any phased payment that may be included in the CIL Charging Schedule. It would be unreasonable if it is intended that development should not proceed until the mitigation measures have actually been carried out by the Local Authority or Natural England, as this could be some time after the CIL charge has been paid by the developer to the Local Authority. Furthermore, the implementation of mitigation works is likely to be out of the control of the developer. Delay in allowing development to proceed once the CIL Charge has been paid would not be in accordance with the key principles of the NPPF to promote growth and provide for new homes.

2.69 Mitigation

2.70 Mr Tim Hoskinson, Savills

- The amendments to policy ME2 to confirm that developments of approximately 50 dwellings can provide mitigation by means of financial contribution is supported. The policy would benefit from greater flexibility to allow phased provision of mitigation measures alongside development is considered more appropriate.

2.71 Mrs Nicola Brunt, Dorset Wildlife Trust

- We have not yet seen evidence that the combination of the 400m exclusion zone and heathland mitigation measures function together as an effective package avoiding harmful events of additional residential development on the European and internationally designated heathlands. Although this is the aspiration, we cannot be certain of 100% effectiveness without monitoring results. We therefore suggest amendment to reflect this.

2.72 Mrs Hilary Chittenden, Environment TAG

- The effectiveness of the package (referred to at the end of para 5) is, as yet, unproven. The wording is pre-empting the findings of current research. Our agreement to the wording of this will depend on the strength of the evidence and recommendations of the current work by Footprint Ecology. ETAG retains an objection because of lack of evidence at this stage. We advise that it would be better to delete the sentence. The combination of ... heathlands.

2.73 Ms Lisa Jackson, Jackson Planning Ltd

- Policy ME2 has been revised to include a statement with regard to the effectiveness of heathland mitigation measures as a package. This is in part made up from SANGs and in part by the range of other projects funded through the Heathland tariff. The spatial expression of this policy is not shown on the proposals map for the core strategy but is shown on the Draft Heathlands' DPD proposals map. Although the policy cross-refers to the Heathlands DPD this is not sufficient to set the spatial framework for the development of the Borough and it therefore fails to meet the national guidance in NPPF paragraph 154 that requires Local Plans to address the spatial implications of economic, social and environmental change.
- The range of mitigation measures that are referred to should not be placed in an SPD, but examined as part of the Core Strategy or Heathlands DPD. Christchurch and East Dorset Councils are the competent authorities as set out in the Habitat Regulations in deciding whether a proposal will affect a European wildlife site and without any public scrutiny, it cannot be adequately demonstrated that no adverse effects are likely.

2.74 Policy Support

2.75 Mr Renny Henderson, RSPB and Mr Nick Squirrell, Natural England

- We support the amendments to this policy.

Councils' Position

2.76 Effectiveness of SANGs

2.77 Evidence now emerging in support of the Joint Heathland DPD is considered sufficiently certain by Natural England to justify the use of SANGs. This is primarily based on monitoring work undertaken on sites where public access has been significantly improved. The use of SANGs is also in combination with the other south east Dorset wide mitigation measures which includes the management of the heathland themselves, improvements of other existing open space and heathland education programmes.

2.78 Regarding the use of the phrase, 'mitigation in perpetuity', this clarifies the fact that it must be in place for the lifetime of the houses it relates to. Whether a SANG is mobile or otherwise is more a matter to be agreed as part of a strategy for a specific site - what must be ensured by this strategy is that it maintains the mitigation for the lifetime of the houses in an agreed form.

2.79 At this stage, the Joint Heathland DPD is at an early stage of preparation and as such, there is a lack of certainty regarding the final content of policies in the DPD.

2.80 SANG Provision and CIL

2.81 Approaches to the potential for double counting the cost of heathland mitigation between on-site legal agreements and CIL charges is to be considered through the emerging Christchurch and East Dorset CIL document.

2.82 SANG Phasing

2.83 If a new development is to have a significant phased element to its delivery and is large enough to require its own SANG, then this is a matter for discussion with Natural England as the development application is progressed. The key factor to address though is to ensure there is adequate mitigation in place to cater for the number of houses that will be occupied in each of the phases.

2.84 For small sites that do not require on-site SANGs, then mitigation will be provided through the CIL contribution. This will be pooled towards the delivery of south east Dorset wide mitigation projects. Upon payment of the charge, this will allow the development to commence. In the same that the current Heathland Planning Framework operates, the partner authorities will identify and deliver the projects to mitigate the combined effects of all these smaller scale developments.

2.85 Mitigation

2.86 Please see officer responses above regarding phasing and evidence studies.

2.87 For the spatial expression of the heathland mitigation, as it is part of a wider south east Dorset issue to address it is considered that the Heathland DPD proposals map is the best place for it to be depicted. There is also likely to be additions to the mitigation locations as the document passes through the various stages towards final adoption. The Heathland DPD is also in effect part of the local plan for the District and Borough.

2.88 Additionally, as the new neighbourhood and urban extension sites progress should they be adopted as policy, then the policies map will reflect their extent.

2.89 The range of measures is considered best placed in an SPD, where it can be regularly reviewed to reflect new evidence or target the areas where housing is coming forward at a given point in time within the plan period, to ensure the mitigation effectively relates to new development. However, this approach will be subject to examination as part of the Heathland DPD, which will also contain the overarching details of the types of mitigation that is appropriate and their general location. This approach is similar to that of the link between CIL and the Infrastructure Delivery Plan.

2.90 Policy Support

2.91 The support is noted.

Pre-Submission Core Strategy

Policy ME 3

Suitable Alternative Natural Greenspace

Suitable Alternative Natural Greenspace (SANG) is required to mitigate the impact of developments of over 50 dwellings. The provision of SANG must meet the following standards which have been agreed by Natural England:

- 8 to 16 ha of SANG land or any standard within an adopted Heathlands Development Plan Document shall be provided in perpetuity per 1,000 new occupants through direct provision as an element of the development. The area of SANG must provide the key features set out in this policy to ensure it performs the function of attracting people away from the heaths.
- Where the planning authority is satisfied that direct provision as an element of the development is not reasonable, the planning authority will require contributions towards the provision of SANGs identified through the Heathland Supplementary Planning Document, or a replacement Heathlands Development Plan Document.
- Contributions will be required towards strategic access management and monitoring measures.
- During the phasing of development the effectiveness of SANGs will be monitored and enhancements will be required if the SANGs are not functional according to the criteria set out in this policy.

SANGs must have the features described below without their functionality being compromised by unsuitable size, shape, location, topography or other inherent characteristics and SANGs must be compatible with other planning policy.

For all sites there must be adequate parking for visitors, unless the site is intended for local pedestrian use only, i.e. within easy walking distance (400m) of the developments linked to it. The amount of car parking space should be determined by the anticipated numbers using the site and arriving by car. If the site is intended for local pedestrian use only, then there must be excellent access for people arriving by foot, with a range of access points directly linking housing and the SANG.

- All SANGs with car parks must have a circular walk which starts and finishes at the car park.
- It should be possible to complete a circular walk of 2.3 – 2.5km around the SANG, and for larger SANGs a variety of circular walks.
- Car parks must be easily and safely accessible by car and should be clearly sign posted.
- The accessibility of the site must include access points appropriate for the particular visitor use the SANG is intended to cater for.
- Access points should have signage outlining the layout of the SANG and the routes available to visitors.
- The SANG must have a safe route of access on foot from the nearest car park and / or footpath/s.
- SANGs must be designed so that they are perceived to be safe by users; they must not have trees and scrub covering parts of the walking routes.
- Paths must be easily used and well maintained but most should remain unsurfaced to avoid becoming too urban in feel. A majority of paths should be suitable for use in all weathers.
- SANGs must be perceived as semi natural spaces without intrusive artificial structures, except in the immediate vicinity of car parks. Visually sensitive way-markers and some benches are acceptable.
- All SANGs larger than 12ha must aim to provide a variety of habitats for users to experience (e.g. some areas of woodland, scrub, grassland, heathland, wetland, open water).
- Access within the SANG must be largely unrestricted with plenty of space provided where it is possible for dogs to exercise freely and safely off lead.
- SANGs must be free from unpleasant visual, auditory or olfactory intrusions (e.g. derelict buildings, intrusive adjoining buildings, dumped materials, loud intermittent or continuous noise from traffic, industry, flood lighting, sewage treatment works, waste disposal facilities).
- SANGs should be clearly sign-posted or advertised in some way.
- SANGs should have leaflets and or websites advertising their location to potential users. It would be desirable for leaflets to be distributed to new homes in the area and to be made available at entrance points to car parks.

The establishment of a SANG should be accompanied by legal agreements to secure the future protection and management of the site.

Consultation Response

Legally Compliant		Sound		Core Strategy is unsound because it is not:								No Indication of legal compliance or soundness
				Positively Prepared		Justified		Effective		Consistent with National Policy		
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
4	1	3	14	3	2	4	6	5	2	3	3	4

Table 2.11

2.92 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
359261	Mr Doug Cramond	DC Planning Ltd	CSPS2097
359461	Mrs Nicola Brunt	Dorset Wildlife Trust	CSPS1519
359553	Mrs Linda Leeding	West Parley Parish Council	CSPS1646
359553	Mrs Linda Leeding	West Parley Parish Council	CSPS2011
359571	Mr Renny Henderson	Royal Society for the Protection of Birds	CSPS3762
360082	Mr and Mrs K Healy		CSPS2507
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS3341
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS3342
503395	Mr Ian Davis		CSPS2324
512459	Mrs Sandra Davis		CSPS2363
521508	Ms Lisa Jackson	Jackson Planning Ltd	CSPS3640
523319	Mr Ryan Johnson	Turley Associates	CSPS3780

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
523531	Mr Tim Hoskinson	Savills	CSPS2130
523531	Mr Tim Hoskinson	Savills	CSPS3204
523893	Miss Lindsay Thompson	Terence O'Rourke Ltd	CSPS2048
524723	Mr John Worth	Wimborne Civic Society	CSPS1929
612430	Mr Nick Squirrel	Natural England, Dorset and Somerset Team	CSPS2073
619967	Mr James Stevens	Home Builders Federation (South West)	CSPS3681
654660	Ms Anne Mason	Transition Town Christchurch	CSPS963
656249	Ms Gemma Care	Barton Willmore LLP	CSPS1092

Summary of Responses

- ***Suitable Alternative Natural Greenspaces (SANGs)***

- Transition Town Christchurch – The value of SANGs in providing alternative areas for leisure use near new developments is as yet unproven. Moreover, SANGs themselves should have biodiversity measures to increase natural habitats.
- Barton Willmore LLP for clients – we support the inclusion within the policy of a requirement for bespoke SANGs of at least 8ha per 1000 new population, in addition to any other measures that are required to satisfy the Habitats Regulations. However we do not agree that a financial contribution towards Strategic Access Management and Monitoring (SAMM) should be required without a case-by-case examination, in light of the Habitats Regulations, of the efficacy of the SANG and other mitigation measures provided in securing avoidance of likely significant effects on the Special Protection Area (SPA). They provide information on a variety of court cases where the need for SAMMs have been considered and have not been found necessary for specific development proposals.
- Dorset Wildlife Trust – consider that the policy is partially sound and partially unsound. The Dorset Wildlife Trust strongly supports the intentions of this policy to mitigate the impact of developments of over 50 dwellings on the Dorset Heathlands. However we have concerns that this policy is over prescriptive and needs further development, allowing each site to be designed on its own merits and with existing natural features and rights of way incorporated and enhanced. It may be more appropriate to refer to guidance given in the Dorset Heathlands Joint Development Plan Document rather than repeat/create criteria here. DWT set out detailed alternative wording to the policy in their response.
- West Parley Parish Council – This policy is unsound. It is an admirable and well conceived policy necessary for the implementation of residential proposals across the plan area, but it has not however been shown that it is deliverable. Owners of the proposed SANGs will be in a strong position and there can be little confidence that developers will be able to bear the whole burden of infrastructure as well as SANGs. This is an

important policy and should be shown to be deliverable before the Core Strategy is adopted. Otherwise there is a clear danger of young families being put in high density housing but the SANGs not materialising – with consequences that are all too well known.

- Terence O'Rourke Ltd, for clients – A joint approach should be adopted by Natural England and the South East Dorset Authorities to ensure the provision of consistent design criteria.
- Wimborne Civic Society – We are in favour of the creation of SANGs.
- Natural England - advise that this policy be re-written so that whilst the scale of developments required to produce SANGs etc is set out the policy refers to the Supplementary Planning Document guidance contained in the Dorset Heathlands Supplementary Planning Document to avoid confusion. Natural England further advise that the policy indicate that the Supplementary Planning Document guidance will be superseded by the Joint Supplementary Planning Document following a further public consultation and democratic approval (as in para 16.23)
- Savills, on behalf of clients – object – the policy does not represent the most appropriate strategy when considered against the reasonable alternative, based on the evidence available. The need to provide mitigation for the impact of development on the Dorset Heathlands is recognised and supported, and further SANG guidance is welcomed, however it is important to ensure consistency of approach across the local authorities dealing with the cross-boundary issues that arise in relation to the Dorset Heathlands. As currently drafted, the policy does not provide sufficient flexibility and the relationship with the planned Dorset-wide heathlands Development Plan Document is unclear. Much of the detail included in the policy would be better expressed as guidance rather than policy and would be better as an appendix or supporting text.
- The policy is supported, but should be amended to include the need for SANGs to offer tranquillity and avoid light pollution, as well as the need to develop SANGs on a site by site basis to take advantage of what localised ecology exists and to encourage its development. SANGS with special habitats where dogs off leads will be discouraged must be robust and large enough to ensure that dog walkers do not go elsewhere and can exercise their dogs on another part of the site.
- ETAG – support the policy in part, but consider that it lacks flexibility. The Heathland Supplementary Planning Document is in preparation. Its effectiveness will inform the Development Plan Document. ETAG consider that the criteria for SANGs should be less prescriptive, but take on board a number of issues such as ensuring that there is sufficient land for the maximum occupation of the dwellings, the SANGs should take account of the wildlife value of the land, the circular walks should not destroy existing habitats, and existing features such as boundary banks, ditches, copses etc should be protected etc. to ensure flexibility and coherence of ecological networks.
- RSPB - we support this policy, but would comment that it would be advantageous of policies on SANG across south east Dorset authorities are similarly drawn
- Home Builders Federation - the policy is unsound as it is unjustified. We have been unable to detect any assessment of the likely impact of this policy on the viability and the deliverability of the plan. It is unclear how the costs of this policy would impact on development viability or whether it is feasible for sites allocated to provide alternative green space.
- Jackson Planning Ltd, on behalf of clients – The impact and pressures of the Dorset Urban Heathlands are to be addressed in the forthcoming Heathland Development Plan Document, however, it must be for the Core Strategy to properly reflect this thinking in terms of SANGs, making use of less pressured green assets (the coast) and acknowledgement of current patterns of use and proposed use through planned build development. Both the coast and the New Forest have significant influence on the urban population of Christchurch and the Core Strategy

must acknowledge this and plan for this spatially. The policy must also address cross boundary issues in relation to mitigation for potential impact on the New Forest.

- Turley Associates for clients, Inclusion of the second bullet point is welcomed as it provides flexibility for negotiation on a site by site basis without compromising the overall objective of SPA mitigation. We question the use of specific development thresholds contrary to the draft Dorset Heathlands Supplementary Planning Document. Greater reference to this Supplementary Planning Document will avoid the need to revise the Core Strategy policy if the content of the Supplementary Planning Document changes prior to adoption, or on a rolling basis over the plan period as anticipated. The Council will need to provide compelling evidence if they are to include development thresholds contrary to the joint Councils' own Supplementary Planning Document.

Councils' Response

2.93 Based on the outcome of the recent Purbeck Core Strategy Examination in Public and the comments received in this consultation, it is recommended that Policy ME3 be deleted and replaced by Appendix 5 which sets out the guidelines for SANGs linked to amended policy ME2. This will ensure it is aligned with the other South East Dorset local authorities that contain National and European protected heathland.

Proposed Changes to the Pre-Submission Core Strategy

Policy ME3 Suitable Alternative Natural Greenspace

Suitable Alternative Natural Greenspace (SANG) is required to mitigate the impact of developments of over 50 dwellings. The provision of SANG must meet the following standards which have been agreed by Natural England:

- 8 to 16 ha of SANG land or any standard within an adopted Heathlands Development Plan Document shall be provided in perpetuity per 1,000 new occupants through direct provision as an element of the development. The area of SANG must provide the key features set out in this policy to ensure it performs the function of attracting people away from the heaths.
- Where the planning authority is satisfied that direct provision as an element of the development is not reasonable, the planning authority will require contributions towards the provision of SANGs identified through the Heathland Supplementary Planning Document, or a replacement Heathlands Development Plan Document.
- Contributions will be required towards strategic access management and monitoring measures.
- During the phasing of development the effectiveness of SANGs will be monitored and enhancements will be required if the SANGs are not functional according to the criteria set out in this policy.

SANGs must have the features described below without their functionality being compromised by unsuitable size, shape, location, topography or other inherent characteristics and SANGs must be compatible with other planning policy.

For all sites there must be adequate parking for visitors, unless the site is intended for local pedestrian use only, i.e. within easy walking distance (400m) of the developments linked to it. The amount of car parking space should be determined by the anticipated numbers using the site and arriving by car. If the site is intended for local pedestrian use only, then there must be excellent access for people arriving by foot, with a range of access points directly linking housing and the SANG.

- All SANGs with car parks must have a circular walk which starts and finishes at the car park.
- It should be possible to complete a circular walk of 2.3 – 2.5km around the SANG, and for larger SANGs a variety of circular walks.
- Car parks must be easily and safely accessible by car and should be clearly sign posted.
- The accessibility of the site must include access points appropriate for the particular visitor use the SANG is intended to cater for.
- Access points should have signage outlining the layout of the SANG and the routes available to visitors.
- The SANG must have a safe route of access on foot from the nearest car park and / or footpath/s.
- SANGs must be designed so that they are perceived to be safe by users; they must not have trees and scrub covering parts of the walking routes.
- Paths must be easily used and well maintained but most should remain unsurfaced to avoid becoming too urban in feel. A majority of paths should be suitable for use in all weathers.
- SANGs must be perceived as semi natural spaces without intrusive artificial structures, except in the immediate vicinity of car parks. Visually sensitive way-markers and some benches are acceptable.
- All SANGs larger than 12ha must aim to provide a variety of habitats for users to experience (e.g. some areas of woodland, scrub, grassland, heathland, wetland, open water).
- Access within the SANG must be largely unrestricted with plenty of space provided where it is possible for dogs to exercise freely and safely off lead.
- SANGs must be free from unpleasant visual, auditory or olfactory intrusions (e.g. derelict buildings, intrusive adjoining buildings, dumped materials, loud intermittent or continuous noise from traffic, industry, flood lighting, sewage treatment works, waste disposal facilities).
- SANGs should be clearly sign-posted or advertised in some way.
- SANGs should have leaflets and or websites advertising their location to potential users. It would be desirable for leaflets to be distributed to new homes in the area and to be made available at entrance points to car parks.

The establishment of a SANG should be accompanied by legal agreements to secure the future protection and management of the site.

Guidelines for the establishment of Suitable Alternative Natural Greenspace (SANGs)

Introduction

'Suitable Alternative Natural Greenspace' (SANGs) is the name given to green space that is of a quality and type suitable to be used as mitigation for applications likely to affect the Dorset Heathlands European and internationally protected sites. The provision of SANGs is one of a range of mitigation measures, a number of which are detailed in the Dorset Heathlands Planning Framework Supplementary Planning Document, which the south east Dorset Planning Authorities and Natural England consider offer an effective means of avoiding or mitigating harm from a number of urban effects.

Its role is to provide alternative green space to divert visitors away from the Dorset Heathlands Special Protection Area (SPA), the two Dorset Heaths Special Areas of Conservation (SACs) and the Dorset Heathlands Ramsar (collectively called the 'Dorset Heathlands' in these guidelines). SANGs are intended to provide mitigation for the likely impact of residential-type developments on the Dorset Heathlands by preventing an increase in visitor pressure. The effectiveness of SANGs as mitigation will depend upon its location and design. These must be such that the SANGs is more attractive to visitors than the Dorset Heathlands.

This appendix describes the features that have been found to draw visitors to the Dorset Heathlands, which should be replicated in SANGs. It provides guidelines on:

- the type of site which should be identified as SANGs;
- measures that can be taken to enhance sites so that they may be used as SANGs.

These guidelines relate specifically to the means to provide mitigation for development of a residential nature within or close to 5km of the Dorset Heathlands. They do not address nor preclude the other functions of green space (e.g. provision of disabled access). Other functions may be provided within SANGs, as long as they do not conflict with the specific function of mitigating visitor impacts on the Dorset Heathlands.

SANGs may be created from:

- existing open space of SANGs quality with no existing public access or limited public access, which for the purposes of mitigation could be made fully accessible to the public;
- existing open space that is already accessible but could be changed in character so that it is more attractive to the specific group of visitors who might otherwise visit the Dorset Heathlands;
- land in other uses that could be converted into SANGs.

The identification of SANGs should seek to avoid sites of high nature conservation value, which are likely to be damaged by increased visitor numbers. Such damage may arise, for example, from increased disturbance, erosion, input of nutrients from dog faeces, and increased incidence of fires. Where sites of high nature conservation value are considered as SANGs, the impact on their nature conservation value should be assessed and considered alongside relevant policy in the local plan.

The character of the Dorset Heathlands and its visitors

The Dorset Heathlands are made up of 42 Sites of Special Scientific Interest, and consist of a mixture of open heathland and mire with some woodland habitats. The topography is varied with some prominent viewpoints. Many sites contain streams, ponds and small lakes. Some have open landscapes with few trees and others have scattered trees and areas of woodland. Most sites are freely accessible to the public, although in some areas access is restricted by army, or other operations.

Surveys have shown that about half of visitors to the Dorset Heathlands arrive by car and about half on foot. Where sites are close to urban development around Poole and Bournemouth, foot access tends to be most common. On rural sites in Purbeck and East Dorset, more visitors come by car. Some 75% of those who visited by car had come from 5.3km of the access point onto the heathlands. A very large proportion of the Dorset Heathland visitors are dog walkers, many of whom visit the particular site regularly (i.e. multiple visits per week) and spend less than an hour there, walking on average about 2.2km.

Guidelines for the quality of SANGs

The quality guidelines have been subdivided into different aspects of site fabric and structure. They have been compiled from a variety of sources but principally from visitor surveys carried out at heathland sites within the Dorset Heathlands and the Thames Basin Heaths.

The guidelines concentrate on the type of SANGs designed principally to cater for heathland dog walkers. Other important heathland mitigation measures, for example facilities designed to attract motor cycle scramblers or BMX users away from heathlands, or facilities for adventurous play for children, are not covered specifically and will need to be considered case by case.

The principle criteria contained in the guidelines have also been put into a checklist format at the end of this appendix.

It is important to note that these guidelines only cover the quality of SANGs provision. There are a number of other matters that will need to be agreed with Natural England and the Council including: provision of in perpetuity management of the SANGs; SANGs capacity; other avoidance and mitigation measures as necessary.

Accessibility - reaching the SANGs

Most visitors reach the Dorset Heathlands either by foot or by car and the same will apply for SANGs. Thus SANGs may be intended principally for the use of a local population living within a 400 metre catchment around the site; or they may be designed primarily to attract visitors who arrive by car (they may also have both functions).

SANGs design needs to take into account the anticipated target group of visitors. For example, where large populations are close to the Dorset Heathlands the provision of SANGs may need to be attractive to visitors on foot.

If intended to attract visitors arriving by car, the availability of adequate car parking is essential. Car parks may be provided specifically for a SANGs or a SANGs may make use of existing car parks, but some existing car parks may have features incompatible with SANGs use, such as car park charging. The amount and nature of parking provision should reflect the anticipated numbers and mode of arrival by visitors to the site and the catchment size of the SANGs. It is important that there is easy access between the car park and the SANGs, i.e. this is not impeded by, for example, a road crossing. Thus such SANGs should have a car park with direct access straight on to the SANGs with the ability to take dogs safely from the car park to the SANGs off the lead. Similarly, the nature of foot access between urban development and a SANGs is important and green corridors reaching into the urban area can be an important part of facilitating access to the SANGs.

Guidelines:

1. Sites must have adequate parking for visitors, unless the site is intended for local pedestrian use only, i.e. within easy walking distance (400m) of the developments linked to it. The amount of car parking space should be determined by the anticipated numbers using the site and arriving by car.
2. Car parks must be easily and safely accessible, be of an open nature and should be clearly sign posted.
3. There should be easy access between the car park or housing and the SANGs with the facility to take dogs safely from the car park to the SANGs off the lead.
4. Access points should have signs outlining the layout of the SANGS and the routes available to visitors.

Paths, tracks and other SANGs infrastructure

SANGs should aim to supply a choice of circular walking routes that provide an attractive alternative to those routes on heathlands in the vicinity (i.e. those heaths that the SANGs is designed to attract visitors away from).

Given the average length of walks on heathland, a circular walk of 2.3-2.5km in length is necessary unless there are particular reasons why a shorter walk is considered still appropriate. Where possible, a range of different length walks should be provided; a proportion of visitors walk up to 5km and beyond so walking routes longer than 2.5 km are valuable, either on-site or through the connection of sites along green corridors.

Paths do not have to be of any particular width, and both vehicular-sized tracks and narrow paths are acceptable to visitors, although narrow corridors where visitors/dogs may feel constrained should be avoided. The majority of visitors come alone and safety is one of their primary concerns. Paths should be routed so that they are perceived as safe by the visitors, with some routes being through relatively open (visible) terrain (with no trees or scrub, or well spaced mature trees, or wide rides with vegetation back from the path), especially those routes that are 1-3 km long.

A substantial number of visitors like to have surfaced but not tarmac paths, particularly where these blend in well with the landscape. This is not necessary for all paths but there should be some visitor-friendly, all weather routes built into the structure of a SANGs, particularly those routes that are 1-3 km long. Boardwalks may help with access across wet areas but excessive use of boardwalks, as may be necessary on sites that are mostly wet or waterlogged such as flood plain and grazing marsh, is likely to detract from the site's natural feel.

Other infrastructure specifically designed to make the SANGs attractive to dog walkers may also be desirable but must not detract from a site's relatively wild and natural feel. Measures could include accessible water bodies for dogs to swim/drink; dog bins; fencing near roads/car-parks, etc. to ensure dog safety; clear messages regarding the need to 'pick-up'; and large areas for dogs to be off lead safely.

Guidelines:

5. Paths must be easily used and well maintained but most should remain unsurfaced to avoid the site becoming too urban in feel. A majority of paths should be suitable for use in all weathers and all year around. Boardwalks may be required in wet sections.

6. All SANGs with car parks must have a circular walk that starts and finishes at the car park.

7. It should be possible to complete a circular walk of 2.3-2.5km around the SANGs, and for larger SANGs there should be a variety of circular walks.

8. SANGs must be designed so that visitors are not deterred by safety concerns.

Advertising - making people aware of the SANGs

The need for some advertising is self evident. Any advertising should make clear that the site is designed to cater specifically for dog walkers.

Guidelines:

9. SANGs should be clearly sign-posted and advertised. .

10. SANGs should have leaflets and/or websites advertising their location to potential visitors. It would be desirable for leaflets to be distributed to new homes in the area and be made available at entrance points and car parks.

Landscape and Vegetation

The open or semi-wooded and undulating nature of most of the Dorset Heathland sites gives them an air of relative wildness, even when there are significant numbers of visitors on site. SANGs must aim to reproduce this quality but do not have to contain heathland or heathy vegetation. Surveys in the Thames Basin heath area show that woodland or a semi-wooded landscape is a key feature that people who use the SPA there appreciate. Deciduous woodland is preferred to coniferous woodland. In these circumstances, a natural looking landscape with plenty of variation including both open and wooded areas is ideal for SANGs. There is clearly a balance to be struck between what is regarded as an exciting landscape and a safe one and so some element of choice between the two is desirable.

Hills do not put people off visiting a site, particularly where these are associated with good views, but steep hills are not appreciated. An undulating landscape is preferred to a flat one. Water features, particularly ponds and lakes, act as a focus for visitors for their visit, but are not essential. The long term management of the SANGs habitats should be considered at an early stage. Grazing management is likely to be necessary, particularly for larger SANGs and those with grasslands.

A number of factors can detract from the essential natural looking landscape and SANGs that have an urban feel, for example where they are thin and narrow with long boundaries with urban development or roads, are unlikely to be effective.

Guidelines:

11. SANGs must be perceived as natural spaces without intrusive artificial structures, except in the immediate vicinity of car parks. Visually-sensitive way-markers and some benches are acceptable.

12. SANGs must aim to provide a variety of habitats for visitors to experience (e.g. some of: woodland, scrub, grassland, heathland, wetland, open water).

13. Access within the SANGS must be largely unrestricted with plenty of space provided where it is possible for dogs to exercise freely and safely off lead.

14. SANGs must be free from unpleasant visual, auditory or olfactory intrusions (e.g. derelict buildings, intrusive adjoining buildings, dumped materials, loud intermittent or continuous noise from traffic, industry, sports grounds, sewage treatment works, waste disposal facilities).

Consultation Response

Legally Compliant		Sound		Core Strategy is unsound because it is not:				No Indication of legal compliance or soundness
				Positively Prepared	Justified	Effective	Consistent with National Policy	
Yes	No	Yes	No					
10	1	6	11	1	5	11	2	0

Table 2.12

2.94 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Organisation Details	Comment ID
359291	Mr Jeremy Woolf	Woolf Bond Planning	PCCS367
359437	Ms Gill Smith	Affordable Housing Officer Dorset County Council	PCCS397
359461	Mrs Nicola Brunt	Urban & East Dorset Living Landscapes Manager Dorset Wildlife Trust	PCCS354
359461	Mrs Nicola Brunt	Urban & East Dorset Living Landscapes Manager Dorset Wildlife Trust	PCCS355
359571	Mr Renny Henderson	Conservation Officer Royal Society for the Protection of Birds	PCCS236
360235	Mr Christopher Undery	Christopher D Undery	PCCS72
360302	Mrs Hilary Chittenden	Chairperson Environment TAG (East Dorset)	PCCS460
360302	Mrs Hilary Chittenden	Chairperson Environment TAG (East Dorset)	PCCS461
521508	Ms Lisa Jackson	Managing Director Jackson Planning Ltd	PCCS494
523893	Miss Lindsay Thompson	Senior Planner Terence O'Rourke Ltd	PCCS214
549174	Mr Justin Milward	Regional & Local Government Officer Woodland Trust	PCCS131

Contact Person ID	Contact Full Name	Contact Organisation Details	Comment ID
612430	Mr Nick Squirrell	Natural England, Dorset and Somerset Team	PCCS268
654618	Mr Peter Tanner	Tanner & Tilley Planning Consultants	PCCS476
654817	Mr Alan Spencer		PCCS134
717053	Mrs Janet Healy		PCCS89
718577	Mr Richard Terry		PCCS138
719394	Ms Jade Ellis	Assistant Planner Turley Associates	PCCS302

Summary of Responses

2.95 Supporting Comments

2.96 Mr Renny Henderson, RSPB, Mrs Gill Smith, Dorset County Council and Mrs Nicola Brunt, Dorset Wildlife Trust

- We support the amendments made to this policy.

2.97 Mr Nick Squirrell, Natural England Dorset and Somerset Team

- Natural England supports the modifications made to this policy. One wording error is detailed below:
- 'Any residential development IN THE AREA BETWEEN (delete within) 400m and 5km of these areas will provided mitigation through a range of measures as set out in the Dorset Heathlands Joint Development Plan Document.'
- This is to be consistent with wording in the Dorset Heathlands SPD.
- In accordance with recent progress on the Dorset Heathlands DPD the following minor rewording is proposed:
- 'The Dorset Heathlands (delete Joint) Development Plan Document AND SUPPLEMENTARY PLANNING DOCUMENT will set out the type of development circumstances, a list of projects which will be funded by developer contributions and the calculated contribution amounts as they apply to different types of development. Projects delivered though the Development Plan Document will include Suitable Alternative Natural Greenspace

(SANG), heathland access and visitor management, wardening, education, habitat re-creation and other appropriate avoidance measures. THESE MITIGATION MEASURES WILL BE REVIEWED AND REVISED WHERE NECESSARY AND MODIFICATIONS BROUGHT FORWARD FOR CONSULTATION THROUGH THE SPD REFRESH IN ACCORDANCE WITH THE AVAILABLE EVIDENCE.

2.98 Mr Jeremy Woolf, Woolf Bond Planning

- The proposed change to a more flexible policy focusing more on the quality rather than the quantity is supported. As elsewhere the SANG requirement should be varied dependent upon the radius of influence to the SPA.

2.99 Location and Accessibility of SANGs

2.100 Mrs Nicola Brunt, Dorset Wildlife Trust

- The policy should provide guidance on where SANGs should be in relation to the heathland/s they are designed to protect and that land adjacent to or in close proximity to existing heathland may be appropriate as Heathland Support Areas (HSAs). We also suggest that it seems less appropriate to aim to provide heathland on SANGs under guideline 12 than more robust habitats, especially where the preceding text identifies that SANGs do not have to contain heathland or heathy vegetation. With this habitat so vulnerable to disturbance it seems less suitable to encourage it on SANGs that are designed to encourage public access.

2.101 Mrs Lisa Jackson, Jackson Planning

- Bodorgan Environmental Management (BEM) generally supports the substance of change from ME3 to Appendix 5. They believe it is a more effective way to secure quality SANG that meets the needs of new residents, and mitigates any likely harm.
- However, BEM Object to the wording “These must be such that the SANGs is more attractive to visitors than the Dorset Heathlands.” This statement is not justified as the evidence to prove superior attractiveness is potentially subjective and would not be proportionate to the requirements of SANG. This is also inconsistent with the consultations in response to the draft Heathlands DPD which has a lower bar to success. The consultation suggested the DPD should describe SANG as having a similar experience to heathland. It is accepted by Natural England that SANG as a means of mitigation is experimental and untested and confirmed as such in the draft DPD that the long term efficacy of SANG is not yet established. Many of the new SANG in the Thames Basin Heath would not meet this onerous and disproportionate test.
- This is inconsistent with the earlier part of the policy that suggests that SANGs are intended to provide mitigation. The draft Heathland DPD acknowledges as part of the evidence base that there are no major SANGs in South East Dorset; it is not possible to establish how effective they are for mitigation.

- BEM believe the policy needs to be more effective to be found sound and needs to consider the distance/ journey time to the protected heathland and the availability of other existing alternative greenspace as a means of establishing the required efficacy of the SANG.
- The proposed SANG at Roeshot will link to the River Mude improvements and link south to the Coast and potentially could create links to Chewton Common. In the earlier consultation document of the DPD the importance of the wider green infrastructure network was recognised.

2.102 Mrs Hilary Chittenden, Chairman Environment TAG

- While supporting the principle of SANGs, subject to the strength of the evidence yet to be presented by Footprint Ecology, we retain our position that the policy is unsound and ask that the points listed below are read together with our previous comments (response to Core Strategy consultation 2012).
- The guidance should be generic and apply to whole of Dorset. The sites and pressures they have to withstand vary from one heathland area and its urban population to another. As previously noted, design should be bespoke but policy should focus primarily on diverting large numbers of people AWAY from the heaths.
- The policy provides no guidance on where SANGs should be in relation to the heathland or heathlands they are designed to protect. This is a critical oversight. Creating a SANG adjacent to, or in close proximity to, an existing heathland is counterproductive in that it will inevitably increase visitor pressure on that heath. Land adjacent to or in close proximity to existing heathland may be appropriate as Heathland Support Areas (HSAs). These HSAs should be additional to and clearly distinct from SANG, and have the entirely different purpose of encouraging redirection of EXISTING visitor pressure away from the relevant heathland.
- It is essential that new car parking is specifically for SANG use and its provision is not used to restrict the land available for informal recreation. It must not be allowed to become cheap/free out of town parking. Those SANGs designed specifically for New Neighbourhoods should encourage access by walking and cycling and comply with Core Strategy Objective 6.
- Guideline 14 The wording “free from” is too stringent. For example, there are relatively few areas that are free from traffic noise though clearly tranquillity is a key attribute: similarly a derelict farm building would not necessarily render a site unsuitable as a SANG. We recommend that the guidance should be more positive encouraging design that makes SANGs attractive to mitigate effects on heathland. This again underlines the importance of potential sites being judged on their merits.

2.103 Mrs Janet Healey, Dorset CRPE

- SANGs within walking distance of new neighbourhoods should not have parking spaces, access should be by foot only. Otherwise there is a danger that these spaces will be used by visitors to the neighbourhood, or by people visiting the town, they would not benefit those wanting to use the SANG.
- Although it is appreciated that dogs can do much damage on heathlands and therefore it is important to encourage dog walkers away from heathland, SANGS must not be designed purely for dogs. However, if the proportion of dog walkers is likely to be high, then possibly water facilities should be provided in order to protect any natural water features where dogs may inadvertently harm the wildlife.
- We agree that SANGS should never be next to playing fields, they have had such awful problems in Ferndown with dog walkers and playing fields. Proximity should be avoided at all costs. SANGS close to/next to heathlands should also be avoided in case the dogs stray into the heaths.

2.104 Mr Alan Spencer, Local Resident

- The policy has been worded as a catch all for people arriving at SANGs either by Car or on Foot, and as a consequence creates an ambiguity as to the facilities one can expect in a SANG. It also leaves an option for the Developer or Council to provide more car parking spaces in New Neighbourhoods which are situated close to dwellings rather than their aim of providing alternative green space.
- Although the policy does differentiate between SANGs close to Heath land and close to Neighbourhoods, in its present form it contradicts Objective 6 of the Core Strategy which sets out the ideal of encouraging the public to walk or cycle to SANGs rather than use the car.
- It should be obvious that any car parks provided in New Neighbourhood SANGs will become free car parks for visitors to Town Centres and / or be utilised as overflow parking for residential streets, as is the current practice.

2.105 *Quality of SANGs*

2.106 Mrs Hilary Chittenden, Chairman Environment TAG

- We strongly object to the inclusion of wording that SANGs are to be designed principally for dogs and offer accessible water bodies for dogs to swim.
- The provision of SANG must recognise the needs of the whole community, which includes non dog walkers and children, and the necessity of managing sustainably for example by grazing (as supported below).
- Guideline 12. We question the wisdom of specifically including "heathland" in the variety of habitats. SANGs must aim to develop the natural characteristics of the area.
- Landscape and vegetation para 2. - We welcome recognition of the need for grazing management.

2.107 *Development Viability*

2.108 Miss Lindsay Thompson, Terence O'Rourke representing Bloor Homes

- The guidelines should be flexible and this is particularly important when providing design guidelines that need to deal with a range of different circumstances. The wording of the quality guidelines appears inflexible in places, through the use of the word 'must'. By definition, a guideline should not be mandatory. Substitution of the word 'must' with 'should ideally' throughout the appendix would reflect the practicalities of provision and provide the flexibility required by developers and decision makers to ensure an appropriate response is made on a site by site basis.
- The appendix mentions visitor surveys from the Dorset Heathlands and the Thames Basin. These surveys should form part of the evidence base to the local plan/core strategy and should be available for consideration. It is not clear how much the guidelines have relied on evidence from the Thames Basin Heaths and how this evidence particularly relates to the Dorset Heathlands.
- If a SANG is intrinsically being designed to mitigate the impact of visitors to the Dorset Heathlands from across the County and beyond, there needs to be an appropriate mechanism in place to either allow flexibility or draw funding from across the County to deliver the SANG. The issue of the requirements need to be tested and should be debated in a basis of a conurbation wide strategy in accordance with the duty to co-operate.

2.109 Ms Jade Ellis, Turley Associates representing Bellway Homes

- Reference to specific circular walk distance necessary within SANGs (page 103) is not sufficiently flexible to satisfy the Effective test of soundness in our view. Nor is there evidence presented to suggest the overall net contribution of a varied supply of SANGS, to meet the varied recreational needs of the population, would not be effective.
- The text should be revised to be less prescriptive and more positive in support of: 1. A proportional approach that reflects an individual developments impact on the SPA (where on site SANG provision is proven necessary); 2. Positively encourage varied SANG provisions off-site that mitigate the level of housing proposed in the JCS.

2.110 Mr Peter Tilley, Tanner and Tilley Planning Consultants

- Whilst we support the deletion of Policy ME3 and the proposal to provide guidance on SANG's in relation to Policy ME2 in Appendix 5, we object to the inclusion in the fourth paragraph to reference to "...the means to provide mitigation for development of a residential nature within or close to 5km of the Dorset Heathlands...". The requirements of Policy ME2 and this guidance should apply to development within 5km of the Dorset Heathlands and there is no justification to apply the requirements to developments beyond this distance.

2.111 Mr Christopher Undery, Surveyor

- See previously submitted Response Form dated 15/06/2012. The imposition on the developer of cost burdens including high proportions of affordable housing, suitable alternative natural green spaces, heathland mitigation, community and transport infrastructure levies etc. will undermine viability, cause developers to reduce purchase offers to landowners to the extent that landowners will decide not to sell, or offers to purchase will fail to reach base price provisions in option agreements. In consequence development will not come forward, landowners will withhold allocated land and housing provision and other benefits will not be achieved.

2.112 Mr Richard Terry, Local Resident

- With limited residential development land identified the burden on developers is to great - the provision of increasing costs - heathland mitigation, transport and many other items. This will lead to reduced offers for land and potentially reducing the supply of land as owners will not sell.

2.113 Trees**2.114 Mr Justin Milward, Regional & Local Government Officer, Woodland Trust**

- Under the 'Landscape & Vegetation' heading, we are pleased to see the new reference to native woodland creation, but would like to see it further supported by a 'two for one' tree replacement policy in respect of trees lost as part of heathland restoration (Policy ME2).

- A reading of new 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 Local Plan.
- Woodland creation is also supported in the Dorset Biodiversity Strategy.

Councils' Position

2.115 We welcome the supporting comments from key stakeholders to the policy changes, and not the revisions recommended by Natural England.

2.116 *Location and Accessibility of SANGS*

- The guidance is quite clear about the location of SANGs, how most people currently access them, and the potential catchment. Each SANG will be designed on the individual circumstances of the location and target visitors. The guidance is sufficiently flexible for details to be agreed on a case by case approach, according to basic agreed principles.
- The suitability of a site as a potential SANG will need to be fully agreed with Natural England at an early stage of discussion, to ensure that sites of high biodiversity are not compromised by the location of the SANG.
- It should be noted that this guidance has been agreed and adopted recently by Purbeck District Council at its Local Plan EiP. The guidance will shortly become adopted across South East Dorset between all stakeholder authorities. The guidance therefore carries considerable weight.

2.117 *Quality of SANGs*

- The suitability of a site as a potential SANG will need to be fully agreed with Natural England at an early stage of discussion, to ensure that sites of high biodiversity are not compromised by the location of the SANG.
- It should be noted that this guidance has been agreed and adopted recently by Purbeck District Council at its Local Plan EiP. The guidance will shortly become adopted across South East Dorset between all stakeholder authorities. The guidance therefore carries considerable weight.

2.118 *Development Viability*

2.119 For larger developments such as the proposed new neighbourhoods, they are required to ensure their impacts are fully mitigated through the provision of SANGs. Whilst there may be the potential for capacity to be added to a SANG through use of additional funds collected via CIL from other developments to enable it to be used to mitigate those other new developments in the vicinity by for example providing improved car parking or green links on to the site, it would be a matter for discussion with Natural England.

2.120 Similarly, discussions on a site-by-site basis are needed with Natural England to agree an approach on a SANG strategy that is both workable and that can fit within the guidelines proposed.

2.121 Work supporting the CIL charging schedules for Christchurch and East Dorset assesses the viability of development based on all the costs developers are likely to face in the District and Borough.

2.122 Trees

- It should be noted that this guidance has been agreed and adopted recently by Purbeck District Council at its Local Plan EiP. The guidance will shortly become adopted across South East Dorset between all stakeholder authorities. The guidance therefore carries considerable weight. It is not considered appropriate to provide detailed Tree policies in the Core Strategy.

Pre-Submission Core Strategy

Policy ME 4

Sustainable development standards for new development

Residential and non residential development including new homes, and the extension of existing homes will be expected to meet national sustainable development standards. Schemes that meet higher standards will be considered more favourably. Developments will be required to incorporate carbon reduction, water and energy efficiency measures and to demonstrate they have explored a range of sustainable and low carbon options. The most appropriate range and type of measures for each development should be informed by the code for Sustainable Homes Design Categories. These will include:

- Water and energy efficiency.
- Orientation and solar gain (natural lighting and heating).
- Use of renewable and low impact materials.
- Minimising waste, pollution and water run-off, incorporating Sustainable Drainage where possible.

Developments involving the conversion or alteration of historic buildings will be expected to demonstrate that they have explored a range of sustainable and low carbon options for construction and energy use and incorporated them into the design where practically possible, provided that this does not harm the character of the building or increase the risk of long-term deterioration to fabric or fittings.

Consultation Response

Legally Compliant		Sound		Core Strategy is unsound because it is not:								No Indication of legal compliance or soundness
				Positively Prepared		Justified		Effective		Consistent with National Policy		
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
3	0	6	5	2	2	3	0	3	2	3	5	7

Table 2.13

2.123 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
359261	Mr Doug Cramond	DC Planning Ltd	CSPS2098
359483	Ms Ellie Challans	Environment Agency	CSPS3935
360271	Cllr Paul Timberlake		CSPS491
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS3357
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS3358
360949	Mr Stuart Goodwill	Barratt David Wilson Ltd	CSPS2709
523531	Mr Tim Hoskinson	Savills	CSPS2131
523531	Mr Tim Hoskinson	Savills	CSPS3205
524723	Mr John Worth	Wimborne Civic Society	CSPS1932
619967	Mr James Stevens	Home Builders Federation (South West)	CSPS3683
626711	Mr Tom Hyde	BRE Global Ltd	CSPS3519
654660	Ms Anne Mason	Transition Town Christchurch	CSPS964

Summary of Responses

• *Sustainable Development Standards*

- Housing development needs to be built near to amenities to encourage carbon friendly forms of transport such as cycling or on foot.
- Cllr Paul Timberlake – I believe all the measures listed in the bullet points of the policy should be compulsory in order to meet sustainable and energy requirements of the future.
- Transition Town Christchurch – Good, but insulation should be added.
- Savills, on behalf of clients, Object: the policy is not consistent with national policy in that the second sentence is unclear and inconsistent with the guidance on the NPPF, and should be deleted.
- BREEAM - Advises that their website gives examples of the approaches taken by other Local authorities to the introduction of policies to require standards set out in the Code for Sustainable Homes and/or BREEAM.
- Home Builders Federation – We welcome the decision to adhere to the Building Regulations and not to introduce local standards that exceed those set nationally. However it is unclear what is implied by the statement that follows that schemes that meet higher standards will be considered more favourably. This implication is that schemes that meet Building Regulations may be considered less favourably than schemes which achieve higher levels. We are not sure that this would be appropriate.

Environment

- ETAG – (with reference to paragraph 13.20) To avoid or mitigate the impact of climate change it is essential that its causes are understood and addressed. Within the Core Strategy consideration has been limited to the use of fossil fuels. ETAG has provided detailed information about the importance of soil carbon and consider that the Core Strategy should consider soil carbon losses due to changes in land management, and suggest that the following wording is added to the text of ME4: All development proposals should identify and take into account the ecosystem services provided by natural and semi-natural habitats. Where soil carbon losses cannot be avoided, mitigation should seek to ensure minimal soil disturbance and restore permanent semi-natural habitat. While supporting the policy, we are concerned that the wording of bullet point 4 appears to imply that if Sustainable Drainage Systems cannot be incorporated development may be allowed, therefore redraft the policy to ensure no ambiguity on provision of Sustainable Drainage Systems.
- Wimborne Civic Society – We feel that this policy should provide adequate safeguards for heritage protection and historic buildings.
- Environment Agency – We would encourage you to specify which Code for Sustainable Homes category you will require within new residential development. You should at least refer to water use, which is very important in this area where much of the water supply is obtained from rivers, some of which like the Hampshire Avon are protected for their wildlife importance. Specifying a water usage level for new developments will also support policy ME1. Suggest that Core Policy 19 of the adopted South Wiltshire Core Strategy be considered as a model for this revision. There is also no consideration of commercial development. This is covered by the BREEAM standards, and you should consider also being specific about what you expect within commercial developments, in terms of sustainability performance.

Councils' Response

2.124 No significant objection was received for this policy and it is considered that the policy continues to meet the overall thrust of the NPPF with regards to supporting the move to a low carbon future.

2.125 Whilst a lack of a specific evidence base for Christchurch and East Dorset precludes a policy that set standards significantly higher than those proposed at the national level, it is considered that the policy encourages those developments that wish to do so. Similarly the issue of soil carbon raised in the responses would also need a similar evidence base - it is also considered that the issue may be better encompassed either in a revised ME1 or in a more detailed development management policy, if and when evidenced.

2.126 Further reference to preferring the use of Sustainable Drainage Systems is provided in policy ME6, which goes further by requiring all new developments to not result in a net increase in surface water run-off.

Proposed Changes to the Pre-Submission Core Strategy

2.127 No change proposed.

Pre-Submission Core Strategy

Policy ME 5

Renewable energy provision for residential and non-residential developments

The provision of renewable, decentralised, and low carbon energy will be encouraged in residential development of 10 or more dwellings (or sites of 0.5 hectares or greater), and non residential development of 1,000m² gross floorspace (or 1 hectare or greater). This will include new development, and the extension and refurbishment of existing homes or premises.

The expectation will be that 15% of the total energy used in these types of development will be from such energy sources (unless having regard to the type of development involved and its location and design, this is not feasible or viable - in which case the highest levels of this type of energy generation possible will be sought). If applicable national standards call for a higher percentage of such energy, the national standards will be applied.

The Councils will require all schemes or phases with a development to meet a set overall site pre-development target for sustainable energy generation rather than allowing a piecemeal approach. Where new national standards increase the requirement then such standards will be required to be integrated into any further ongoing development on the site.

Within larger developments and new neighbourhoods/urban extensions, the Councils will require the investigation of options for district heating and/or power facilities. Developments may be required to connect to district heating and/or power facilities where appropriate, feasible and viable. Developers will be expected to assess a range of suitable options including district wide and/or micro generation in respect of their sites, with the suitability of the chosen technology being judged on a site-specific basis.

Energy provision should normally be provided on-site, particularly on larger developments, or if not viable, through the Community Infrastructure Levy.

Consultation Response

Legally Compliant		Sound		Core Strategy is unsound because it is not:								No Indication of legal compliance or soundness
				Positively Prepared		Justified		Effective		Consistent with National Policy		
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
4	1	4	10	2	1	3	1	5	1	6	4	0

Table 2.14

2.128 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
359261	Mr Doug Cramond	DC Planning Ltd	CSPS2105
360082	Mr and Mrs K Healy		CSPS2508
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS3359
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS3360
521508	Ms Lisa Jackson	Jackson Planning Ltd	CSPS3652
523319	Mr Ryan Johnson	Turley Associates	CSPS3297
523319	Mr Ryan Johnson	Turley Associates	CSPS3782
523531	Mr Tim Hoskinson	Savills	CSPS2132
523531	Mr Tim Hoskinson	Savills	CSPS3206
527744	Mr Alan Hannify	Alliance Planning	CSPS2306
619967	Mr James Stevens	Home Builders Federation (South West)	CSPS3684
650810	Ms Fiona Astin	Synergy Housing	CSPS392

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
654618	Mr Peter Tanner	Tanner & Tilley Planning Consultants	CSPS884
654660	Ms Anne Mason	Transition Town Christchurch	CSPS965

Summary of Responses

• *Renewable energy provision*

- Synergy Housing – We believe that the emphasis of this policy is flawed. Overall carbon reduction can be achieved by having highly energy efficient buildings rather than purely through the inclusion of renewable energy technologies such as heat pumps etc. Such technology solutions remain relatively expensive and are not always easy to use or understand by dwelling occupants. Suggest that the emphasis of this policy is changed to reflect a dwelling emissions target rather than concentrating on renewable energy technologies. Then there is a choice of whether to reach the target with a ‘fabric first’ approach or including technology solutions (or indeed a combination of the two).
- Tanner and Tilley, on behalf of Pennyfarthing Homes, - it is considered that the Local Authority should clarify the policy and confirm that if the local authorities include energy provision within the Community Infrastructure Levy, where energy provision is to be provided on-site this will be funded through Community Infrastructure Levy rather than the developer being faced with what would otherwise be a ‘double charge’.
- Transition Town Christchurch – add ‘Sustainability should be a material consideration in all planning decisions.’
- DC Planning Ltd, for clients – the Councils’ stance on renewable energy is set in too rigid a framework and to a degree reflects past rather than current thinking. The increasing consensus is that reducing energy consumption by in-built fabric means is more appropriate and effective in the reduction of carbon emissions than bolt on or even integral renewable energy devices. These could effectively just be meeting a % of energy from a wasteful home. The policy should acknowledge that there is ‘another way of doing things’ through enhanced specification for the built fabric.
- Savills, on behalf of clients – the policy is inconsistent with national policy, in that para 95 of the NPPF advises that any local requirements should be consistent with national standards. Recommend the deletion of the second and third paragraphs of ME5.
- We fully support this policy for the provision of small scale localised renewable energy.
- Alliance Planning, for Eco Sustainable Solutions Ltd - It is submitted that the Core Strategy should set out the scale of the requirement derived from national policy to deliver decentralised renewable energy sources that reduce carbon emissions and reliance on traditional sources. There should also be a clear strategy for the development of renewable energy generating capacity that will enable or support the acknowledged need to tackle climate change, including the identification of potential sites and renewable energy sources. We would propose the inclusion of a specific policy stating as follows: ‘The development of low carbon decentralised, renewable energy proposals will be supported including combined heat and power, wind and solar proposals.’ Supporting text should reference the commitment outlined in the NPPF to increase the supply of renewable and low carbon energy. These changes will give substance to the statements pertaining to climate change and ensure that the Core Strategy is positively prepared, justified, effective and consistent with national policy.

- ETAG – support subject to minor changes, in that the proposals should demonstrate that they will achieve a net reduction on carbon emissions, as required in NPPF para 95.
- Turley Associates, for clients - object to the policy on the grounds that the 15% renewable energy target would add a very significant and inappropriate burden to new development. It also does not support current best practice. Strongly request that the council remove the 15% target within policy ME5 and apply Building Regulations as the local standard for energy and carbon reductions. We request that the council amend this wording to include only regulated energy which is in accordance with Government Policy on Zero carbon homes. (Paras 95 and 96 of the NPPF). Finally we request the council apply the recommendations of the Zero Carbon Hub's research into the development of low and Zero Carbon Homes. This work strongly recommends that a 'fabric first' approach be adopted which requires homes to focus on energy and carbon reductions through the use of a more insulated fabric prior to the use of renewable technologies.
- Jackson Planning Ltd, for clients – The Core Strategy is not sound as policy ME5 fails to deal with the strategic issues of renewable energy development. Suggest an addition to Policy ME5 (or separate policy): Proposals for renewable energy production and ancillary infrastructure, including distributed generation will be supported in order to reach the Government's target of 15% renewable energy production by 2020. Proposals should demonstrate that they do not have a negative impact on: i adjoining land uses, ii nature conservation designations, iii heritage assets, iv the wider landscape, in particular New Forest National Park, v residential amenity both during construction and operation, vi the road network. (this representation is substantiated by additional evidence submitted with the representation by MEM Ltd).
- Home Builders Federation - It is not appropriate to specify how carbon reduction targets (of Part L of the Building Regulations) are achieved by developers, such as 15% of total energy used to be from on-site or off-site renewable energy as specified in this policy. It is a matter for developers alone how they achieve the Part L requirements and how they achieve this will depend on the specific circumstances of each site. It would assist the industry better if the councils identified through the plan suitable areas for renewable energy plant to be constructed and existing low carbon energy sources and supporting infrastructure (para 97 of the NPPF).

Councils' Response

2.129 The key concerns raised with this policy were based around viability of development, greater emphasis on the need for a 'fabric first' approach and whether it still fitted with Government's national policies.

2.130 The figure of 15% was aspirational and did not take sufficient account of viability. The figure of 10% is based on evidence that takes account development viability and it is proposed that this figure is placed in the policy, subject to viability.

2.131 The fabric first approach is already effectively a requirement of policy ME4 as is the need for greater energy efficiency. If new development is inherently designed for low energy consumption, then this will in turn reduce the amount of energy needed by the 10% requirement.

2.132 Paragraph 97 of the NPPF looks to local authorities to have in place strategies to promote energy from renewable and low carbon sources which this policy aims to fulfil.

2.133 The Government's move towards a zero carbon buildings policy, if it comes in 2016 as previously proposed, is likely to result in a similar or greater proportion of on site provision as well as off-site through allowable solutions.

2.134 In terms of dealing with the more strategic issues relating to renewable energy, it is considered an additional policy is required. This is in line with the requirements set out in the NPPF.

Proposed Changes to the Pre-Submission Core Strategy

Policy ME5 Renewable energy provision for residential and non-residential developments....

....The expectation will be that ~~15%~~ **10%** of the total energy used in these types of development will be from such energy sources (unless having regard to the type of development involved and its location and design, this is not feasible or viable - in which case the highest levels of this type of energy generation possible will be sought). If applicable national standards call for a higher percentage of such energy, the national standards will be applied.

Consultation Response

Legally Compliant		Sound		Core Strategy is unsound because it is not:				No Indication of legal compliance or soundness
				Positively Prepared	Justified	Effective	Consistent with National Policy	
Yes	No	Yes	No					
3	1	1	1	0	1	0	0	1

Table 2.15

2.135 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Organisation Details	Comment ID
359571	Mr Renny Henderson	Conservation Officer Royal Society for the Protection of Birds	PCCS231

Contact Person ID	Contact Full Name	Contact Organisation Details	Comment ID
360302	Mrs Hilary Chittenden	Chairperson Environment TAG (East Dorset)	PCCS462
521508	Ms Lisa Jackson	Managing Director Jackson Planning Ltd	PCCS478
654817	Mr Alan Spencer		PCCS133
717890	Angela Pooley	Co-ordinator Eastdorset Friends of the Earth	PCCS117
719947	Mrs Susan Phyllis Christine Chapman		PCCS400

Summary of Responses

2.136 Angela Pooley, Friends of the Earth

- Reducing the target for renewables from 15% to 10% is contrary to the UK's binding target of achieving a minimum of 15% of all energy coming from renewables. It is also contrary to the policies in the Bournemouth, Dorset & Poole Renewable Energy Strategy to 2020.

2.137 Mr Alan Spencer, Local Resident

- The policy, by reducing its target from 15% to 10%, is ignoring that future innovation can have an impact in reducing the effects of Climate Change. It also gives a message to developers and the public that climate change is not a serious issue. 10% is a soft target; it is quite easily achievable with modern materials and processes.

2.138 Mr Renny Henderson, RSPB

- We object to this amendment. We are unclear as to the justification of the reduction to 10%.

2.139 Mrs Hilary Chittenden, Environment TAG

- As advised in our response to Objective 3, we do not support the reduction of aspirational targets for renewable energy provision. Arguments about viability cannot be sustained when the technology that might be applicable to any site over the Plan period is unknown as is the level of Government incentives. We should be striving to achieve the maximum that is technically possible as required in NPPF 97.

2.140 Mrs Susan Phyllis Christine Chapman

- Target has been altered to 10% rather than 15%. This is not in line with "presumption in favour of sustainable development". Rt Hon Greg Clarke, minister for planning in National Planning Policy Framework.

2.141 Ms Lisa Jackson, Jackson Planning

- The basis of the reduction of the renewable energy target from 15% to 10% is not sound. It is inconsistent with National Energy Policy and the Government's target in National Energy Policy EN-1. It is also inconsistent with NPPF paragraph 93 that emphasises the role planning plays to secure radical reductions in greenhouse emissions and supporting the delivery of renewable and low carbon infrastructure. Paragraph 95 – third bullet point- requires LPAs to set standards for sustainability consistent with the Government's policy. A reduction of Renewable Energy provision reduction to 10% within the policy is not justified on viability grounds. The very fact that larger proportions of total energy used must be from renewable sources will assist in driving down unit prices.

Councils' Position

2.142 The proposed change based on available evidence on viability of development rather than on the Government target of 15% that directly relates to the need for the Country to cut Carbon Dioxide emissions. Whilst no specific target is set out in the NPPF, the policy is worded such that if a higher national standard is set, this would take precedence.

Policy ME8 (New Policy) Sources of Renewable Energy

Pre-Submission

2.143 No policy.

Proposed Changes to the Pre-Submission Core Strategy

Policy ME 8 (New Policy) Sources of Renewable Energy

The Councils encourage the sustainable use and generation of energy from renewable and low carbon sources where adverse social, environmental and visual impacts have been minimised to an acceptable level.

Proposals for renewable energy apparatus will only be permitted where:

- The technology is suitable for the location and does not cause significant adverse harm to visual amenity from both within the landscape and views into it, and within the Cranborne Chase AONB is in accordance with the current AONB Management Plan;
- It would not have an adverse ecological impact upon the integrity of protected habitats or species unless there is no alternative solution and there are imperative reasons of overriding public interest;
- It would not cause interference to radar, or electronic communications networks, or highway safety;
- It would not cause significant harm to neighbouring amenity by reason of visual impact, noise, vibration, overshadowing, flicker (associated with turbines), or other nuisances and emissions;
- It includes an agreed restoration scheme, any necessary mitigation measures, with measures to ensure the removal of the installations when operations cease;
- Safe access during construction and operation must be provided; and
- It avoids harm to the significance and settings of heritage assets.

Further work will be undertaken to identify suitable areas for renewable and low carbon energy sources

Consultation Response

Legally Compliant		Sound		Core Strategy is unsound because it is not:				No Indication of legal compliance or soundness
				Positively Prepared	Justified	Effective	Consistent with National Policy	
Yes	No	Yes	No					
6	0	0	8	3	4	6	5	1

Table 2.16
2.144 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Organisation Details	Comment ID
359461	Mrs Nicola Brunt	Urban & East Dorset Living Landscapes Manager Dorset Wildlife Trust	PCCS356
359571	Mr Renny Henderson	Conservation Officer Royal Society for the Protection of Birds	PCCS242
360302	Mrs Hilary Chittenden	Chairperson Environment TAG (East Dorset)	PCCS464
474462	Mrs Sheila Bourton		PCCS499
474490	Mrs Sheila Bourton	Chairman Keep Wimborne Green	PCCS500
521508	Ms Lisa Jackson	Managing Director Jackson Planning Ltd	PCCS490
654456	Mr Elliot Marx		PCCS224
717890	Angela Pooley	Co-ordinator Eastdorset Friends of the Earth	PCCS118
718911	Mr Joshua Lambert	Planning Assistant Pro Vision Planning and Design	PCCS176

Summary of Responses
2.145 Mr Renny Henderson, Conservation Officer, Royal Society for the Protection of Birds

- We generally support the aims of this new policy.

2.146 Mr Joshua Lambert, Pro-Vision Planning representing Wessex Water

- The Estate supports policy ME8 as the policy is consistent with Paragraph 97 of the NPPF

2.147 Mrs Lisa Jackson, Jackson Planning representing Meyrick Estates

- Please note that with the new policy additions KS13 and ME8 the previous objections about these omissions have now been overcome

2.148 *Conflict with Policy ME1*

2.149 Mr Renny Henderson, Conservation Officer, RSPB

- We suggest the addition of text which highlights the need for schemes to be comprehensively assessed and to avoid or mitigate for potential harm, in accordance with Policy ME1.

2.150 Mrs Nicola Brunt, Dorset Wildlife Trust

- Dorset Wildlife Trust consider that ME8 could conflict with ME1 with the paragraph permitting development where “ It would not have an adverse ecological impact upon the integrity of protected habitats and species unless there is no alternative solution and there are imperative reasons of overriding public interest”.
- We consider that there should also be reference to priority habitats and species and continue to be a requirement to mitigate or compensate for any harm to the natural environment where such schemes are approved.

2.151 Mrs Hilary Chittenden, Chairman, Environment TAG

- While accepting that policies throughout the Core Strategy are mutually dependent there could be risk of this policy conflicting with biodiversity policy, ME1.

2.152 *Renewable Technology*

2.153 Angela Pooley, Co-ordinator East Dorset Friends of the Earth

- The wording for this policy is unjustifiably negative and suggests a lack of commitment to renewable technology, in particular, wind.

2.154 Mrs Sheila Bourton

- With regard to renewable energy apparatus, how does the Council measure "it will not cause significant harm to a neighbouring amenity by reason of... ."? What is meant by "significant"? There must surely be a demonstrative formula to measure perceived harm.

2.155 Mrs Sheila Bourton, Chairman, Keep Wimborne Green

- How does the Council measure "significant harm to a neighbouring amenity..."? What is meant by "significant"?

2.156 Mr Elliot Marx, Local Resident

- The Councils encourage the sustainable use and generation of energy from renewable and low carbon sources where adverse social, environmental and visual impacts have been minimised to an acceptable level.
- The judgement of at what point impacts have been minimised to 'acceptable' levels is open to challenge as the New Policy ME8 proposed here will not result in the needed amount of renewable energy being generated.
- Loss of visual amenity should not be a deciding factor in granting permission for installation of wind turbines or any other renewable energy installation. The need for new renewable energy generation is too urgent to compromise development in this way

Councils' Position

2.157 The supporting comments are welcomed.

2.158 Policy ME1

2.159 ME1 applies to all development, including renewable energy, so whilst not specifically referred to, a development site would need to comply with this policy.

2.160 Renewable Technology

2.161 It is considered the policy meets the requirements of the NPPF. It will however, continue to be developed as further work will be undertaken to identify suitable areas for renewable and low carbon energy sources during the plan period. This is stated in the policy itself allowing flexibility to meet changes in technology advancement. With regard to the term 'significant', this will be judged on a case by case basis, but has been accepted by Planning Inspectors as being an appropriate form of wording in this policy.

2.162 Paragraph 13.33 -

2.163 PPS25-The National Planning Policy Framework makes specific recommendations that development should be located away from flood zones. It also requires that development within flood zones should be flood resistant (keeping water out) and resilient (to recover quickly following a flood). Development is also recommended to incorporate Sustainable Urban Drainage Systems to manage surface water runoff.

2.164 Ms Gill Smith, DCC

- Dorset County Council supports these proposed changes.

Pre-Submission Core Strategy

Policy ME 6

Flood management, mitigation, and defence.

When assessing new development, the local authorities will apply the sequential and exception tests set out in PPS25.

All developments (including redevelopments and extensions which require planning permission) within areas at risk of flooding will be required to incorporate appropriate flood resistance and resilience measures as a means of "future proofing" against the effects of climate change. Historic buildings and sites may be exempt from this Policy where measures would harm their character or increase the risk of long-term deterioration to fabric or fittings.

All developments will be required to demonstrate that flood risk does not increase as a result of the development proposed, and that options have been taken to reduce overall flood risk. Post-development surface water run-off must not exceed pre-development levels and options should have been sought to reduce levels of run-off overall. This will primarily be through the use of Sustainable Urban Drainage Systems (SUDS) and a range of flood resistance and resilience measures. Space for such measures should be set aside within larger developments.

The design, construction, operation and maintenance of SUDS must meet national standards. Plans for new drainage systems will need to be approved by Dorset County Council (as SUDS approval body) before construction can start.

Strategic flood defences are identified in the Core Strategy Infrastructure Delivery Plan, and delivery of these schemes will be supported by a range of funding sources including the Community Infrastructure Levy (CIL). Section 106 planning obligations will continue for implementation of site specific flood defence improvements where required. Where development is of a sufficient scale to fund flood alleviation works to make that development safe throughout its design life, works in kind will be considered where appropriate.

For developments within a flood risk area which pass the sequential test, but where risk can not be adequately mitigated on site, a flood management strategy and delivery plan will be required prior to the grant of consent. The strategy will identify the measures required to reduce flood risk and surface water run-off at the site for the duration of its design life, making it safe (including unaided access/egress during flood events) and ensuring that flood risk does not increase elsewhere as a result. The delivery plan will identify the level and source of funding required for such measures and set out a realistic and achievable timetable for implementation. For very large schemes, area wide flood attenuation measures may be required.

Consultation Response

Legally Compliant		Sound		Core Strategy is unsound because it is not:								No Indication of legal compliance or soundness
				Positively Prepared		Justified		Effective		Consistent with National Policy		
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
8	0	8	10	2	1	2	1	1	2	2	11	4

Table 2.17

2.165 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
359437	Ms Gill Smith	Dorset County Council	CSPS2030
359483	Ms Ellie Challans	Environment Agency	CSPS3936
359529	Mrs Lisa Goodwin	Sixpenny Handley with Pentridge Parish Council	CSPS2482
360082	Mr and Mrs K Healy		CSPS2509
360271	Cllr Paul Timberlake		CSPS495
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS3374
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS3386
474462	Mrs Sheila Bourton		CSPS189
474490	Mrs Sheila Bourton	Keep Wimborne Green	CSPS219
524338	Mr Kenneth Brooks		CSPS243
654660	Ms Anne Mason	Transition Town Christchurch	CSPS966
656493	Cllr Tony Gibb	Eastern Area DAPTC	CSPS1482

Summary of Responses

- **Risk of Flooding**
 - Environment Agency (EA) - Please replace any reference to PPS25 with the NPPF. Policy ME6 – please amend the second sentence to read: ‘Where, exceptionally, all development (including redevelopments and extensions which require planning permission) can be permitted within areas at risk of flooding, they will be required to incorporate...’ This reflects the potential result of the Sequential and Exceptions Tests, which all new development proposals within flood zones 2 and 3 are subject to. It is important to make it clear in the policy that development allowed within flood risk areas is the exception rather than the rule. The Options for Consideration document contained policy ME18 – ‘Development within areas at risk of coastal erosion’. We would encourage you to allow this policy to remain as coastal erosion poses a real threat to existing and new communities within Christchurch. The EA also request a consistent approach to the mention of Flood Risk Assessments, surface water management etc within the individual policies in respect of new neighbourhoods throughout the plan.
 - ETAG - (para 13.28) there is no mention of surface flooding or the pollution risk it poses particularly at employment sites. (NPPF para 110). (para 13.30 – 13.37 and Policy ME6) support the proposals to ‘future proof’ against the effects of climate change, but are concerned that the ecosystem function, in terms of water storage capacity, of proposed development sites has not been taken into consideration (NPPF para 109). Suggest that para 13.33 will need to be amended to be consistent with the NPPF. As part of that change, reference should be made to the water storage capacity of the land and the need for that to be enhanced to reduce the risk of flooding.
 - DCC – as Lead Local Flood Authority, DCC has responsibility to develop a strategy to tackle local flood risks and to ensure that other plans and policies accord with it. It is suggested that the following wording be added to para 13.30: ‘The National Planning Policy Framework (NPPF), when supported by the Christchurch and East Dorset Strategic Flood Risk Assessments (SFRA), Dorset Surface Water Management Plan 2011 and Flood Map for Surface Water (Environment Agency), will inform decisions regarding the suitability of all forms of development within flood zones.’ Para 13.33 and Policy ME6 should be amended by removing reference to ‘Urban’ in ‘Sustainable Urban Drainage Systems’ and SUDS.
 - Keep Wimborne Green – the importance of protecting both new and existing properties from flood risk cannot be over emphasised. Particular area at risk is the proposed WMC5 Cranborne Road where run off could seriously affect existing properties south of this new proposed development.
 - Cllr P Timberlake - not entirely happy with the parts of ME6 which allow development on flood plains – especially in view of the possible effects of global warming and rising water levels, and if development is allowed, is it better to allow historic buildings to take their chance with nature, rather than take some protective action, even of this does affect the building’s integrity to some degree. He suggests not allowing any residential development in flood plains where there is a more than 100 year to one likelihood of flooding taking place.
 - Transition Town Christchurch – Good but should include rainwater harvesters to control surface water run-off and protect storm flooding from overwhelming sewers and polluting nearby sea. These also can supplement garden water requirements during times of drought.
 - Eastern Area DAPTC – The chalk landscape produces particular problems with flooding in certain areas which can lead to paralysis of the economy and infrastructure with an allied impact on foul water drainage. It is essential that the District Council recognises their liability to work with the County Council to mitigate the effects of surface water flooding which are now more common than 25 years ago.

- Sixpenny Handley Parish Council – Surface water drainage in Sixpenny Handley is inadequate in that it cannot cope with flash flooding/winterbourne ground water with the result that it impinges on the foul water (sewerage) system and thus be the cause of serious environmental health problems.
- We fully support this policy. It is particularly important in Wimborne as the old town is so susceptible to flash floods in storm conditions.

Councils' Response

2.166 The policy requires updating with references to the NPPF as well as the comments from the Environment Agency. Alterations to the text are also required to include comments from DCC regarding Sustainable Drainage Systems in Policy ME6 and the text in paragraph 13.30 and 13.33.

2.167 The issues of coastal erosion and development is now sufficiently covered by the Shoreline Management Plan (SMP) for the area so does not require a specific policy on the matter.

2.168 The issues of pollution on the natural environment is effectively covered by policy ME1 which is concerned with all adverse impacts on designated sites, habitats or species.

2.169 Issues of water storage capacity of land and surface water drainage need to be considered at a more detailed stage of the development process along with the work DCC is now required to do as the lead local flood authority, when work towards ensuring there is no net increase in surface water run-off is being addressed.

2.170 References to rainwater harvesting for use for gardening, etc. is primarily covered by the requirements of policy ME4, but is also an issue likely to be encompassed when site run-off levels are addressed.

Proposed Changes to the Pre-Submission Core Strategy

Policy ME6 Flood management, mitigation, and defence

When assessing new development, the local authorities will apply the sequential and exception tests set out in the **National Planning Policy Framework. PPS25.**

Where exceptionally, all developments (including redevelopments and extensions which require planning permission) **can be permitted** within areas at risk of flooding **they** will be required to incorporate appropriate flood resistance and resilience measures as a means of "future proofing" against the effects of climate change. Historic buildings and sites may be exempt from this Policy where measures would harm their character or increase the risk of long-term deterioration to fabric or fittings.

All developments will be required to demonstrate that flood risk does not increase as a result of the development proposed, and that options have been taken to reduce overall flood risk. Post-development surface water run-off must not exceed pre-development levels and options should have been sought to reduce levels of run-off overall. This will primarily be through the use of Sustainable ~~Urban~~ Drainage Systems (SUDS) and a range of flood resistance and resilience measures. Space for such measures should be set aside within larger developments.

Consultation Response

Legally Compliant		Sound		Core Strategy is unsound because it is not:				No Indication of legal compliance or soundness
				Positively Prepared	Justified	Effective	Consistent with National Policy	
Yes	No	Yes	No					
1	0	1	1	0	1	0	0	1

Table 2.18

2.171 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Organisation Details	Comment ID
359437	Ms Gill Smith	Affordable Housing Officer Dorset County Council	PCCS399

Contact Person ID	Contact Full Name	Contact Organisation Details	Comment ID
360302	Mrs Hilary Chittenden	Chairperson Environment TAG (East Dorset)	PCCS463
490815	Mrs Trish Jamieson	Clerk Burton Parish Council	PCCS482

Summary of Responses

2.172 *Supporting comments*

2.173 Gill Smith, Dorset County Council

- Dorset County Council supports these proposed changes.

2.174 Mrs Trish Jamieson, Clerk, Burton Parish Council

- Supports the strengthening of the restrictions on building in areas likely to flood.
- Notes that this policy as strengthened will protect Burton Village from development in unsatisfactory areas.

2.175 Mrs Hilary Chittenden, Chairman Environment TAG

- The revised wording needs slight correction so that it makes sense. Where exceptionally any developmentRemove the word '*all*'.

Councils' Position

2.176 The supporting comments are welcomed. The comments regarding the use of the word 'all' are noted, but it is not considered necessary to make the change suggested in this instance.

Pre-Submission Core Strategy

Policy ME 7

Protection of Groundwater

Groundwater Source Protection Zones will be identified on the proposals map. Where development is proposed in a location likely to affect a Groundwater Source Protection Zone, an assessment of the impact and any mitigation measures proposed must be provided.

This assessment should cover the following:

- The nature of the development, and its anticipated impact on groundwater in terms of contaminants both during construction, and upon completion.
- The need for the development to be in a location affecting Groundwater Source Protection Zones.
- Proximity and impact on licenced and un-licenced water supply.
- Impact on underground aquifers.

The assessment should reflect advice contained in the Environment Agency's document 'Groundwater Protection: Policy & Practice' (GP3).

Consultation Response

Legally Compliant		Sound		Core Strategy is unsound because it is not:								No Indication of legal compliance or soundness
				Positively Prepared		Justified		Effective		Consistent with National Policy		
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
3	0	3	0	1	0	1	0	1	0	1	0	0

Table 2.19

2.177 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
360271	Cllr Paul Timberlake		CSPS496
474462	Mrs Sheila Bourton		CSPS190
474490	Mrs Sheila Bourton	Keep Wimborne Green	CSPS220

Summary of Responses

- ***Protection of Groundwater***

- Keep Wimborne Green – Groundwater Protection Zones should not be compromised and adequate assessments should be made before any development takes place. This is particularly important when this Country is experiencing drought conditions on ever more frequent occasions.
- Cllr P Timberlake – Support Policy ME7.

2.178 Councils' Position

2.179 Based on national policy and the consultation responses, it is recommended that no change is made to this policy.