



Core Strategy Submission

Consultation Response Analysis by Topic

COMMUNITY FACILITIES AND SERVICES



Prepared by Christchurch Borough Council and
East Dorset District Council

May 2013

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1 Introduction

1.1 This document sets out a consolidated summary and analysis of the Core Strategy responses received in relation to Community Facilities at Pre-Submission stage (Consultation period 2nd April to 25th June 2012) and at the Schedule of Proposed Changes stage (consultation period of 5th November - 21st December 2012.). The analysis relates to chapters 3 and 15.

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

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

2 Analysis of Responses

The Core Strategy Vision

Pre-Submission

Perhaps most important of all, our communities will thrive. There will be targeted regeneration to provide improved housing facilities and services in the Somerford, Leigh Park and Heatherlands Estates. Community facilities will be safeguarded and support will be given to the community groups and organisations to develop volunteering, and to obtain premises from which to deliver services. The provision of a new community facility in Christchurch town centre will be supported.

Summary of Responses

- Loss of a community hall in Christchurch town centre runs counter to the strategy of helping communities to prosper.
- Support for local communities is affected by the decision to remove references to a new Druitt Hall community facility, and the decision to demolish the existing Hall.

Councils' Response - how we have taken into account the consultation responses?

2.1 The reference to support for a community facility in Christchurch town centre will be removed from the Vision as they are not a current aspiration of the Council.

Proposed Changes to the Pre-Submission Core Strategy

...Perhaps most important of all, our communities will thrive. **The challenges of supporting a significant elderly and retired population will be planned for through provision of appropriate housing, health and community facilities and services.** There will be targeted regeneration to provide improved housing, facilities and services in the Somerford, Leigh Park and Heatherlands Estates. Community facilities will be safeguarded and support will be given to the community groups and organisations to develop volunteering, and to obtain premises from which to deliver services. **The provision of a new community facility in Christchurch town centre will be supported....**

Summary of Responses

2.2 The vast majority of comments received on the vision objected to the removal of the sentence "The provision of a new community facility in Christchurch town centre will be supported." The objections felt this was not evidenced, was contrary to the Localism Act, to the NPPF, and to Policy LN6 of the Core Strategy, and that there was clear evidence of need, and lack of consultation.

Councils' Position

2.3 In terms of the Vision, the removal of the sentence in the Vision relating to a town centre community facility does not preclude such a facility coming forward, which can be considered under Policy LN6. However it is felt that this particular facility should not be specifically referred to.

Objective 7

Pre-Submission

To help our communities to thrive and to help people support each other.

The main town centres of Christchurch, Wimborne, Ferndown and Verwood will be **the focus for commercial, retail and community facilities**, with district centres and villages playing a supporting role. **New facilities and services** will be developed alongside the new neighbourhoods, and associated facilities will be provided as part of new employment development at Ferndown and Bournemouth Airport.

2.4 Consultation Response

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

Table 2.1

2.5 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
359529	Mrs Lisa Goodwin	Sixpenny Handley with Pentridge Parish Council	CSPS2414
654456	Mr Elliot Marx		CSPS958
654660	Ms Anne Mason	Transition Town Christchurch	CSPS934
656493	Cllr Tony Gibb	Eastern Area DAPTC	CSPS1468

Summary of Responses

- There was objection to the removal of specific wording relating to a community facility to replace the existing DrUITT Hall in Christchurch town centre.

Councils' Response - how we have taken into account the consultation responses?

2.6 There are no firm plans for a community facility in Christchurch town centre and references to such a facility will therefore be removed from the vision.

Policy LN6: Community Facilities and Services

Pre-Submission

Policy LN6

Overall, the size and type of new market and affordable dwellings will reflect current and projected local housing needs identified in the latest Strategic Housing Market Assessment and informed by future Annual Monitoring Reports to ensure that the proposed development contributes towards attaining a sustainable and balanced housing market. Individual sites will be expected to reflect the needs of the Strategic Housing Market Assessment, subject to site specific circumstances and the character of the local area

All new housing will be required to be built to meet minimum living space standards for both internal and external areas. The Councils will produce a Supplementary Planning Document which will set out the detailed requirements of this policy. In the meantime the Councils will apply the Homes and Community Agency Housing Quality Indicators in relation to private open space, unit sizes, unit layout and accessibility within the unit.

2.7 Consultation Response

Legally Compliant		Sound		Core Strategy is unsound because it is not:								No Indication of legal compliance or soundness
				Positively Prepared		Justified		Effective		Consistent with National Policy		
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
19	1	3	23	6	14	5	14	5	14	15	3	4

Table 2.2

2.8 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
359261	Mr Doug Cramond	DC Planning Ltd	CSPS2101
359277	Mr Jamie Sullivan	Tetlow King	CSPS2758

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
359284	Miss Lynne Evans	Southern Planning Practice	CSPS2242
359295	Mrs Maria Humby	Alderholt Parish Council	CSPS4004
359529	Mrs Lisa Goodwin	Sixpenny Handley with Pentridge Parish Council	CSPS2493
360509	Miss Rose Freeman	The Theatres Trust	CSPS371
360509	Miss Rose Freeman	The Theatres Trust	CSPS3479
515938	Mr Frank Stevens		CSPS393
654456	Mr Elliot Marx		CSPS962
654660	Ms Anne Mason	Transition Town Christchurch	CSPS975
656493	Cllr Tony Gibb	Eastern Area DAPTC	CSPS1487

Summary of Responses

- **Size and type of new dwellings**
 - Sturminster Marshall Parish Council - Any further housing development needs to be of smaller units that are affordable for the younger population of the village.
 - Tetlow King on behalf of South West HARP Planning Consortium - Policy should only be applied to sites of more than 20 units as beneath this level there is a danger that the policy could be used to micro manage the housing mix across the two local authority areas. Unless more detail is provided on how the policy might operate in practice the policy may add undue burdens to development and not accord with paragraph 173 of the National Planning Policy Framework (NPPF).
 - Goadsby Ltd on behalf of Libra Homes, Seaward Properties Ltd and Sempcorp Bournemouth Water - Support the first part of the policy which accepts that needs identified in the SHMA have to be balanced against site specific circumstances and the character of the area. Paragraph 17 (5th bullet point) of the NPPF confirms that account must be taken of the different roles and character of different areas.
 - Pennyfarthing Homes - Support general principle in first paragraph of Policy LN1.

Living Space Standards

- Environment TAG East Dorset - Welcome proposals but suggest rewording to read “All new housing will be required to be built to meet at least the minimum...”
- South West HARP Planning Consortium - Welcome introduction of Homes and Communities Agency Housing Quality Indicator Standards and applying them to all new development. However we could sound a note of caution for any standards higher than this being established through a Supplementary Planning Document as this would be contrary to paragraph 173 of the NPPF which 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”.
- Goadsby on behalf of Libra Homes, Seaward Properties Ltd and Sembcorp Bournemouth Water - Imposition of minimum living space standards is unnecessary and unjust. It will reduce effectiveness of delivery of housing. Individual space standards were abandoned over 30 years ago. Imposes unnecessary burden on developers at a time the industry is seeking to address the additional cost of meeting increasing environmental standards, such as the Code for Sustainable Homes. Suggest delete the second paragraph of Policy LN1.
- Home Builders Federation South West - The insistence on minimum dwelling standards will have significant implications for the viability of schemes. Any standards should be assessed at plan making stage to ensure they do not impair viability and implementation of the plan (paragraph 173 of NPPF). The viability of HQI should be assessed before submitting the plan. The affordable housing viability assessments make no such provision for the costs of HQI.
- Woolf Bond Planning - Second paragraph of policy is open ended, not sufficiently specific and does not provide effective or justified policy. The Mid Sussex standards have been subject to criticism from building industry due to excessive size of dwellings as a result. The inclusion of the policy will add to costs and damage the viability of future residential schemes.
- Turley Associates - Reference to interim application of the Homes and Communities Association indicators should be removed as they have not been informed by local circumstances. This is insufficiently flexible and prescriptive. If space standards are to be imposed at a local level, they should be consulted upon through the Supplementary Planning Document and not prescribed until this has been adopted.
- Minimum unit sizes proposed are contrary to the Council’s desire to use land efficiently. The proposed loss and amount of valuable green belt land for new housing development could be reduced by building smaller units without compromising the living standards of new residents.

- Pennyfarthing Homes - Evidence base does not justify the imposition of living space standards.
- DCC - No reference to waste collection or recycling. The Homes and Communities Agency guidelines do not refer to space for storage or collection of waste. Developers should be aware of the space requirements for the recycling and rubbish collection service to be introduced across the county between October 2012 and 2015. Amend first sentence of second paragraph 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 requirement".
- Pennyfarthing Homes - For new open market housing, living space standards should not be prescribed but should be a matter for the developer and their customer.
- Pennyfarthing Homes - The application of the Homes and Communities Agency Housing Quality Indicators to new open market housing is not legally compliant. The NPPF states that design policies should avoid unnecessary prescription or detail. It is considered that the application of space standards will stifle innovation, originality or initiative in the design of new dwellings.
- South West HARP Planning Consortium - Awaiting report back from Sir John Harman Commission on imposition of standards on new housing. Commission expected to report back to Grant Shapps later this year and may make policy on housing standards dated. Proposed policy is unsound as not consistent with national policy in paragraph 173 of NPPF.

Councils' Response - how we have taken into account the consultation responses?

2.9 *Size and Type of New Dwellings*

2.10 Evidence in the Strategic Housing Market Assessment supports a policy influencing housing size and mix on all sites. The majority of sites that are likely to come forward within the plan area would be under 20 units. If the policy only applied to sites of over 20 units, this would lessen opportunities to seek an appropriate size and mix of housing. There is flexibility within the policy with the wording "subject to site specific circumstances and the character of the local area."

2.11 *Living Space Standards*

2.12 The NPPF is clear that planning should always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings (para 17). Development must have regard to its impact on people's living conditions. This includes factors such as achieving acceptable levels of privacy, and ensuring sufficient internal and external space.

2.13 Evidence (CABE 2010) identifies that poor living space standards have detrimental impacts on health, well-being, education attainment, family welfare and antisocial behaviour. Consequently policies setting out minimum space standards have been adopted throughout London and elsewhere e.g. Bristol and Mid Sussex. The Mayor of London's Housing Design Standards Evidence Summary July 2010 provides strong evidence of why it is appropriate and realistic to apply living space standards

2.14 The principle of a policy for living space standards has been supported at previous stages of the Core Strategy, so there is evidence of local support for the introduction of a policy. On this basis it is considered appropriate to base a policy in the Core Strategy on application of the Homes and Community Association Housing Quality Indicators and further consideration be given to bespoke standards in a Supplementary Planning Document if justified by new evidence. The proposed policy only relates to two key aspects within the Indicators which are private open space and unit sizes, layout and internal accessibility (HQI sections 3.2.1 to 3.2.9 and 5.1 to 5.1.13). These are simple to assess and will ensure that residents have sufficient living space for comfortable and healthy living.

2.15 The policy, supported by the Supplementary Planning Document can provide a clear indication to developers of the factors that the Councils consider important in considering future housing proposals. The policy provides a basis for a methodology to assess issues relating to living space standards, to be set out in more detail in a supporting Supplementary Planning Document. The same approach has been used by Bristol City Council in their Core Strategy.

2.16 Analysis undertaken by the Councils has shown that a large proportion of planning permissions granted over recent years would have met the proposed standards. However, there were still sufficient to justify concern that dwellings are being built that offer poor living standards.

2.17 The Three Dragons Viability Report 2010 tested the economic implications of different amounts of planning obligations (£5,000 and £15,000) as well as an affordable housing contribution. It also considered separately the impact on viability of the introduction of Lifetime Homes Standards and Code for Sustainable Homes at code level 4. The assessment therefore provides a broad assessment of viability in the local area which is useful to inform development of affordable housing and space standards policy. Subsequently, viability testing has been applied to the proposed new neighbourhoods and urban extension which have taken into account the proposed standards. These have shown that the schemes remain viable. The Councils have also commissioned work to consider development viability in the context of charging a Community Infrastructure Levy. This will further update the evidence base.

2.18 The Councils understand that development must be viable for the developer and landowner. The costs associated with the proposed standards will be taken into account when negotiating the viability of schemes and S.106 costs.

2.19 The Supplementary Planning Document will contain specific details including the requirements relating to waste storage.

Proposed Changes to the Pre-Submission Core Strategy

Community facilities and services....

2.20 ~~Loss of facilities will be resisted unless it is shown that the facility is no longer needed. The loss of existing community facilities and services will be resisted unless it is clearly demonstrated there is insufficient demand and it is not feasible and viable to support their continued existence and the loss would not result in a substantial decline in the range and quality of facilities and services for local people~~

2.21 ~~Where appropriate, financial contributions towards the provision of facilities and services will be sought. Planning obligations may be sought in accordance with the Community Infrastructure Levy Regulations 2010 to obtain financial contributions towards the provision of facilities and services.~~

2.22 Consultation Response Table

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

Table 2.3

2.23 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Organisation Details	Comment ID
359284	Miss Lynne Evans	Consultant Southern Planning Practice	PCCS248
359437	Ms Gill Smith	Affordable Housing Officer Dorset County Council	PCCS404
654046	Mr David Pardy		PCCS140

Summary of Responses

2.24 Lack of definition of community facilities and services

2.25 Hall and Woodhouse consider the policy to be ambiguous as community facilities and services are not defined as they are in Policy PC4. Not clear whether policy relates to privately run facilities such as pubs and local shops or more specifically to facilities which are generally funded. Policy wording and the Infrastructure Delivery Plan suggests that the policy is directed to facilities that are generally publicly funded, but this is not clear.

2.26 Councils' Position

2.27 It is still considered that continued reference to "community facilities and services" is in conformity with the terminology in paragraph 70 of the NPPF which makes it clear that the term extends to privately run facilities as well as publicly funded.

2.28 Loss of facilities: unclear

2.29 Hall and Woodhouse consider the proposed addition of the requirement to show that the "loss would not result in a substantial decline in the range and quality of facilities and services for local people" is not defined as to how this will be measured. Also the two parts of the policy may conflict - a facility may no longer be viable but its loss would remove the only facility of its kind from the community. The policy should focus on ensuring that a facility or service has been adequately marketed to prove whether it remains viable.

2.30 Councils' Position

2.31 Issues on how to measure decline of quality and range of facilities and assessing viability are normally considered at pre-application discussion or planning application stage. There is potential to include further detail in a policy within the Development Management DPD.

2.32 References to financial contributions

2.33 Dorset County Council consider the wording confusing as it does not set out the difference between planning obligations and CIL and how the two relate to each other. Implies that planning obligations may be sought under CIL regulations, which is incorrect. Suggest that Core Strategy should include a new policy and supporting text in the Key Strategy.

2.34 Hall & Woodhouse consider the reference too vague and that the circumstances and basis in which contributions should be sought need to be detailed.

2.35 Druitt Hall

2.36 The first sentence re loss of existing community facilities is contrary to CBC's plans to demolish Druitt Hall.

2.37 Councils' Position

2.38 CIL will be the primary means of securing developer contributions to address the impacts of development on infrastructure. The use of Section 106 obligations where appropriate can complement CIL. The CIL Regulations 2010 define the circumstances where each can be used. Thus it is correct to refer to planning obligations being sought in accordance with the CIL Regulations 2010.”

2.39 It is not considered necessary to include a new policy in the Core Strategy regarding CIL. The Infrastructure Delivery Plan sets out the intention that each Council intends to become a CIL charging authority and sets out the priorities. Where relevant, Core Strategy policies contain references to CIL.

2.40 It is not considered necessary to detail the circumstances and basis in which contributions should be sought as this is contained within the CIL Regulations.

2.41 The demolition of Druitt Hall does not preclude the building of a new community hall. A smaller hall could be accommodated on land already owned by the Council. It is understood that the Community Partnership have expressed their continued aspiration to provide a new hall for the Town Centre but have yet to submit a planning application for a smaller hall.