

Dorset Council Local Plan,
South Walks House,
South Walks Road,
Dorchester, DT1 1XJ.

Please reply to:

9 Sundew Road
Broadstone
Poole. BH18 9NX
gerald.rigler@gmail.com

11th March 2021

Dear Sirs / Madams,

INITIAL RESPONSE to THE CURRENT PROPOSED LOCAL PLAN

Further to my letter dated 10th March about the above, it seems appropriate to stress that our first two responses are made because, amongst other matters that we have considered, Government has recently stated the following :-

A : Within the current planning system, the standard method does not present a target in plan-making, but instead provides a starting point for determining the level of need for the area, and it is only after consideration of this, alongside what constraints areas face, such as the Green Belt, and the land that is actually available for development, that the decision on how many homes should be planned for is made. It does not override other planning policies, including the protections set out in Paragraph 11b of the NPPF or our strong protections for the Green Belt. It is for local authorities to determine precisely how many homes to plan for and where those homes most appropriately located. In doing this they should take into account their local circumstances and constraints.

and B : More broadly, we heard suggestions in the consultation that in some places the numbers produced by the standard method pose a risk to protected landscapes and Green Belt. We should be clear that meeting housing need is never a reason to cause unacceptable harm to such places.

With regard to our other local and on-going research, it is noted that ONS has published household data and projections which suggest that the local growth in past and projected households will be entirely associated with those aged over 75 years : a credible answer to outstanding Question 5, defined in our Appendix 'C' (of the 10th March 2021) should refer and is awaited with interest.

Yours faithfully,

Gerald Rigler : Chairman (2020/2021) Purbeck & Poole Group of Dorset CPRE

**DORSET COUNCIL LOCAL PLAN CONSULTATION – JANUARY 2021
LOCAL GROUP RESPONSE of March 2021**

1 : The response (prepared by Jo Witherden BSc (Hons) DipTP DipUD MRTPI) and submitted by The Dorset Branch of CPRE is fully supported and commended by this Purbeck and Poole Group.

2 : The housing target needs to address local needs. At the time of compiling this response, one web-site was offering at least 1500 dwellings for sale in our area – two with a price tag of nearly £12 million each. The provision of truly affordable housing of the right quantities in the right places for local working families must form part of a sound Local Plan for Dorset.

3 : The promotion of isolated employment sites (eg the Dorset Innovation Park at Winfrith) and isolated housing sites (eg Alderholt) suggest that general infrastructure issues are being ignored which renders the proposed plan unsound.

4 : The proposal for a traveller site in Swanage conflicts with the requirements of Swanage and overlooks the possibilities of allocating some well fenced land at Holton Heath, always assuming that other land adjacent to the A35 (no doubt used by travellers) cannot be made available.

5 : The outline information in Appendix ‘A’ (concerning congestion and housing distribution, etc) confirms that co-ordination of some infrastructure issues needs urgent attention to produce a sound plan. Such co-ordination may be difficult since many organisations and separate funding sources are involved : a matter not to be neglected if proposals are to be deliverable – not just an illusory ‘wish list’.

6 : The expected influence of the report produced by Professor Dasgupta (commissioned by HM Treasury) is not apparent. The proposed destruction of wild-life habitats and biodiversity (eg at Lytchett Matravers) refers.

7 : The railway line between Wareham and Norden is not included in the map of transport infrastructure. This suggests that current proposals are ignoring not only aspects of the lengthy and dubious consultation processes associated with the

Purbeck District Plan proposals (that still require further consultations if they were to be progressed to demonstrate soundness, or otherwise) but also are ignoring the established environmental constraint that there could be no increases in road capacity across Purbeck.

8 : The impacting effects upon the proposed Local Plan created by the Dorset Local Enterprise Partnership require explanation and justification, since it is perceived that associated initiatives are simply encouraging existing businesses to move around rather than fostering new businesses – a possible example of ‘change’ being confused with ‘progress’.

9 : The encouragement of any necessary Suitable Alternative Green Space (SANG) in locations remote from the building site concerned (particularly on agricultural or otherwise valued land) is not supported, particularly when sought to obtain easements on a development site and since it creates otherwise avoidable car journeys when the plan should be reducing any such needs. It is also relevant to recall that recent SANGs (in our area) have damaged a valued vista in Swanage and, in the case of Upton Country Park led, we understand, to the local extinction of the smooth snake and sand lizard : damaging matters that imply lack of due care in decision-making.

10 : The proposal to erect extra-care facilities (probably remote from the communities which originally included the ‘cared for’) requires suitable justification, irrespective of any commercial advantage to developers that might accrue from banning pets that would damage wildlife.

11 : The legal interpretation of “exceptional circumstances” (as distinct from “usual or normal consequences”) related to running out of suitable building land requires satisfactory clarification when suitable urban land is being hoarded or under-utilised. It may be that the eventual plan may need to involve enabling ‘compulsory purchases’ - no doubt at current usage values (rather than anticipated values) ! Such action should ensure that valued natural assets (and their settings) are not damaged or lost and the primary economic asset of Dorset protected.

12 : The enhanced risk of increased water pollution (exacerbating the pollution of Poole harbour) associated with too many new dwellings in the wrong places requires clarification about how any such risk will be removed, without making the situation worse during the relevant timescales.

13 : The proposal for a Holiday Park near Morden is not supported since it involves creating illegal damage to a sensitive area and should not involve any release from Green Belt protections.

14 : The proposal that Wool and Moreton Station should get the majority of the proposed houses in Purbeck ignores the high quality of the natural environment at Wool (see Appendix ‘B’ listing crucial species involved) and the totally inadequate infrastructure services and facilities at Moreton Station. Such a stance renders the proposal unsound and, in one case, probably illegal. The mere presence of a railway line does not, of itself, provide adequate infrastructure services and facilities for a community.

15 : The proposal to foster so many houses in Corfe Mullen, Wimborne Minster, Colehill and other parts of South East Dorset (that could impact upon the integrity of the Green Belt Zone and the usefulness of agricultural land in reducing food imports) depends upon the validity of the alleged “need” : Item ‘2’ above refers. It seems relevant to record the current difficulties (over recent years) in securing local people to occupy dwellings previously approved for construction in South East Dorset.

16 : The apparent disregard of local Neighbourhood Planning at this stage of the consultation is not understood and hopefully, any such attitude will be corrected at the earliest opportunity to ensure that local knowledge, understandings and goodwill are properly harnessed into the eventual formation of a sound Local Plan for Dorset.

17 : A number of our questions (as listed by Appendix ‘C’) to Dorset Council have not, as yet, been answered during the current pandemic situation. Consequently the subject matter of such questions must be satisfactorily addressed in order to move towards the creation of a sound Dorset Local Plan

APPENDIX 'A' to LOCAL GROUP RESPONSE

**(Concerning congestion and housing distribution
plus
associated impacts on infrastructure services and facilities)**

comprising

four letters about collaboration
to Dorset Council commencing with letter dated 29th June 2020
reiterating the need for
inter-departmental and organisational cooperation.



Dorset CPRE

Patron: Her Majesty The Queen

The Chief Executive, Dorset Council, County Hall,
Colliton Park, Dorchester, DT1 1XJ.

The Chief Executive, BCP Council, The Town Hall,
Bourne Avenue, Bournemouth, BH2 6DY.

Please reply to:

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29th June 2020

Dear Sir,

OVERVIEW & SCRUTINY ISSUES

It is trusted the Council is now in the process of learning the lessons from the initial impact of Covid-19 on its various communities for which it has certain health and well-being responsibilities to discharge.

Presumably one of the lessons will be the extent to which it is necessary to secure timely collaboration and adequate resources to support governmental initiatives requiring progression.

I know that some earlier correspondence exists requesting evidence of adequate “Overview and Scrutiny” of such Council responsibilities, relating to the shrinkage of the two functioning hospitals in our major conurbation to form one hospital (copies attached for ease of reference). It is stressed that such correspondence is deemed appropriate since timely access from parts of Dorset (outside the conurbation area) will become extremely unlikely, particularly for emergency treatments that will only be available for so many in the Far East of Dorset (especially emergencies requiring intensive neo-natal services and/or high dependency baby care, currently available in Poole).

No doubt, (to avoid wasted effort, to avoid anger over confusions and to minimize damage to local confidence) it will soon be possible to see clear evidence that Overview and Scrutiny has been satisfactorily completed into how the Council can discharge **all** of its associated responsibilities [*for social services, housing, planning, roads, traffic congestion, environmental protection, health and well-being of all Dorset communities, collaboration with other responsible organisations and securing adequate resources*] in such a way as to support effectively the revised and reduced “sickness treatment arrangements” that have been proposed by Dorset CCG and approved for “due progress” by a Secretary of State. It has previously been asserted that support for ‘due progress’ does not absolve any Local Authority from their own “long-term” responsibilities in the matter, since the Secretary of State concerned has no relevant remit or powers – eg to supply more support services associated with NHS proposals requiring more travel (in a climate emergency !) or NHS moves towards more day treatments.

However, we do remain confident that suitable evidence of the complete satisfaction of both collaborating Councils in Dorset will become available before the Dorset CCG plans are implemented, in any substantial manner. Early production of such evidence would not only allay the concerns held in the reliant rural communities but also foster confidence that they can flourish because all services are being shaped to meet their needs for the next few decades / half century.

Yours faithfully,

COPY

Gerald Rigler : Chairman, CPRE Purbeck and Poole Group



Dorset CPRE

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The Chief Executive, Dorset Council, County Hall,
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25th July 2020

Dear Sir,

OVERVIEW & SCRUTINY ISSUES

Further to my letter dated 29th June (copy attached for ease of reference), it is understood the NHS has ministerial authority to progress its plans (*not necessarily without adjustment*) for the transformation of their hospitals in the BCP area : hospitals that also support communities elsewhere in Dorset. Within this context it is noted that :-

1 : The NHS has now secured some town planning approvals (with relevant conditions), from the BCP Council planning committee, concerning the sites in the BCP Council area. The decisions were made upon the basis that increased risks to human life is not a material consideration for their relevant deliberations.

2 : At no time has the BCP Council approved the way in which the various "C2 Class" buildings (planned to appear on the sites) should be used by the NHS which is clearly seeking cost reductions by concentrating / improving services whilst reducing clinical duplication / increasing travel by patients and carers.

3 : Despite the severe lessons of Covid-19 about safe available capacity, it is increasingly obvious that the NHS is still planning to use the buildings so that compliance with the "Golden Hour" for travelling will be impossible for those in Dorset needing emergency and/or specialized maternity services and who currently can just about get to the Poole hospital site in an hour.

4 : For the NHS plans to be effective, it must be necessary for both Local Authorities to discharge all their own responsibilities (attached letter refers) at an increased level to deal with the potential need for extra Social Services arising from the need to remove 'bed-blocking' created by the reduction in bed numbers, let alone the needs that could arise from the increased incidence of day-surgery. The exclusion of the potential effects of housing targets from the NHS proposals must also affect the Local Authorities.

5 : If the NHS proposed uses of their two main sites were swapped during progress of the 'transformation' (so that all planned surgery is on the Bournemouth site) the necessary road improvements and public transport provision may be less onerous and, more significantly, would help maintain compliance with the Golden Hour needed by all, for emergencies and specialized maternity services.

Public concerns should be alleviated if there was clear evidence (from both collaborating Local Authorities) that they will have the capabilities and resources to ensure the health and well-being of all Dorset communities adversely affected by the NHS reduction in service delivery locations. It is unknown whether, or not, ministerial views about the resources of the NHS are in conflict with

ministerial views about the resources of Local Authorities and clarification seems essential by Overview & Scrutiny Boards, in an effort to settle concerns.

Yours faithfully,

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Gerald Rigler : Chairman, CPRE Purbeck and Poole Group

Copy to : Cllr Jane Somper, Cllr Piers Brown and Cllr Philip Broadhead



Dorset CPRE

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[***gerald.rigler@gmail.com***](mailto:gerald.rigler@gmail.com)

9th February 2021

Dear Sir,

OVERVIEW & SCRUTINY ISSUES

Thank you for the holding reply received in respect of my letter dated 25th July last year (copy attached for ease of reference) that referred to an earlier expression of concern.

Whilst your substantive response is awaited by me, no doubt your staff (preparing a proposed Local Plan) have been made aware of our concerns about a perceived lack of evidence that can demonstrate adequate coordination of all the issues previously outlined by my letters mentioned above.

Yours faithfully,

COPY

Gerald Rigler : Chairman, CPRE Purbeck and Poole Group



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15th February 2021

Dear Sir,

OVERVIEW & SCRUTINY ISSUES

Further to my letter dated 9th February addressed to you about the above issues, it is confirmed that I have received an email from Mr Jonathan Mair.

Unfortunately he did not cover the issues associated with the responsibilities, duties and resources of your Unitary Authority and specifically your collaboration with the other Dorset Unitary Authority : matters that relate to the production of meaningful Strategic Master Plans (the required Local Plans) for “post – Covid” Dorset. In this connection, *with Dorset being required to accommodate so many extra dwellings / inhabitants, with our infrastructure likely to prove inadequate, with our natural assets being seen as a basis for significant growth in tourism and with the Independent Reconfiguration Panel [IRP] having prompted all parties to engage constructively in a number of issues (including the development of an “A&E Local Model”)*, it is trusted that as a stake-holder in local matters you are ensuring that the general health and well-being of all current and potential communities will be secured. Such action, to be satisfactory, requires evidence of the “greater co-production between interested parties” across Dorset that the IRP advocated.

Yours faithfully,

COPY

Gerald Rigler : Chairman, CPRE Purbeck and Poole Group

APPENDIX 'B' to LOCAL GROUP RESPONSE

(A conservative list of crucial species found either on the development sites or in the SANG being proposed at Wool and requiring due respect of the associated habitat mosaic to avoid illegalities)

Six pages in total

WOOL - PRIORITY SPECIES

Item	Where Found	Threats	Mitigation ??
Common Hazel dormouse Full protection under UK & European Legislation 2017	Coombe Wood	Removal of scrub along walks opening up of wood Disturbance by tree felling	Suggestion made of recreating scrub could take 30 years!
Otter Full protection European Legislation 2017	SSSI River Frome and water meadows	Pollution recognised by N.C.C. as not optimum state it occurs now in the River Frome, there are declines in fish numbers eg. Salmon recorded – more sewage contamination	Build a new sewage station and pipework – where? Time? Expense
Great Crested Newt Full protection European Legislation 2017	In Coombe Wood and substantial population in pond in property next to Area 3	Loss of terrestrial part of habitat on site of area 3	Negotiations with land owner have occurred
Water Vole Priority Species Legal protection under the Wildlife and Countryside Act 1981	River Frome	People pressure and dogs sweeping away river banks – climate change	NONE
Hedgehog B.A.P species	All over Parish (possibly with exception of new development at Purbeck Gate)	Increasing traffic replacement of hedges by fences isolation of habitat, insidious urbanisation and intensive arable farming	Holes in fences – voluntary
Harvest Mouse B.A.P. Species	Organic Development Fields	Total loss of habitat	NONE
Brown Hare Priority Species	Organic quiet fields		NONE
Grass Snake Priority Species	Coombe Wood low population plus Water meadows		NONE Capture relocate
Adder Priority Species	Under hedges on development sites	Construction and people	NONE Capture relocate

Item	Where Found	Threats	Mitigation ??
Common lizard Priority Species	Coombe Wood along the track in the centre of Coombe Wood – also slow worms here	Woodland management for a SANG with paths widened.	NONE Capture relocate
All native reptiles are legally protected and PRIORITY SPECIES			
Salmon Priority Species	River Frome	Decline over 5 years – increased pollution in River Frome, more sewage	NONE
Lamprey Priority Species	River Frome		NONE
Slowworm Priority Species	Most development sites	Construction	Obligation on developer to search and remove – to where
Nightjar S.P.A. Highest level protection Annex 1	Foraging along River Frome in site 1 round monument Coombe Wood SPA Heathland	Loss of linked functioning habitat food sources.	As Coombe Wood is the SANG to draw visitors off the heathland
Woodlark Annex 1 S.P.A. protection	Coombe Wood	Loss of scrub around reservoir and along paths	Replanted scrub will not act as habitat for 30 years
Corn Bunting Priority Species Wildlife and 1981 Countryside Act	Hedges Development fields	Construction loss of hedgerows for nesting	NONE
All birds including nest & eggs legally protected	Coombe Wood and development sites		Bird boxes are not an adequate solution
Cuckoo Priority Species & Yellow Hammer Priority Species	River Frome water meadows Hedges development fields	Loss of host – reed warblers decline in numbers with People disturbance Warblers and disturbance	NONE

BATS

Bat Species are most likely to be lost by increasing urbanisation with lighting and traffic pollution, nitrogen oxides, ozone, sulphur dioxide and ammonia and particle pollution particularly important in this.

All bat species are afforded full protection under the UK and European legislation Habitats and Species.

Two threats occur to cause serious decline or loss of Species:

1. Loss of roosts - it is illegal to disturb roosts and unoccupied roosts are equally protected. 56 Suitable trees in Coombe Wood; these no doubt include the 25 + veterans in the wood. Local authorities have a duty to ensure impacts upon legally protected Species are a

material consideration in any planning permission. All sites of the development have recordings of bat registrations. 172 in area 1, 265 in areas 2, 3 and 4. There are 10 records for Bats in Coombe Wood. This must be a principal roost area as large numbers of all sizes (different Species) have been recorded in July 2019 issuing from the main entrance.

2. Loss of connectivity from feeding areas. The development fields are all organically managed for 20-years therefore have high levels of insects. Survey of total sites have recorded 203 beetles on moth rich hedges occurring on all sites and some sites provide nectar as the Meadows are flower rich EG area 2. This plus the fact that area 3 is in part horse paddock with horse manure boosting beetle populations could account for the moderate and even high levels of bat activity in the south of area 3, therefore provide particularly rich foraging ground for bats.

Areas 2 and 3 and the northern part of area 1 are most likely to be negatively affected by increasing traffic and pollution and lighting on the A352. This will be especially important as a network of roads converge on the Winfrith roundabout. The development extends the Parish in its western part around this roundabout, but there will be an elongated east-west band of light also from traffic across the parish. This lighting will be particularly important at dusk and will be the most active time for migrating, foraging bats will have a particularly negative effect and will make any mitigation very limited. The local authority should have a lighting policy and discussions may be needed between an independent ecologist, lighting professionals and local authorities to provide any level of mitigation. This is now accepted by local authorities, certainly planning officers or developers should ensure a lighting assessment alongside an ecological assessment.

The Newburgh roundabout is a bat hub. This hub will break the flight paths. A statement in a paper recently read states no lighting is bat friendly and no bat totally light tolerant although the sensitivity varies. Generally the larger slower flying bats which may have travelled from further away to feed here e.g. from roosts in the line of Ancient Valley Woods, Perry Coppice etc. are the most sensitive to light. (If this was the case they would be flying into a higher level of housing lighting than before development). These include some of the rarest bats recorded on sites - Barbastelle bats are very rare, are particularly sensitive to light consequently they are put at a competitive disadvantage with other bats and are less able to forage successfully and efficiently where light pollution occurs. This can have a significant impact upon fitness and breeding success so artificial light has potentially devastating consequences for the Species Rouse et al 2016 Barbastelle, Core Sustainance zone calculated at 6 km. Connectivity requirements include tree lines, hedgerows and river corridors. It frequents deciduous Woodland and wet meadows. Low records occur in Coombe Wood. It can roost in trees or buildings 3% of records come from sites 2, 3 and 4 so it could be using the Natural corridors see below.

The alignment of developments from the South at Coombe Wood towards the River Frome in the North likely forms a perfect Natural Corridor for Bats with the plentiful moth rich hedgerows. This provides a food rich migration route and foraging area. Coombe Wood certainly has 2 roosts and with the 25+ cavity rich veteran trees provides key roosting areas. This is evidenced by observations of different species recorded flying out of the wood at dusk. Other Bat roosts possible as trees occur on the sites - 56 trees in all having moderate to high roosting potential. The majority of species recorded use trees as roosts. The fact that site 1 near the Ancient Monument has the highest number of bat records (8) being next to Coombe Wood suggests a link here. Another very rare species the Grey Long Eared Bat appears to be recorded in Coombe Wood and from areas 2,3,4. The Greater Horse Shoe Bat is another rarity and is recorded near the Ancient Monument. It is a tree rooster so maybe using Coombe Wood. BUT the nearest confirmed roost is East of the parish at Binnegar. This whole development site is of extreme importance for Bats.

However despite suggestions that links could be forged through it providing a bat corridor, evidence suggests it already exists, the whole development with light and air pollution and removal of rich foraging sites will cause a steep decline in Bat Populations in Wool. Bat species are given full legal protection under the Habitats & Species Regulation 2017. Removal of foraging areas cannot be mitigated against for lost roosts. The evidence for the success of Bat Boxes being successful is only poor to medium – not adequate. At Bovington the building of the Harbour School as a replacement for Bovington Middle School was preceded by rigorous survey of the site by D.C.C. even so not all trees stated to be retained were saved but in particular a very impressive commendable and expensive Bat Hotel provided for losses from removal of the old buildings may not have been successful - no monitoring evidence. Interested local residents who previously experienced plentiful bat activity in area over recent summers have had very few sightings.

BADGERS

Badgers protected by the badgers act 1992. A large community of badgers with setts on Coombe Wood SANG about 50% of the setts are in the northwest and therefore highly likely to draw attention to themselves by increasing visitor presence. Clearance of scrub in this area and along the paths will make them even more obvious and likely to be disturbed by visitors. Clearance supervised by an ecologist does not inspire confidence that people pressure will not cause disturbance and will remove likely habitat used by dormice and woodlark for nesting and feeding. What mitigation measures are going to be provided? a notice saying keep out please? or policing at night as found necessary? from any possible badger baiters.

Applicant will need to demonstrate to the council's satisfaction that no adverse effects on their functionality linked habitat.

BIRDS

Birds 50% of the 67 species breeding in Wool are on the Red List of high conservation concern. Also the majority of those listed here are PRIORITY SPECIES. (These will be underlined) Corn Bunting, Yellowhammer, Bullfinch, Thrush and Linnet use the Hedges on all the Organic development fields for nesting. The centres of the grass organic fields (Site 1) are used by Lapwing and Skylark for breeding and feeding. The Cuckoo uses the Frome meadows where Meadow Pipits and Reed Warblers occur these provide hosts for its egg laying. The Frome Meadows are also used by Cettis Warbler. In Coombe Wood there are breeding Marsh Tit, Spotted Flycatcher and Lesser Red Poll, (they use the coniferous areas). Two single records in area 1 One of these is unsubstantiated as also records of Nightingales one in Coombe Wood and one near the Ancient Monument, Bullfinch, Dunnock and Firecrest and Hobby also breed here. Two of the most important Annexe 1 SPA birds are recorded in Coombe Wood- the Woodlark and the Nightjar. This latter one uses the wood as a functionally linked a feeding area.

INVERTEBRATES

Invertebrates - There are 13 Priority Species:- Stag Beetle is found in Coombe Wood SANG. Black Oil Beetles – Priority Species has been recorded for the central area of site 1. Other records include Dingy Skipper, Grizzled Skipper, Wall, Small Heath, Grayling, Silver Studded Blue, Cinnabar And Hornet Robber Fly. Most of the butterflies occur in the organic fields but the Grayling likely to be on the edge. The White Admiral records would have been for Coombe Wood.

Many species occurring on the development sites are threatened e.g. 3 Nationally Notable species including Ampedus Sanguinolentus. Recent survey work on the organic fields (proposed for building sites) has recorded 314 different invertebrates species. This list included 203 beetles and 6% nationally notable species. Obviously all insects are possible casualties of increasing traffic on

the A352 and being drawn to house lighting. They could be at risk due to changes resulting from climate change floods and droughts.

FLOWERING PLANTS

A full list of Ancient Woodland indicators is found in Coombe Wood where there are sweeps of Bluebells. Most Ancient Woodland flowers are Dorset Notables. As with all other species of flowering plant it is illegal to dig these up. With empty gardens new residents may be tempted to do this e.g. Bluebells and Primroses. Throughout the Parish there are over 400 flowering plants and increasing numbers of dogs (with faeces enrichment) and increased traffic pollution is bound to have a detrimental effect.

SPECIES	OCCURRENCE	DESIGNATION
Corky Fruited Water Dropwort	Areas around the Winfrith roundabout	Nationally Scarce
Cornflower Not Planted	Field 2	Nationally Notable
Corn Marigold	Field 2 and others	Dorset Notable
Common Storks Bill	Scattered Organic Fields	Dorset Notable
Corn Spurrey	Scattered Organic Fields	Dorset Notable
Field Madder	Scattered Organic Fields	Dorset Notable

NON-FLOWERING PLANTS

Southern Grey Physcia is the only lichen Priority Species mentioned but a full lichen survey has not been carried out in Coombe Wood. A short survey has been carried out by Brian Edwards DERC, which recognised 2 European important Species on a veteran Oak *Schimatomma niveum* and *Rhinodina roboris*. This Oak is near the main track and pond and has been designated as a play area in plans for the proposed SANG, tree climbing allowed? A survey has not been carried out and Coombe Wood with all its dead wood is likely to reveal rarities and more Priority Species.

SANG

A SANG is of utmost importance – under pinning the soundness of a plan in an area where European Heathland exists. In the case of Wool the large housing allocation rests on the selection of Coombe Wood, Ancient Woodland providing part of this essential. From the earliest days Purbeck planning has had an ambivalent if not obfuscating attitude to this selection. It is now good to realise that Ancient Woodland and 25 or more Ancient Veteran trees (Coombe Wood) have protection under national policy. It does register as Ancient Woodland in its entirety, part of it is mature deciduous Oak – one third of the balance, Maple and Ash woodlands. Approximately two-thirds is planted some deciduous Woodlands in the main Beech the rest is Coniferous. It is registered as a PAWS (a Plantation on Ancient Woodland Site) but this does not take into account the mature old deciduous woodland : the veterans. The joint government paper on Ancient Woodland Forestry Commission and Natural England, 13th of October 2014 clearly states ancient semi-natural woodland and plantations on Ancient Woodland sites have equal protection under the National Planning Policy Framework which also states planning authorities should refuse planning permission or developments that would lead to loss or deterioration of irreplaceable habitats.

The area of woodland used has been reduced by including some fields around the Ancient Monument. This does not remove the constraints. Also having special protection areas in the wood is inappropriate mitigation. Many of the species of conservation importance will not be compartmentalized. This includes Bats (10 present in all the development). Myositis species are very rare and recorded in Coombe Wood. It is also true for birds - Woodlark and Nightjar Annexe 1 SPA. species. The latter species uses the wood as functionally linked feeding habitat. Other priority and protected species such as dormice and badgers will not be confined.

CAUSES OF DETERIORATION are listed in government papers on Ancient Woodland

- Changing the water table and drainage
- Increasing disturbances from visitors
- Increasing impact from domestic pet dogs- noise and increasing people pressure
- Increasing fly-tipping and bottles causing traps for small mammals. Cats predation, also enrichment from faeces.

Add to the above list anti-social behaviour including vandalism, graffiti on trees and barbecues (fire e.g. Wareham Forest summer 2019 & 2020 widespread wildlife loss).

The Yorkshire Naturalist Trust has done a full investigation into determining the impact of development with increasing proximity to and levels of damage and disturbance.

Fin Rylatt and Lauren Garside York Naturalist Trust issue 97 September 2017
LOSS AND DIFFERENTIATION OF ANCIENT WOODLAND WILL BE A CONCOMMITMENT OF MAKING IT A SANG. It will affect habitat loss- a suitable place to breed feed and shelter and seclusion. Deterioration caused by management for a SANG must place safety prime factor, e.g. risks from falling trees and branches must be avoided. There will be tree felling noise and chainsaws and large-scale vehicular movements. Change of layout of wood will effect foraging bats.

Paths must be suitable for all weathers including changing atmosphere humidity. Removal of scrub with path widening will be important but disturb daytime resting places for dormice. Area of scrub near reservoir suitable breeding site for Woodlark Annex 1.

Higher risk factors will be applied to trees - less dead and decaying wood prime habitat for fungi and saproxylic insects. These habitat features are highly likely to show species richness and rarity but, regrettably, the necessary evaluation has yet to occur.

A compensation strategy voiced by Natural England is replanting the woodland areas of conifers with deciduous woodlands. Over a long period of time if done in small coups this would lead to an increase in biodiversity and there are new grants now for this sort of Forest management from the Forestry Commission. But for these trees adding to the overall biodiversity would need 20 years plus. Meanwhile unless in very small groups of trees there would be biodiversity loss, including reduction or even possible loss of large populations of Goldcrests and Siskins and Firecrests. Noise and disturbance of the soil during extraction would have a negative effect. Opening up the wood would adversely affect and lower air humidity.

The role of Compensation is inappropriate as a stand-alone reason for overriding the NPPF guidance on development affecting Ancient Woodland. It will not be appropriate to take these measures into account solely. "They can only be considered once the existence of wholly exceptional circumstances has been established" (these are usually reasons of National Importance – e.g. Countrywide Infrastructure). Coombe Wood is in the A.O.N.B.

Therefore, it would be **totally inappropriate for Dorset Council to accept any advice that there are "no constraints" in putting an Ancient Woodland into use as a SANG** : it would conflict with the National Planning Policy Framework and their own policies.

APPENDIX ‘C’ to LOCAL GROUP RESPONSE

(Schedule of Formal Questions submitted to Dorset Council awaiting answers at the time of this response which highlight other matters requiring satisfactory attention to produce a sound Local Plan)

FORMAL REQUESTS for SOUND INFORMATION from DORSET COUNCIL TO AID MEANINGFUL LOCAL PLAN CONSULTATIONS

- 1 : What is the area of Brownfield land (recorded in the Dorset Register) and how many dwellings does the proposed plan expect to be erected in that area ?
- 2 : When was the Dorset Brownfield Register last validated ?
- 3 : Since surface car parks are an under-utilisation of urban areas, are they included in the Dorset Brownfield Register to encourage redevelopment and extra dwellings ?
- 4 : Since the “shortage of land for housing alone is not considered (by central government) to be a reason for altering the Green Belt”, why is Dorset Council associating itself with a need to erode its primary natural / economic assets by supporting any relaxation of the recycling pressures on urban land, currently protected by a Green Belt ?
- 5 : What is the need for dwellings with more than two bedrooms ?
- 6 : How will Dorset Council prioritise the actual delivery of truly affordable (low cost) housing for local working families on median locally earned incomes ?
- 7 : Since failing the Housing Delivery Test can present difficulties for Councils (and their local communities), why is Dorset Council seeking to maximise housing numbers rather than using available opportunities to minimise the risk of failure ? It is germane to note that Dorset Council probably cannot ensure delivery anyway – although relevant enforcement details could still be a “work in progress”.
- 8 : Sound planning by any Unitary Council requires realistic targets. Why have 9,000 extra dwellings been added to the current Dorset Council housing target for adjacent BCP Council and none for the other neighbours in Devon, Somerset, Wiltshire and Hampshire ?

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