

**Core Strategy Pre-Submission – Chapter 15 Meeting Local Needs**

Contact Person ID	Contact Full Name	Contact Company / Organisation	ID	Number	Question 1 - Legally compliant	Question 2 - Sound	Question 3 - Positively Prepared	Question 3 - Justified	Question 3 - Effective	Question 3 - Consistent with national policy	Question 4	Question 5	Question 6	Question 7	Order	Filename
360692	Mrs Wendy Britton		<a href="#">CSPS684</a>	15	Yes	No	Yes	Yes	Yes	Yes	<p>This objection relates to the Pre-Submission Core Strategy (PSCS) and the 'soundness' of the policies regarding the potential development of land at Arch Ground, Station Road, Sturminster Marshall as a New Neighbourhood and Area of Public Open Space with recreational and community facilities. References are made (but not exclusively) to the PSCS and the following policies:-</p> <ol style="list-style-type: none"> <li>1. KS1 (settlement hierarchy)</li> <li>2. KS4 (housing provision and provision of land)</li> <li>3. HE4 (open space provision)</li> <li>4. Chapter 4 (the broad location and scale of housing)</li> <li>5. Chapter 12 (strategic allocations)</li> <li>6. Chapter 14 (creating high quality and distinctive environments)</li> <li>7. Chapter 15 (meeting local needs)</li> <li>8. RA1 (Bailie Gate)</li> </ol> <p><b>BACKGROUND</b> This objection is in respect of policies and the text of the PSCS which would if implemented deny the development of about 7.2 hectares (ha.) of land known as Arch Ground (as shown edged red on the map attached to the hard copy submission). The promotion of the land for development has a long planning history which is available from the files held by East Dorset District Council and the owners. However, to date planning permission has not been secured due to policy restrictions resulting from the site being within the Green Belt. The current use of the land is agricultural. It is enclosed by Station Road and by the housing opposite fronting that road. It is also enclosed by the hedge-row, trees and the industrial buildings situated on or near the adjacent boundary of the Bailie Gate industrial estate. The other two boundaries are bounded by natural high hedge-rows etc. The south-east boundary is also clearly defined by an existing access track. The land is not within the conservation area, nor is it subject to flooding. Access to the site is from Station Road. The land is in private ownership and does not provide any public amenity. Views to the distant open countryside are restricted by the boundaries as previously described. The land is flat and constrained and is visually uninspiring. The site is situated on the main road through the existing built-up area. It is close to existing local amenities, facilities and services including public service vehicle routes to nearby Wimbourne Minster (5m), Poole(7m) and Blandford(7m). It is also close to the shops, post-office, school, 3 pubs, church, pharmacy, garage, hairdresser, community hall, golf course and is immediately proximate to the site of a large industrial employment estate.</p> <p><b>THE PROPOSAL</b> It is clear from the above information that the land meets all the requirements necessary (see Note.1) for the development of a New Neighbourhood as defined in policy KS4 and referred to in Chapter 4.21. The area proposed for residential development would require the redefinition of the Green Belt boundaries to allow the removal of</p>	<p>The following alterations are required to be made:-</p> <ol style="list-style-type: none"> <li>1. Generally – Amend the Pre-Submission Core Strategy to include a Strategic Policy regarding, The development of a 'New Neighbourhood' and area of Public Open Space etc. at Station Road Sturminster Marshall. This policy should be drawn for the sake of clarity in a similar form as to Policy RA1.</li> <li>2. Pol.HE4 - amend table to incorporate the above.</li> <li>3. Pol.KS1. - amend to incorporate 1 above.</li> <li>4. Pol. KS4. - Ditto</li> <li>5. Chapter 4 – Ditto</li> <li>6. Chapter12 – Ditto</li> <li>7. Chapter 14 – Ditto</li> <li>8. Chapter 15 – Ditto</li> </ol>	Yes, I wish to participate at the oral examination	To support the proposal	689	

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											<p>about 3.7ha. from the total site area of 7.2ha. currently in the Green Belt.</p> <p>Economically viable and highly sustainable low density residential development of the site would be phased in line with demand and the need to make good, the substantial housing short-fall which has accrued over the last decade or so.</p> <p>In addition the Proposal incorporates the provision of the 3.5 ha. of retained Green Belt land as Public Open Space with recreational and community facilities, similar to that described in the 'saved policy SM2 and SM3' of the 2002 local plan.</p> <p>It is to be noted that the removal of above 3.7ha. of land from the Green Belt replicates the similar removal of 3.3ha. from the Green Belt in order for the highly successful and adjacent Bailie Gate industrial estate to be expanded as set out in Policy RA1.</p> <p>It is also to be noted that as an indirect result of the expansion of the Bailie Gate industrial estate the New Neighbourhood would meet the potential need for additional housing in the Sturminster Marshall area, over and above that required to meet future household growth and the making good of the current substantial short-fall.</p> <p>The Proposal would also provide additional support and enable the growth of existing services etc. currently available in Sturminster Marshall area of East Dorset.</p> <p>Note1.</p> <p>'New Neighbourhoods' are residential led schemes around settlements with good access to key services, facilities and employment. They are designed to produce high quality sustainable developments, that are able to be integrated into the local character of the area without having a detrimental impact on the surrounding countryside They will require the re-drawing of the Green Belt boundaries to accommodate them. The difficulty in meeting housing need, will provide the exceptional circumstances to enable the provision of New Neighbourhoods.</p>					
654989	Tanner & Tilley	Tanner & Tilley Planning Consultants	<a href="#">CSPS982</a>	15	No	No	Yes	Yes	Yes	Yes	<p>The NPPF advocates that local planning authorities should plan for a wide choice of quality homes and to have regard for current and future demographic trends. Having regard for the very high proportion of older person households within the Plan area and the projected growth of the number and proportion of older people over the Plan period, particularly among the very old and frail elderly, it is important that the Core Strategy should identify how it intends to address this particular issue and how special accommodation will be encouraged to be provided to serve the present and future needs of older people. It is recognised that older people household account for a significant under occupation of the existing housing stock. The broadening of choice and housing opportunity for older people can contribute significantly to releasing under-occupied housing stock that will promote re-investment into the existing housing stock and make a significant contribution to providing for the housing needs of younger households.</p>	<p>It is suggested that the LPA include policies in the Core Strategy aimed at encouraging the provision of a broad range of accommodation to address the growing elderly population, including encouragement for sheltered housing, care homes and Extra Care accommodation, throughout the Plan area.</p> <p>It is also suggested that the LPA recognise the need to develop strategies for providing for the needs of the ageing population, relating to access to services and facilities; access to transport; education; entertainment and recreation facilities; and for the provision of housing and care facilities to serve the needs of older people. It is suggested that these strategies be further detailed in Development Plan Documents.</p>	No, I do not wish to participate at the oral examination		689	

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654456	Mr Elliot Marx		<a href="#">CSPS960</a>	15.1			Yes	Yes			'Our basic needs include health, safety and shelter. We also need social cohesion, (ADD) Community resilience, and education. Without the ability to provide for these needs we fail to live successful and meaningful lives.' People also need Community resilience for adaptation to times of climate change and economic downturn.				690	
656493	Cllr Tony Gibb	Eastern Area DAPTC	<a href="#">CSPS1484</a>	15.1	No	No	No	No	No	No	<p>RURAL RESPONSE TO EAST DORSET AND CHRISTCHURCH CORE STRATEGY</p> <p>This response is made to supplement those made by individual parishes. Some of the points made are general to all some are specific to a few. This response does not concern itself with Christchurch Borough.</p> <p>Area Covered by Response including the parishes and grouped parishes of Aderholt, Cranborne, Knowlton, Gussages, Vale of Allen, Holt, Pamphill &amp; Shapwick, Sixpenny Handley with Pentridge, Sturminster Marshall. It does not include the conurbations along the A31 or Verwood and Three Legged Cross.</p> <p>Despite previous comments, the Core Strategy remains urban centric, focussing on the conurbations along the A31 and ignoring the largest part of the District. The size of the rural community (as covered by this response) is 25597 hectares or 72.21% of the East Dorset Area (source Dorset Data Book 2011). The rural population is 12950 or 14.74% of the East Dorset population. These communities deserve better recognition within the Core Strategy before it can be fully supported.</p> <p>The Defra Local Authority dataset post 2009 classified East Dorset with a rural population of 73.29% and a classification of R50. <a href="http://webarchive.nationalarchives.gov.uk/20110215111010/http://archive.defra.gov.uk/evidence/statistics/rural/rural-definition.htm">http://webarchive.nationalarchives.gov.uk/20110215111010/http://archive.defra.gov.uk/evidence/statistics/rural/rural-definition.htm</a> . The DEFRA maps classify the majority of East Dorset as "Less Sparse and Less Sparse Dispersed.</p> <p>A recent report by Prof Mark Shucksmith OBE, of Newcastle University who has conducted several studies for the Commission for Rural Communities (CRC) indicated that "It should be no surprise to us that powerful groups prevail in designing rural policy and planning, and that less powerful groups are generally excluded from decisions. Average house prices in rural areas exceed those in urban areas of England by around 25%, with higher prices in some villages costing nearly 11 times the average income.</p> <p>"Rural communities are often proclaimed by those who live there as inclusive and neighbourly, but it seems they often prevent the new housing which would enable poorer and middle income groups to share the rural idyll. People's housing opportunities are crushed and their life-chances diminished by the failure to build sufficient houses in rural Britain."</p> <p>All the points made in the latest CRC State of the Countryside Report 2010 are valid in East Dorset <a href="http://www.defra.gov.uk/crc/documents.state-of-the-countryside-report/sotc2010/">http://www.defra.gov.uk/crc/documents.state-of-the-countryside-report/sotc2010/</a> . The key points from Section 2 are replicated at Annex A. Since the CRC is not due to be abolished until Mar 2013, it recommended that they be consulted to enhance the credibility of the</p>	The East Dorset and Christchurch Core Strategy needs to be enhanced in a number of areas before it can be said to reflect the majority of the East Dorset area. It cannot be endorsed in its current state.			690	

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

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											<p>recognises their liability to work with the county council to mitigate the effects of surface water flooding which are now more common than 25 years ago.</p> <p>Population shift. The increase in elderly population can only continue as efforts are made to sustain the rural centres. These will attract retired people who will not necessarily contribute to the local economy except through volunteering.</p> <p>Housing. A policy is required to encourage major landowners to build Affordable Housing within their estates to make up for the properties that have been sold off and are used as second homes. A policy of 100% taxation of second homes is required to support the infrastructure costs of the district.</p> <p>Growth potential. – Whilst mention is made of diversification, there need to be strong policies to encourage small business units and Home Working within the rural area. Limiting this will be to stifle the rural economy.</p> <p>Annex A to                      Eastern Area DAPTC Response to                      EDDC Core Strategy Submission                      Extract From CRC State of the Countryside Report 2010                      Key summary points on social issues:</p> <ul style="list-style-type: none"> <li>• Between 2001 and 2008 the population of rural England rose faster than in urban areas. The fastest growth was in Village, hamlet and isolated dwellings – Less sparse areas which grew by 6.1%.</li> <li>• 23.5% of people in rural areas are over state retirement age compared with 18.1% in urban areas.</li> <li>• Whilst over 98% of urban residents have the following services within 4km, for rural residents 51% have a bank or building society, 85% have cashpoints, 80% a GP surgery, 62% a supermarket, 57% an NHS dentist, 67% a pharmacy and 48% a secondary school.</li> <li>• Approximately 5% of rural households were using dial-up internet connections in 2009 compared with 2% in urban areas.</li> <li>• People in villages and hamlets with the lowest incomes spend an average of £50 per week on travel compared with £32 in rural towns and £28 in urban areas.</li> <li>• In rural areas the cheapest housing is six times the annual income of the lowest income households, compared to five times in urban areas. Despite house price falls during the recession in hamlets in sparse areas of the country the multiple is nine times annual household incomes.</li> <li>• 28% of those households not on the mains gas network in villages and hamlets are in fuel poverty compared with 13% who are on the mains gas network. The comparative figures for urban areas are 18% and 12%.</li> <li>• 87% of people living in the most rural districts are satisfied with their area as a place to live compared with 76% living in the most urban authorities.</li> <li>• 29% of people living in the most rural districts have given unpaid voluntary help at least monthly over the last year compared with 21% of people living in the most urban authorities.</li> </ul> <p>Communications is a basic need in today's and tomorrow's society.</p>					

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359437	Ms Gill Smith	Dorset County Council	<a href="#">CSPS2003</a>	15.1	Yes	No					<p>The proportion of the population over retirement age in both Christchurch and East Dorset is already above the County and national average. The proportion of residents aged 65 and over in 2033 is predicted to reach 38 percent in Christchurch and East Dorset. Despite the increase in older age groups, no specific proposals to meet their housing or community needs are included in the Core Strategy.</p> <p>County Council officers have discussed the needs and wishes of older people and of those with mental health problems and learning disabilities with Christchurch and East Dorset Planning Officers. While the general approach is to encourage independent living supported by care in people's own homes, there will still be a need for some new build provision, particularly in view of the rising number of elderly people. The Core Strategy does not adequately address the needs of these groups and should be amended to ensure that it encourages measures (such as lifetime homes and dedicated tenancies for people with mental health or learning disabilities) to help widen the housing choice open to them.</p>	<p>The Core Strategy should adopt an approach that recognises the need to cater for all members of the community. This could be through an appropriate policy in Section 15 "Meeting Local Needs" or through requirements within the individual policies for the new neighbourhoods and other large sites, seeking a proportion of "lifetime homes" and some dedicated tenancies for people with learning disabilities and people with mental health problems. Any new care homes and sheltered housing new builds should have some provision that is equivalent to affordable housing. In this way the new housing provided would help to widen the choice open to these groups</p>	Yes, I wish to participate at the oral examination	Dorset County Council wishes to partake in any oral hearing on this matter in order to fulfill its role under the duty to cooperate and ensure that its interests are considered in the emerging Core Strategy.	690	
359529	Mrs Lisa Goodwin	Sixpenny Handley with Pentridge Parish Council	<a href="#">CSPS2488</a>	15.1							Line 1 - Insert "shelter and communications"- This is a basic need in today's and tomorrow's society.				690	<a href="#">2248941_0_1.pdf</a> <a href="#">2248860_0_1.pdf</a> <a href="#">2248948_0_1.pdf</a>
360289	Mr Kevin Hodder	East Boro Housing Trust	<a href="#">CSPS2325</a>	15.2	Yes	Yes					<p>5. Supported/Sheltered Housing Who leads on this within a District? The District Local Authority is totally reliant on the County Council to "revenue fund" support services to any development. Who therefore leads on the strategic development if plans of this specific housing provision for the future.</p>				691	
657462	Ms Carla Fulgoni	The Planning Bureau Limited	<a href="#">CSPS2346</a>	15.2							<p>I set out below the comments on behalf of our clients McCarthy &amp; Stone Retirement Lifestyles Ltd in respect of the Core Strategy. McCarthy &amp; Stone is the UK's leading provider of specialist Retirement and Extra Care Housing for older owner-occupiers and are members of the Housing and Ageing Alliance. Having developed over 800 developments throughout the UK the company is in a very strong position to comment upon the impact of emerging Development Plan policies, in particular in relation to private retirement and extra care developments. This is a specialised form of development that has its unique development and selling constraints that make it very different to open market housing.</p> <p>The principle ongoing objection that McCarthy and Stone have to the emerging Core Strategy policies of the Council stems from the need to ensure that greater weight and emphasis be placed upon the ageing population and their associated housing needs and options. It should not be underestimated that unless it is properly planned for over the next 20 years there is likely to be a serious short fall in specialist accommodation for the older population, which will have a knock on effect in meeting housing needs of the whole area and wider policy objectives. McCarthy and Stone therefore raise objection to the absence of policy consideration.</p> <p>Core Strategy The Core Strategy rightly draws out that the Districts will experience</p>				691	



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

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											<p>make more effective use of the existing housing stock) and the agreed approach contributes to the objective of creating mixed and balanced communities. Such policies should be sufficiently flexible to take account of changing market conditions over time.</p> <p>By 2026 older people will account for almost half (48 per cent) of the increase in the total number of households, resulting in 2.4 million more older households than there are today . The number of people aged 85 or over will increase by 2.3 million by 2036 – 184 per cent increase . The ageing of society poses one of our greatest housing challenges. The Government has recognised this and has set out its aims and objectives of providing more specialised housing for older people in ‘A National Strategy for Housing in an Ageing Society – Lifetime Homes, Lifetime Neighbourhoods’. The National Strategy identifies the important role the planning system has in delivering housing choice for older people, stating;</p> <p>‘Spatial planning offers a new and real opportunity to provide more and better quality housing – across the necessary range – for an ageing population in a way that we’ve not done before.’</p> <p>In respect to future planning policy the Strategy is clear as to the level of importance to be given to an ageing society, stating;</p> <p>‘Recent reforms to the planning system require regional and local plans to take proper account of ageing and the needs of older people. Future planning policy reform will reflect the high priority we are giving to the challenge of ageing.’</p> <p>It is considered that in light of the Government Strategy guidance that it is appropriate for the Core Strategy to have greater regard to this objective. My Client’s response is based on meeting the Government’s objective, set out in the National Strategy, to ensure that sufficient specialist housing is delivered to meet the growing needs of an ageing population. This is reinforced in recent publications, please refer to the attached appendix to this letter.</p> <p>The ageing population has increasingly been seen as a potential issue that needs to be positively planned for in all new Local Development Frameworks and particularly at the Core Strategy level. The Department of Health and Communities and Local Government document ‘Lifetime Homes, Lifetime Neighbourhoods – A National Strategy for Housing in an Ageing Society’ dated February 2008 takes this further in looking at the wide range of options that policy makers need to include in formulating future plans. The Strategy identified providing a positive vision for specialised housing and providing more homes and more choice through public funding and encouraging private sector provision through planning system reforms(para 27). The strategy also noted that the vast majority of older householders (68%) owned their own home in 2001, and the figure was projected to rise to 75% by 2026. As such, these people are expected to wish to maintain their own independence by continuing to own their own homes.</p> <p>Chapter 11 of the Lifetimes Homes strategy specifically deals with specialised housing identifying that there is a continuing need for specialised housing and that such accommodation will continue to offer a certain advantage over private housing, particularly to those who need a physical environment designed for those with</p>					



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											<p>impairments, better access to help and care, company and a sense of safety. In the provision of appropriate accommodation for the elderly it is also recognised that the private sector has a major strategic role in this.</p> <p>Specialist Retirement Housing Needs Specialist retirement housing meets a number of Core Strategy aims and yet is given little weight in the overall document. Retirement Housing and Assisted Living Extra Care:</p> <ol style="list-style-type: none"> <li>1. brings older people closer to transport links, local shops and services reducing car dependency,</li> <li>2. enables older people to release equity,</li> <li>3. frees up the housing chain,</li> <li>4. reduces under occupation and meets the wider Core Strategy aims of retaining and enhancing much needed housing stock to families (85% of McCarthy and Stone customers downsize from houses to move to retirement housing),</li> <li>5. creates opportunities for more efficient provision of local care services eg GP services, reduces the need for respite care after hospital stays, offers a supportive setting with close family, neighbours and house manager, reduces pressure on working families to provide informal care, and</li> <li>6. it makes optimum use of centrally located brownfield sites.</li> </ol> <p>Well located and designed specialist housing for older home owners is a highly sustainable form of housing. There should be a presumption in favour of sustainable housing and in particular specialist housing which is being proposed on suitable sites.</p> <p>Mix of Housing – A retirement and care development such as that developed by McCarthy and Stone is an important contributor to the housing mix in a particular area. By its very nature it is a single entity with communal space and facilities and could not provide a mix of house types and tenure within the same block.</p> <p>Summary It is clear from local and national statistical data that the demographics of Christchurch and East Dorset and the UK as a whole is ageing. The Council recognise the current and future increase in the older people in the district and in older person households which will have significant implications on the overall housing market in a district with many physical constraints on residential development. The evidence suggests that there is a current and growing need for specialised forms of private sector accommodation for older persons such as retirement housing (cat II type sheltered housing) and assisted living extra care. The Core Strategy fails to draw out sufficient policy weight on this issue. I have appended to this letter recent assessments and reports that reinforce the need for LPAs to give more appropriate weight to such specialist housing and extra care. I trust that due weight will be given to these reports and the requirements of the NPPF to provide policy support for this highly sustainable form of development.</p>					
359437	Ms Gill Smith	Dorset County Council	<a href="#">CSPS2303</a>	15.3	Yes						The NPPF gives guidance on how Local Plans should address cultural matters. Plans should : • set out the strategic priorities for the area including the provision of	Cultural needs should be discussed in Section 2 of the Core Strategy. Reference should also be made to the Dorset Cultural	Yes, I wish to participate at the oral examination	Dorset County Council wishes to partake in	692	

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											<p>cultural infrastructure and other facilities;</p> <ul style="list-style-type: none"> <li>• allocate sites to meet the scale and type of cultural development required in town centres;</li> <li>• promote the retention of cultural buildings to support a strong rural economy;</li> <li>• promote healthy communities by planning positively for cultural buildings and guarding against the loss of facilities and</li> <li>• take account of the cultural benefits that conservation of the historic environment can bring.</li> </ul> <p>Whilst the Core Strategy addresses some of these points in the discussion of individual settlements, it lacks an overall strategy or policy guidance for cultural provision. The evidence base includes the Open Space, Sport and Recreation Study, but this does not sufficiently address the key points from the NPPF. No reference is made to the Dorset Cultural Strategy 2009 – 2014. More emphasis could be given to the importance of good design and means of ensuring this is achieved.</p>	<p>Strategy 2009-14. More emphasis could be given to the importance of good design and means of ensuring this is achieved.</p>		<p>any oral hearing on this matter in order to fulfill its role under the duty to cooperate and ensure that its interests are considered in the emerging Core Strategy.</p>		
359529	Mrs Lisa Goodwin	Sixpenny Handley with Pentridge Parish Council	<a href="#">CSPS24 91</a>	15.3							<p>First sentence Line 2 – Add “..... local community and especially provision for the young, elderly and vulnerable.</p>				692	<p><a href="#">2248948_0_1.pdf</a>  <a href="#">2248860_0_1.pdf</a>  <a href="#">2248941_0_1.pdf</a></p>
359264	Mr Peter Atfield	Goadsby Ltd	<a href="#">CSPS35 80</a>	15.3	Yes	No	No	No	No	Yes	<p>Whilst accepting that housing growth in Christchurch and East Dorset needs to take account of the Strategic Housing Market Assessment (SHMA), Policy LN1 goes too far in prescribing the form, and standard, of residential development. The first part of the policy does accept that the needs identified in the SHMA have to be balanced against site specific circumstances and the character of the local area; and this is properly so. The National Planning Policy Framework (NPPF), in Paragraph 17 (5th Bullet Point) confirms that account must be taken of the different roles and character of different areas.</p> <p>However, the second paragraph of the policy seeks to impose minimum living space standards for internal and external areas. This is considered unnecessary and unjust. It will reduce the effectiveness of the delivery of housing in the plan area.</p> <p>Paragraph 50 of the NPPF encourages the delivery of a choice of high quality homes, reflecting demographic and market trends. Reference is made, in the second Bullet Point, to the identification of the size, type, tenure and range of housing that is required. However, these matters are not to be so prescriptive as to include the size of individual rooms and gardens. Individual space standards such as these were abandoned over 30 years ago. They were regarded as impairing deliverability by imposing arbitrary controls on developers and their customers, as well as discouraging building at higher densities, particularly on brownfield sites.</p> <p>This part of the policy imposes an unnecessary burden on developers at a time when the industry is seeking to address the additional cost of meeting increasing environmental standards, such as the Code for Sustainable Homes.</p>	<p>Delete the second paragraph of Policy LN 1.</p>	<p>No, I do not wish to participate at the oral examination</p>		692	
359264	Mr	Goadsby	<a href="#">CSPS35</a>	15.3	Yes	No	No	No	No	Yes	<p>Whilst accepting that housing growth in Christchurch and East</p>	<p>Delete the second Paragraph of Policy LN 1.</p>	<p>No, I do</p>		692	

Contact Person ID	Contact Full Name	Contact Company / Organisation	ID	Number	Question 1 - Legally compliant	Question 2 - Sound	Question 3 - Positively Prepared	Question 3 - Justified	Question 3 - Effective	Question 3 - Consistent with national policy	Question 4	Question 5	Question 6	Question 7	Order	Filename	
	Peter Atfield	Ltd	<a href="#">45</a>								<p>Dorset needs to take account of the Strategic Housing Market Assessment (SHMA), Policy LN1 goes too far in prescribing the form, and standard, of residential development. The first part of the policy does accept that the needs identified in the SHMA have to be balanced against site specific circumstances and the character of the local area; and this is properly so. The National Planning Policy Framework (NPPF), in Paragraph 17 (5th Bullet Point) confirms that account must be taken of the different roles and character of different areas.</p> <p>However, the second paragraph of the policy seeks to impose minimum living space standards for internal and external areas. This is considered unnecessary and unjust. It will reduce the effectiveness of the delivery of housing in the plan area.</p> <p>Paragraph 50 of the NPPF encourages the delivery of a choice of high quality homes, reflecting demographic and market trends. Reference is made, in the second Bullet Point, to the identification of the size, type, tenure and range of housing that is required. However, these matters are not to be so prescriptive as to include the size of individual rooms and gardens. Individual space standards such as these were abandoned over 30 years ago. They were regarded as impairing deliverability by imposing arbitrary controls on developers and their customers, as well as discouraging building at higher densities, particularly on brownfield sites.</p> <p>This part of the policy imposes an unnecessary burden on developers at a time when the industry is seeking to address the additional cost of meeting increasing environmental standards, such as the Code for Sustainable Homes. In addition, the numerous planning obligations associated with the development of an urban extension site, in particular the provision of a Sustainable Alternative Natural Green Space (SANGS), impose substantial viability constraints that will hamper the delivery of housing.</p>		not wish to participate at the oral examination				
359264	Mr Peter Atfield	Goadsby Ltd	<a href="#">CSPS3581</a>	15.4	Yes	No	No	No	No	Yes	<p>Whilst accepting that housing growth in Christchurch and East Dorset needs to take account of the Strategic Housing Market Assessment (SHMA), Policy LN1 goes too far in prescribing the form, and standard, of residential development. The first part of the policy does accept that the needs identified in the SHMA have to be balanced against site specific circumstances and the character of the local area; and this is properly so. The National Planning Policy Framework (NPPF), in Paragraph 17 (5th Bullet Point) confirms that account must be taken of the different roles and character of different areas.</p> <p>However, the second paragraph of the policy seeks to impose minimum living space standards for internal and external areas. This is considered unnecessary and unjust. It will reduce the effectiveness of the delivery of housing in the plan area.</p> <p>Paragraph 50 of the NPPF encourages the delivery of a choice of high quality homes, reflecting demographic and market trends. Reference is made, in the second Bullet Point, to the identification of the size, type, tenure and range of housing that is required. However, these matters are not to be so prescriptive as to include the size of individual rooms and gardens. Individual space standards such as</p>	Delete the second paragraph of Policy LN 1.	No, I do not wish to participate at the oral examination		694		

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											these were abandoned over 30 years ago. They were regarded as impairing deliverability by imposing arbitrary controls on developers and their customers, as well as discouraging building at higher densities, particularly on brownfield sites. This part of the policy imposes an unnecessary burden on developers at a time when the industry is seeking to address the additional cost of meeting increasing environmental standards, such as the Code for Sustainable Homes.					
359264	Mr Peter Atfield	Goadsby Ltd	<a href="#">CSPS3546</a>	15.4	Yes	No	No	No	No	Yes	Whilst accepting that housing growth in Christchurch and East Dorset needs to take account of the Strategic Housing Market Assessment (SHMA), Policy LN1 goes too far in prescribing the form, and standard, of residential development. The first part of the policy does accept that the needs identified in the SHMA have to be balanced against site specific circumstances and the character of the local area; and this is properly so. The National Planning Policy Framework (NPPF), in Paragraph 17 (5th Bullet Point) confirms that account must be taken of the different roles and character of different areas. However, the second paragraph of the policy seeks to impose minimum living space standards for internal and external areas. This is considered unnecessary and unjust. It will reduce the effectiveness of the delivery of housing in the plan area. Paragraph 50 of the NPPF encourages the delivery of a choice of high quality homes, reflecting demographic and market trends. Reference is made, in the second Bullet Point, to the identification of the size, type, tenure and range of housing that is required. However, these matters are not to be so prescriptive as to include the size of individual rooms and gardens. Individual space standards such as these were abandoned over 30 years ago. They were regarded as impairing deliverability by imposing arbitrary controls on developers and their customers, as well as discouraging building at higher densities, particularly on brownfield sites. This part of the policy imposes an unnecessary burden on developers at a time when the industry is seeking to address the additional cost of meeting increasing environmental standards, such as the Code for Sustainable Homes. In addition, the numerous planning obligations associated with the development of an urban extension site, in particular the provision of a Sustainable Alternative Natural Green Space (SANGS), impose substantial viability constraints that will hamper the delivery of housing.	Delete the second Paragraph of Policy LN 1.	No, I do not wish to participate at the oral examination		694	
359264	Mr Peter Atfield	Goadsby Ltd	<a href="#">CSPS3582</a>	15.5	Yes	No	No	No	No	Yes	Whilst accepting that housing growth in Christchurch and East Dorset needs to take account of the Strategic Housing Market Assessment (SHMA), Policy LN1 goes too far in prescribing the form, and standard, of residential development. The first part of the policy does accept that the needs identified in the SHMA have to be balanced against site specific circumstances and the character of the local area; and this is properly so. The National Planning Policy Framework (NPPF), in Paragraph 17 (5th Bullet Point) confirms that account must be taken of the different roles and character of different areas. However, the second paragraph of the policy seeks to impose	Delete the second paragraph of Policy LN 1.	No, I do not wish to participate at the oral examination		695	

Contact Person ID	Contact Full Name	Contact Company / Organisation	ID	Number	Question 1 - Legally compliant	Question 2 - Sound	Question 3 - Positively Prepared	Question 3 - Justified	Question 3 - Effective	Question 3 - Consistent with national policy	Question 4	Question 5	Question 6	Question 7	Order	Filename
											<p>minimum living space standards for internal and external areas. This is considered unnecessary and unjust. It will reduce the effectiveness of the delivery of housing in the plan area.</p> <p>Paragraph 50 of the NPPF encourages the delivery of a choice of high quality homes, reflecting demographic and market trends. Reference is made, in the second Bullet Point, to the identification of the size, type, tenure and range of housing that is required. However, these matters are not to be so prescriptive as to include the size of individual rooms and gardens. Individual space standards such as these were abandoned over 30 years ago. They were regarded as impairing deliverability by imposing arbitrary controls on developers and their customers, as well as discouraging building at higher densities, particularly on brownfield sites.</p> <p>This part of the policy imposes an unnecessary burden on developers at a time when the industry is seeking to address the additional cost of meeting increasing environmental standards, such as the Code for Sustainable Homes.</p>					
359264	Mr Peter Atfield	Goadsby Ltd	<a href="#">CSPS3547</a>	15.5	Yes	No	No	No	No	Yes	<p>Whilst accepting that housing growth in Christchurch and East Dorset needs to take account of the Strategic Housing Market Assessment (SHMA), Policy LN1 goes too far in prescribing the form, and standard, of residential development. The first part of the policy does accept that the needs identified in the SHMA have to be balanced against site specific circumstances and the character of the local area; and this is properly so. The National Planning Policy Framework (NPPF), in Paragraph 17 (5th Bullet Point) confirms that account must be taken of the different roles and character of different areas.</p> <p>However, the second paragraph of the policy seeks to impose minimum living space standards for internal and external areas. This is considered unnecessary and unjust. It will reduce the effectiveness of the delivery of housing in the plan area.</p> <p>Paragraph 50 of the NPPF encourages the delivery of a choice of high quality homes, reflecting demographic and market trends. Reference is made, in the second Bullet Point, to the identification of the size, type, tenure and range of housing that is required. However, these matters are not to be so prescriptive as to include the size of individual rooms and gardens. Individual space standards such as these were abandoned over 30 years ago. They were regarded as impairing deliverability by imposing arbitrary controls on developers and their customers, as well as discouraging building at higher densities, particularly on brownfield sites.</p> <p>This part of the policy imposes an unnecessary burden on developers at a time when the industry is seeking to address the additional cost of meeting increasing environmental standards, such as the Code for Sustainable Homes. In addition, the numerous planning obligations associated with the development of an urban extension site, in particular the provision of a Sustainable Alternative Natural Green Space (SANGS), impose substantial viability constraints that will hamper the delivery of housing.</p>	Delete the second Paragraph of Policy LN 1.	No, I do not wish to participate at the oral examination		695	
359264	Mr Peter Atfield	Goadsby Ltd	<a href="#">CSPS3583</a>	15.6	Yes	No	No	No	No	Yes	<p>Whilst accepting that housing growth in Christchurch and East Dorset needs to take account of the Strategic Housing Market</p>	Delete the second paragraph of Policy LN 1.	No, I do not wish to		696	



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											<p>Assessment (SHMA), Policy LN1 goes too far in prescribing the form, and standard, of residential development. The first part of the policy does accept that the needs identified in the SHMA have to be balanced against site specific circumstances and the character of the local area; and this is properly so. The National Planning Policy Framework (NPPF), in Paragraph 17 (5th Bullet Point) confirms that account must be taken of the different roles and character of different areas.</p> <p>However, the second paragraph of the policy seeks to impose minimum living space standards for internal and external areas. This is considered unnecessary and unjust. It will reduce the effectiveness of the delivery of housing in the plan area.</p> <p>Paragraph 50 of the NPPF encourages the delivery of a choice of high quality homes, reflecting demographic and market trends. Reference is made, in the second Bullet Point, to the identification of the size, type, tenure and range of housing that is required. However, these matters are not to be so prescriptive as to include the size of individual rooms and gardens. Individual space standards such as these were abandoned over 30 years ago. They were regarded as impairing deliverability by imposing arbitrary controls on developers and their customers, as well as discouraging building at higher densities, particularly on brownfield sites.</p> <p>This part of the policy imposes an unnecessary burden on developers at a time when the industry is seeking to address the additional cost of meeting increasing environmental standards, such as the Code for Sustainable Homes.</p>		participate at the oral examination			
359264	Mr Peter Atfield	Goadsby Ltd	<a href="#">CSPS3548</a>	15.6	Yes	No	No	No	No	Yes	<p>Whilst accepting that housing growth in Christchurch and East Dorset needs to take account of the Strategic Housing Market Assessment (SHMA), Policy LN1 goes too far in prescribing the form, and standard, of residential development. The first part of the policy does accept that the needs identified in the SHMA have to be balanced against site specific circumstances and the character of the local area; and this is properly so. The National Planning Policy Framework (NPPF), in Paragraph 17 (5th Bullet Point) confirms that account must be taken of the different roles and character of different areas.</p> <p>However, the second paragraph of the policy seeks to impose minimum living space standards for internal and external areas. This is considered unnecessary and unjust. It will reduce the effectiveness of the delivery of housing in the plan area.</p> <p>Paragraph 50 of the NPPF encourages the delivery of a choice of high quality homes, reflecting demographic and market trends. Reference is made, in the second Bullet Point, to the identification of the size, type, tenure and range of housing that is required. However, these matters are not to be so prescriptive as to include the size of individual rooms and gardens. Individual space standards such as these were abandoned over 30 years ago. They were regarded as impairing deliverability by imposing arbitrary controls on developers and their customers, as well as discouraging building at higher densities, particularly on brownfield sites.</p> <p>This part of the policy imposes an unnecessary burden on</p>	Delete the second Paragraph of Policy LN 1.	No, I do not wish to participate at the oral examination		696	



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											developers at a time when the industry is seeking to address the additional cost of meeting increasing environmental standards, such as the Code for Sustainable Homes. In addition, the numerous planning obligations associated with the development of an urban extension site, in particular the provision of a Sustainable Alternative Natural Green Space (SANGS), impose substantial viability constraints that will hamper the delivery of housing.						
474462	Mrs Sheila Bourton		<a href="#">CSPS192</a>	Policy LN1	Yes	No	Yes				From a speech delivered by Fiona Austin, Head of Business Development at Synergy Housing Ltd. at an EDDC Policy & Resources Meeting in February 2012, Ms Austin stated that the minimum unit sizes proposed by our Council (and I quote) "is larger than we have to build to for our funding requirements and contrary to the Council's desire to use land efficiently". Surely, therefore, the loss and amount of valuable greenbelt land being suggested for housing development could be reduced by building smaller units without compromising the living standards of new residents,		No, I do not wish to participate at the oral examination		698		
654618	Tanner & Tilley	Pennyfarthing Homes	<a href="#">CSPS898</a>	Policy LN1		No	Yes	Yes	Yes	Yes	Whilst we support the general principle that the overall size and type of new market and affordable dwellings should reflect current and projected local housing needs identified in the latest Strategic Housing Market Assessment and informed by future Annual Monitoring Reports, we consider that for new open market housing the living space standards for both internal and external areas should not be prescribed but should be a matter for the developer and their customer. We consider that the evidence base does not justify the imposition of minimum living space standards. The Homes and Community Agency Housing Quality Indicators is intended to apply to affordable housing provided by Registered Providers. It does not apply to open market housing. Therefore, the application of the HCA Housing Quality Indicators to new open market housing is not legally compliant. Whilst the use of general design codes by local authorities can be helpful in promoting the delivery of high quality design, the NPPF states that design policies should avoid unnecessary prescription or detail and should concentrate on guiding the overall scale, density, massing etc. it is considered that application of minimum internal and external space standards is likely to stifle innovation, originality or initiative in the design of new dwellings. Therefore we consider that the second paragraph to Policy LN1 should be deleted.	It is suggested that the second paragraph to Policy LN1 be deleted in its entirety.	No, I do not wish to participate at the oral examination		698		
359541	Mr Roger Lucas	Sturminster Marshall Parish Council	<a href="#">CSPS1899</a>	Policy LN1							Any further housing development needs to be of smaller units that are affordable for the younger population of the village.				698		
359437	Ms Gill Smith	Dorset County Council	<a href="#">CSPS2018</a>	Policy LN1	Yes						Comments: The policies in the Core Strategy do not contain any reference to waste collection or recycling. Policy LN1 talks about living space standards, referring to the Homes and Communities Agency (HCA) Housing Quality Indicators as a source of information. However the HCA guidelines do not refer to space for the storage or collection of waste. The Dorset Waste Partnership will be introducing a new recycling	Amend first sentence of second paragraph of Policy LN1 to read "All new housing will be required to be built to meet minimum living space standards for both internal and external areas, including allowance of space for the storage and collection of waste to meet local collection requirements."	Yes, I wish to participate at the oral examination	Dorset County Council wishes to partake in any oral hearing on this matter in order to fulfill its role under the duty	698		

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											and rubbish collection service across the County between October 2012 and 2015. This will involve the use of larger wheeled containers than previously. Communal properties will be provided with communal bins to meet their needs. Developers should be aware of the space requirements for the new waste containers, communal bin stores and manoeuvring of waste vehicles when planning new developments and this should be reflected in the Core Strategy. Reference should be made in Policy LN1 which refers to standards of living space for internal and external areas. More detailed advice could be included in the Supplementary Planning Guidance that is to be prepared on this subject.			to cooperate and ensure that its interests are considered in the emerging Core Strategy.			
359261	Mr Doug Cramond	DC Planning Ltd	<a href="#">CSPS2099</a>	Policy LN1		Yes							Yes, I wish to participate at the oral examination	In connection with comments on WMC3	698		
359277	Mr Jamie Sullivan	Tetlow King	<a href="#">CSPS2704</a>	Policy LN1	Yes	No	Yes	No	No	No	We restate our previous recommendation that this policy should only be applied to sites of more than 20 units. Beneath this level there is a danger that this policy could be used to micro manage the housing mix across the two local authority areas. We consider that unless more detail is provided as to how the policy might operate in practice then it would be considered the policy may add undue burdens to development and would not accord with paragraph 173 of the NPPF. With regards to the minimum living space standards we welcome the introduction of HCA Housing Quality Indicator standards and applying them to all new development. This will create a level playing field for housing associations and general market developers. We would sound a note of caution for any standards higher than this being established through an SPD, as this would probably be contrary to the NPPF. Paragraph 173 states that: "Supplementary planning documents should be used where they can help applicants make successful applications or aid infrastructure delivery, and should not be used to add unnecessarily to the financial burdens on development." Furthermore we are still waiting to hear back from the Sir John Harman Commission on the imposition of standards on new housing. the commission is expected to report back to Grant Shapps later this year and may make any policy on housing standards dated. We therefore consider the policy as proposed is unsound as it is not consistent with national policy (paragraph 173 of the NPPF).		No, I do not wish to participate at the oral examination		698		
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	<a href="#">CSPS3415</a>	Policy LN1		Yes					We welcome the proposals but suggest minor changes to the wording to avoid any ambiguity. (PI see 2nd response)		No, I do not wish to participate at the oral examination		698		
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	<a href="#">CSPS3416</a>	Policy LN1		No	No				There is a risk that the wording at the beginning of para 2 of policy could be interpreted as developers only have to meet the minimum living space standards.	Amend to read, All new housing will be required to be built to meet at least the minimum...	No, I do not wish to participate at the oral examination		698		
523319	Mr Ryan Johnson	Turley Associates	<a href="#">CSPS3300</a>	Policy LN1		No			Yes		Reference to the HCA Quality Indicators should be removed, as	Remove interim application of HCA	Yes, I wish to participate	We would wish	698	<a href="#">2255451_0_1.pdf</a> <a href="#">2255452_0_1.</a>	

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											decisions on the size of private open space, unit sizes, unit layout and accessibility within the unit are best framed at the local level having regard to the local housing market, character of the area and accessibility to local facilities. This is insufficiently flexible and prescriptive. If space standards are to be imposed at a local level they should be consulted upon through the SPD as indicated and not prescribed until this has been adopted.	indicators that have not been informed by local circumstances.	at the oral examination	to participate at the Examination in Public to elaborate on these comments, particularly in the context of the lands controlled by our client.		<a href="#">pdf</a>
359264	Mr Peter Atfield	Goadsby Ltd	<a href="#">CSPS3578</a>	Policy LN1	Yes	No	No	No	No	Yes	<p>Whilst accepting that housing growth in Christchurch and East Dorset needs to take account of the Strategic Housing Market Assessment (SHMA), Policy LN1 goes too far in prescribing the form, and standard, of residential development. The first part of the policy does accept that the needs identified in the SHMA have to be balanced against site specific circumstances and the character of the local area; and this is properly so. The National Planning Policy Framework (NPPF), in Paragraph 17 (5th Bullet Point) confirms that account must be taken of the different roles and character of different areas.</p> <p>However, the second paragraph of the policy seeks to impose minimum living space standards for internal and external areas. This is considered unnecessary and unjust. It will reduce the effectiveness of the delivery of housing in the plan area.</p> <p>Paragraph 50 of the NPPF encourages the delivery of a choice of high quality homes, reflecting demographic and market trends. Reference is made, in the second Bullet Point, to the identification of the size, type, tenure and range of housing that is required. However, these matters are not to be so prescriptive as to include the size of individual rooms and gardens. Individual space standards such as these were abandoned over 30 years ago. They were regarded as impairing deliverability by imposing arbitrary controls on developers and their customers, as well as discouraging building at higher densities, particularly on brownfield sites.</p> <p>This part of the policy imposes an unnecessary burden on developers at a time when the industry is seeking to address the additional cost of meeting increasing environmental standards, such as the Code for Sustainable Homes.</p>	Delete the second paragraph of Policy LN 1.	No, I do not wish to participate at the oral examination		698	
359264	Mr Peter Atfield	Goadsby Ltd	<a href="#">CSPS3544</a>	Policy LN1	Yes	No	No	No	No	Yes	<p>Whilst accepting that housing growth in Christchurch and East Dorset needs to take account of the Strategic Housing Market Assessment (SHMA), Policy LN1 goes too far in prescribing the form, and standard, of residential development. The first part of the policy does accept that the needs identified in the SHMA have to be balanced against site specific circumstances and the character of the local area; and this is properly so. The National Planning Policy Framework (NPPF), in Paragraph 17 (5th Bullet Point) confirms that account must be taken of the different roles and character of different areas.</p> <p>However, the second paragraph of the policy seeks to impose</p>	Delete the second Paragraph of Policy LN 1.	No, I do not wish to participate at the oral examination		698	

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											<p>minimum living space standards for internal and external areas. This is considered unnecessary and unjust. It will reduce the effectiveness of the delivery of housing in the plan area.</p> <p>Paragraph 50 of the NPPF encourages the delivery of a choice of high quality homes, reflecting demographic and market trends. Reference is made, in the second Bullet Point, to the identification of the size, type, tenure and range of housing that is required. However, these matters are not to be so prescriptive as to include the size of individual rooms and gardens. Individual space standards such as these were abandoned over 30 years ago. They were regarded as impairing deliverability by imposing arbitrary controls on developers and their customers, as well as discouraging building at higher densities, particularly on brownfield sites.</p> <p>This part of the policy imposes an unnecessary burden on developers at a time when the industry is seeking to address the additional cost of meeting increasing environmental standards, such as the Code for Sustainable Homes. In addition, the numerous planning obligations associated with the development of an urban extension site, in particular the provision of a Sustainable Alternative Natural Green Space (SANGS), impose substantial viability constraints that will hamper the delivery of housing.</p>					
619967		Home Builders Federation (South West)	<a href="#">CSPS3689</a>	Policy LN1		No	Yes		Yes		<p>The policy is unsound as it is unjustified and contrary to national policy.</p> <p>The Councils cannot specify dwelling space standards through an SPD and propose to introduce this outwith the formal local plan process. Any standards that are to be applied to development must be assessed at the plan-making stage to ensure that they do not impair viability and the implementation of the plan (paragraph 173 of the Framework). Since the plan must also be implementable from the date of its adoption (see paragraph 174), the council cannot introduce new standards through SPD if these have the potential to compromise viability from day one.</p> <p>If the Councils are proposing that all new development complies with the HCA Housing Quality Indicators then it will need to have assessed the viability of doing so before submitting the plan. The two affordable housing viability assessments make no such provision for the cost of doing so. The insistence on minimum dwellings standards will have significant implications for the viability of schemes and it is incumbent on the Councils to assess the impact of these standards at the plan making stage.</p>		Yes, I wish to participate at the oral examination	The HBF would like to appear at the examination to debate these matters further.	698	
359291	Mr Jeremy Woolf	Woolf Bond Planning	<a href="#">CSPS3815</a>	Policy LN1	Yes	No	Yes	No	No	Yes	<p>The policy is not justified as the second paragraph of the policy is open ended, not sufficiently specific and does not provide effective or justified policy.</p> <p>The Mid Sussex standards have been subject to much criticism from the building industry due to the excessive size of dwellings as a result. Any new development will comply with relevant national standards. The inclusion of such a policy will add to costs and damage the viability of future residential schemes.</p>	The second paragraph if the policy should be deleted.	No, I do not wish to participate at the oral examination		698	
523319	Mr Ryan Johnson	Turley Associates	<a href="#">CSPS3785</a>	Policy LN1		No			Yes		<p>Thank you for the invitation to comment on the Pre-Submission Core Strategy DPD. I write on behalf of our client, Burry &amp; Knight Ltd, who</p>	Suggested Change Remove interim application of HCA indicators that have not	Yes, I wish to participate	We would wish to participate at	698	

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											<p>are the owners and developers of Hoburne Farm Estate, which includes land east of phase 8 of the Hoburne Farm Estate (SHLAA reference 8/11/0525); and are the owners and operators of Hoburne Caravan Park (SHLAA reference 8/11/0287).                      Our clients support the Council in their objective to progress and adopt a Local Plan for the area as quickly as possible. This will provide clarity and certainty for the development industry and all those who interact with the planning system. More importantly it will assist the Council in its efforts to address the significant housing land supply shortages in the borough, particularly over the next five years. We have reviewed the plan and its evidence base and conclude that revisions are needed if the Council are to satisfy the tests of soundness in the NPPF. The following paragraph/policy specific comments are therefore made to assist the Council in finalising the plan before it is formally submitted to the Secretary of State.                      We would wish to participate at the Examination in Public to elaborate on these comments, particularly in the context of the lands controlled by our client.                      Policy LN1 – Dwelling Size &amp; Type                      Comment Reference to the HCA Quality Indicators should be removed, as decisions on the size of private open space, unit sizes, unit layout and accessibility within the unit are best framed at the local level having regard to the local housing market, character of the area and accessibility to local facilities. This is insufficiently flexible and prescriptive. If space standards are to be imposed at a local level they should be consulted upon through the SPD as indicated and not prescribed until this has been adopted.</p>	<p>been informed by local circumstances.</p>	<p>at the oral examination</p>	<p>the Examination in Public to elaborate on these comments, particularly in the context of the lands controlled by our client.</p>		
359264	Mr Peter Atfield	Goadsby Ltd	<a href="#">CSPS39 B2</a>	Policy LN1	Yes	No	No	No	No	No	<p>Whilst accepting that housing growth in Christchurch and East Dorset needs to take account of the Strategic Housing Market Assessment (SHMA), Policy LN1 goes too far in prescribing the form, and standard, of residential development. The first part of the policy does accept that the needs identified in the SHMA have to be balanced against site specific circumstances and the character of the local area; and this is properly so. The National Planning Policy Framework (NPPF), in Paragraph 17 (5th Bullet Point) confirms that account must be taken of the different roles and character of different areas.                      However, the second paragraph of the policy seeks to impose minimum living space standards for internal and external areas. This is considered unnecessary and unjust. It will reduce the effectiveness of the delivery of housing in the plan area.                      Paragraph 50 of the NPPF encourages the delivery of a choice of high quality homes, reflecting demographic and market trends. Reference is made, in the second Bullet Point, to the identification of the size, type, tenure and range of housing that is required. However, these matters are not to be so prescriptive as to include the size of individual rooms and gardens. Individual space standards such as these were abandoned over 30 years ago. They were regarded as impairing deliverability by imposing arbitrary controls on developers and their customers, as well as discouraging building at higher densities, particularly on brownfield sites.</p>	<p>Delete the second Paragraph of Policy LN 1.</p>	<p>No, I do not wish to participate at the oral examination</p>		698	



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											This part of the policy imposes an unnecessary burden on developers at a time when the industry is seeking to address the additional cost of meeting increasing environmental standards, such as the Code for Sustainable Homes.					
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	<a href="#">CSPS34 18</a>	15.10		Yes					Support in part We welcome recognition of the need for new development to respect the character of the area. (PI see 2nd response)		No, I do not wish to participate at the oral examination		701	
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	<a href="#">CSPS34 20</a>	15.10		No					Existing "character areas" (para 15.10) do not apply to new neighbourhoods. There would be better local acceptance of these large scale developments if local stakeholders were to be involved in early discussions about possible design options. Where development is within or adjacent to the AONB or AGLVs, or close to sensitive wildlife areas (eg native woodland, veteran or ancient trees, river corridors) proposals should include adequate buffering and screening. "Feature buildings" should not dominate in more rural landscape settings. Opportunities should be taken to design to keep cars and utility areas to the rear of development when seen from main thoroughfares and open green spaces, including SANGs.	Para 15.10 Add: Local stakeholders will be involved in the decision making process.	No, I do not wish to participate at the oral examination		701	
654618	Tanner & Tilley	Pennyfarthing Homes	<a href="#">CSPS90 1</a>	Policy LN2	Yes	No	Yes	No	Yes	Yes	Whilst we generally support the aims of Policy LN2 we consider that, as worded, new housing development below 30dph will be the norm rather than the exception, particularly as we consider the local planning authority will come under pressure from local residents, town councils and parish councils to resist increases in existing density. Therefore, we consider Policy LN2 should be strengthened such that it will be expected that new housing development will be provided with a minimum density of 30 dph and that only in exceptional circumstances (e.g. in areas designated as "Low Density Areas" in Development Plan Documents) will development be permitted below 30dph. We suggest that the strengthening of Policy LN2 be considered in tandem with our comments on Policy HE2 that the existing 'Special Character Areas' be critically reviewed.	We suggest that Policy LN2 be changed to read:- " Design, layout and density of new housing development On all sites, the design and layout of new housing development should maximise the density of development to a level which is acceptable for the locality. A minimum density of net 30dph will be expected. Only in exceptional circumstances, i.e. proposed development in areas designated as "Low Density Areas", may housing development be considered below 30dph where a lower density is may be more appropriate. Proposed housing densities will be informed by the Strategic Housing Land Availability Assessment, housing need as set out in the Strategic Housing Market Assessment, the master plan reports for new neighbourhoods and future Annual Monitoring Reports. Proposals for higher density developments will be acceptable in the following types of location where this form of development will not have an adverse impact on the character of the area and where residents have the best access to facilities, services and jobs: •New greenfield housing sites (density range	Yes, I wish to participate at the oral examination	To contribute to the discussion on the need to secure a minimum of 30dph as the norm rather than the exception.	702	



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												to be determined by outputs of master planning process). •Town centres. •Along the Prime Transport Corridors. •Areas outside town centres with good access to public transport and essential facilities and services. •In areas where there is a high level of need for affordable housing or on land already owned by housing associations, or where a housing association is the applicant. The Councils will carefully consider the design and density of new development in terms of their responsibilities for community safety under Section 17 of the Crime & Disorder Act, and will involve the Police Architectural Liaison Officer in appropriate cases.				
654660	Ms Anne Mason	Transition Town Christchurch	<a href="#">CSPS972</a>	Policy LN2		No	No	No	No	No	Brownfield sites should always be considered before greenfield and this is not acknowledged here. Once greenfield sites are developed species and biodiversity loss is almost always permanent. This is not the time to sacrifice greenfield sites, as local food production will become increasingly vital.				702	<a href="#">2259130_0_1.pdf</a>
360089	Ms Julie Goodman	Somerford Community Partnership	<a href="#">CSPS1984</a>	Policy LN2							The Partnership is extremely unhappy about the following proposal concerning housing density, which would allow high density housing in areas where there is a high level of need for affordable housing or on land already owned by housing associations, or where a housing association is the applicant. While the Association accepts that there is a need for affordable housing it does not accept that this need compels the acceptance of those in need as second-class citizens. It believes that this policy is likely to lead to the creation of high-density ghettos and points to the proposals by Sovereign Housing Association to redevelop Scotts Green to a density and to a design which the Borough's Planning (Control) Committee found completely unacceptable. Nor can the Partnership accept that a housing association should automatically be allowed to develop land to a high density simply because it is the applicant. The Partnership notes the growing tendency among housing associations to build homes for sale at market prices, and would be extremely concerned at granting a right to housing associations that is denied to private builders.				702	
359261	Mr Doug Cramond	DC Planning Ltd	<a href="#">CSPS2100</a>	Policy LN2		Yes							Yes, I wish to participate at the oral examination	In connection with comments on WMC3	702	
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	<a href="#">CSPS3417</a>	Policy LN2		Yes					Support in part We welcome recognition of the need for new development to respect the character of the area. (PI see 2nd response)		No, I do not wish to participate at the oral examination		702	

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360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	<a href="#">CSPS3419</a>	Policy LN2		No					Existing “character areas” (para 15.10) do not apply to new neighbourhoods. There would be better local acceptance of these large scale developments if local stakeholders were to be involved in early discussions about possible design options. Where development is within or adjacent to the AONB or AGLVs, or close to sensitive wildlife areas (eg native woodland, veteran or ancient trees, river corridors) proposals should include adequate buffering and screening. “Feature buildings” should not dominate in more rural landscape settings. Opportunities should be taken to design to keep cars and utility areas to the rear of development when seen from main thoroughfares and open green spaces, including SANGs.	Para 15.10 Add: Local stakeholders will be involved in the decision making process.	No, I do not wish to participate at the oral examination		702	
359291	Mr Jeremy Woolf	Woolf Bond Planning	<a href="#">CSPS3816</a>	Policy LN2	Yes	No	Yes	No	Yes	Yes	The policy places overreliance upon the need for 'the master plan reports for new neighbourhoods' to inform housing density.	The sentence should be amended to read 'the indicative master plan reports for new neighbourhoods', so as to give additional flexibility to schemes as they develop.	No, I do not wish to participate at the oral examination		702	
359284	Miss Lynne Evans	Southern Planning Practice	<a href="#">CSPS2222</a>	15.13	Yes	No	Yes	Yes	Yes	Yes	Hall & Woodhouse support the objective to bring forward affordable housing in response to the identified need for affordable housing. However, objection is raised to the requirement for affordable housing on proposals involving any net increase in residential provision and therefore including development proposals as small as those promoting even 1 net new dwelling. The concern is that rather than assisting in bringing forward affordable housing, the policy trigger sought will hinder housing development coming forward and frustrate the realisation of the fundamental policy objectives of the Core Strategy. The policy is therefore ineffective and unsound. The whole aim of the NPPF is to secure sustainable development and to help secure much needed development across the country. Whilst the importance of affordable housing provision is supported in the NPPF, this particular policy, in setting such a low threshold is likely to stymie development and therefore is inconsistent with national planning policy objectives to help bring forward much needed development. The trigger for requiring affordable housing to be provided on site, off site or through a financial contribution requires rethinking to enable smaller developments to continue to come forward and contribute to the vitality and prosperity of the local community. The Council's own Meeting Local Needs Background Paper recognises that the requirements for affordable housing must not inhibit the strategic objectives for housing and economic growth. However, it is contended that in promoting this policy it has not heeded its own concerns. The NPPF also emphasises that policies need to be flexible to respond to changing market circumstances and there is no indication in the policy that there is scope for flexibility.	Reconsideration needs to be given to the minimum scale of development, before an affordable housing requirement is triggered	Yes, I wish to participate at the oral examination	The representations submitted raise important and complex policy issues which require oral examination and round table discussion in order that the Inspector can be properly informed in reaching a decision on the soundness of the Core Strategy.	705	
359264	Mr Peter Atfield	Goadsby Ltd	<a href="#">CSPS3575</a>	15.13	Yes	No	No	No	No	No	Policy LN 3 imposes a higher affordable housing requirement on the urban extension sites without justification. There is no reason why	Amend Policy LN 3 by removing the reference to a minimum 50% requirement	Yes, I wish to participate	To consider the	705	

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											<p>different quotas should be imposed on different categories (i.e. greenfield or brownfield) of site. As set out in Paragraph 47 of the National Planning Policy Framework (NPPF), Local Plans should meet the full, objectively assessed needs for open market and affordable housing in the housing market area.</p> <p>Policy LN 3 will have the effect of reducing the delivery of much needed open market housing in key, strategic locations. If the full, objectively assessed needs for affordable housing cannot be met without reducing the delivery of open market housing, then additional land should be allocated for its development.</p> <p>The Core Strategy (CS) introduces a new approach to the provision of affordable housing whereby all residential development sites will be required to contribute where there is a net increase in housing. This differs from the historic approach of seeking a contribution to affordable housing based on thresholds of either 25 or 15 units. The new policy requirement needs to be monitored so as to gauge its effectiveness in the delivery of low cost housing. This may avoid the need to impose higher targets on strategic sites; and may even reduce the quota overall.</p> <p>There is no evidence that the urban extension sites are located in areas where affordable housing need is at its greatest. Paragraph 50 of the NPPF requires the size, type, tenure and range of affordable housing to reflect local demand in particular locations. Demand, or need, may be lower in the wards and parishes in proximity to the urban extension sites. Without evidence to prove to the contrary, the imposition of a two level quota policy is not justified.</p>	<p>for affordable housing on the urban extension sites; i.e. the first sentence of the second paragraph of the policy.</p>	<p>at the oral examination</p>	<p>implications of the Housing Needs Assessment at the local level and to review the government's new approach to quantifying affordable housing need.</p>		
359264	Mr Peter Atfield	Goadsby Ltd	<a href="#">CSPS3560</a>	15.13	Yes	No	No	No	No	No	<p>Policy LN 3 imposes a higher affordable housing requirement on the urban extension sites without justification. There is no reason why different quotas should be imposed on different categories (i.e. greenfield or brownfield) of site. As set out in Paragraph 47 of the National Planning Policy Framework (NPPF), Local Plans should meet the full, objectively assessed needs for open market and affordable housing in the housing market area.</p> <p>Policy LN 3 will have the effect of reducing the delivery of much needed open market housing in key, strategic locations. If the full, objectively assessed needs for affordable housing cannot be met without reducing the delivery of open market housing, then additional land should be allocated for its development.</p> <p>The Core Strategy (CS) introduces a new approach to the provision of affordable housing whereby all residential development sites will be required to contribute where there is a net increase in housing. This differs from the historic approach of seeking a contribution to affordable housing based on thresholds of either 25 or 15 units. The new policy requirement needs to be monitored so as to gauge its effectiveness in the delivery of low cost housing. This may avoid the need to impose higher targets on strategic sites; and may even reduce the quota overall.</p> <p>There is no evidence that the urban extension sites are located in areas where affordable housing need is at its greatest. Paragraph 50 of the NPPF requires the size, type, tenure and range of affordable housing to reflect local demand in particular locations. Demand, or</p>	<p>Amend Policy LN 3 by removing the reference to a minimum 50% requirement for affordable housing on the urban extension sites; i.e. the first sentence of the second paragraph of the policy.</p>	<p>Yes, I wish to participate at the oral examination</p>	<p>To consider the implications of the Housing Needs Assessment at the local level and to review the government's new approach to quantifying affordable housing need.</p>	705	

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											need, may be lower in the wards and parishes in proximity to the urban extension sites. Without evidence to prove to the contrary, the imposition of a two level quota policy is not justified.					
360271	Cllr Paul Timberlake		<a href="#">CSPS501</a>	15.14	Yes	No	Yes	Yes	No	Yes	In helping to meet housing, especially affordable housing, needs, maximum effort should be used to bring the 2.3% of vacant dwellings in East Dorset back into use asap in order to reduce the need for new dwellings.	Include policy to bring empty homes back into use.	No, I do not wish to participate at the oral examination		706	
359284	Miss Lynne Evans	Southern Planning Practice	<a href="#">CSPS2226</a>	15.14	Yes	No	Yes	Yes	Yes	Yes	<p>Hall &amp; Woodhouse support the objective to bring forward affordable housing in response to the identified need for affordable housing. However, objection is raised to the requirement for affordable housing on proposals involving any net increase in residential provision and therefore including development proposals as small as those promoting even 1 net new dwelling.</p> <p>The concern is that rather than assisting in bringing forward affordable housing, the policy trigger sought will hinder housing development coming forward and frustrate the realisation of the fundamental policy objectives of the Core Strategy. The policy is therefore ineffective and unsound.</p> <p>The whole aim of the NPPF is to secure sustainable development and to help secure much needed development across the country. Whilst the importance of affordable housing provision is supported in the NPPF, this particular policy, in setting such a low threshold is likely to stymie development and therefore is inconsistent with national planning policy objectives to help bring forward much needed development.</p> <p>The trigger for requiring affordable housing to be provided on site, off site or through a financial contribution requires rethinking to enable smaller developments to continue to come forward and contribute to the vitality and prosperity of the local community. The Council's own Meeting Local Needs Background Paper recognises that the requirements for affordable housing must not inhibit the strategic objectives for housing and economic growth. However, it is contended that in promoting this policy it has not heeded its own concerns.</p> <p>The NPPF also emphasises that policies need to be flexible to respond to changing market circumstances and there is no indication in the policy that there is scope for flexibility.</p>	Reconsideration needs to be given to the minimum scale of development, before an affordable housing requirement is triggered	Yes, I wish to participate at the oral examination	The representations submitted raise important and complex policy issues which require oral examination and round table discussion in order that the Inspector can be properly informed in reaching a decision on the soundness of the Core Strategy.	706	
359264	Mr Peter Atfield	Goadsby Ltd	<a href="#">CSPS3576</a>	15.14	Yes	No	No	No	No	No	<p>Policy LN 3 imposes a higher affordable housing requirement on the urban extension sites without justification. There is no reason why different quotas should be imposed on different categories (i.e. greenfield or brownfield) of site. As set out in Paragraph 47 of the National Planning Policy Framework (NPPF), Local Plans should meet the full, objectively assessed needs for open market and affordable housing in the housing market area.</p> <p>Policy LN 3 will have the effect of reducing the delivery of much needed open market housing in key, strategic locations. If the full, objectively assessed needs for affordable housing cannot be met without reducing the delivery of open market housing, then additional land should be allocated for its development.</p> <p>The Core Strategy (CS) introduces a new approach to the provision</p>	Amend Policy LN 3 by removing the reference to a minimum 50% requirement for affordable housing on the urban extension sites; i.e. the first sentence of the second paragraph of the policy.	Yes, I wish to participate at the oral examination	To consider the implications of the Housing Needs Assessment at the local level and to review the government's new approach to quantifying affordable	706	



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											<p>of affordable housing whereby all residential development sites will be required to contribute where there is a net increase in housing. This differs from the historic approach of seeking a contribution to affordable housing based on thresholds of either 25 or 15 units. The new policy requirement needs to be monitored so as to gauge its effectiveness in the delivery of low cost housing. This may avoid the need to impose higher targets on strategic sites; and may even reduce the quota overall.</p> <p>There is no evidence that the urban extension sites are located in areas where affordable housing need is at its greatest. Paragraph 50 of the NPPF requires the size, type, tenure and range of affordable housing to reflect local demand in particular locations. Demand, or need, may be lower in the wards and parishes in proximity to the urban extension sites. Without evidence to prove to the contrary, the imposition of a two level quota policy is not justified.</p>			housing need.		
359264	Mr Peter Atfield	Goadsby Ltd	<a href="#">CSPS3561</a>	15.14	Yes	No	No	No	No	No	<p>Policy LN 3 imposes a higher affordable housing requirement on the urban extension sites without justification. There is no reason why different quotas should be imposed on different categories (i.e. greenfield or brownfield) of site. As set out in Paragraph 47 of the National Planning Policy Framework (NPPF), Local Plans should meet the full, objectively assessed needs for open market and affordable housing in the housing market area.</p> <p>Policy LN 3 will have the effect of reducing the delivery of much needed open market housing in key, strategic locations. If the full, objectively assessed needs for affordable housing cannot be met without reducing the delivery of open market housing, then additional land should be allocated for its development.</p> <p>The Core Strategy (CS) introduces a new approach to the provision of affordable housing whereby all residential development sites will be required to contribute where there is a net increase in housing. This differs from the historic approach of seeking a contribution to affordable housing based on thresholds of either 25 or 15 units. The new policy requirement needs to be monitored so as to gauge its effectiveness in the delivery of low cost housing. This may avoid the need to impose higher targets on strategic sites; and may even reduce the quota overall.</p> <p>There is no evidence that the urban extension sites are located in areas where affordable housing need is at its greatest. Paragraph 50 of the NPPF requires the size, type, tenure and range of affordable housing to reflect local demand in particular locations. Demand, or need, may be lower in the wards and parishes in proximity to the urban extension sites. Without evidence to prove to the contrary, the imposition of a two level quota policy is not justified.</p>	Amend Policy LN 3 by removing the reference to a minimum 50% requirement for affordable housing on the urban extension sites; i.e. the first sentence of the second paragraph of the policy.	Yes, I wish to participate at the oral examination	To consider the implications of the Housing Needs Assessment at the local level and to review the government's new approach to quantifying affordable housing need.	706	
359284	Miss Lynne Evans	Southern Planning Practice	<a href="#">CSPS2227</a>	15.15	Yes	No	Yes	Yes	Yes	Yes	<p>Hall &amp; Woodhouse support the objective to bring forward affordable housing in response to the identified need for affordable housing. However, objection is raised to the requirement for affordable housing on proposals involving any net increase in residential provision and therefore including development proposals as small as those promoting even 1 net new dwelling.</p> <p>The concern is that rather than assisting in bringing forward affordable housing, the policy trigger sought will hinder housing</p>	Reconsideration needs to be given to the minimum scale of development, before an affordable housing requirement is triggered	Yes, I wish to participate at the oral examination	The representations submitted raise important and complex policy issues which require oral	708	

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											<p>development coming forward and frustrate the realisation of the fundamental policy objectives of the Core Strategy. The policy is therefore ineffective and unsound.</p> <p>The whole aim of the NPPF is to secure sustainable development and to help secure much needed development across the country. Whilst the importance of affordable housing provision is supported in the NPPF, this particular policy, in setting such a low threshold is likely to stymie development and therefore is inconsistent with national planning policy objectives to help bring forward much needed development.</p> <p>The trigger for requiring affordable housing to be provided on site, off site or through a financial contribution requires rethinking to enable smaller developments to continue to come forward and contribute to the vitality and prosperity of the local community. The Council's own Meeting Local Needs Background Paper recognises that the requirements for affordable housing must not inhibit the strategic objectives for housing and economic growth. However, it is contended that in promoting this policy it has not heeded its own concerns.</p> <p>The NPPF also emphasises that policies need to be flexible to respond to changing market circumstances and there is no indication in the policy that there is scope for flexibility.</p>			examination and round table discussion in order that the Inspector can be properly informed in reaching a decision on the soundness of the Core Strategy.		
359264	Mr Peter Atfield	Goadsby Ltd	<a href="#">CSPS3577</a>	15.15	Yes	No	No	No	No	No	<p>Policy LN 3 imposes a higher affordable housing requirement on the urban extension sites without justification. There is no reason why different quotas should be imposed on different categories (i.e. greenfield or brownfield) of site. As set out in Paragraph 47 of the National Planning Policy Framework (NPPF), Local Plans should meet the full, objectively assessed needs for open market and affordable housing in the housing market area.</p> <p>Policy LN 3 will have the effect of reducing the delivery of much needed open market housing in key, strategic locations. If the full, objectively assessed needs for affordable housing cannot be met without reducing the delivery of open market housing, then additional land should be allocated for its development.</p> <p>The Core Strategy (CS) introduces a new approach to the provision of affordable housing whereby all residential development sites will be required to contribute where there is a net increase in housing. This differs from the historic approach of seeking a contribution to affordable housing based on thresholds of either 25 or 15 units. The new policy requirement needs to be monitored so as to gauge its effectiveness in the delivery of low cost housing. This may avoid the need to impose higher targets on strategic sites; and may even reduce the quota overall.</p> <p>There is no evidence that the urban extension sites are located in areas where affordable housing need is at its greatest. Paragraph 50 of the NPPF requires the size, type, tenure and range of affordable housing to reflect local demand in particular locations. Demand, or need, may be lower in the wards and parishes in proximity to the urban extension sites. Without evidence to prove to the contrary, the imposition of a two level quota policy is not justified.</p>	Amend Policy LN 3 by removing the reference to a minimum 50% requirement for affordable housing on the urban extension sites; i.e. the first sentence of the second paragraph of the policy.	Yes, I wish to participate at the oral examination	To consider the implications of the Housing Needs Assessment at the local level and to review the government's new approach to quantifying affordable housing need.	708	
359264	Mr	Goadsby	<a href="#">CSPS35</a>	15.15	Yes	No	No	No	No	No	Policy LN 3 imposes a higher affordable housing requirement on the	Amend Policy LN 3 by removing the	Yes, I	To consider	708	



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	Peter Atfield	Ltd	<a href="#">62</a>								<p>urban extension sites without justification. There is no reason why different quotas should be imposed on different categories (i.e. greenfield or brownfield) of site. As set out in Paragraph 47 of the National Planning Policy Framework (NPPF), Local Plans should meet the full, objectively assessed needs for open market and affordable housing in the housing market area.</p> <p>Policy LN 3 will have the effect of reducing the delivery of much needed open market housing in key, strategic locations. If the full, objectively assessed needs for affordable housing cannot be met without reducing the delivery of open market housing, then additional land should be allocated for its development.</p> <p>The Core Strategy (CS) introduces a new approach to the provision of affordable housing whereby all residential development sites will be required to contribute where there is a net increase in housing. This differs from the historic approach of seeking a contribution to affordable housing based on thresholds of either 25 or 15 units. The new policy requirement needs to be monitored so as to gauge its effectiveness in the delivery of low cost housing. This may avoid the need to impose higher targets on strategic sites; and may even reduce the quota overall.</p> <p>There is no evidence that the urban extension sites are located in areas where affordable housing need is at its greatest. Paragraph 50 of the NPPF requires the size, type, tenure and range of affordable housing to reflect local demand in particular locations. Demand, or need, may be lower in the wards and parishes in proximity to the urban extension sites. Without evidence to prove the contrary, the imposition of a two level quota policy is not justified.</p>	reference to a minimum 50% requirement for affordable housing on the urban extension sites; i.e. the first sentence of the second paragraph of the policy.	wish to participate at the oral examination	the implications of the Housing Needs Assessment at the local level and to review the government's new approach to quantifying affordable housing need.		
474462	Mrs Sheila Bourton		<a href="#">CSPS193</a>	Policy LN3	Yes	Yes					<p>It is right that the Council should demand from developers on Greenfield sites that they should build at least 50% as affordable houses, however, it would be preferable if this percentage was higher. It is a sad state of affairs that affordable housing has to be built "on the back" of market housing.</p> <p>Our area of East Dorset will always attract residents from outside our region as Dorset is a desirable place to live and it is hard to see how this market housing will benefit the existing residents of Dorset. We can never build ourselves out of the housing or lack of housing problem.</p>		No, I do not wish to participate at the oral examination		709	
360149	Mr John Urganhar		<a href="#">CSPS90</a>	Policy LN3							No - mixing "affordable" housing within developments will never be popular as it tends to reduce the desirability of the more expensive properties.				709	
647876	Mr Christopher Whitche		<a href="#">CSPS123</a>	Policy LN3							As with the decision made about the future of Druitt Hall this complete leaflet is irrelevant as it appears to me that the final decision has been made. I also begrudge even more money wasted on this leaflet as with the rise in Councillors expenses "austerity"?				709	
647898	Mr Derek Beasley		<a href="#">CSPS115</a>	Policy LN3	Yes	Yes	Yes	Yes	Yes	Yes					709	
360271	Cllr Paul Timberlake		<a href="#">CSPS502</a>	Policy LN3	Yes						Query the 50% of affordable homes as this may not be possible on some sites where additional developmental costs, ie provision of	Consider a flexible figure for affordable housing which would reflect the geology and	No, I do not wish to participate		709	

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											SUDS, may not make it acceptable for developers..	other factors of a particular site.	at the oral examination			
650810	Ms Fiona Astin	Synergy Housing	<a href="#">CSPS38</a>	Policy LN3	Yes	No	Yes	No	No	Yes	The document should clearly set out what mechanism will be used to test viability submissions.	Inclusion of at least an outline of the mechanism to be used to test viability.	Yes, I wish to participate at the oral examination	Synergy Housing has experience of being party to viability arguments in relation to affordable housing provision and is conversant with development costs. It is not <b>NECESSARY</b> for Synergy Housing to speak at the oral examination, but the offer of contributing to the oral examination is there if it would be considered useful.	709	
220620	Miss S Thorpe	Gleeson Developments Ltd	<a href="#">CSPS90</a>	Policy LN3	Yes	Yes	Yes	Yes	Yes	Yes		Policy LN3 – Affordable housing Housing delivery and need has been assessed through the Bournemouth and Poole SHMA which covers the wider Dorset HMA including the joint authorities of Christchurch and East Dorset. The SHMA report is lengthy and covers a range of character areas across Dorset comprising of the urban areas within Bournemouth and Poole, to the rural areas to the north of the major urban areas which are largely bounded by the A31. Within the policy the Council states that new green field residential development sites will be required to provide a minimum of 50% affordable housing across the development areas. Within the supporting background documents for this policy, which include the Christchurch Affordable Housing Provision report and the East Dorset Affordable Housing Provision Report 2010 there does not appear to be any justification for the	Yes, I wish to participate at the oral examination		709	

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												<p>requirement of 50% affordable housing on greenfield sites, and 40% affordable housing on other sites across the joint areas. The provision of such a high provision of affordable housing is not based upon any wider policy requirements within the development plan, or other documents that have until recently formed part of the development plan, such as the emerging South West Regional Spatial Strategy. Accordingly, having reviewed the background documents it does not appear that the council have considered the implications of viability to the delivery of the green field sites when the council will also be requiring the developer to contribute through the CIL process, provide SANG to mitigate impacts to the SPA and also deliver zero carbon homes by 2016. Gleeson are supportive of the council's aspirations to deliver affordable housing across the joint authorities during the plan period to address housing need across Christchurch and East Dorset. The District also requires market housing to meet the private housing shortfall due to the mix of existing housing. The SHMA identifies that the mix of existing private housing stock provides a majority of detached houses and bungalows, with a low proportion of smaller family homes, terraced housing or flats. Gleeson are therefore supportive of the inclusion of some flexibility within Policy LN3 to allow the council discretion in applying this policy to take into consideration other planning benefits associated with the larger green field sites, for example community or environmental facilities and amenities that would also be beneficial to the wider District. In addition, the council's background evidence also shows that there is housing need across the market sector; therefore with an agreed mix of smaller market units this will also benefit the community by addressing private housing need, whilst also delivering a proportion of affordable housing which should provide for a sustainable and balanced community. We are concerned that if insufficient flexibility is applied to the application of 50% affordable housing within Policy LN3 then this may affect site viability and deliverability</p>				

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												for the large scale development sites which would have a resulting effect of reducing the overall delivery of residential units including market and affordable. Therefore in setting the target at 50% with no valid justification there could be an overall reduction in housing delivery across the joint authorities. Gleeson therefore support a flexible policy which gives the council a degree of discretion in applying the percentage of affordable housing to take into account site specific considerations and other on-site deliverables in addition to viability which is mentioned within the wording of the policy as we do not feel that the council has reflected development costs accurately within Policy LN3 of the Core Strategy. We would therefore recommend additional wording including “up to 50%” and “where appropriate” to allow planning officers the discretion to apply the policy on a site by site basis when wider delivery constraints and site specific Core Strategy Policy requirements can be considered comprehensively.				
654618	Tanner & Tilley	Pennyfarthing Homes	<a href="#">CSPS92Z</a>	Policy LN3	Yes	No	Yes	Yes	Yes	Yes	<p>Pennyfarthing supports the provision of 50% affordable housing on allocated greenfield housing sites.</p> <p>However, we question the evidence base that seeks to justify the viability of the proposal to provide 40% of affordable housing on all other residential development sites. The Affordable Housing Viability Assessment for East Dorset District, carried out by consultants Three Dragons (Final Report 2010) was based on density policy assumptions as at 2008 when national planning policy was advocating minimum densities of 30dph and was prior to the Coalition Government guidance that garden land should not be regarded as brownfield sites. The case studies carried out in that report suggested that it would be viable to provide 40% affordable housing in high value areas. However it showed that lower value areas may only be able to viably support lower percentages of affordable housing. It also assumed that within the higher value areas minimum densities of 30dph or more could be achieved. However, in most high value areas in East Dorset District and in the Borough of Christchurch the existing character tends to be of low density housing where it is likely that higher density development would be resisted. Therefore it is questionable whether the density of development that would be allowed in the high value areas would be sufficiently viable to deliver affordable housing.</p> <p>It also suggests that the percentage of affordable housing to be provided by new development should vary according to the different market value areas rather than applying a blanket requirement of 40% affordable housing across the whole of the Plan area.</p>	<p>We suggest that the evidence base in support of this proposed policy be reviewed taking into account the removal of minimum density requirements from national planning policy guidance together with the removal of gardens from the definition of brownfield land and the likelihood that the majority of development sites within the Plan area are unlikely to achieve a minimum density of 30dph but may be considerably lower. It is also suggested that the LPA consider setting the percentage of affordable housing that will be sought having regard to the different market value areas across the Plan area rather than 40% being applied throughout the whole area.</p>	Yes, I wish to participate at the oral examination	We would wish to participate in the oral part of the examination so that we may contribute to the debate on this particular issue.	709	

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											We consider that the requirement of the provision of 40% affordable housing on all other housing development sites is likely to result in all of those planning applications being accompanied by viability assessments seeking to reduce the affordable housing requirement.					
654704	Mrs J E John		<a href="#">CSPS10 60</a>	Policy LN3							Affordable housing means low cost private housing and low cost rented housing. This would it seems be the ideal way to start young people off with a home of their own. However in many cases it would seem a high proportion of these properties are bought by local housing agencies who are, not only in the business of finding places for people to rent, but some are in it to make a profit - so no matter what problems some residents present, as long as the DHSS money . social services guaranteed finances pay the rent, these agencies are very backward in coming forward in dealing with some difficult social situations arising from other residents. Yes of course we need all types of housing but residents who are known to cause problems must be monitored for all sakes. To have a roof over peoples's heads does not make problems go away.				709	
655432	Mr Andy Davies		<a href="#">CSPS10 25</a>	Policy LN3							Let's not get blinded by contributions from developers and look at what Christchurch needs. We have large areas of brownfield sites that could easily be used for housing. Housing should blend in and not destroy our Green Belt.				709	
655526	Mr Paul Morrison		<a href="#">CSPS10 40</a>	Policy LN3							Well in all honesty does it? This sounds like cramming them in wherever there is a space. Good news at last for the building industry who have suffered lean times in recent years.				709	
359555	Mr L Hewitt	Wimborne Minster Town Council	<a href="#">CSPS20 71</a>	Policy LN3	Yes	Yes							No, I do not wish to participate at the oral examination		709	
524723	Mr John Worth	Wimborne Civic Society	<a href="#">CSPS19 47</a>	Policy LN3							We think the targets of 50% affordable housing on greenfield sites and 40% otherwise are ambitious but worth pursuing, provided the affordable units are scatered in the areas concerned. For this reason we are opposed to LN4, proposing 100% affordable housing, as having the potential to create socially exclusive enclaves.				709	
359261	Mr Doug Cramond	DC Planning Ltd	<a href="#">CSPS21 02</a>	Policy LN3		Yes					Improvement of the Plan would arise if some amendment were made to Policies LN3 (Provision of Affordable Housing) and ME5 (Renewable Energy Provision).	In the case of the former the % of affordable homes should be expressed as maxima not minima. Furthermore the policy should have reference in it to any delivery target being subject ot viability. It is clear from recent public presentations by the Housing Development and Enabling MANager that this is the approach intended to be taken - the policy wording shuld reflect this. Clearly Wyatts will do what it can on the WMC3 site. However, it will need to be borne in mind that this list of planning obligations, including the new football ground and replacement	Yes, I wish to participate at the oral examination	In connection with coments on WMC3	709	

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												allotments, would give rise to a viability profile not in accord with 'normal' greenfield development, indeed akin to a brownfield one. Hence flexibility needs to be maintained in the manner of precise percentage of affordable housing at this stage.				
360289	Mr Kevin Hodder	East Boro Housing Trust	<a href="#">CSPS23</a> 23	Policy LN3	Yes	Yes					3. Viability and Social Housing Thresholds are Key. If too high, sites and Section 106s will not come forward. If too low you will not provide much affordable housing. 50% Greenfield and 40% other is high when you add CIL costs also. The threshold level of six is good. My suggestion would be one to two units no contribution with CIL contribution (you want to encourage small development). 3 – 6 units an off site commuted sum. 6 plus Section 106 affordable units on site. Again I make this suggestion to help stimulate small unit development/remodels in this economically challenged time but to also gain for Local Authority policy driven social/affordable housing gain.				709	
523531	Mr Tim Hoskins	Savills	<a href="#">CSPS21</a> 34	Policy LN3		No				No	The increase in affordable housing provision from 40% in the Core Strategy Options Consultation to 50% in the Core Strategy Pre-Submission is not supported by the evidence base for this policy set out in the Affordable Housing Provision and Developer Contributions report. Furthermore, we are concerned that the evidence base has not taken the full range of likely development costs and the likely impact on viability into account. Alternative means of affordable housing provision such as affordable rent are likely to play an increasingly important role in the delivery of affordable housing, and flexibility is essential.	The affordable housing provision should be set at a target of up to 40%, subject to viability considerations. Greater flexibility on tenure mix should be incorporated into the policy to allow for a higher proportion of intermediate housing and affordable rent.	Yes, I wish to participate at the oral examination	Savills are acting on behalf of the Canford Estate and Harry J Palmer Ltd in relation to their landholdings on the edge of Corfe Mullen that form part of the CM1 allocation in the Pre-submission Draft Core Strategy. We are seeking participation at the oral part of the examination in order to help ensure that the plan is sound and deliverable	709	
360082	Mr and Mrs K Healy		<a href="#">CSPS25</a> 11	Policy LN3	Yes	Yes					We fully support the provision of affordable housing. It is the need for affordable housing to keep the younger members of the population in East Dorset that persuades us not to object to all housing on the Green Belt. However we have two concerns: • We are very concerned about the last point which indicates that developers can provide a reduced amount of affordable housing	• This section should include a reference to upholding the total numbers of affordable housing, even if the percentage of affordable housing is not the same on each site. • Local need must be prioritised and seen to be working, if there is no local need then	No, I do not wish to participate at the oral examination		709	



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											<p>contribution providing they provide sufficient evidence that it is not viable. Are developers likely to cite as evidence the large cost of providing SUDS for some of the potential housing sites?</p> <ul style="list-style-type: none"> <li>We will support affordable housing while there is a proven need and that it is allocated to those with local connections or work in this area.</li> </ul>	<p>overall housing numbers, both market and affordable, should be reduced.</p> <ul style="list-style-type: none"> <li>We believe there have been improvements made to the Housing Register over recent years, we are still waiting for confirmation that all duplication has been deleted. By duplication we mean where one person can register their need in any number of housing areas. These figures must be published and used in assessing the real need of affordable housing before this pre submission document is submitted.</li> </ul>				
359284	Miss Lynne Evans	Southern Planning Practice	<a href="#">CSPS22 28</a>	Policy LN3	Yes	No	Yes	Yes	Yes	Yes	<p>Hall &amp; Woodhouse support the objective to bring forward affordable housing in response to the identified need for affordable housing. However, objection is raised to the requirement for affordable housing on proposals involving any net increase in residential provision and therefore including development proposals as small as those promoting even 1 net new dwelling.</p> <p>The concern is that rather than assisting in bringing forward affordable housing, the policy trigger sought will hinder housing development coming forward and frustrate the realisation of the fundamental policy objectives of the Core Strategy. The policy is therefore ineffective and unsound.</p> <p>The whole aim of the NPPF is to secure sustainable development and to help secure much needed development across the country. Whilst the importance of affordable housing provision is supported in the NPPF, this particular policy, in setting such a low threshold is likely to stymie development and therefore is inconsistent with national planning policy objectives to help bring forward much needed development.</p> <p>The trigger for requiring affordable housing to be provided on site, off site or through a financial contribution requires rethinking to enable smaller developments to continue to come forward and contribute to the vitality and prosperity of the local community. The Council's own Meeting Local Needs Background Paper recognises that the requirements for affordable housing must not inhibit the strategic objectives for housing and economic growth. However, it is contended that in promoting this policy it has not heeded its own concerns.</p> <p>The NPPF also emphasises that policies need to be flexible to respond to changing market circumstances and there is no indication in the policy that there is scope for flexibility.</p>	<p>Reconsideration needs to be given to the minimum scale of development, before an affordable housing requirement is triggered</p>	Yes, I wish to participate at the oral examination	<p>The representations submitted raise important and complex policy issues which require oral examination and round table discussion in order that the Inspector can be properly informed in reaching a decision on the soundness of the Core Strategy.</p>	709	
656228	Mr Adrian Dwyer		<a href="#">CSPS24 87</a>	Policy LN3							<p>No. If you make it too difficult and too expensive for developers, they won't develop.</p>				709	
656650	Mrs Patricia Fear		<a href="#">CSPS24 46</a>	Policy LN3							<p>No. Build houses on the land for supermarket. Christchurch does not need more supermarkets so build houses there instead.</p> <p>My family have lived in Christchurch for 3 generations and we are very sad and angry at the way outsiders who just retire and come to live here, are trying to spoil and ruin this lovely Christchurch.</p>				709	

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656664	Mr Glen Morrison		<a href="#">CSPS24 61</a>	Policy LN3							Affordable housing and building more houses in the local area is not a solution when there are no policies set out in this pre-submission to address those properties that remain empty and un-inhabited throughout most of the year. This underutilized housing needs to house these people in need of a roof over their heads and not become the investment vehicles that remain dormant and ineffective by many owners who don't even live in the area. This problem is reducing the number of available dwellings that can be deemed vacant rather than just building on the town's Green Belt to resolve a problem with housing policy in our town.				709	
510796	Mr Rollo Reid		<a href="#">CSPS27 20</a>	Policy LN3							No. No greenfield wanted or needed. Develop brownfield and infill where needed.				709	
656369	Mr Timothy Peter Cook	John Reid and Sons (Structsteel) Ltd	<a href="#">CSPS27 74</a>	Policy LN3							No. Not at all. Affordable housing needs to be located on brown field sites, close to town and local amenities.				709	
656426	Mrs Pauline Pritchard		<a href="#">CSPS27 55</a>	Policy LN3							There must be sites available - not Green Belt that could be developed.				709	
656527	Ms Nicole Cox		<a href="#">CSPS28 14</a>	Policy LN3							We need more affordable housing. Only worth doing CN1 extension if majority affordable.				709	
656534	Mr Rob Warn		<a href="#">CSPS28 24</a>	Policy LN3							Maximise affordable to meet need.				709	
656536	Ms Wendy Voller		<a href="#">CSPS28 31</a>	Policy LN3							Housing need must be for Christchurch residents - families.				709	
360949	Mr Stuart Goodwill	Barratt David Wilson Ltd	<a href="#">CSPS27 10</a>	Policy LN3	Yes	No	No	Yes	No	Yes	The increase in affordable housing provision from 40% in the Core Strategy Options Consultation to 50% in the Core Strategy Pre-Submission is not supported by the evidence base for this policy as set out in the Affordable Housing Provision and Developer Contributions report. Furthermore, the evidence base has not taken into account the full range of likely development costs and the likely impact on viability into account.	The affordable housing provision should be set at a target of up to 40%, subject to viability considerations. Greater flexibility on tenure mix should be incorporated into the policy to allow for a higher proportion of intermediate housing.	No, I do not wish to participate at the oral examination		709	
359277	Mr Jamie Sullivan	Tetlow King	<a href="#">CSPS27 05</a>	Policy LN3							We note the affordable housing policy and welcome the emphasis on making the most of opportunities to deliver as much affordable housing as possible. However, we are concerned that the policy may be over-ambitious and lack the flexibility to deliver the optimal amount of affordable housing. In terms of flexibility the requirement for all schemes to provide a minimum target of affordable housing is too restrictive. We would prefer the Councils to state that this is a starting point for negotiation. In addition, our experience of very high affordable housing targets, in places such as South Hams is not positive. In order to accord with the NPPF, the Local Plan should also set out here a trajectory for the delivery of affordable housing. paragraph 13 of the NPPF states that: "for market and affordable housing, illustrate the expected rate of housing delivery through a trajectory for the plan period" Finally we have concerns over the requirement for contributions on				709	

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											schemes under five units. Whilst we understand that in places like Christchurch this is where a significant amount of housing comes from, we are concerned that it will lead to a considerable strain on officer time to negotiate Section 106 agreements and go through planning appeals in order to secure small proportions of affordable housing. We would rather see scarce resources focussed on the largest schemes where the highest proportion of affordable housing can be delivered.					
523531	Mr Tim Hoskins	Savills	<a href="#">CSPS3208</a>	Policy LN3	No	No				No	The increase in affordable housing provision from 40% in the Core Strategy Options Consultation to 50% in the Core Strategy Pre-Submission is not supported by the evidence base for this policy set out in the Affordable Housing Provision and Developer Contributions report. Furthermore, we are concerned that the evidence base has not taken the full range of likely development costs and the likely impact on viability into account.	The affordable housing provision should be set at a target of up to 40%, subject to viability considerations. Greater flexibility on tenure mix should be incorporated into the policy to allow for a higher proportion of intermediate housing.	Yes, I wish to participate at the oral examination	Savills are acting on behalf of Barratt David Wilson Homes in relation to land to the north of Christchurch Road, West Parley that forms the FWP4 allocation in the Pre-submission Draft Core Strategy. We are seeking participation at the oral part of the examination in order to help ensure that the plan is sound and deliverable.	709	<a href="#">2249912_0_1.pdf</a> <a href="#">2249911_0_1.pdf</a> <a href="#">2249910_0_1.pdf</a>
507525	Mr David Lander	Boyer Planning Ltd	<a href="#">CSPS3222</a>	Policy LN3	Yes	No	No	Yes	Yes	No	In considering the Pre-submission Core Strategy our focus has been on the policies related to East Dorset District Council and Verwood in particular. In general we consider the vision for the District and corresponding policies to be appropriate and capable of meeting the tests of soundness. Concerns are however raised regarding certain elements of the policies as discussed below and in the next section. Where concerns are raised regarding specific policies we identify which of the three test of soundness; justified, effective and consistent with national policy; we consider them to fail. Policy LN3: Provision of Affordable Housing 3.2 Policy LN3 seeks to maximise the delivery of affordable housing		Yes, I wish to participate at the oral examination	The representation relates to a key policy in the Core Strategy	709	<a href="#">2253553_0_1.pdf</a> <a href="#">2253533_0_1.pdf</a> <a href="#">2253534_0_1.pdf</a> <a href="#">2253535_0_1.pdf</a> <a href="#">2253536_0_1.pdf</a> <a href="#">2253530_0_1.pdf</a> <a href="#">2253531_0_1.pdf</a>

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											<p>across the Districts. The policy states that:                      "All greenfield residential development which results in a net increase of housing is to provide a minimum of 50% of the residential units as affordable housing on the site unless otherwise stated in strategic allocation policies. All other residential development which results in a net increase of housing is to provide a minimum of 40% of the residential units as affordable housing on the site."                      3.3 It is considered that this requirement of the policy is not effective in the context of East Dorset District. It is acknowledged that the District has a high level of affordable housing need, calculated at 440 dwellings per annum (CLG) or 243 dpa (BHM) respectively (EDDC Affordable Housing Provision &amp; Developer Contributions in Dorset, January 2010). In addition the District has experienced low annual completions of affordable housing in recent years, with no completions in 2006/07 and 2007/08.                      3.4 Policy KS4 of the Core Strategy sets a housing target for the District equivalent to 350dpa. This housing target will be comprised of both market and affordable housing. As such although the housing target will go some way towards meeting the demand for affordable housing it will not meet the entire identified need. As highlighted above, the District has a recent history of under provision of affordable housing. To help meet the need for both affordable and market housing in the District it will be important to facilitate developments coming forward to provide the much needed completions.                      3.5 Policy LN3 includes a caveat that the viability of provision of affordable housing will be taken account of if accompanied by clear evidence which is supported. In January 2010 East Dorset District Council published the Affordable Housing Provision and Developer Contributions in East Dorset final report, produced by Three Dragons. The report divided the District into the following market value areas:                      High Value Rural East Dorset•                      Consultation response to the Christchurch and East Dorset Pre-submission Core Strategy Consultation                        10.221 – Land at Ringwood Road, Verwood                      5                      East Dorset Rural•                      Wimborne Minster• &amp; St Leonards                      Southern Settlements•                      Low Value East Dorset (including Verwood).•</p>					

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											<p>3.6 In testing the residual values across these areas the report concluded that there was a “significant variance in residual values by market value area, reflecting the different housing prices found in each of them” (para. 3.10). The report concluded by providing three possible policy options regarding affordable housing provision:</p> <ul style="list-style-type: none"> <li>• “A single percentage target across the whole district and which is realistic in the lower value market areas. We consider that a target of 40% would be a reasonable percentage and would be a continuation of current policy;</li> <li>• A split target which achieves 40% generally across the district and 50% in High Value Rural;</li> <li>• A more refined split target which achieves 50% in High Value Rural, 40% in East Dorset Rural and Wimborne Minster and 35% in Southern Settlements and Low Value East Dorset.”</li> </ul> <p>3.7 The Council has chosen to proceed with an overall affordable housing target of 40%, but this is increased on greenfield sites to 50% unless otherwise stated in strategic allocation policies. As highlighted above Verwood falls within the Low Value East Dorset market value area. The Three Dragons report recommended that such areas should have an affordable housing target of 35-40%. Neither of the two proposed greenfield strategic allocations in Verwood has had their affordable housing target reduced below 50%.</p> <p>3.8 It is submitted that the evidence base provided by the Three Dragons assessment should be used in considering which greenfield strategic allocations should have their target lowered from 50%. As such, to ensure soundness, sites in Verwood should have a target of 35% affordable housing to take account of its location in the Low Value East Dorset market value area.</p>					
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	<a href="#">CSPS34 21</a>	Policy LN3		Yes					<p>Support in part Delivery of the maximum possible number of affordable/intermediate homes for local people is most strongly supported. It is vital that this is not just put forward in principal but actually achieved. Please see 2nd response</p>				709	
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	<a href="#">CSPS34 22</a>	Policy LN3		No	No				<p>To ensure sustainability, such homes should be provided in perpetuity. There is considerable concern in the community that housing will be allocated to people who are not local and who find it difficult/impossible to adapt to the more rural living of the District. This has created significant social problems in the past. It is essential that policy does not permit this: it would not be in the interests of the tenants or the local community.</p>	<p>Amend para 7 to: ....secured and retained in perpetuity for those in housing need and with a local connection. Amend 11.17 to include a commitment that annual housing completions survey will include a review of compliance with meeting local need.</p>	<p>Yes, I wish to participate at the oral examination</p>	<p>As part of the East Dorset Community Partnership, ETAG’s remit on biological sciences and sustainability is</p>	709	



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														wider than that of Natural England or Dorset Wildlife Trust. Membership includes highly qualified natural scientists and town & parish representatives.		
360792	Miss Carol Evans	Evans & Traves LLP	<a href="#">CSPS3482</a>	Policy LN3	No	No	No	No	No	No	<p>The requirement that all development sites involving a net gain in residential units to provide 40% affordable housing on-site is unrealistic, overly burdensome, creates too much uncertainty, does not provide for flexibility and ultimately will result in the failure of the document to fulfil the housing needs and targets.</p> <p>Unrealistic</p> <p>The Three Dragons report January 2010 makes massive assumptions in terms of existing use values. As evidenced through the SHLAA work the vast majority of residential development that takes place, particularly within Christchurch comes through the redevelopment of existing housing (72% in Christchurch between 2006-2011). The Three Dragons report does not set out what is expected as a reasonable developers risk and profit and the uplift in land values that landowners would require to incentivise them to go through the pre-application and application process. As such, the residual land value as stated in the case studies does not fully explain the costs that still need to be taken out of the residual land value, e.g. stamp duty costs for the landowners to move to an equivalent or better dwellinghouse, impacts of capital gains tax, legal fees etc. Land owners in more than ¾ of the redevelopment sites within Christchurch need to be incentivised to move for development purposes. The NPPF states in paragraph 173 in considering the viability of development schemes, decisions should 'provide competitive returns to a willing landowner.' As such, the residual land value has to be a good proportion above the existing land value to ensure that sites are deliverable. We content that the assumptions made in the Three Dragons report will result in too high a proportion of the residual land value being an affordable housing contribution and as such sites will not come forward.</p> <p>The Three Dragons report also assumes much higher densities of development than is commonplace within the majority of the built up areas of Christchurch and East Dorset. As evidenced by the SHLAA work a very high proportion of planning applications in the Christchurch and East Dorset areas are for developments of less than 5 units. These are often within suburban locations even when described as main settlements and often have low average densities of between 15 and 30 dwellings per hectare as demonstrated in the 'Key Facts' preamble to Policy HE2. In order to comply with</p>	<p>A reasonable tariff based approach for developments with a net gain of residential units of 5 dwellings or under. A complete review of the evidence needs to be undergone to establish the correct tariff, not assumptions that do not relate to the characteristics of East Dorset and Christchurch.</p> <p>Developments over 6 units, a reduced percentage of 20% that can be reviewed annually taking account of market conditions. In the first year of the plan a 10% affordable housing contribution on developments of 6 or over to introduce the scheme and not to 'turn off the tap' as occurred in Bournemouth.</p> <p>Allow flexibility to annually review the percentage requirement of affordable housing and the tariff to be set that relates to the annual monitoring review on delivery.</p>	Yes, I wish to participate at the oral examination	To be able to challenge the Council's evidence and allow the Inspector to hear the arguments from the private development side working in the section consistently and with the experience of other Council's affordable housing policy.	709	

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											<p>proposed policy HE2 to ensure that development is 'compatible' with its surroundings, similarly low density development of a maximum of 30dph is only likely to be tolerated. There is a conflict between Policy HE2 and the assumption made in the Three Dragons report. Three Dragons report assumes significantly higher densities of development in order to be able to deliver 40% affordable housing. For example, Case Study D proposes 12 dwellings in place of 2 dwellings on a site of 0.25 hectares with a density of 50 dwellings per hectare. Setting aside that a site this size, that is not within the Special Character Areas or Conservation Areas, is very rare, in such low density areas a 50 dwellings per hectare scheme is likely to fail the test of respecting local distinctiveness and the criteria of policy HE2. If East Dorset has a low density environment of 64.4% and Christchurch 42.5% consisting of detached houses and bungalows, the probability of a 50dph development being seen as acceptable at application stage is highly unlikely. As such, the assumptions that all developments can deliver 40% affordable housing on-site is based on an unrealistic scenario.</p> <p>The case studies set out in the Three Dragons report appear to demonstrate that between 25% and 30% affordable housing is achievable. Case study D is the only case study that alleges that 40% delivery onsite of affordable housing is acceptable and as discussed above, it is considered that this type of development will rarely come forward. Therefore even in consideration of the Three Dragons evidence, 40% is not a realistically achievable target. The NPPF states in paragraph 154 that 'Local Plans should be aspirational but realistic'. This is a wholly unrealistic policy.</p> <p><b>Uncertainty and Overly Burdensome</b></p> <p>The NPPF states that, 'only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan.' This policy requiring all residential development applications with a net gain in units will deliver 40% on site is unrealistic. As such, most applications will require, as the last sentence of the policy states, 'clear evidence to be submitted.' This will be particularly pertinent for sites that could have the capacity for 5 units as stated by Three Dragons and in the proposed policy. As established by the SHLAA a high number of small sites have come through historically therefore this will have a massive impact. There is no guidance on how this 'clear evidence' will be assessed. Are there benchmarks to be set down assuming the clear evidence means submitting viability assessments? Who will judge the assessments? If the Council brings in external expertise what will the cost be? Should this policy be introduced there is no clear guidance for the development industry or the LPA on how this policy should be implemented.</p> <p>Importantly, at the very start of a project when a developer approaches a landowner, there is no benchmark to establish what offer can be made as a purchase price to the landowner. As Three Dragons own case studies show, only one case out of five could (questionably) deliver the full 40% affordable housing contribution. Therefore, it is reasonable to assume that 80% of applications will need to be accompanied by clear evidence. With such uncertainty</p>					

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											<p>and the need to speculate significant amounts of time and money in entering into negotiations with the LPA based on a policy that is so unrealistic, landowners will not have confidence in the process, developers will have to speculate too much cost and time upfront and development will not come forward.</p> <p>There has been no account in the Three Dragons evidence put forward of the impact of other s.106 contributions on a schemes viability that will continue to be in force during the plan period such as the heathland mitigation, the South-East Dorset infrastructure contributions and open space contributions. There is no hierarchy of priorities of the contributions within the Core Strategy. Neither the decision-maker nor Applicant is guided.</p> <p>The NPPF is clear in paragraph 173 and states, 'the sites and the scale of development identified within the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing landowner and willing developer to enable the development to be deliverable'.</p> <p>Importantly, paragraph 173 states that, 'Plans should be deliverable.' The persistence of this wholly unreasonable policy jeopardises the ability of the plan to deliver its housing targets.</p> <p><b>Duty to Co-operate</b></p> <p>The assertions made in the paragraphs above have been based on experience of dealing with a Three Dragons led affordable housing policy in the neighbouring authority of Bournemouth Borough Council in 2010. In Bournemouth, this policy resulted in a significantly reduced level of applications for a net gain in residential units. This is borne out by the Council's annual monitoring report. The uncertainty surrounding the securing of land at a price to ensure a reasonable return for the landowner and the developer resulted in such a significant drop in applications that the Council has now amended this policy and introduced a tariff system for different sizes and locations of development sites to create more certainty within the planning system.</p> <p>The result of Bournemouth's decision to introduce such an unrealistic policy was to amend the policy to introduce a tariff based system a year from adopting that policy. There was no flexibility in the policy to permit the 40% to be lowered and as such the tariff that is in place is still prohibitively high. However, what it does offer is a start point for negotiations between a landowner and developer and has brought back a limited degree of certainty into the system.</p> <p>The NPPF states in paragraph 159 that LPA's should be, 'working with neighbouring authorities where housing market areas cross administrative boundaries'.</p> <p>As a result of this misguided policy in Bournemouth, the development industry has turned to areas outside of Bournemouth itself, such as Christchurch and East Dorset. As neighbouring districts, the housing markets are linked. No evidence has been submitted to demonstrate</p>					

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											<p>that there has been any consultation with Bournemouth Borough Council regarding the practical operations of this policy or the implication of the policy on the residential housing market that has broadly similar characteristics of large suburban style land and a high dependency of redevelopment of existing properties to be able to bring forward development.</p> <p>Inflexible</p> <p>Paragraph 50 of the NPPF states that, 'such policies should be sufficiently flexible to take account of changing market conditions over time.' Paragraph 177 states that affordable housing requirements should be 'kept under review'. There is nothing set out in the document to enable flexibility of the policy should delivery of housing stall due to the implementation of this policy. There is nothing that permits the LPA's to move to a tariff approach or another approach to deliver affordable housing if needed should market conditions worsen or the policy fail to deliver the needed affordable housing. Should the CIL process eventually include affordable housing contributions, then there is nothing to anticipate this occurring. This burdensome policy fails 'to take account of relevant market and economic signals' (paragraph 158, NPPF). What is needed is certainty to bring back confidence into the market. This policy is directly contrary to this.</p> <p>For the reasons given above, it is considered that this policy is unsound as it is not based on robust evidence that it is realistic and therefore is not reasonably justified. This policy is not positively prepared and will not be effective in delivering the needed affordable housing and will stifle the delivery of market housing.</p>					
523319	Mr Ryan Johnson	Turley Associates	<a href="#">CSPS33 01</a>	Policy LN3	No				Yes		<p>It is unclear why the Council have proposed site specific policies elsewhere in the plan that are not consistent with this policy, particularly when this policy is flexible enough to negotiate lower provisions on sites where there are proven viability and wider benefit grounds at the point of a planning application.</p>	<p>For consistency, clarity and avoidance of policy duplication, site specific affordable housing percentages should be removed and replaced with reference to policy LN3.</p>	<p>Yes, I wish to participate at the oral examination</p>	<p>We would wish to participate at the Examination in Public to elaborate on these comments, particularly in the context of the lands controlled by our client.</p>	709	<p><a href="#">2255452_0_1.pdf</a>  <a href="#">2255451_0_1.pdf</a></p>
359264	Mr Peter Atfield	Goadsby Ltd	<a href="#">CSPS35 73</a>	Policy LN3	Yes	No	No	No	No	No	<p>Policy LN 3 imposes a higher affordable housing requirement on the urban extension sites without justification. There is no reason why different quotas should be imposed on different categories (i.e. greenfield or brownfield) of site. As set out in Paragraph 47 of the National Planning Policy Framework (NPPF), Local Plans should meet the full, objectively assessed needs for open market and affordable housing in the housing market area.</p> <p>Policy LN 3 will have the effect of reducing the delivery of much needed open market housing in key, strategic locations. If the full, objectively assessed needs for affordable housing cannot be met without reducing the delivery of open market housing, then additional</p>	<p>Amend Policy LN 3 by removing the reference to a minimum 50% requirement for affordable housing on the urban extension sites; i.e. the first sentence of the second paragraph of the policy.</p>	<p>Yes, I wish to participate at the oral examination</p>	<p>To consider the implications of the Housing Needs Assessment at the local level and to review the government's new approach</p>	709	

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											land should be allocated for its development. The Core Strategy (CS) introduces a new approach to the provision of affordable housing whereby all residential development sites will be required to contribute where there is a net increase in housing. This differs from the historic approach of seeking a contribution to affordable housing based on thresholds of either 25 or 15 units. The new policy requirement needs to be monitored so as to gauge its effectiveness in the delivery of low cost housing. This may avoid the need to impose higher targets on strategic sites; and may even reduce the quota overall. There is no evidence that the urban extension sites are located in areas where affordable housing need is at its greatest. Paragraph 50 of the NPPF requires the size, type, tenure and range of affordable housing to reflect local demand in particular locations. Demand, or need, may be lower in the wards and parishes in proximity to the urban extension sites. Without evidence to prove to the contrary, the imposition of a two level quota policy is not justified.			to quantifying affordable housing need.		
359264	Mr Peter Atfield	Goadsby Ltd	<a href="#">CSPS35</a> <a href="#">59</a>	Policy LN3	Yes	No	No	No	No	No	Policy LN 3 imposes a higher affordable housing requirement on the urban extension sites without justification. There is no reason why different quotas should be imposed on different categories (i.e. greenfield or brownfield) of site. As set out in Paragraph 47 of the National Planning Policy Framework (NPPF), Local Plans should meet the full, objectively assessed needs for open market and affordable housing in the housing market area. Policy LN 3 will have the effect of reducing the delivery of much needed open market housing in key, strategic locations. If the full, objectively assessed needs for affordable housing cannot be met without reducing the delivery of open market housing, then additional land should be allocated for its development. The Core Strategy (CS) introduces a new approach to the provision of affordable housing whereby all residential development sites will be required to contribute where there is a net increase in housing. This differs from the historic approach of seeking a contribution to affordable housing based on thresholds of either 25 or 15 units. The new policy requirement needs to be monitored so as to gauge its effectiveness in the delivery of low cost housing. This may avoid the need to impose higher targets on strategic sites; and may even reduce the quota overall. There is no evidence that the urban extension sites are located in areas where affordable housing need is at its greatest. Paragraph 50 of the NPPF requires the size, type, tenure and range of affordable housing to reflect local demand in particular locations. Demand, or need, may be lower in the wards and parishes in proximity to the urban extension sites. Without evidence to prove to the contrary, the imposition of a two level quota policy is not justified.	Amend Policy LN 3 by removing the reference to a minimum 50% requirement for affordable housing on the urban extension sites; i.e. the first sentence of the second paragraph of the policy.	Yes, I wish to participate at the oral examination	To consider the implications of the Housing Needs Assessment at the local level and to review the government's new approach to quantifying affordable housing need.	709	
619967		Home Builders Federation (South West)	<a href="#">CSPS36</a> <a href="#">90</a>	Policy LN3		No		Yes			The policy is unjustified as it is not supported by the evidence base and because the evidence base is flawed in terms of meeting the requirements of the Framework in terms of factoring in the cost of local plan policy requirements on viability. The evidence for the affordable housing targets is provided in two reports: the Christchurch Affordable Housing Provision and		Yes, I wish to participate at the oral examination	The HBF would like to appear at the examination to debate these matters further.	709	



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											<p>Developer Contributions report, January 2010, and the East Dorset Affordable Housing and Developer Contributions report, January 2010. On the basis of these reports the plan policy requires 50% affordable housing (AH) on green field sites and 40% elsewhere. However, the modelling underestimates the costs to be applied to development in several areas. The Framework requires the costs of standards to be applied to development to be assessed to ensure viability.</p> <p>The modelling has not factored in the higher costs of building to zero carbon homes from 2016 onwards. As this is a cost that will apply for the majority of the plan period it must be factored into the viability assessment. Since the Framework requires such costs to be assessed the analysis cannot be relied upon as a reliable assessment of the costs that will apply to house building over the plan period.</p> <p>The modelling assesses the impact of the Code Level 4 of the Code for Sustainable Homes. The Part L element of the Building Regulations constitutes 80% of the cost of the Code. This will be a mandatory requirement from 2013. The plan must account for these costs in its viability analysis. The viability modelling, however, has not reflected these costs. The Christchurch report notes in paragraph 3.27 that the cost of moving to Code 4 could add in the region of £7k per unit based upon the costs indicated by the Cyril Sweet 2007 report. While this report is out of date, the average costs are not dissimilar to the ranges cited in the DCLG August 2011 update. On a 30pdh scheme this would add a total £210,000 to the cost of bringing the scheme forward. If we take residual lands values (RLV) listed in Appendix 3 of the report for Christchurch and then deduct the cost of moving to Code 4 the following RLVs are generated when building at 30 dph (the plans minimum density set out in policy LN2) and assuming a policy complaint 50% AH target:</p> <p>RLVs at 30dph and at 50% AH (assuming planning gain of £5k per dwelling)</p> <p>Current Building Regs Factoring in Code 4                  £2.74m £2.53m                  £1.74m £1.53m                  £1.49m £1.28m</p> <p>While these reductions in the RLV might appear small, they must be considered against the context of the RLVs already being very low when compared against the total development value. Once the cost of a higher s106 package, Zero Carbon homes from 2016, Heathlands mitigation, Alternative Natural Greenspace provision and dwelling space standards are factored in (each is considered further below) then the RLVs are likely to be eroded to nominal, if not negative, levels. The Councils needs to factor-in these additional costs to ensure that its AH targets are achievable and the plan is deliverable.</p> <p>As stated above, the modelling does not reflect the costs of the proposed dwelling space standards as set out in policy LN1. These could have a very significant impact on reducing RLVs further. The cost of discharging the various Dorset Heathlands mitigation measures described in policy ME2 and providing Alternative Natural</p>					

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											<p>Greenspace (policy ME3) will also need to be factored into the viability assessment.</p> <p>It should also be noted that the viability assessment is predicated on a modest planning obligations package (CIL and s106) of only £5k per dwelling. Both reports do model the impact of £15k per dwelling but conveniently only cite the RLV on schemes at 50dph at 40% because schemes at this density and percentage of AH provide the strongest RLVs in the modelling. Once the impact of £15k per unit is factored into a development at 30dph and at the policy compliant level of 50% AH for green field sites then the impact on viability is much worse. On a 30dph scheme the RLV would be reduced by a further £450,000k (15k x 30 dwellings). If we take the figures I have quoted above that reflect the cost of moving to Code 4 then this shows the following impact on RLVs for a scheme at 30dph at 50% AH:</p> <p>Code 4 Minus £450k planning gain                      £2.53m £2.08m                      £1.53m £1.08m                      £1.28m £0.83m</p> <p>While admittedly these are only my own 'back of a fag packet' calculations they do indicate the potential impact that the costs of local policies and standards could have on the deliverability of the core strategy. It is very unlikely that RLVs at these kind of levels will incentivise land owners to bring forward land.</p> <p>The cost of moving towards Zero Carbon Homes from 2016 also has the potential to add between £16k and £23k per dwelling depending on location and land type (see DCLG: Cost of Building to the Code for Sustainable Homes: Updated cost review, August 2011). It is important therefore to ensure that there is a sufficient 'cushion' built into the viability modelling to ensure that these future costs can be accommodated and RLVs are not so eroded that development will not come forward. The costs of zero carbon tend to be higher on green field sites – at the higher end of £23,000 per unit. So, on a 30dph scheme this could add a further £690k to development costs. If we factor this cost into the results I have provided above then we are edging towards very marginal RLVs.</p> <p>I have focused upon the impact that the 50% AH target has on viability because this is the target that will be applied to green field sites. As the successful implementation of the plan depends upon a proportion of green field sites coming forward in both districts these green field sites must not be subjected to such a burden of costs that will prevent them from viable development. To do otherwise would mean that the Council has an undeliverable plan on its hands. The plan would, consequently, be unsound.</p> <p>To summarise, the viability assessments that have been carried out to date do not meet the requirements of the Framework. The Council has not accurately reflected all the costs that the core strategy intends to impose on development to assess what impact this will have on development viability while still ensuring that competitive returns are provided for landowners and developers. This is necessary to ensure that the core strategy is deliverable.</p> <p>Housing mix on site</p>					

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											We do not understand why the mix on site must reflect the outputs of the SHMA when neither Council is providing the level of housing indicated as necessary by their reports to address affordable housing need. If the Councils are not meeting their objectively assessed needs, then the precise question of mix becomes academic because there is a close correlation between affordability and supply. A reduction in supply compared to the objective need would only increase the problem of affordability in both districts. The amount of affordable housing needed on schemes would really need to be increased to compensate for the decline in supply (with poorer residents increasingly priced-out by more affluent incomers). Because the Councils cannot increase the proportion of affordable homes on schemes without jeopardising viability the only solution they have to improving affordability and increasing the supply of affordable dwellings is to make the land available to meet the objectively assessed need. If the Councils are unwilling to do this then they should be more honest and state that Christchurch and East Dorset are not places where you can expect to live if you are households of modest means.					
523319	Mr Ryan Johnson	Turley Associates	<a href="#">CSPS37 86</a>	Policy LN3		No			Yes		Thank you for the invitation to comment on the Pre-Submission Core Strategy DPD. I write on behalf of our client, Burry & Knight Ltd, who are the owners and developers of Hoburne Farm Estate, which includes land east of phase 8 of the Hoburne Farm Estate (SHLAA reference 8/11/0525); and are the owners and operators of Hoburne Caravan Park (SHLAA reference 8/11/0287). Our clients support the Council in their objective to progress and adopt a Local Plan for the area as quickly as possible. This will provide clarity and certainty for the development industry and all those who interact with the planning system. More importantly it will assist the Council in its efforts to address the significant housing land supply shortages in the borough, particularly over the next five years. We have reviewed the plan and its evidence base and conclude that revisions are needed if the Council are to satisfy the tests of soundness in the NPPF. The following paragraph/policy specific comments are therefore made to assist the Council in finalising the plan before it is formally submitted to the Secretary of State. We would wish to participate at the Examination in Public to elaborate on these comments, particularly in the context of the lands controlled by our client. Policy LN3 – Provision of Affordable Housing Comment It is unclear why the Council have proposed site specific policies elsewhere in the plan that are not consistent with this policy, particularly when this policy is flexible enough to negotiate lower provisions on sites where there are proven viability issues and/or wider benefit considerations at the point of a planning application.	Suggested Change For consistency, clarity and avoidance of policy duplication, site specific affordable housing percentages should be removed and replaced with reference to policy LN3.	Yes, I wish to participate at the oral examination	We would wish to participate at the Examination in Public to elaborate on these comments, particularly in the context of the lands controlled by our client.	709	
359264	Mr Peter Atfield	Goadsby Ltd	<a href="#">CSPS39 81</a>	Policy LN3	Yes	No	No	No	No	No	Policy LN 3 imposes a higher affordable housing requirement on the urban extension sites without justification. There is no reason why different quotas should be imposed on different categories (i.e. greenfield or brownfield) of site. As set out in Paragraph 47 of the National Planning Policy Framework (NPPF), Local Plans should meet the full, objectively assessed needs for open market and	Amend Policy LN 3 by removing the reference to a minimum 50% requirement for affordable housing on the urban extension sites; i.e. the first sentence of the second paragraph of the policy.	Yes, I wish to participate at the oral examination	To consider the implications of the Housing Needs Assessment at	709	

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											<p>affordable housing in the housing market area. Policy LN 3 will have the effect of reducing the delivery of much needed open market housing in key, strategic locations. If the full, objectively assessed needs for affordable housing cannot be met without reducing the delivery of open market housing, then additional land should be allocated for its development.</p> <p>The Core Strategy (CS) introduces a new approach to the provision of affordable housing whereby all residential development sites will be required to contribute where there is a net increase in housing. This differs from the historic approach of seeking a contribution to affordable housing based on thresholds of either 25 or 15 units. The new policy requirement needs to be monitored so as to gauge its effectiveness in the delivery of low cost housing. This may avoid the need to impose higher targets on strategic sites; and may even reduce the quota overall.</p> <p>There is no evidence that the urban extension sites are located in areas where affordable housing need is at its greatest. Paragraph 50 of the NPPF requires the size, type, tenure and range of affordable housing to reflect local demand in particular locations. Demand, or need, may be lower in the wards and parishes in proximity to the urban extension sites. Without evidence to prove to the contrary, the imposition of a two level quota policy is not justified.</p>			the local level and to review the government's new approach to quantifying affordable housing need.		
474462	Mrs Sheila Bourton		<a href="#">CSPS194</a>	Policy LN4	Yes	Yes					No evidence has been supplied as to the number of affordable houses which could be accommodated on these Exception sites. These additional houses could contribute to the overall numbers of new houses required in the District. Numbers of new houses on Exception sites should therefore be quantified in order that the number of new houses on other proposed developments in "new neighbourhoods" could possibly be reduced thus saving valuable and irreplaceable Greenbelt		No, I do not wish to participate at the oral examination		711	
474490	Mrs Sheila Bourton	Keep Wimborne Green	<a href="#">CSPS222</a>	Policy LN4	Yes	No			Yes		We consider this part of the document to be ineffective because no evidence has been supplied as to the number of proposed houses for these Exception sites. It is important that a quantifiable number is ascertained because the numbers of new dwellings on these Exception sites would contribute to the total of new houses proposed for the whole of our area. It would then be possible to reduce new house building on other sites identified and possibly save some greenbelt..		No, I do not wish to participate at the oral examination		711	
360692	Mrs Wendy Britton		<a href="#">CSPS658</a>	Policy LN4	Yes	No	Yes	Yes	Yes	Yes	<p>1. This objection is directed to the proposed mandatory requirement in LN4 (page 177), that any housing permitted on Green Belt release land must be 100% affordable housing. The intention to maximize Affordable Housing is appropriate. This tool for implementation (all houses on Green Belt release land to be 'affordable') is unsound and inappropriate. It is too inflexible a mechanism and, because of the inevitable (and justifiable) local opposition to such a development, it will be undeliverable. This will then fail to meet the desire to produce more affordable housing and also fail to implement, in practical terms, the acceptance at national planning level, that some Green Belt release must occur.</p> <p>2. It is difficult to see where policy LN4 has sprung from. It does not</p>	The first proviso to LN4 ('the housing comprises 100% affordable housing') should be removed.	Yes, I wish to participate at the oral examination	My representation stems from a personal interest. I own land in the community where I once lived and that will be directly affected by the outcome of	711	

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											<p>follow, logically, or by development from, any of the previous discussions or policies. LN3 proposes a threshold of 50% affordable housing for 'greenfield' sites.</p> <p>3. I cannot see, anywhere, a remit to approach affordable housing provision by arbitrarily stipulating a 100% threshold, simply because the 'green field' comes from 'Green Belt'. A future decision of the Planning Authority, whether to permit an 'exceptional' release of land from Green Belt to meet housing demand, can and should be properly governed by the factors outlined in KS2, that is to say, to ensure the preservation of the physical identity of individual settlements, and to maintain an area of open land around a conurbation. To link such a threshold increase to a Green Belt release is arbitrary and will hamstring the necessary flexibility that a Planning Authority must have. And, on what logic? There is no evidence, robust or otherwise, to justify it. Some land may be better suited to 100% Affordable Housing than other; why stipulate that Green Belt release land must always be the best such location?</p> <p>4. And what of the local residents? They are used to land that they knew to be green belt, open, and probably literally, fields. Now it is to be entirely 'Affordable Housing'; this will, however wrongly or unrealistically, provide the ground for a fear of a 'ghetto'. The planners can absorb this fear, in individual cases, by standing by the need for a broad vision of the development, permitting infrastructure assistance to a community, as well as housing. Presumably even a community centre would be precluded by such restrictions.</p> <p>5. And, if only Affordable Housing is permitted, will it make any development uneconomic, with the same consequence, that the houses needed by the District will not be built?</p> <p>6. The Core Strategy Vision (CSV) properly recognises the obligation to satisfy the pressing need for housing, saying that the 'limited alterations of [green belt] boundaries' will assist in meeting it. The CSV goes no further than saying that, 'Almost all new housing development will contribute to the provision of affordable housing...'. The increase to 100% for Green Belt release land is thus unwarranted by the Core Strategy. Objective 5 of the CSV simply contemplates that 'developments of 100% affordable housing schemes may be considered EXCEPTIONALLY in in land adjoining rural and urban settlements' [my emphasis]. Is the uncertainty of this LN4 proviso the reason that (para 15.18) there is proposed a 'Supplementary Planning Document on the provision of affordable housing'?</p>			these representations. I feel that some brief words, informed by such personal knowledge on the real impact of this proposal may assist the Inspector (unless he or the Council are already persuaded by my representations!!).		
650810	Ms Fiona Astin	Synergy Housing	<a href="#">CSPS39</a>	Policy LN4	Yes	No			No		<p>The policy only talks about 'land adjoining' settlements and this isn't always practical for rural exceptions sites. It also sets out WHICH settlements rather than leaving it to any settlement to demonstrate housing need if it has any. Most importantly, it only allows 100% affordable schemes - there is very little subsidy available for affordable housing at the current time and this is likely to continue for some time to come.</p>	<p>Broaden the wording to encompass redevelopment of brown field or other infill sites rather than just 'land adjoining settlements.'</p> <p>Change the list of settlements to a wording which covers any settlement that can justify housing need by provision of a compliant local housing needs survey.</p> <p>Change the policy to allow the inclusion of private sale or market rent property in order</p>	Yes, I wish to participate at the oral examination	It is not necessary to speak at the oral examination. However, as a major local affordable housing provider it may	711	



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												to cross-subsidise the affordable housing provision to meet local affordable housing need.		be useful to share our experiences at the oral examination.		
653320	mr mark huggins		<a href="#">CSPS821</a>	Policy LN4	No	No	Yes	Yes	Yes	Yes	This document is unsound: Colehill has not been identified in Policy LN4 on page 177 as a settlement area within East Dorset for affordable housing exception sites. I feel strongly that Colehill should be named as an area for exception sites because: ** Affordable homes are needed in Colehill to allow local people to live and work in their area and for younger generations to be able to afford to stay in their local community once they get to an age where they want to leave home and live independently. ** There are a lack of affordable homes in Colehill. ** I would like to add that if this policy is submitted in it's current form without exception sites in Colehill. For example, Burton (Christchurch) is included and is a comparable exception site area to Colehill.	Include Colehill to be considered for settlement development projects	Yes, I wish to participate at the oral examination		711	
654618	Tanner & Tilley	Pennyfarthing Homes	<a href="#">CSPS828</a>	Policy LN4	Yes	No	Yes	Yes	Yes	No	We consider that consideration should be given to the inclusion of a small amount of open market housing within the mix of affordable housing on these exception sites. The inclusion of a mix of, say 70% affordable housing and 30% open market housing on these sites would be more likely to encourage these sites to come forward; would result in a better mix of housing that would provide for an inclusive mixed community; and would be more likely to promote the delivery of affordable housing than might otherwise be the case. Paragraph 54 of the NPPF suggests that LPA's should consider whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs. We also consider that this policy should apply to land adjoining all defined rural and urban settlements where there is an identified local housing need and not just those currently listed in the proposed policy.	We suggest that the policy be replaced with the following:- " Affordable housing exception sites Exceptionally land adjoining the defined rural and urban settlements which would otherwise be considered inappropriate for development may be developed in order to provide affordable housing, in perpetuity, provided that: •The housing comprises a minimum of 70% affordable housing (the balance could be made up by open market housing); and •Secure arrangements are included for the affordable housing to ensure that its benefits will be enjoyed by successive as well as initial occupiers. •The proposed development would provide a mix of housing size and type which meets demonstrated local housing needs as identified in the Strategic Housing Market Assessment. •The development is small scale and reflects the setting, form and character of the settlement and the surrounding landscape. This policy will apply to land adjoining all settlements, subject to the above provisos."	Yes, I wish to participate at the oral examination	We would wish to contribute to any debate on this issue at the oral examination.	711	
654716	Mrs Barbara Huggins		<a href="#">CSPS809</a>	Policy LN4	No	No	Yes	Yes	Yes	Yes	Affordable housing provision is a necessity in Colehill. There are 3 schools in Colehill and provision is needed so that parents can be within walking distance of schools. When young people who have been brought up in Colehill and are of an age to live independantly, they need to have affordable housing	Colehill should have exception sites included in ths core strategy so that affordable nhosing can be created in this area	Yes, I wish to participate at the oral examination	So that I can present the argument for Colehill to be granted	711	

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											options so that they do not have to leave their local community. Colehill should be included as an area where exception sites are available for affordable homes.			exception sites		
654847	mr Philip Strong		<a href="#">CSPS87 1</a>	Policy LN4	No	No	Yes	Yes	Yes	Yes	I believe that affordable housing should be made available to young people in the area. There are adequate schools and provisions for these people and we should be encouraging them to remain in the area and raise their children using the infrastructure already in place. I feel there is a lack of this provision in Colehill.	inclusion of the Colehill area.	Yes, I wish to participate at the oral examination	Because I consider the core strategy to be unsound	711	
654848	Miss Susan Strong		<a href="#">CSPS87 3</a>	Policy LN4	No	No	Yes	Yes	Yes	Yes	<p>I must say that I am bemused as to why in a document of this enormity that some areas that are indeed very similar are included whilst others are left out.</p> <p>I have seen many area that have been identified for creating affordable housing on exception sites... why not Colehill?</p> <p>To my mind, all areas house local people &amp; they in turn have subsequent generations who wish to remain in their local area. Without the provision of local affordable housing using exception sites this becomes impossible &amp; families are then split... have we learnt nothing from the detrimental impact on communities in the slum clearance!</p> <p>Young families need to be able to live locally to their children's schools , to walk their children to school. In Colehill there are 3 schools &amp; with an ageing population there is an ever increasing pressure on housing. Why rule out exception sites that may well provide good potential for affordable housing.</p> <p>There are many homes in Colehill but few affordable, why are you forcing local people to have to move away from their community &amp; support networks - surely this is detrimental to an already deteriorating modern society!</p> <p>Again I state that I am aware of other areas that have been identified for creating affordable housing on exception sites... why not Colehill?</p> <p>Leaving out Colehill makes the policy unsound &amp; illegal at worst &amp; bias in favour of other comparable areas at best.</p>	You need to include Colehill exception sites for consideration for affordable housing.	Yes, I wish to participate at the oral examination	Because I have many points that I wish to put forward.	711	
360245	Mr Richard Burden	Cranborne Chase & West Wiltshire Downs AONB	<a href="#">CSPS15 69</a>	Policy LN4							<p>Thank you for consulting the AONB on this important policy document. As the ANOB considers there are some quite fundamental matters for discussion this letter is being sent simultaneously to Judith Plumley and yourself.</p> <p>The Cranborne Chase and West Wiltshire Downs AONB has been established under the 1949 National Parks and Access to the Countryside Act to conserve and enhance the outstanding natural beauty of this area which straddles three County, one Unitary and five District councils. It is clear from the Act, subsequent government sponsored reports, and the Countryside and Rights of Way Act 2000 that natural beauty includes wildlife, scientific, and cultural heritage. It is also recognised that in relation to their landscape characteristics and quality, National Parks and Areas of Outstanding Natural Beauty are equally important aspects of the nation's heritage and environmental capital. The AONB Management Plan (2009 – 2014) is a statutory document that has been approved by the Secretary of State and was adopted by your Council early in 2009.</p> <p>The ANOB has looked with considerable interest at your Core</p>				711	<a href="#">2239337_0_1.pdf</a> <a href="#">2239336_0_1.pdf</a>

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											<p>Strategy Pre-Submission Document. We are acutely aware, with the production of the National Planning Policy Framework (NPPF), the revocation of the Regional Spatial Strategy (RSS), and the removal of the whole suite of Planning Policy Statements and Planning Policy Guidance that all Core Strategy documents are in real danger of being insufficiently detailed to provide adequate policy guidance through to 2028.</p> <p>It is, however, clear from the NPPF that Government envisages the re-emergence of Local Plans with considerable detail within them to cover policy and decision making needs. It is noticeable that the NPPF puts equal weight on achieving economic, social and environmental gains jointly and simultaneously through sustainable development. There is a clear implication that solely economic proposals are not automatically sustainable.</p> <p>Crucially Paragraph 14, in association with Footnote 9, clearly indicates that there should be special policies in these emerging Local Plans to cover special situations. Those special situations include designated landscapes such as AONBs. Paragraph 218 also indicates that it would be in order for Local Plans to take on board those policies that have been lost in the revocation of the RSS. The thrust, therefore, of the AONB's comments relate to matters that we feel should be included in the Core Strategy to overcome the policy vacuum created by the loss of the higher level strategies and policies on which the whole concept of Core Strategies was predicted. Whilst there is much to be supported in the pre-submission Core Strategy the AONB is of the view that without the additional policies to fill the gaps created by the loss of the higher level strategies and policies it will not be fully fit for purpose through to 2028 and therefore would have to be regarded as less than sound. In particular the AONB would wish to see clear policies that indicate the special character of the AONB, and proposed developments within it, would be handled in ways different from other, undesignated, areas of countryside within the District. Similarly we would commend the RSS suite of policies ENV1, 2, 3, 4, 5, and in particular ENV3 which relates to the setting of AONBs. We would wish to see priority given to conserving and enhancing natural beauty within the AONB and to priority being given to conserving and enhancing natural beauty where there is conflict with proposed development.</p> <p>As I am sure you are aware the AONB recognises the need for affordable housing for those that live and work within the AONB. We are, however, concerned that exception sites for affordable housing should be genuinely sustainable. Sites on edges of villages, or villages that do not have shops and schools, are unlikely to be sustainable and are going to require the occupants of those houses to have their own personal transport which, of course, militates against that development being sustainable.</p>					
656493	Cllr Tony Gibb	Eastern Area DAPTC	<a href="#">CSPS14 B5</a>	Policy LN4	No	No	No	No	No	No	<p>RURAL RESPONSE TO EAST DORSET AND CHRISTCHURCH CORE STRATEGY</p> <p>This response is made to supplement those made by individual parishes. Some of the points made are general to all some are</p>	The East Dorset and Christchurch Core Strategy needs to be enhanced in a number of areas before it can be said to reflect the majority of the East Dorset area. It cannot			711	

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											<p>specific to a few. This response does not concern itself with Christchurch Borough.</p> <p>Area Covered by Response including the parishes and grouped parishes of Aderholt, Cranborne, Knowlton, Gussages, Vale of Allen, Holt, Pamphill &amp; Shapwick, Sixpenny Handley with Pentridge, Sturminster Marshall. It does not include the conurbations along the A31 or Verwood and Three Legged Cross.</p> <p>Despite previous comments, the Core Strategy remains urban centric, focussing on the conurbations along the A31 and ignoring the largest part of the District. The size of the rural community (as covered by this response) is 25597 hectares or 72.21% of the East Dorset Area (source Dorset Data Book 2011). The rural population is 12950 or 14.74% of the East Dorset population. These communities deserve better recognition within the Core Strategy before it can be fully supported.</p> <p>The Defra Local Authority dataset post 2009 classified East Dorset with a rural population of 73.29% and a classification of R50. <a href="http://webarchive.nationalarchives.gov.uk/20110215111010/http://archive.defra.gov.uk/evidence/statistics/rural/rural-definition.htm">http://webarchive.nationalarchives.gov.uk/20110215111010/http://archive.defra.gov.uk/evidence/statistics/rural/rural-definition.htm</a> . The DEFRA maps classify the majority of East Dorset as "Less Sparse and Less Sparse Dispersed.</p> <p>A recent report by Prof Mark Shucksmith OBE, of Newcastle University who has conducted several studies for the Commission for Rural Communities (CRC) indicated that "It should be no surprise to us that powerful groups prevail in designing rural policy and planning, and that less powerful groups are generally excluded from decisions. Average house prices in rural areas exceed those in urban areas of England by around 25%, with higher prices in some villages costing nearly 11 times the average income.</p> <p>"Rural communities are often proclaimed by those who live there as inclusive and neighbourly, but it seems they often prevent the new housing which would enable poorer and middle income groups to share the rural idyll. People's housing opportunities are crushed and their life-chances diminished by the failure to build sufficient houses in rural Britain."</p> <p>All the points made in the latest CRC State of the Countryside Report 2010 are valid in East Dorset <a href="http://www.defra.gov.uk/crc/documents.state-of-the-countryside-report/sotc2010/">http://www.defra.gov.uk/crc/documents.state-of-the-countryside-report/sotc2010/</a> . The key points from Section 2 are replicated at Annex A. Since the CRC is not due to be abolished until Mar 2013, it recommended that they be consulted to enhance the credibility of the District Strategy.</p> <p>Estates. There is no reference in the Strategy to the fact that much of the rural area of the district is made up of private estates – Cranborne, Shaftesbury, Crichel, Kingston Lacy (NT), Edmondsham, Rushmore (part of). All have a part to play and are involved in various ways in the life and economy of East Dorset; this has to be recognised.</p> <p>The Core Strategy. There is a lack of a clearly defined Aim for the document. If there is to be a Vision it should lead to an Aim "To produce a Strategy For the Development of East Dorset during the period 2013 to 2028". Para 4.1 of the Key Strategy is therefore</p>	<p>be endorsed in its current state.</p>				

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											<p>limiting in that it says that the strategy is only concerned with identifying the locations for development; it is putting the cart before the horse. The objectives should cover the key areas of the strategy: economy, housing, welfare, environment, communications. The policies should be specific within each key objective.</p> <p>Core Strategy Objectives. Either all the objectives cover the partnership area or all need to specify which parts they pertain to. (Obj 1 and 4). Too many of the objectives start to discuss particular aspects, which limit their application. An objective should be an achievable target from which the policy statements are derived.</p> <p>Whilst the majority of the rural economy is based on agriculture, there are also a wide variety of home workers who need stronger recognition in the strategy. Both need firm policies to support their continued existence; the national evidence would suggest that home working will increase dramatically during coming years as the price of travelling continues to rise and central government supports the improvements of the communications infrastructure.</p> <p>Generic policy statements are not sufficient to embrace them.</p> <p>Market Towns. The lack of any partnership working within East Dorset reduces the role of the market towns as a focus for their area. The location of the market towns in the south of the district does not help. There is confusion of terminology within the document between Rural Service Centres and Key Settlements.</p> <p>Communications – Broadband will play an essential part of the future of East Dorset. It is an essential requirement for farmers, home workers and the service sector. 100% coverage of mobile communications is required to ensure connection with the emergency services at all times and to make up for the poor broadband coverage. A firm policy to support enhanced communications across the rural community is essential.</p> <p>Highways. Rural roads must be maintained to support the local economy and tourist traffic which will only increase. The A354 is classified as a strategic route yet there is no strategy or policy to support this. The B3081 / B3078 / B3082 roads are all secondary and local distributor roads; within the rural community these roads are as important as the streets in the towns yet they are not recognised within the strategy or policies.</p> <p>Environmental Issues – surface water drainage. The chalk landscape produces particular problems with flooding in certain areas which can lead to paralysis of the economy and infrastructure with an allied impact on foul water drainages. It is essential that the District recognises their liability to work with the county council to mitigate the effects of surface water flooding which are now more common than 25 years ago.</p> <p>Population shift. The increase in elderly population can only continue as efforts are made to sustain the rural centres. These will attract retired people who will not necessarily contribute to the local economy except through volunteering.</p> <p>Housing. A policy is required to encourage major landowners to build Affordable Housing within their estates to make up for the properties that have been sold off and are used as second homes. A policy of 100% taxation of second homes is required to support the</p>					



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											<p>infrastructure costs of the district.</p> <p>Growth potential. – Whilst mention is made of diversification, there need to be strong policies to encourage small business units and Home Working within the rural area. Limiting this will be to stifle the rural economy.</p> <p>Annex A to Eastern Area DAPTC Response to EDDC Core Strategy Submission Extract From CRC State of the Countryside Report 2010 Key summary points on social issues:</p> <ul style="list-style-type: none"> <li>• Between 2001 and 2008 the population of rural England rose faster than in urban areas. The fastest growth was in Village, hamlet and isolated dwellings – Less sparse areas which grew by 6.1%.</li> <li>• 23.5% of people in rural areas are over state retirement age compared with 18.1% in urban areas.</li> <li>• Whilst over 98% of urban residents have the following services within 4km, for rural residents 51% have a bank or building society, 85% have cashpoints, 80% a GP surgery, 62% a supermarket, 57% an NHS dentist, 67% a pharmacy and 48% a secondary school.</li> <li>• Approximately 5% of rural households were using dial-up internet connections in 2009 compared with 2% in urban areas.</li> <li>• People in villages and hamlets with the lowest incomes spend an average of £50 per week on travel compared with £32 in rural towns and £28 in urban areas.</li> <li>• In rural areas the cheapest housing is six times the annual income of the lowest income households, compared to five times in urban areas. Despite house price falls during the recession in hamlets in sparse areas of the country the multiple is nine times annual household incomes.</li> <li>• 28% of those households not on the mains gas network in villages and hamlets are in fuel poverty compared with 13% who are on the mains gas network. The comparative figures for urban areas are 18% and 12%.</li> <li>• 87% of people living in the most rural districts are satisfied with their area as a place to live compared with 76% living in the most urban authorities.</li> <li>• 29% of people living in the most rural districts have given unpaid voluntary help at least monthly over the last year compared with 21% of people living in the most urban authorities.</li> </ul> <p>Mention needs to be made of the large estates.</p>					
657152	Miss Suzannah Bath		<a href="#">CSPS13 85</a>	Policy LN4	No	No	No	Yes	Yes	Yes	Policy LN4 should include Colehill for affordable housing exception sites.	Include Colehill in the sites documented for East Dorset in Policy LN4.			711	
657154	Miss Katherine Bath		<a href="#">CSPS13 84</a>	Policy LN4	No	No	Yes	Yes	Yes	Yes	Colehill should have exception sites for affordable housing. Young people cannot afford to live in Colehill and should be able to stay in their local area. There is no reason not to include Colehill in the areas for affordable housing exception sites.	Colehill should be included in the areas for East Dorset exception sites.			711	
657160	Mr Richard Bath		<a href="#">CSPS13 83</a>	Policy LN4	No	No	Yes	Yes	Yes	Yes	Colehill not included in exception sites for affordable housing. Other areas of similar size and housing included - no reason to exclude Colehill where affordable housing is very limited and much	Include Colehill in areas within East Dorset for exception site inclusion.			711	

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											needed.					
657163	Ms Wendy Grace		<a href="#">CSPS1380</a>	Policy LN4	No	No	Yes	Yes	Yes	Yes	Colehill is not included as an area for exception sites for affordable housing. Affordable housing is much needed in Colehill. Other areas of similar size are included i.e Burton. This is unsound policy.	Include Colehill in the East Dorset settlements for inclusion for exception sites.	No, I do not wish to participate at the oral examination		711	
524723	Mr John Worth	Wimborne Civic Society	<a href="#">CSPS1952</a>	Policy LN4							We think the targets of 50% affordable housing on greenfield sites and 40% otherwise are ambitious but worth pursuing, provided the affordable units are scattered in the areas concerned. For this reason we are opposed to LN4, proposing 100% affordable housing, as having the potential to create socially exclusive enclaves.				711	
359529	Mrs Lisa Goodwin	Sixpenny Handley with Pentridge Parish Council	<a href="#">CSPS2492</a>	Policy LN4							The large estates should be included.				711	<a href="#">2248941_0_1.pdf</a> <a href="#">2248860_0_1.pdf</a> <a href="#">2248948_0_1.pdf</a>
360082	Mr and Mrs K Healy		<a href="#">CSPS2514</a>	Policy LN4	Yes	Yes					We fully support this policy.		No, I do not wish to participate at the oral examination		711	
359503	Mrs Lisa Goodwin	Knowlton Parish Council	<a href="#">CSPS2940</a>	Policy LN4		No	Yes	Yes	No	No	We are regularly reminded throughout that there is a significant shortfall of 'affordable housing' in East Dorset. Less frequently acknowledged is the existence of the 'hidden homeless' – those who do not qualify for consideration for an affordable house because they are living with Mum and Dad because local housing is beyond their grasp. There are clues all over the rural settlements: multiple cars in the drive and the occupied-looking caravan in the garden are a good starting point. There is a hidden need for housing for local people which is not currently being addressed and is more likely to increase in the 15-year time period as a further generation arrives: The development constraints and influences in rural East Dorset are well known, a significant portion of the land having one or more factor to consider, be it green belt or areas for the protection of the natural or built environments. For each of the parishes in Knowlton there is a village envelope which has been substantially filled, leaving little scope for expansion. Whilst the UK population continues to increase, some of these constraints must be examined in a more people-centred light and exceptions to previous policies must be considered in a more sympathetic and realistic way. The prospect of expanding existing environmental conservation areas should be treated with great caution. If local opposition to development – and there will be opposition from several sectors of the population – is to be answered, there needs to be a clear benefit accruing to the local community. Therefore, where a development of affordable houses is proposed, it must be shown to be substantially linked to benefit to people with a strong local association and that this restriction will be rigidly enforced. Whether it be via Section 106-type agreement or community land trust acquisition, the inevitability of a need for new housing within the timescale of this Strategy must be acknowledged and accepted by		No, I do not wish to participate at the oral examination		711	

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											the communities themselves and reflected in the Strategy.					
359277	Mr Jamie Sullivan	Tetlow King	<a href="#">CSPS2739</a>	Policy LN4	Yes	No	No	No	No	No	<p>We welcome the inclusion of a policy on rural exception sites in the core Strategy, particularly as Christchurch Borough Council do not currently have such a policy in their Local Plan. However, we are concerned about the level of the detail of the policy and have a number of recommended changes that would make the policy sound in terms of being "effective" and "positively prepared".</p> <p>First of all the policy will only apply to sites that adjoin the settlement boundary. This seems unduly restrictive as there may be circumstances where a suitable site does not adjoin the settlement boundary. Whilst rural exception schemes usually adjoin the boundary, the test should be how they relate to the settlement, which is already covered in the policy wording.</p> <p>The policy also makes no provision for the use of cross- subsidy from general market housing. The NPPF now encourages local authorities to do so in their Local Plans in order to encourage rural affordable housing schemes to come forward. In our experience the majority of local authorities are now allowing cross-subsidy within their emerging local plan policies. With the severe lack of funding available for these grant-hungry schemes, most authorities see it as the best way to ensure that the rural affordable housing comes forward. We therefore urge the Councils to follow suit.. We enclose a copy of our discussion paper. (attached)</p> <p>Finally, we are concerned about the use of the term "small scale" in restricting the types of schemes this policy will apply to. The size of the scheme this policy will apply to. The size of the scheme should reflect the level of need and the policy already contains wording to ensure that the development reflects "the setting, form and character" of the settlement. This should be sufficient to ensure that the development is appropriate to the size of the settlement.</p> <p>We recommend the policy is amended as below:                      "Exceptionally land adjoining, or in close proximity to, the defined rural and urban settlements which would otherwise be considered inappropriate for development may be developed in order to provide affordable housing, in perpetuity, provided that:                      Delete first bullet point-the housing comprises 100% affordable housing</p> <p>Secure arrangements are included to ensure that its benefits will be enjoyed by successive as well as initial occupiers</p> <p>The proposed development would provide a mix of housing size and type which meets demonstrated local housing needs as identified in the Strategic Housing Market Assessment.</p> <p>The development is (delete small scale) and reflects the setting form and character of the settlement and the surrounding landscape.</p> <p>In exceptional circumstances a proportion of market housing may be considered appropriate where it can be demonstrated that the site would be unviable, as an exception site that meets the above criteria, without cross-subsidy."</p>		No. I do not wish to participate at the oral examination		711	<a href="#">2248826_0_1.pdf</a>
656643	Mr Tom Whild	Terence O'Rourke Ltd	<a href="#">CSPS3181</a>	Policy LN4	Yes	No	No	Yes	No	No	The principle of a policy which allows for the provision of the development of affordable housing on exception sites is broadly supported. However we consider that the policy is unduly restrictive	The policy should re-worded to include additional settlements in East Dorset, notably Corfe Mullen.	Yes, I wish to participate at the oral examination	The Perry Family trust is a prospective	711	<a href="#">2253414_0_1.pdf</a>

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											in terms of the settlements at which exception sites will be considered acceptable. There is a strong need for affordable housing across East Dorset and a policy which would restrict the development of 100% affordable housing schemes for settlements where market housing is also proposed would appear unjustified. The Perry Family Trust is keen to ensure the delivery of affordable housing in Corfe Mullen, where there has been no new affordable housing for the past 16 years, and is keen to develop part of its land for 100% affordable housing. We do not consider that the delivery of new affordable housing should be constrained on the basis of a housing allocation for which there is substantial doubt over delivery.		on	developer of affordable housing and is able to provide detailed local knowledge of affordable housing within Corfe Mullen.		
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	<a href="#">CSPS3423</a>	Policy LN4		Yes					Policy is essential to support rural communities		No, I do not wish to participate at the oral examination		711	
521508	Ms Lisa Jackson	Jackson Planning Ltd	<a href="#">CSPS3645</a>	Policy LN4	Yes	No	Yes	Yes	Yes	Yes	This policy is not sound as it is currently drafted as the policy is inconsistent with national policy in the NPPF at paragraph 54. The national policy framework supports the development of affordable housing exception sites within the rural area. As currently drafted the policy restricts the location of exception sites. Please note this representation is substantiated by additional evidence in a supporting statement submitted with the representations by MEM Ltd.	The policy needs to be redrafted to be consistent with the NPPF to make it sound. This would mean the removal of the locational limits at the end of the policy, and rewording of the first line of the policy to say: Exceptionally land in the rural area which would otherwise..... In addition to make it consistent with paragraph 54 of the NPPF, the policy should also allow market housing where this facilitates significant additional affordable housing.	No, I do not wish to participate at the oral examination		711	<a href="#">2267120_0_1.pdf</a>
490815	Mrs Trish Jamieson	Burton Parish Council	<a href="#">CSPS3609</a>	Policy LN4							Burton Village is felt by those who live there to be a very special community. Despite the spurt of housing growth in the 1960s and 1970s the new development was confined to the area between Salisbury Road and Stony Lane and Burton's essential character as a rural village has been maintained. This is recognised by the establishment of the Burton Conservation Area, which protects the core of the old village and its essential features. The Parish Council, elected in May 2011, in commenting on these proposals has as its aim the preservation and enhancement of the character of the village and the lives of its residents by: _ Preventing development inimical to the village _ Supporting and promoting appropriate developments To this end the Council supports the need for a new Local Plan and Core Strategy and acknowledges that without the new plan there is a considerable danger that developers will be able to seek to pursue development proposals which might not be in the best interests of the Village. The Parish Council also accepts that the new Core Strategy offers opportunities to protect services and facilities in the village, and to develop new ones - for example, to pursue extensions to public transport, to protect local shops and facilities, and to secure improvements to private transport. Aware of the difficulties facing young couples with roots in the village				711	

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											finding housing, the Council welcomes the commitment to allowing a development of 100% affordable housing and will seek the adoption of a Rural Exception policy for Burton. For these reasons the Council welcomes many of the new policies and proposals, but it has to be noted that it has serious concerns over proposed Policy CN2.						
619967		Home Builders Federation (South West)	<a href="#">CSPS36 91</a>	Policy LN4		No	Yes				The policy is unsound as it is unjustified. The Councils have not provided evidence to demonstrate that providing 100% affordable housing in rural locations outside of the defined rural and urban settlements will be viable. Paragraph 54 of the Framework states that local planning authorities should consider how the provision of market housing can facilitate affordable housing supply. The policy should be worded differently so that it does not preclude the ability of a scheme to provide some market housing if this is necessary to allow for a viable development. Otherwise, only schemes based on heavily subsidised land, or land released at sub-market values, would be feasible.		Yes, I wish to participate at the oral examination	The HBF would like to appear at the examination to debate these matters further.	711		
656629	John Campbell	Roeshot Hill Allotment Association	<a href="#">CSPS38 36</a>	Policy LN4							We appreciate that the strategy within the Document relates to a wide geographic area and the rationalisation of demands from a wide range of competing interests. Whilst the interests and concerns of Christchurch allotment gardeners may seem almost incidental in such context, they are by no means so. We have examined the Document from three perspectives: (1) proposals affecting Christchurch; (2) allotment provision in Christchurch and (3) the impact on the rural environment of Christchurch. We have found that a number of the issues that concern us touch upon fundamental principles contained in the document. HOUSING POLICY - Christchurch The Document draws upon a number of assessments of housing supply and predicted demand to conclude that urban infill will be insufficient to meet future housing needs. After briefly reviewing the physical constraints on building elsewhere in Christchurch, it is proposed to adjust the Green Belt area at Roeshot Hill, Burton and Marsh Lane to accommodate housing developments. 1. We consider these proposals to be unjustified in that: 1.1 They rest on the assumption that 'housing trumps environment' in a Borough which is characterised by its urban, rural and coastal mix, which makes 'life pleasant' for its inhabitants and which attracts a large volume of visitors and vacationers. Our view is that the assumption in the document is merely a subjective assessment, and that it fails to grasp the inconvenient truth that Christchurch cannot accommodate all who may wish to live in the Borough whilst maintaining its present character. 1.2 The proposals for housing at Burton fail to explain how an additional 45 dwellings will serve the 'specific needs' of the village. On the contrary, the effect of the proposal would be negative by turning Burton from a village into a conurbation. 1.3 The Document contemplates the development of 'exception sites' in order to meet the need for affordable housing in the area. This weakens the case for provision of new market homes at the expense		Yes, I wish to participate at the oral examination		711	<a href="#">2267876_0_1.pdf</a>	



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											<p>of the rural environment.</p> <p>2. The proposals are ineffective in that:</p> <p>2.1 They would adversely affect the Green Belt by releasing some of the 'best and most versatile agricultural land' at Roeshot Hill and substituting unspecified land of lesser value.</p> <p>2.2 They do not ensure the reduction of local demand for new market homes in the absence of a residential qualification (such as applied elsewhere in Dorset) and/or other measures to ensure that local residents have the ability and opportunity to absorb new housing as it becomes available. The document admits the attractions of Christchurch as a retirement location, and the phenomenon of 'supply stimulating demand' could well result in migrants from other areas of the country exacerbating rather than reducing the demands on local resources without reducing local housing needs.</p> <p>3. The proposals are non-compliant with section 110 Localism Act 2011</p> <p>Christchurch shares a housing market area and travel to work area with Bournemouth and Poole, New Forest Council and adjacent local authorities in Hampshire. It is mostly a matter of preference rather than strategic issues that determine where people live. If it is the case that Christchurch cannot accommodate more than 2060 additional homes without impacting on its rural villages and Green Belt, the question arises as to whether there has been a reasonable allocation of resources to absorb regional housing needs.</p> <p>Despite some reference to joint working with neighbouring Dorset authorities (but not Hampshire) there is no evidence of any specific arrangement whereby unmet requirements in Christchurch might be met by neighbouring authorities, particularly by Bournemouth, which is by far the largest authority. We feel that it is reasonable to conclude that the Christchurch Borough Council and East Dorset District Council have failed to fully exhaust the duty to co-operate with adjoining local authorities within the spirit of section 110.</p> <p>4. The proposals are non-compliant in respect of Sustainability</p> <p>The Sustainability Assessment is not on consultation and is only referred to in paragraph 1.21. By not have the SA open for consultation in the same way as the Core Strategy the Council are failing to complete stage D of the Sustainability Assessment effectively and thus the Core Strategy is unsound. This could be subject to Judicial Review.</p>					
359437	Ms Gill Smith	Dorset County Council	<a href="#">CSPS2015</a>	15.19	Yes						<p>Site allocations for gypsies, travellers and travelling show people are being dealt with in a separate Development Plan Document (DPD) which is being jointly prepared by all the Dorset authorities. The Core Strategy refers to this and includes a criteria based policy for the location of sites. The reference to and links with the work of the Dorset Councils on Gypsies, Travellers and Travelling Show people is welcomed.</p> <p>In the Key Facts the first and second bullets refer to estimates by Dorset County Council. The estimates quoted are those agreed by all Dorset Councils at the Dorset Authorities Joint Committee in October 2008. This should be reflected in the text.</p> <p>The third bullet point is not completely accurate. It is correct that</p>	<p>Amend first and second bullets to read "Dorset County Councils estimate..."</p> <p>Amend third bullet to read: "Currently there are no publicly owned and managed transit or residential sites in Christchurch and East Dorset, but there are some private sites. The January 2012 caravan counts indicate some 4 pitches in Christchurch and 8 pitches in East Dorset have permanent planning permission for private caravans."</p>	<p>Yes, I wish to participate at the oral examination</p>	<p>Dorset County Council wishes to partake in any oral hearing on this matter in order to fulfill its role under the duty to cooperate and ensure that its interests are</p>	714	

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											there are no publicly owned and managed transit sites or residential sites in Christchurch and East Dorset, but there are privately owned sites. The January 2012 caravan count indicates some 4 pitches in Christchurch and 8 pitches in East Dorset have permanent planning permission for private caravans. The text should reflect this.			considered in the emerging Core Strategy.		
359437	Ms Gill Smith	Dorset County Council	<a href="#">CSPS2017</a>	15.20	Yes						<p>The government has recently published new policy guidance on sites for gypsies, travellers and travelling show people, namely "Planning Policy for Traveller Sites" (PPfTS). Para 15.20 refers to the previous policy advice and should be updated.</p> <p>There are some significant differences between the wording of Policy LN5 and the Government's policy in PPfTS. For instance, the spirit and tone of the criteria under para 11 of Policy B are generally more proactive than those set out in Policy LN5. They refer to matters such as the need for policies to promote peaceful and integrated co-existence between the site and the local community; to promote access to appropriate health facilities and ensure children can attend school on a regular basis.</p> <p>Policy C (in PPfTS) refers to the need to ensure that the scale of sites in rural or semi-rural areas does not dominate the locality. Policy D suggests that, if there is a lack of affordable land to meet local traveller needs, local planning authorities may consider including a rural exception site policy for traveller sites. Neither of these matters is addressed in Policy LN5.</p> <p>In the light of the difference in tone and approach to site development that the PPfTS provides, it is suggested that to avoid confusion in interpretation Christchurch and East Dorset Councils may wish to redraft Policy LN5 or consider withdrawing it and referring to the PPfTS as the source of policy advice.</p>	<p>Amend para 15.20 to read:                      "The government provides policy guidance for gypsy, traveller and travelling show people sites in Planning Policy for Traveller Sites."                      Redraft Policy LN5 in line with the new government policy advice or withdraw the policy and refer directly to "Planning Policy for Traveller Sites" as the source of policy advice on the location of sites for gypsies, travellers and travelling show people</p>	Yes, I wish to participate at the oral examination	Dorset County Council wishes to partake in any oral hearing on this matter in order to fulfill its role under the duty to cooperate and ensure that its interests are considered in the emerging Core Strategy.	716	
360245	Mr Richard Burden	Cranborne Chase & West Wiltshire Downs AONB	<a href="#">CSPS1570</a>	Policy LN5							<p>Thank you for consulting the AONB on this important policy document. As the AONB considers there are some quite fundamental matters for discussion this letter is being sent simultaneously to Judith Plumley and yourself.</p> <p>The Cranborne Chase and West Wiltshire Downs AONB has been established under the 1949 National Parks and Access to the Countryside Act to conserve and enhance the outstanding natural beauty of this area which straddles three County, one Unitary and five District councils. It is clear from the Act, subsequent government sponsored reports, and the Countryside and Rights of Way Act 2000 that natural beauty includes wildlife, scientific, and cultural heritage. It is also recognised that in relation to their landscape characteristics and quality, National Parks and Areas of Outstanding Natural Beauty are equally important aspects of the nation's heritage and environmental capital. The AONB Management Plan (2009 – 2014) is a statutory document that has been approved by the Secretary of State and was adopted by your Council early in 2009.</p> <p>The AONB has looked with considerable interest at your Core Strategy Pre-Submission Document. We are acutely aware, with the production of the National Planning Policy Framework (NPPF), the revocation of the Regional Spatial Strategy (RSS), and the removal of the whole suite of Planning Policy Statements and Planning Policy Guidance that all Core Strategy documents are in real danger of</p>				717	<a href="#">2239336_0_1.pdf</a> <a href="#">2239337_0_1.pdf</a>

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											<p>being insufficiently detailed to provide adequate policy guidance through to 2028.</p> <p>It is, however, clear from the NPPF that Government envisages the re-emergence of Local Plans with considerable detail within them to cover policy and decision making needs. It is noticeable that the NPPF puts equal weight on achieving economic, social and environmental gains jointly and simultaneously through sustainable development. There is a clear implication that solely economic proposals are not automatically sustainable.</p> <p>Crucially Paragraph 14, in association with Footnote 9, clearly indicates that there should be special policies in these emerging Local Plans to cover special situations. Those special situations include designated landscapes such as AONBs. Paragraph 218 also indicates that it would be in order for Local Plans to take on board those policies that have been lost in the revocation of the RSS.</p> <p>The thrust, therefore, of the AONB's comments relate to matters that we feel should be included in the Core Strategy to overcome the policy vacuum created by the loss of the higher level strategies and policies on which the whole concept of Core Strategies was predicted. Whilst there is much to be supported in the pre-submission Core Strategy the AONB is of the view that without the additional policies to fill the gaps created by the loss of the higher level strategies and policies it will not be fully fit for purpose through to 2028 and therefore would have to be regarded as less than sound. In particular the AONB would wish to see clear policies that indicate the special character of the AONB, and proposed developments within it, would be handled in ways different from other, undesignated, areas of countryside within the District. Similarly we would commend the RSS suite of policies ENV1, 2, 3, 4, 5, and in particular ENV3 which relates to the setting of AONBs. We would wish to see priority given to conserving and enhancing natural beauty within the AONB and to priority being given to conserving and enhancing natural beauty where there is conflict with proposed development.</p> <p>In the light of the problems caused by traveller sites, not just to the actual sites and the immediate surroundings themselves, but the damage to the verges of narrow roads and subsequent loss of rural character, the AONB would wish to see policy LN5 excluding the AONB from locations for these sites.</p>					
359437	Ms Gill Smith	Dorset County Council	<a href="#">CSPS2016</a>	Policy LN5	Yes						<p>The government has recently published new policy guidance on sites for gypsies, travellers and travelling show people, namely "Planning Policy for Traveller Sites" (PPfTS). Para 15.20 refers to the previous policy advice and should be updated.</p> <p>There are some significant differences between the wording of Policy LN5 and the Government's policy in PPfTS. For instance, the spirit and tone of the criteria under para 11 of Policy B are generally more proactive than those set out in Policy LN5. They refer to matters such as the need for policies to promote peaceful and integrated co-existence between the site and the local community; to promote access to appropriate health facilities and ensure children can attend school on a regular basis.</p>	<p>Amend para 15.20 to read:                      "The government provides policy guidance for gypsy, traveller and travelling show people sites in Planning Policy for Traveller Sites."                      Redraft Policy LN5 in line with the new government policy advice or withdraw the policy and refer directly to "Planning Policy for Traveller Sites" as the source of policy advice on the location of sites for gypsies, travellers and travelling show people</p>	<p>Yes, I wish to participate at the oral examination</p>	<p>Dorset County Council wishes to partake in any oral hearing on this matter in order to fulfill its role under the duty to cooperate and ensure that its interests are</p>	717	

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											Policy C (in PPfTS) refers to the need to ensure that the scale of sites in rural or semi-rural areas does not dominate the locality. Policy D suggests that, if there is a lack of affordable land to meet local traveller needs, local planning authorities may consider including a rural exception site policy for traveller sites. Neither of these matters is addressed in Policy LN5. In the light of the difference in tone and approach to site development that the PPfTS provides, it is suggested that to avoid confusion in interpretation Christchurch and East Dorset Councils may wish to redraft Policy LN5 or consider withdrawing it and referring to the PPfTS as the source of policy advice.			considered in the emerging Core Strategy.		
524723	Mr John Worth	Wimborne Civic Society	<a href="#">CSPS1953</a>	Policy LN5							We support this policy, and have recommended public-owner specific locations for travellers, underpinned by health and safety services, so that those parked illicitly can be moved on by the forces of law and order.				717	
359437	Ms Gill Smith	Dorset County Council	<a href="#">CSPS2304</a>	Policy LN5	Yes						The NPPF gives guidance on how Local Plans should address cultural matters. Plans should : <ul style="list-style-type: none"> <li>• set out the strategic priorities for the area including the provision of cultural infrastructure and other facilities;</li> <li>• allocate sites to meet the scale and type of cultural development required in town centres;</li> <li>• promote the retention of cultural buildings to support a strong rural economy;</li> <li>• promote healthy communities by planning positively for cultural buildings and guarding against the loss of facilities and</li> <li>• take account of the cultural benefits that conservation of the historic environment can bring.</li> </ul> Whilst the Core Strategy addresses some of these points in the discussion of individual settlements, it lacks an overall strategy or policy guidance for cultural provision. The evidence base includes the Open Space, Sport and Recreation Study, but this does not sufficiently address the key points from the NPPF. No reference is made to the Dorset Cultural Strategy 2009 – 2014. More emphasis could be given to the importance of good design and means of ensuring this is achieved.	Cultural needs should be discussed in Section 2 of the Core Strategy. Reference should also be made to the Dorset Cultural Strategy 2009-14. More emphasis could be given to the importance of good design and means of ensuring this is achieved.	Yes, I wish to participate at the oral examination	Dorset County Council wishes to partake in any oral hearing on this matter in order to fulfill its role under the duty to cooperate and ensure that its interests are considered in the emerging Core Strategy.	717	
360082	Mr and Mrs K Healy		<a href="#">CSPS2515</a>	Policy LN5	Yes	Yes					We will support this policy providing the guidelines in the policy are followed both in practice and spirit.		No, I do not wish to participate at the oral examination		717	
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	<a href="#">CSPS3424</a>	Policy LN5		Yes					Considerations achieve an appropriate balance for settled and travelling communities.		No, I do not wish to participate at the oral examination		717	
644337	Mr David Edwards		<a href="#">CSPS29</a>	15.23	Yes	No		Yes			There is no mention of the provision of allotments in this section.	The provision of allotments is a growing need, considering the need to provide local, affordable food, the recreational and health values and the improved community spirit that they are proven to provide.	No, I do not wish to participate at the oral examination		720	



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652711	Mr Raymond Silverthorne		<a href="#">CSPS47</a>	15.23	No	No				Yes	<p>There is currently no provision at all within this document for "Places of Worship". this is therefore inconsistent with the NPPF and specifically the following paragraphs of the NPPF.</p> <p>NPPF – Paragraph 28 – promote the retention and development of local services and community facilities in villages, such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.</p> <p>NPPF – Paragraph 70 plan positively for the provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;</p> <p>NPPF – Paragraph 171 Health and well-being171. Local planning authorities should work with public health leads and health organisations to understand and take account of the health status and needs of the local population (such as for sports, recreation and places of worship), including expected future changes, and any information about relevant barriers to improving health and well-being.</p>	<p>We recommend that you amend the wording of the core strategy so there is clear recognition given to the importance of "Places of Worship" both in potential new build and change of use of existing properties.</p>	Yes, I wish to participate at the oral examination	I am happy to explain my feeling orally if required	720	
654046	Mr David Pardy		<a href="#">CSPS63</a>	15.23	No	No	Yes	No	Yes	Yes	<p>1. Inadequate attention is given to the provision of schools to match the planned increase in population, particularly from the Christchurch Urban Extension</p> <p>2. No mention is made here of the provision of allotments</p>	<p>1. Schools - a detailed analysis of the likely increase in pupil numbers arising from the housing policy must be undertaken &amp; provision made for land to accommodate existing school expansion or new schools</p> <p>2. Allotments - the plans for the Christchurch Urban Extension appear to have dwellings with mainly small gardens so the strategy should address the likely increase in demand for plots over &amp; above the currently large waiting list</p>	Yes, I wish to participate at the oral examination		720	
654295	Mrs Jean Pardy	Labour Party Christchurch Branch	<a href="#">CSPS65</a>	15.23	No	No	Yes	Yes	Yes	Yes	<p>The passing mention of education needs in para. 15.23 (Key Facts) does not adequately address the problem of the demand for school places arising from the Christchurch Urban Extension in Section 6. The passing mention of education needs in para. 15.23 (Key Facts) does not adequately address the problem.</p>	<p>A full study of likely population profiles is needed to provide a forecast of the need for extra school facilities</p>	No, I do not wish to participate at the oral examination		720	
654456	Mr Elliot Marx		<a href="#">CSPS96</a>	15.23							<p>' A large proportion of the population are above retirement age with 34% in Christchurch and 32% in East Dorset compared to 19% nationally. The numbers of elderly are set to increase dramatically over the next 15 years. In 2001, about 30% of people in the districts were living alone which may impact on the need for community support, particularly for the pensioner households... There are a wide range of cultural facilities either in, or within close proximity of the districts, including theatres, cinemas, museums, historic attractions and arts venues.' Account should be specifically taken of community halls as essential facilities.</p>				720	



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											Government recommendations such as Big Society Community Involvement and Localism Act call for Local Planning Policy to address the needs of volunteer services, local decision making and community activities. Community meeting spaces are essential to this					
654660	Ms Anne Mason	Transition Town Christchurch	<a href="#">CS97</a>	15.23			Yes	Yes	No		<p>Key Facts reflect the importance of community facilities to support residents, especially older people, who often live alone.</p> <p>" There are a wide range of cultural facilities either in, or within close proximity of the districts, including theatres, cinemas, museums, historic attractions and arts venues."</p> <p>No mention is made of Community Halls which are multipurpose hubs for serving local needs and essential to community resilience: Benefits of community buildings: The uses associated with community buildings are wide and diverse. The following is a list of potential benefits associated with well-run community buildings.</p> <p>-- Health, Welfare and Leisure activities provided within community buildings include: parent and toddler groups, after school clubs, youth clubs, bingo, lunch clubs for elderly people, smoking cessation, benefits and legal advice, slimming classes, Tai Chi and exercise classes. As well as contributing to physical health many activities also contribute towards reducing incidences of social isolation, an issue of particular importance to older people.</p> <p>-- Education and Training activities provided within community buildings include: IT training, basic skills classes, English speaking classes, homework support clubs.</p> <p>-- Community Cohesion. Community buildings have great potential to provide 'neutral ground'; enabling interaction between diverse groups and hosting activities to promote better community relations.</p> <p>-- Crime and Anti-Social Behaviour can be addressed through activities for young people as distractions and alternatives to anti-social behaviour. Some community buildings have also enabled the provision of support for people dependent on drugs or alcohol and have provided a base for crime prevention initiatives.</p> <p>-- Economic Benefits tend to be an indirect, but often very substantial, consequence of the types of activities undertaken within community buildings. Education and training activities for example raise the ability of local people to gain employment. Health and welfare activities including the provision of childcare in the form of pre-schools/breakfast clubs and after school clubs in community buildings also have the effect of enabling parents to take part in training and employment.</p> <p>-- Environmental Improvement for communities can be achieved through the provision of high quality community buildings that represent a flagship building for the area. Maximising the use of a community building can also reduce environmental blight by discouraging vandalism and graffiti.</p> <p>-- Civil Renewal refers to the process of building the capacity of individuals and groups to develop their own solutions to the issues that might affect them, and to make a positive difference in their communities. Specific activities contributing towards civil renewal</p>			720	<a href="#">2259130_0_1.pdf</a>	

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											include participation in community consultations, area panel meetings, community forums and even festivals and fairs. -- Social inclusion and social capital. People are excluded when they are not part of the networks which support most people in ordinary life - networks of family, friends, community and employment. Among many others, poor people, ex-prisoners, homeless people, people with AIDS, people with learning					
359284	Miss Lynne Evans	Southern Planning Practice	<a href="#">CSPS22 39</a>	15.23	Yes	No	Yes	Yes	Yes	Yes	1. The policy is ambiguous in terms of the community facilities and services that it seeks to address, as they are not defined, and in particular in the light of another policy, Policy PC4 which also addresses similar issues. The policy is therefore unsound as it is not positively prepared and effective. It is not clear whether this policy relates to privately run facilities such as pubs and local shops or more specifically to facilities that are generally publicly funded. The Policy wording, supporting text and Infrastructure Delivery Plan suggests that the policy is directed to facilities that are generally publicly funded but this is not clear. 2. The policy in so far as it seeks to resist the loss of facilities unless it can be shown that the facility is no longer needed is unsound because there is no clear advice as to how the policy requirement will be measured – it has not therefore been positively prepared; it is not justified, effective or consistent with national policy. 3. The part of the policy which indicates that ‘where appropriate, financial contributions towards the provision of facilities and services will be sought’ is considered too vague to be justified or effective. The circumstances in which such contributions will be sought and the basis for the contributions need to be detailed.	The policy needs to be reconsidered alongside Policy PC4 to ensure that there is no duplication or ambiguity between the two policies. The policy in so far as it seeks to resist the loss of facilities unless it can be shown that the facility is no longer needed is unsound and clear measures need to be set out as to how the policy requirement will be measured. The part of the policy which indicates that ‘where appropriate, financial contributions towards the provision of facilities and services will be sought’ is considered too vague to be justified or effective. The circumstances in which such contributions will be sought and the basis for the contributions need to be detailed.	Yes, I wish to participate at the oral examination	The representations submitted raise important and complex policy issues which require oral examination and round table discussion in order that the Inspector can be properly informed in reaching a decision on the soundness of the Core Strategy.	720	
359498	Mrs Lisa Goodwin	Holt Parish Council	<a href="#">CSPS29 24</a>	15.23		No	Yes	Yes	No	No	With a growing percentage of older people and this trend set to continue, the Core Strategy makes little or no mention of increased provision of their housing needs or indeed their community needs. Likewise little attention is given to the creation of additional facilities or centres for those people with learning disabilities or mental health problems. If one considers the way in which Adult Social Care funding is being directed towards personnel budgeting then those people in receipt of this benefit need to have somewhere to spend it.		Yes, I wish to participate at the oral examination	To represent the views of the Parish.	720	
359284	Miss Lynne Evans	Southern Planning Practice	<a href="#">CSPS22 40</a>	15.24	Yes	No	Yes	Yes	Yes	Yes	1. The policy is ambiguous in terms of the community facilities and services that it seeks to address, as they are not defined, and in particular in the light of another policy, Policy PC4 which also addresses similar issues. The policy is therefore unsound as it is not positively prepared and effective. It is not clear whether this policy relates to privately run facilities such as pubs and local shops or more specifically to facilities that are generally publicly funded. The Policy wording, supporting text and Infrastructure Delivery Plan suggests that the policy is directed to facilities that are generally publicly funded but this is not clear. 2. The policy in so far as it seeks to resist the loss of facilities unless it can be shown that the facility is no longer needed is unsound because there is no clear advice as to how the policy requirement will be measured – it has not therefore been positively prepared; it is	The policy needs to be reconsidered alongside Policy PC4 to ensure that there is no duplication or ambiguity between the two policies. The policy in so far as it seeks to resist the loss of facilities unless it can be shown that the facility is no longer needed is unsound and clear measures need to be set out as to how the policy requirement will be measured. The part of the policy which indicates that ‘where appropriate, financial contributions towards the provision of facilities and services will be sought’ is considered too	Yes, I wish to participate at the oral examination	The representations submitted raise important and complex policy issues which require oral examination and round table discussion in order that the Inspector can	722	

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											not justified, effective or consistent with national policy. 3. The part of the policy which indicates that 'where appropriate, financial contributions towards the provision of facilities and services will be sought' is considered too vague to be justified or effective. The circumstances in which such contributions will be sought and the basis for the contributions need to be detailed.	vague to be justified or effective. The circumstances in which such contributions will be sought and the basis for the contributions need to be detailed.		be properly informed in reaching a decision on the soundness of the Core Strategy.		
360509	Miss Rose Freeman	The Theatres Trust	<a href="#">CSPS371</a>	Policy LN6	Yes	Yes					We have a comment for Policy LN6 for general community facilities and services. Although there are examples of community facilities within LN6, we suggest that as there is no glossary to explain the term "community facilities" that para. 15.23 (or an additional paragraph) includes a full description for clarity such as community facilities provide for the health and wellbeing, social, educational, spritual, recreational, leisure and cultural needs of the community.		No, I do not wish to participate at the oral examination		723	
515938	Mr Frank Stevens		<a href="#">CSPS393</a>	Policy LN6							I feel insufficient weight has been given to pressure on the infrastructure that increased housing units will cause. I came to the area in 1964 and since then there have been something like 5 schools added or increased in size. This means that normal traffic comes to a stand still between 1430 hrs and 1800 hrs on a week day. Further schools will only add to the burden.				723	
654456	Mr Elliot Marx		<a href="#">CSPS962</a>	Policy LN6		Yes	Yes	Yes	Yes	Yes	Facilities and services will be provided to support existing and future population growth and changes in the age profile by the following: New facilities should be concentrated in the settlements of Christchurch, Highcliffe, Burton, Corfe Mullen, Wimborne Minster, Colehill, Ferndown, West Moors, Verwood, Alderholt, Cranborne, Sixpenny Handley, Three Legged Cross and Sturminster Marshall. Comment: GOOD For reasons of sustainability and resilience. Reduces transport needs and allows the critical mass needed for creating vibrant centres. The Council will work with partners and service providers to ensure the timely provision of high quality, convenient, local and accessible facilities and services for community and cultural use such as education, health, libraries, facilities for older people / children and young people and community buildings Comment:..GOOD--Specifice reference to community halls needed asmeeting places. Priority will be given to any proposals to allow the multi-use of existing facilities, followed by the expansion of existing, well located facilities to allow for the co-location of facilities and services. Comment: GOOD -- economic and sustainable use of existing facilities. New facilities will be required to serve the needs of the population and new development when the alternatives above are not feasible. Preference will be given to the clustering of services and facilities. Loss of facilities will be resisted unless it is shown that the facility is no longer needed. Comment: Good. this planning policy will ensure full community participation . Where appropriate, financial contributions towards the provision of facilities and services will be sought. Good.				723	

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654660	Ms Anne Mason	Transition Town Christchurch	<a href="#">CSPS975</a>	Policy LN6	Yes	Yes	Yes	Yes	Yes	Yes	<p>Community facilities and services</p> <p>Facilities and services will be provided to support existing and future population growth and changes in the age profile by the following:</p> <p>New facilities should be concentrated in the settlements of Christchurch, Highcliffe, Burton, Corfe Mullen, Wimborne Minster, Colehill, Ferndown, West Moors, Verwood, Alderholt, Cranborne, Sixpenny Handley, Three Legged Cross and Sturminster Marshall. This is where access can be by public transport, bike and on foot. Some facilities can be provided in smaller settlements in innovative ways such as the provision of health care in the home. Services can also be provided in more innovative ways in suburban areas of Christchurch and East Dorset where access to facilities is more restricted to the car.</p> <p>The Council will work with partners and service providers to ensure the timely provision of high quality, convenient, local and accessible facilities and services for community and cultural use such as education, health, libraries, facilities for older people / children and young people and community buildings.</p> <p>Priority will be given to any proposals to allow the multi-use of existing facilities, followed by the expansion of existing, well located facilities to allow for the co-location of facilities and services.</p> <p>New facilities will be required to serve the needs of the population and new development when the alternatives above are not feasible. Preference will be given to the clustering of services and facilities. Loss of facilities will be resisted unless it is shown that the facility is no longer needed.</p> <p>Where appropriate, financial contributions towards the provision of facilities and services will be sought.</p>	GOOD in spirit-- follow this with practice!			723	<a href="#">2259130_0_1.pdf</a>
656493	Cllr Tony Gibb	Eastern Area DAPTC	<a href="#">CSPS1487</a>	Policy LN6	No	No	No	No	No	No	<p>RURAL RESPONSE TO EAST DORSET AND CHRISTCHURCH CORE STRATEGY</p> <p>This response is made to supplement those made by individual parishes. Some of the points made are general to all some are specific to a few. This response does not concern itself with Christchurch Borough.</p> <p>Area Covered by Response including the parishes and grouped parishes of Aderholt, Cranborne, Knowlton, Gussages, Vale of Allen, Holt, Pamphill &amp; Shapwick, Sixpenny Handley with Pentridge, Sturminster Marshall. It does not include the conurbations along the A31 or Verwood and Three Legged Cross.</p> <p>Despite previous comments, the Core Strategy remains urban centric, focussing on the conurbations along the A31 and ignoring the largest part of the District. The size of the rural community (as covered by this response) is 25597 hectares or 72.21% of the East Dorset Area (source Dorset Data Book 2011). The rural population is 12950 or 14.74% of the East Dorset population. These communities deserve better recognition within the Core Strategy before it can be fully supported.</p> <p>The Defra Local Authority dataset post 2009 classified East Dorset with a rural population of 73.29% and a classification of R50. <a href="http://webarchive.nationalarchives.gov.uk/20110215111010/http://archive.defra.gov.uk/evidence/statistics/rural/rural-definition.htm">http://webarchive.nationalarchives.gov.uk/20110215111010/http://archive.defra.gov.uk/evidence/statistics/rural/rural-definition.htm</a> . The</p>	The East Dorset and Christchurch Core Strategy needs to be enhanced in a number of areas before it can be said to reflect the majority of the East Dorset area. It cannot be endorsed in its current state.			723	

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											<p>DEFRA maps classify the majority of East Dorset as “Less Sparse and Less Sparse Dispersed.</p> <p>A recent report by Prof Mark Shucksmith OBE, of Newcastle University who has conducted several studies for the Commission for Rural Communities (CRC) indicated that “It should be no surprise to us that powerful groups prevail in designing rural policy and planning, and that less powerful groups are generally excluded from decisions. Average house prices in rural areas exceed those in urban areas of England by around 25%, with higher prices in some villages costing nearly 11 times the average income.</p> <p>“Rural communities are often proclaimed by those who live there as inclusive and neighbourly, but it seems they often prevent the new housing which would enable poorer and middle income groups to share the rural idyll. People’s housing opportunities are crushed and their life-chances diminished by the failure to build sufficient houses in rural Britain.”</p> <p>All the points made in the latest CRC State of the Countryside Report 2010 are valid in East Dorset  <a href="http://www.defra.gov.uk/crc/documents.state-of-the-countryside-report/sotc2010/">http://www.defra.gov.uk/crc/documents.state-of-the-countryside-report/sotc2010/</a> . The key points from Section 2 are replicated at Annex A. Since the CRC is not due to be abolished until Mar 2013, it recommended that they be consulted to enhance the credibility of the District Strategy.</p> <p>Estates. There is no reference in the Strategy to the fact that much of the rural area of the district is made up of private estates – Cranborne, Shaftesbury, Crichele, Kingston Lacy (NT), Edmondsham, Rushmore (part of). All have a part to play and are involved in various ways in the life and economy of East Dorset; this has to be recognised.</p> <p>The Core Strategy. There is a lack of a clearly defined Aim for the document. If there is to be a Vision it should lead to an Aim “To produce a Strategy For the Development of East Dorset during the period 2013 to 2028”. Para 4.1 of the Key Strategy is therefore limiting in that it says that the strategy is only concerned with identifying the locations for development; it is putting the cart before the horse. The objectives should cover the key areas of the strategy: economy, housing, welfare, environment, communications. The policies should be specific within each key objective.</p> <p>Core Strategy Objectives. Either all the objectives cover the partnership area or all need to specify which parts they pertain to. (Obj 1 and 4). Too many of the objectives start to discuss particular aspects, which limit their application. An objective should be an achievable target from which the policy statements are derived.</p> <p>Whilst the majority of the rural economy is based on agriculture, there are also a wide variety of home workers who need stronger recognition in the strategy. Both need firm policies to support their continued existence; the national evidence would suggest that home working will increase dramatically during coming years as the price of travelling continues to rise and central government supports the improvements of the communications infrastructure.</p> <p>Generic policy statements are not sufficient to embrace them.</p> <p>Market Towns. The lack of any partnership working within East</p>					



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											<p>Dorset reduces the role of the market towns as a focus for their area. The location of the market towns in the south of the district does not help. There is confusion of terminology within the document between Rural Service Centres and Key Settlements.</p> <p>Communications – Broadband will play an essential part of the future of East Dorset. It is an essential requirement for farmers, home workers and the service sector. 100% coverage of mobile communications is required to ensure connection with the emergency services at all times and to make up for the poor broadband coverage. A firm policy to support enhanced communications across the rural community is essential.</p> <p>Highways. Rural roads must be maintained to support the local economy and tourist traffic which will only increase. The A354 is classified as a strategic route yet there is no strategy or policy to support this. The B3081 / B3078 / B3082 roads are all secondary and local distributor roads; within the rural community these roads are as important as the streets in the towns yet they are not recognised within the strategy or policies.</p> <p>Environmental Issues – surface water drainage. The chalk landscape produces particular problems with flooding in certain areas which can lead to paralysis of the economy and infrastructure with an allied impact on foul water drainages. It is essential that the District recognises their liability to work with the county council to mitigate the effects of surface water flooding which are now more common than 25 years ago.</p> <p>Population shift. The increase in elderly population can only continue as efforts are made to sustain the rural centres. These will attract retired people who will not necessarily contribute to the local economy except through volunteering.</p> <p>Housing. A policy is required to encourage major landowners to build Affordable Housing within their estates to make up for the properties that have been sold off and are used as second homes. A policy of 100% taxation of second homes is required to support the infrastructure costs of the district.</p> <p>Growth potential. – Whilst mention is made of diversification, there need to be strong policies to encourage small business units and Home Working within the rural area. Limiting this will be to stifle the rural economy.</p> <p>Annex A to                      Eastern Area DAPTC Response to                      EDDC Core Strategy Submission                      Extract From CRC State of the Countryside Report 2010                      Key summary points on social issues:</p> <ul style="list-style-type: none"> <li>• Between 2001 and 2008 the population of rural England rose faster than in urban areas. The fastest growth was in Village, hamlet and isolated dwellings – Less sparse areas which grew by 6.1%.</li> <li>• 23.5% of people in rural areas are over state retirement age compared with 18.1% in urban areas.</li> <li>• Whilst over 98% of urban residents have the following services within 4km, for rural residents 51% have a bank or building society, 85% have cashpoints, 80% a GP surgery, 62% a supermarket, 57% an NHS dentist, 67% a pharmacy and 48% a secondary school.</li> </ul>					

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											<ul style="list-style-type: none"> <li>• Approximately 5% of rural households were using dial-up internet connections in 2009 compared with 2% in urban areas.</li> <li>• People in villages and hamlets with the lowest incomes spend an average of £50 per week on travel compared with £32 in rural towns and £28 in urban areas.</li> <li>• In rural areas the cheapest housing is six times the annual income of the lowest income households, compared to five times in urban areas. Despite house price falls during the recession in hamlets in sparse areas of the country the multiple is nine times annual household incomes.</li> <li>• 28% of those households not on the mains gas network in villages and hamlets are in fuel poverty compared with 13% who are on the mains gas network. The comparative figures for urban areas are 18% and 12%.</li> <li>• 87% of people living in the most rural districts are satisfied with their area as a place to live compared with 76% living in the most urban authorities.</li> <li>• 29% of people living in the most rural districts have given unpaid voluntary help at least monthly over the last year compared with 21% of people living in the most urban authorities.</li> </ul> This provides the nearest definition to the role of service centre.						
359261	Mr Doug Cramond	DC Planning Ltd	<a href="#">CSPS21 01</a>	Policy LN6		Yes							Yes, I wish to participate at the oral examination	In connection with comments on WMC3	723		
359529	Mrs Lisa Goodwin	Sixpenny Handley with Pentridge Parish Council	<a href="#">CSPS24 83</a>	Policy LN6							This provides the nearest definition to the role of service centre.				723	<a href="#">2248948_0_1.pdf</a> <a href="#">2248860_0_1.pdf</a> <a href="#">2248941_0_1.pdf</a>	
359284	Miss Lynne Evans	Southern Planning Practice	<a href="#">CSPS22 42</a>	Policy LN6	Yes	No	Yes	Yes	Yes	Yes	1. The policy is ambiguous in terms of the community facilities and services that it seeks to address, as they are not defined, and in particular in the light of another policy, Policy PC4 which also addresses similar issues. The policy is therefore unsound as it is not positively prepared and effective. It is not clear whether this policy relates to privately run facilities such as pubs and local shops or more specifically to facilities that are generally publicly funded. The Policy wording, supporting text and Infrastructure Delivery Plan suggests that the policy is directed to facilities that are generally publicly funded but this is not clear. 2. The policy in so far as it seeks to resist the loss of facilities unless it can be shown that the facility is no longer needed is unsound because there is no clear advice as to how the policy requirement will be measured – it has not therefore been positively prepared; it is not justified, effective or consistent with national policy. 3. The part of the policy which indicates that ‘where appropriate, financial contributions towards the provision of facilities and services will be sought’ is considered too vague to be justified or effective. The circumstances in which such contributions will be sought and the basis for the contributions need to be detailed.	The policy needs to be reconsidered alongside Policy PC4 to ensure that there is no duplication or ambiguity between the two policies. The policy in so far as it seeks to resist the loss of facilities unless it can be shown that the facility is no longer needed is unsound and clear measures need to be set out as to how the policy requirement will be measured. The part of the policy which indicates that ‘where appropriate, financial contributions towards the provision of facilities and services will be sought’ is considered too vague to be justified or effective. The circumstances in which such contributions will be sought and the basis for the contributions need to be detailed.	Yes, I wish to participate at the oral examination	The representations submitted raise important and complex policy issues which require oral examination and round table discussion in order that the Inspector can be properly informed in reaching a decision on the soundness of the Core Strategy.	723		

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359277	Mr Jamie Sullivan	Tetlow King	<a href="#">CSPS2758</a>	Policy LN6	Yes	No	No	Yes	No	No	<p>This policy seems to be the only one in the Core Strategy aimed at providing the necessary facilities for older people. However, it makes no mention of either housing or care for older people. We consider that given the level of demographic of the over 75s during the plan period (51% increase in Christchurch and a 55% increase in East Dorset) it is essential that the right type of care and accommodation is provided for this age group. Without the right type of housing and care being provided, older people will face a lack of choice and opportunity in older age across the two local authority areas. It will also reduce the turnover in housing stock for younger families to move into. The NPPF also states that local authorities should "identify the scale and mix of housing" required for older people (paragraph 159) and "plan for a mix of housing based on the current and future demographic trends, market trends and the needs of different groups in the community, such as ...older people."(paragraph 50 bullet point 1)</p> <p>The Core Strategy sets out the issue of demographic change in the profile section of this document, but does not then follow it through with an appropriate policy. We strongly recommend a standalone policy is inserted in this section to allow schemes to be determined against. Without this issue there will be a policy vacuum which could delay these types of schemes coming forward. The Core Strategy would therefore be considered unsound on the grounds that it is not "positively prepared" to meet the needs of older people, not "consistent with national policy" and not "effective".</p> <p>We recommend the policy proposed below is included in this section of the Core Strategy:</p> <p>The Council will encourage the provision of specialist housing for older people.</p> <p>The Council aims to ensure that older people are able to secure and sustain their independence in a home appropriate to their circumstances and to actively encourage developers to build new homes to the "Lifetime Homes" standards so they can be readily adapted to meet the needs of those with disabilities and the elderly as well as assisting independent living at home.</p> <p>The Council will, through the identification of sites, allowing for windfall developments, and/or granting of planning consents in sustainable locations, provide for the development of retirement accommodation, residential care homes, close care, Extra Care and assisted care housing and Continuing Care Retirement Communities. Sites should be sustainable by virtue of their location and there will be a preference for sites within defined settlements. Where such sites are not available, regard will be had to the potential for development to be self-contained to reduce travel requirements and the availability of public transport.</p>		No, I do not wish to participate at the oral examination		723	
360509	Miss Rose Freeman	The Theatres Trust	<a href="#">CSPS3479</a>	Policy LN6	Yes	Yes					<p>We support the document and find it to be Sound and are particularly pleased that the Regent Theatre and Barrington Theatre are acknowledged in policies CH1 for Christchurch and FWP1 for Ferndown.</p> <p>We have a comment for Policy LN6 for general community facilities and services. Although there are examples of community facilities</p>		No, I do not wish to participate at the oral examination		723	

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											within Policy LN6, we suggest that as there is no Glossary to explain the term 'community facilities' that para.15.23 (or an additional paragraph) includes a full description for clarity such as community facilities provide for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community.					
359284	Miss Lynne Evans	Southern Planning Practice	<a href="#">CSPS22 43</a>	15.25	Yes	No	Yes	Yes	Yes	Yes	<p>1. The policy is ambiguous in terms of the community facilities and services that it seeks to address, as they are not defined, and in particular in the light of another policy, Policy PC4 which also addresses similar issues. The policy is therefore unsound as it is not positively prepared and effective. It is not clear whether this policy relates to privately run facilities such as pubs and local shops or more specifically to facilities that are generally publicly funded. The Policy wording, supporting text and Infrastructure Delivery Plan suggests that the policy is directed to facilities that are generally publicly funded but this is not clear.</p> <p>2. The policy in so far as it seeks to resist the loss of facilities unless it can be shown that the facility is no longer needed is unsound because there is no clear advice as to how the policy requirement will be measured – it has not therefore been positively prepared; it is not justified, effective or consistent with national policy.</p> <p>3. The part of the policy which indicates that 'where appropriate, financial contributions towards the provision of facilities and services will be sought' is considered too vague to be justified or effective. The circumstances in which such contributions will be sought and the basis for the contributions need to be detailed.</p>	<p>The policy needs to be reconsidered alongside Policy PC4 to ensure that there is no duplication or ambiguity between the two policies.</p> <p>The policy in so far as it seeks to resist the loss of facilities unless it can be shown that the facility is no longer needed is unsound and clear measures need to be set out as to how the policy requirement will be measured.</p> <p>The part of the policy which indicates that 'where appropriate, financial contributions towards the provision of facilities and services will be sought' is considered too vague to be justified or effective. The circumstances in which such contributions will be sought and the basis for the contributions need to be detailed.</p>	Yes, I wish to participate at the oral examination	The representations submitted raise important and complex policy issues which require oral examination and round table discussion in order that the Inspector can be properly informed in reaching a decision on the soundness of the Core Strategy.	724	
359284	Miss Lynne Evans	Southern Planning Practice	<a href="#">CSPS22 44</a>	15.26	Yes	No	Yes	Yes	Yes	Yes	<p>1. The policy is ambiguous in terms of the community facilities and services that it seeks to address, as they are not defined, and in particular in the light of another policy, Policy PC4 which also addresses similar issues. The policy is therefore unsound as it is not positively prepared and effective. It is not clear whether this policy relates to privately run facilities such as pubs and local shops or more specifically to facilities that are generally publicly funded. The Policy wording, supporting text and Infrastructure Delivery Plan suggests that the policy is directed to facilities that are generally publicly funded but this is not clear.</p> <p>2. The policy in so far as it seeks to resist the loss of facilities unless it can be shown that the facility is no longer needed is unsound because there is no clear advice as to how the policy requirement will be measured – it has not therefore been positively prepared; it is not justified, effective or consistent with national policy.</p> <p>3. The part of the policy which indicates that 'where appropriate, financial contributions towards the provision of facilities and services will be sought' is considered too vague to be justified or effective. The circumstances in which such contributions will be sought and the basis for the contributions need to be detailed.</p>	<p>The policy needs to be reconsidered alongside Policy PC4 to ensure that there is no duplication or ambiguity between the two policies.</p> <p>The policy in so far as it seeks to resist the loss of facilities unless it can be shown that the facility is no longer needed is unsound and clear measures need to be set out as to how the policy requirement will be measured.</p> <p>The part of the policy which indicates that 'where appropriate, financial contributions towards the provision of facilities and services will be sought' is considered too vague to be justified or effective. The circumstances in which such contributions will be sought and the basis for the contributions need to be detailed.</p>	Yes, I wish to participate at the oral examination	The representations submitted raise important and complex policy issues which require oral examination and round table discussion in order that the Inspector can be properly informed in reaching a decision on the soundness of the Core Strategy.	725	