



Core Strategy Submission

Consultation Response Analysis by Topic

CREATING HIGH QUALITY AND DISTINCTIVE ENVIRONMENTS



Prepared by Christchurch Borough Council and
East Dorset District Council

May 2013

1 Introduction	2
2 Analysis of Responses	2

1 Introduction

1.1 This document sets out a consolidated summary and analysis of the Core Strategy responses received in relation to the issue of High Quality and Distinctive Environments 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.).

1.2 This response analysis relates to the Core Strategy Vision, Strategic Objective 2 and Chapter 14, Creating High Quality and Distinctive Environments.

1.3 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.

1.4 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

Chapter 3, Challenges, Vision and Strategic Objectives

Pre-Submission Core Strategy

The Core Strategy Vision

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

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

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	
12	6	6	28	16	11	13	18	16	14	13	14	21

Table 2.1

2.1 List of Consultee Reference Numbers

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

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

Summary of Responses

2.2 The comments from key stakeholders and the general public in respect of this policy have been grouped together into various themes which are set out below. This does not refer to every response individually. In several cases, responses received on this chapter of the Core Strategy refer to generic issues and do not specifically request a change to be made to either the Vision or the Objectives. These issues are picked up in the response summaries, however the paper concentrates on those who have specifically requested changes to the Vision or Objectives.

2.3 Representations on the text of Chapter 3.

2.4 There were a number of representations made on the text relating to Chapter 3. In many cases these related to the list of issues and challenges identified at the start of the Chapter. These representations were primarily statements regarding particular issues and did not request any change to be made to the text, or indeed to the Vision and Objectives. No response is therefore made to these comments, in relation to landscape and the historic environment, these are summarised as follows:

- A number of detailed policies relating to protection of the Green Belt and of conservation areas have been deleted from the old Local Plan and have not been replaced in the Core Strategy.

2.5 Representations on the Core Strategy Vision

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

2.6 Nature Conservation and ecology

- The vision expresses protection for the natural environment in a negative way, and that the emphasis should be on the intrinsic value of these natural assets.
- There should be mention of other priority habitats and species.
- The importance of connecting networks of habitats should be mentioned in the vision.

Councils' Response

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

2.8 No further wording changes are proposed to the Vision in respect of representations. In cases where no change is made:

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

Proposed Changes to the Pre-Submission Core Strategy

The Core Strategy Vision

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

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

Consultation Response

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

Table 2.2

2.11 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Organisation Details	Comment ID
359461	Mrs Nicola Brunt	Urban & East Dorset Living Landscapes Manager Dorset Wildlife Trust	PCCS309

Contact Person ID	Contact Full Name	Contact Organisation Details	Comment ID
359571	Mr Renny Henderson	Conservation Officer Royal Society for the Protection of Birds	PCCS245
360302	Mrs Hilary Chittenden	Chairperson Environment TAG (East Dorset)	PCCS440
476036	Mr Colin Jamieson		PCCS160
490815	Mrs Trish Jamieson	Clerk Burton Parish Council	PCCS477
612430	Mr Nick Squirrell	Natural England, Dorset and Somerset Team	PCCS256
653852	Mrs Susan Newman-Crane		PCCS98
654046	Mr David Pardy		PCCS139
654456	Mr Elliot Marx		PCCS223
654660	Ms Anne Mason	chair Transition Town Christchurch	PCCS166
654962	Mr Christopher Chope		PCCS374
656832	Mr Paul Ramsey		PCCS283
662364	Mr Peter Fenning		PCCS317
662364	Mr Peter Fenning		PCCS281
662668	Mr & Mrs A Atkins		PCCS169
663076	Mrs Sheila Richards		PCCS123
691333	Mr B.F Sherry		PCCS314
718880	Mr Stephen Robson		PCCS222
718913	Mr Denis Daly		PCCS181
719393	Mrs Kathleen Roberts		PCCS287
719400	Terry Tuck		PCCS290
719401	Mrs Maureen Fisher		PCCS291

Contact Person ID	Contact Full Name	Contact Organisation Details	Comment ID
719409	Jacquetta Morris		PCCS292
719411	Mrs Jane Low		PCCS293
719418	S Rogers		PCCS296
719435	Mr Peter Smith		PCCS301
719463	Mrs B Mullins		PCCS305
719475	Mrs Eileen Ward		PCCS306
719483	Mr James Cain	Planning Consultant Coles Miller Solicitors	PCCS312
719484	Peter Mark Fisher		PCCS310
719490	Mrs Eileen Gay		PCCS311
719499	Mr Nigel Morris		PCCS313
719516	Liz Evans		PCCS325
719520	Mrs Georgina Sherry		PCCS328
719569	Mr Rob Evans		PCCS339
719572	Mr Paul Roberts		PCCS346
719575	Mrs Emily Graves		PCCS352
719579	Mrs Rosemary Hacker		PCCS353
719597	Mr Gerald Hacker		PCCS357
719606	Mrs Karen Pigott		PCCS360
719610	Ms Jane Susan Fitzpatrick		PCCS361
720046	Mrs Stephanie King		PCCS421
720136	Mr Roger Theodore Crispin Street		PCCS426

Summary of Responses

2.12 The comments from key stakeholders and the general public in respect of the Proposed Changes to the Vision (and including preceding paragraphs 3.1 and 3.2), have been grouped together into various themes and are as follows:

2.13 *Changes to the Core Strategy Vision*

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

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

Councils' Position

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

Pre-Submission Core Strategy

Objective 2

To maintain and improve the character of the towns and villages, and to create vibrant local centre.

A clear **hierarchy of centres** will be developed, with a clear strategy for the major centres. Town and district centre boundaries will be created in Christchurch, Wimborne, Ferndown, Verwood and West Moors to help create a vibrant centre with a range of services and facilities. **Locally listed buildings** will now form part of the heritage protection strategy, and a local list will be created in East Dorset, and the Christchurch Local List updated. The Christchurch Borough Character Assessment and design standards in East Dorset will be used to guide design of new development.

Article 4(1) and 4(2) Directions will be considered to control small scale works which might damage the character of **Conservation Areas** as part of Conservation Area Management Plans. **Open space** will be provided alongside new residential development. **Special Character Areas** and **Areas of Great Landscape Value** will be reviewed and possibly expanded in East Dorset. **Rural Design Guides** will be produced.

Consultation Response

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

Table 2.3

2.17 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	CSPS2410
359571	Mr Renny Henderson	Royal Society for the Protection of Birds	CSPS3706
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS3219
524723	Mr John Worth	Wimborne Civic Society	CSPS1945
524723	Mr John Worth	Wimborne Civic Society	CSPS1928
654506	Mr John Showell		CSPS807

Summary of Responses

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

2.19 Potential new town

- The strategy of incremental expansion of settlements is flawed, and a new town should be considered, possibly in the St Leonards or Verwood areas.

2.20 Representations on policy for rural areas.

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

Councils' Position

- The strategy proposed is to locate new development close to existing settlements where facilities and services already exist or can be enhanced. This is considered more realistic and less intrusive than a major new settlement.
- This objective primarily relates to protecting the character of settlements throughout the area, rather than the location of development.

2.21 No changes are proposed to this Objective in response to representations.

Chapter 14, Creating High Quality and Distinctive Environments

Pre-Submission Core Strategy

Policy HE 1

Protection of local historic and architectural interest

The protection of national and local listed buildings, along with monuments, sites, gardens, landscapes and their settings of historic, archaeological, architectural or artistic interest will form part of the heritage protection strategy. Article 4 Directions will be considered where there are threats to heritage assets. Local lists of heritage assets will identify key buildings and structures which, although not of sufficient quality to meet national listing criteria, have valuable architectural or historic merit and make a positive contribution to local character. Development proposals affecting such sites or buildings will be sympathetic to their character and will respect their key architectural or historic features.

Consultation Response

Legally Compliant		Sound		Core Strategy is unsound because it is not:								No Indication of legal compliance or soundness
				Positively Prepared		Justified		Effective		Consistent with National Policy		
Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	
4	1	4	9	7	2	4	0	5	2	3	1	4

Table 2.4

2.22 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
359478	Mr Rohan Torkildsen	English Heritage	CSPS2749
359553	Mrs Linda Leeding	West Parley Parish Council	CSPS1647
359553	Mrs Linda Leeding	West Parley Parish Council	CSPS2012
360271	Cllr Paul Timberlake		CSPS498
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS3402
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS3403
361158	Mr Chris Clarke	Dorset Gardens Trust	CSPS2259
503395	Mr Ian Davis		CSPS2327
512459	Mrs Sandra Davis		CSPS2364
523319	Mr Ryan Johnson	Turley Associates	CSPS3298
523319	Mr Ryan Johnson	Turley Associates	CSPS3783
524338	Mr Kenneth Brooks		CSPS252

524723	Mr John Worth	Wimborne Civic Society	CSPS1934
653852	Mrs Susan Newman-Crane		CSPS602
654618	Mr Peter Tanner	Tanner & Tilley Planning Consultants	CSPS885
654852	Mr Roger Donne	The Christchurch Antiquarians	CSPS878
663588	Mr Roger Street	Christchurch Conservation Trust	CSPS3746

Summary of Responses

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

2.24 *Historic Environment*

- English Heritage – require additional information included in the supporting text about heritage features under threat, and to include a Delivery and Monitoring section.
- English Heritage – require that the policy be more thorough in addressing Valuing our Historic Environment, in accordance with the requirements of the NPPF. Heritage assets will be conserved and where appropriate enhanced for their historic significance and importance locally, their potential to contribute towards the local economy etc will be exploited. This will be promoted by ensuring proposals and initiatives are supported that protect and enhance the heritage assets, and promote the sensitive expansion, growth and land use change around settlements and within built up areas, working with local authorities to provide highway improvements and street furniture, sensitive re-use of historic buildings, up to date CA appraisals, use of Article 4 directions, maintain a local list of heritage assets, and use rural design guides.
- The policy should be strengthened in respect of locally listed buildings by the reinstatement of the wording of policy BE 19 of the Christchurch Local Plan.
- The reference in the policy to protection of local listed buildings goes beyond that set out in the NPPF and the policy should be amended to comply with the provisions of national policy.
- The Christchurch Antiquarians – request that HE1 reinstates the policies set out in the Christchurch Local Plan as it is felt that the proposed policy may lead to a lessening of protection for the heritage of Christchurch as expressed in its built environment, scheduled ancient monuments and open spaces.
- Wimborne Civic Society welcome the proposal for the local listing of key buildings and structures which have valuable architectural or historic merit and make a positive contribution to local character.

- Dorset Gardens Trust wish to ensure that the policy applies to all types of heritage asset, and not just buildings and structures, and sets out the principles of how a Local List can be achieved within local policy.
- ETAG – support the policy, but would wish to see added a commitment that, where possible, historic landscapes will be restored.
- The policy and reasoned justification should be clearer on what the ‘heritage protection strategy’ is and how development control decisions are to be made against this.
- Christchurch Conservation Trust – expresses concern regarding the combining of existing Local Plan policies in the new Core Strategy policy which fails to specifically include some of these existing policies.

Councils' Response

2.25 The comments from English Heritage regarding the provisions in the NPPF are noted and the policy will be updated to meet the requirements of para 126 of the NPPF. It is our intention that the heritage protection strategy will cover the detailed elements suggested by these comments, and will provide a framework to deliver a comprehensive strategy to protect the historic environment.

2.26 Proposed Pre-Submission Change

2.27 The policy has been updated to incorporate the views of English Heritage and the provisions in the NPPF.

Proposed Changes to the Pre-Submission Core Strategy

Policy HE 1

Protection of local historic and architectural interest

The protection of national and local listed buildings, along with monuments, sites, gardens, landscapes and their settings of historic, archaeological, architectural or artistic interest will form part of the heritage protection strategy.

Heritage assets are an irreplaceable resource and will be conserved and where appropriate enhanced for their historic significance and importance locally to the wider social, cultural and economic environment.

This will be promoted by ensuring proposals and initiatives are supported that protect and enhance the heritage assets, with the sensitive and viable re-use of the heritage asset when considering a conversion or new development, which makes a positive contribution to local character and distinctiveness.

Article 4 Directions will be considered where there are threats to heritage assets. Local lists of heritage assets will identify key buildings and structures which, although not of sufficient quality to meet national listing criteria, have valuable architectural or historic merit and make a positive contribution to local character. **Conservation Area and Special Character Area Appraisals will be updated.** Development proposals affecting such sites or buildings will be sympathetic to their character and will respect their key architectural or historic features.

Consultation Response

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

Table 2.5

2.28 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Organisation Details	Comment ID
359478	Mr Rohan Torkildsen	West Territory Planner English Heritage	PCCS289
490815	Mrs Trish Jamieson	Clerk Burton Parish Council	PCCS483
501560	Mr Christopher Clarke		PCCS47
653893	Mr Michael Bailey		PCCS371
656832	Mr Paul Ramsey		PCCS285
657138	Mr Mike Hirsh	Intelligent Land	PCCS63
662364	Mr Peter Fenning		PCCS363
663076	Mrs Sheila Richards		PCCS124

Summary of Responses

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

2.30 *General Comments*

2.31 Rohan Torkildsen, English Heritage

- Policy HE1 is unclear, repetitive, incomplete, and inconsistent with the NPPF.
- The title is misleading. The third paragraph is grammatically confusing. Other text is criticised.
- The Policy is silent on a few areas I would have expected to be included, as a result I would suggest it is redrafted to accord with the NPPF.
- Suggestions for developing DPDs are given.

2.32 Mr M Hirsh, Intelligent Land

- The Policy omits the reference to criteria for the use of Heritage Assets for residential purposes and fails to describe the context of viability as being 'optimal', there is also no reference to enabling development.
- It fails to meet the position set out at paragraph 55 bullet point 2 of the NPPF, which places it in conflict with 'saved' policy CSIDE2 of the EDLP.

2.33 Burton Parish Council

- Supports the new wording. Point out that Burton is a Conservation Area and that Burton Farm was identified as an irreplaceable resource

2.34 Additional Comments:

- The proposed changes to Policy HE1 are very much better than the original. However there is still a discrepancy between the description of the heritage assets to be protected in paragraph 1 of the amended text, and the fourth paragraph (starting Article 4..). The first paragraph is more all embracing than the fourth paragraph, which refers only to key buildings and structures. The text should be more consistent.
- The additional statement refers to heritage assets being an irreplaceable resource. I would imagine that Burton Farm would come under the category of Heritage.
- Why are Conservation and Special Character Area Appraisals to be updated?
- Is this being changed to accommodate new development?
- Christchurch has a rich archaeological heritage which is virtually ignored throughout the Core Strategy and proposed changes to it. Current Structure Plan and Local Plan policies are combined into a bland Policy HE1 and are inadequate.
- Burton Farm clearly has heritage importance. Such a statement can be interpreted in many ways and appears to be so designed as to leave open the possibility of redeveloping the old barns and possibly the farm itself.
- It appears that the Council are altering the Conservation Area Appraisal to meet the changes made by this development rather than the other way round. I object to this bending of the rules.

Councils' Position

2.35 The amended text has taken on board the previous comments given by English Heritage, so these new comments are somewhat surprising. The advice in the NPPF has been followed, and this supersedes previous advice. The Core Strategy takes a strategic approach and replaces the Structure Plan and Local Plans. It is not proposed to change the policy as it meets the requirements of the NPPF.

2.36 Burton Farm is recognised as a heritage asset, and the policy has not been drafted to allow new development. Appraisals need to be updated periodically and it was always intended the Character Statements would be updated during the life of the Plan.

Pre-Submission Core Strategy

Policy HE 2

Design of new development

Within Christchurch and East Dorset the design of development must be of a high quality, reflecting and enhancing areas of recognised local distinctiveness. To achieve this, development will be permitted if it is compatible with or improves its surroundings in:

- Layout
- Site coverage
- Architectural style
- Scale
- Bulk
- Height
- Materials
- Landscaping
- Visual impact
- Relationship to nearby properties
- Relationship to mature trees.

This is within the context of the Christchurch Borough Wide Character Assessment. In the East Dorset rural area, design should accord with the Rural Design Summary. In Special Character Areas development must respect the identified features and characteristics. Careful design to reduce the risk of crime will be required.

Consultation Response

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

Table 2.6

2.37 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
360271	Cllr Paul Timberlake		CSPS499
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS3404
474462	Mrs Sheila Bourton		CSPS191
474490	Mrs Sheila Bourton	Keep Wimborne Green	CSPS221
521508	Ms Lisa Jackson	Jackson Planning Ltd	CSPS3639
524338	Mr Kenneth Brooks		CSPS253
654618	Mr Peter Tanner	Tanner & Tilley Planning Consultants	CSPS897

Summary of Responses

2.38 The comments from key stakeholders and the general public in respect of this policy are as follows:

2.39 Design Issues

- English Heritage request that the Relevant Evidence part of the section (para 14.13) should refer to both the Christchurch Character Assessments, 2003 and the East Dorset Special Character Areas.
- Keep Wimborne Green – it is important that the scale, height, bulk of any new development does not dwarf existing property and that mature trees should be retained where possible.
- Support the inclusion of the East Dorset Local Plan policies DES8 and BUCON6 in the Core Strategy. I understand that the Planning Minister has made it crystal clear to the Planning Inspectorate that any of its decisions had to be made on a local list approach and ensure residents views were respected if developers tried to overturn Local Plans.
- Tanner and Tiller, on behalf of local developer, considers that the extent of the Special Character Areas in East Dorset is a constraint to making effective and efficient use of land within the existing built up areas, and suggest that a review of these areas should be undertaken in the preparation of the Development Plan Documents to identify whether some of those areas are capable of accommodating additional residential development.
- ETAG – the text should be amended to ensure that new neighbourhoods should also comply with the policy, and suggest that development should take account of all existing habitats and features.
- Jackson Planning on behalf of client - the policy needs to include good lighting design as part of the criteria that make development proposals acceptable

Councils' Response

2.40 This policy proposes to preserve valued features in the settlements which give them their distinctive characteristics and sense of place. New development must respect the prevailing characteristics of a local area, and support improvements by good design. The Councils' will consider using Design Codes, where they could help deliver high quality outcomes, in accordance with the NPPF (para 59), and will consider the design of lighting within them. The NPPF also supports design policies and decisions which connect with people and places, and integrate new development into the natural, built and historic environment.

2.41 The new neighbourhoods will be subject to detailed Development Briefs to be agreed with the Councils for each site. This will deal with all detailed matters of delivery of the site, such as general layout, SANGs, landscape buffering and other site requirements. The master planning work prepared for the North Christchurch Urban Extension fulfils the function of a development brief.

2.42 Policy HE2 offers clear guidance on design principles, without being overly prescriptive or stifling innovation or originality. It is considered the policy meets the requirements of the NPPF, and with the support of Design Codes and Character Assessments offers clear design guidance.

Proposed Pre-Submission Change

2.43 Minor change to Policy HE2 to protect amenity and an East Dorset Urban Design Guide is to be prepared to complement the Countryside Design Summary and set out some basic requirements for good design in the urban areas.

Proposed Changes to the Pre-Submission Core Strategy

Policy HE 2

Design of new development

Within Christchurch and East Dorset the design of development must be of a high quality, reflecting and enhancing areas of recognised local distinctiveness. To achieve this, development will be permitted if it is compatible with or improves its surroundings in:

- Layout
- Site coverage
- Architectural style
- Scale
- Bulk
- Height
- Materials
- Landscaping
- Visual impact
- Relationship to nearby properties, **including minimising general disturbance to amenity**
- Relationship to mature trees.

This is within the context of the Christchurch Borough Wide Character Assessment. In the East Dorset rural area, design should accord with the **Rural Countryside** Design Summary. **An East Dorset Urban Design Guide will set out the key characteristics expected to be incorporated into schemes.** In Special Character Areas development must respect the identified features and characteristics. Careful design to reduce the risk of crime will be required.

Consultation Response

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

Table 2.7

2.44 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Organisation Details	Comment ID
359437	Ms Gill Smith	Affordable Housing Officer Dorset County Council	PCCS401
360302	Mrs Hilary Chittenden	Chairperson Environment TAG (East Dorset)	PCCS465
474462	Mrs Sheila Bourton		PCCS23
474490	Mrs Sheila Bourton	Chairman Keep Wimborne Green	PCCS35

Summary of Responses

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

2.46 General comments

2.47 G Smith, Dorset County Council

- Dorset County Council supports these proposed changes to para 1.26-1.27 and Policy HE2.

2.48 Keep Wimborne Green

- We agree this is very important. Who decides what level of disturbance is acceptable? How will it be policed?

2.49 Sheila Bourton, Local Resident

- I agree that it is very important to minimize general disturbance to existing properties, I am concerned as to how this will be measured and policed? What level of disturbance is acceptable?

2.50 Hilary Chittenden, Environment TAG

- Analysis para 9.58 commits to including light pollution but has not done so. It is not covered by “amenity”. The changes have not addressed ETAG concerns.

Councils' Position

2.51 The design of new development will be monitored through the development management process and through the discharge of conditions.

2.52 The policy makes reference to the need to consider the tranquillity of an area and to take account of the need to prevent light pollution, in accordance with the NPPF. As previously discussed, saved East Dorset Local Plan policy LTDEV1 addresses how proposals that require external lighting will be assessed across the Plan area, and it is considered that this policy is sufficient at the present time, and will be re-examined in the second part of the Christchurch and East Dorset Local Plan which will consider site allocations and development management policies. No change is therefore required to Policy HE2 in this respect.

Pre-Submission Core Strategy

Policy HE 3

Landscape Quality

Development will need to protect and seek to enhance the landscape character of the area.

Proposals will need to demonstrate that the following factors have been taken into account:

1. The character of settlements and their landscape settings.
2. Natural features such as trees, hedgerows, woodland, field boundaries, water features and wildlife corridors.
3. Features of cultural, historical and heritage value.
4. Important views and visual amenity.
5. Tranquillity and the need to protect against intrusion from light pollution, noise and motion.

Development proposals within or affecting the setting of the Area of Outstanding Natural Beauty will need to have regard to the relevant Management Plan. Within the Areas of Great Landscape Value development will be permitted where its siting, design, materials, scale and landscaping are sympathetic with the particular landscape quality and character of the Areas of Great Landscape Value.

Consultation Response

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

Table 2.8

2.53 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
359553	Mrs Linda Leeding	West Parley Parish Council	CSPS1648
359553	Mrs Linda Leeding	West Parley Parish Council	CSPS2013
360082	Mr and Mrs K Healy		CSPS2510
360245	Mr Richard Burden	Cranborne Chase & West Wiltshire Downs AONB	CSPS1568
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS3405
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS3407
503395	Mr Ian Davis		CSPS2328
512459	Mrs Sandra Davis		CSPS2366
521508	Ms Lisa Jackson	Jackson Planning Ltd	CSPS3641
523319	Mr Ryan Johnson	Turley Associates	CSPS3299
523319	Mr Ryan Johnson	Turley Associates	CSPS3784
654660	Ms Anne Mason	Transition Town Christchurch	CSPS967

Summary of Responses

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

2.55 *Landscape Quality*

- West Parley Parish Council - This policy is supported.
- Cranborne Chase and West Wiltshire Downs AONB – Wish to see more substantive policies to overcome the vacuum created by the loss of the higher level strategies and policies on which the whole concept of the Core Strategy was predicated. HE3 seems insufficiently robust as it appears that it could be interpreted as relating to proposals within the AONB or only within the setting of the AONB and excluding the AONB itself. The policy

should relate to landscape character assessments and historic landscape characterisation and separate statements for development within and outside the AONB.

- The policy should apply to very local landscapes as well as larger scale ones to protect the features residents know and love from harmful developments.
- Turley Associates, for clients, ask that the policy is amended as the use of the words 'protect and seek to enhance' is insufficiently flexible to endure the plan period. For example there may be many instances where the loss of some features are more than compensated for through additional provision on and off a site, which may also generate wider social, economic and environmental benefits as a consequence.

2.56 Environment

- The policy must ensure that wildlife corridors are wide enough to be fit for purpose.
- Tranquillity should apply to SANG areas too.
- ETAG request that Supplementary Planning Guidance be prepared to establish criteria for landscape and its component features, for tranquillity and for light pollution. The policy should make provision for setting criteria against which development proposals will be judged.
- Jackson Planning, for a client, suggests that HE3 should be revised with a new specific point with regard to artificial lighting pollution to protect all areas, but with particular regard to intrinsically dark landscapes and nature conservation.

Councils' Response

2.57 The policy makes reference to the need to consider the tranquillity of an area and to take account of the need to prevent light pollution, in accordance with the NPPF. Saved East Dorset Local Plan policy LTDEV1 addresses how proposals that require external lighting will be assessed across the Plan area, and it is considered that this policy is sufficient at the present time, and will be re-examined in the second part of the Christchurch and East Dorset Local Plan which will consider site allocations and development management policies. No change is therefore required to Policy HE3 in this respect.

2.58 The NPPF (paragraph 116) recommends that great weight should be afforded to the AONB and sets out considerations relating to this landscape. The AONB Management Team recommend the policy should reflect these sentiments to strengthen it and offer greater protection to these landscapes. It is suggested the policy is altered to reflect this.

2.59 Proposed Pre-Submission Change

2.60 The policy has been amended to take into account the changes recommended in the NPPF, English Heritage and from the AONB Partnership.

Proposed Changes to the Pre-Submission Core Strategy

Policy HE 3

Landscape Quality

Development will need to protect and seek to enhance the landscape character **and scenic beauty** of the area.

Proposals will need to demonstrate that the following factors have been taken into account:

1. The character of settlements and their landscape settings.
2. Natural features such as trees, hedgerows, woodland, field boundaries, water features and wildlife corridors.
3. Features of cultural, historical and heritage value.
4. Important views and visual amenity.
5. Tranquillity and the need to protect against intrusion from light pollution, noise and motion.

Development proposals within **orand** affecting the setting of the Area of Outstanding Natural Beauty will need to have regard to the relevant Management Plan.

Within the Areas of Great Landscape Value development will be permitted where its siting, design, materials, scale and landscaping are sympathetic with the particular landscape quality and character of the Areas of Great Landscape Value. **Planning permission will be refused for major developments in these designated areas except in exceptional circumstances and where they are in the public interest.**

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					
0	0	0	0	0	0	0	0	0

Table 2.9

2.61 No responses were received to this proposed change.

Councils' Position

2.62 The Councils' position is as set out above in response to the Pre Submission Core Strategy.

Pre-Submission Core Strategy

Policy HE 4

Open Space Provision

The open space standards and Local Need Area boundaries provided by the 2007 Open Space, Sport and Recreation Studies will be applied throughout the Plan area (amended as necessary to take account of recent open space developments and new areas allocated for housing in the Core Strategy). Contributions will be directed towards meeting the quantity, quality and accessibility shortfalls for each of the Local Need Areas. The aim is to deliver a combination of new facilities and improvements to existing ones, depending on the unique needs of the Local Needs Areas and the availability of land.

Existing open spaces and leisure facilities identified on the Proposals Map will be protected and their loss will not be permitted unless their whole or partial redevelopment would result in greater benefits to the community than retaining that facility. On such occasions the replacement must be provided in close proximity, unless it can be shown that the open space, sport or recreational facility was not required.

Recommended Open Space Standards from the 2007 Open Space, Sport & Recreation Study:

Open space type	Recommended accessibility standard (straight line distance).	Recommended quantity standard (hectares per 1000 population)	Recommended quantity standard (square metres per person)	Total recommended provision
Recreation Grounds & Public Gardens (includes parks)	450m	0.5 ha	5.0 sq m	3.75 ha per 1000 population / 37.5 sq m per person
Amenity Green Space	450m	0.5 ha	5.0 sq m	
Natural & Semi-natural Green Space	600m	1.0 ha	10.0 sq m	
Active (outdoor) Sports Space	600m	1.25 ha	12.5 sq m	
Children & Young People's Space	450m	0.25 ha	2.5 sq m	
Allotments	600m	0.25ha	2.5 sq m	

Table 2.10

Children's play provision, which forms part of the children and young people's space category, must be provided on the basis of the standards set out in Appendix 1. Where appropriate in terms of location and the nature of the development, and where a local need for small scale facilities has been identified, on site provision will be preferable. It may be appropriate for earlier developments to provide the land upon which later developments pay for structures or equipment. Financial contributions towards off site provision of open space may be acceptable where it is impractical for provision to be on site. In this instance contributions should be in line with the standards set out in this policy.

The policy will aim to deliver a combination of new facilities and improvements to existing ones, depending on the unique needs of the 'Local Need Areas' and the availability of land.

Delivering new and enhanced provision

The Councils will produce an 'implementation and delivery plan' which will include a list of the priority needs and objectives for each local Needs Area and specific opportunities for new or enhanced provision. It will identify opportunities to maximise the use of existing sites and potentially re-designate sites for alternative leisure uses, in line with local needs.

Location of new provision

When considering sites for new open space and leisure provision, priority will be given to sites which are easily accessible by a range of transport modes and which can be integrated into a network of green infrastructure. Sites for new open space provision will be identified through an implementation and delivery plan and considered for allocation through the forthcoming Site-Specific Allocations Development Plan Document.

Green Infrastructure

Where appropriate, the Community Infrastructure Levy will be used to ensure that elements of green infrastructure will be incorporated into their design such as 'permeability', with green foot and cycle paths running through the development, connecting with existing routes wherever possible.

Consultation Response

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

Table 2.11

2.63 List of Consultee Reference Numbers

Contact Person ID	Contact Full Name	Contact Company / Organisation	Comment ID
359291	Mr Jeremy Woolf	Woolf Bond Planning	CSPS3814
359571	Mr Renny Henderson	Royal Society for the Protection of Birds	CSPS3766
360157	Mr Peter Fenning	The Open Spaces Society	CSPS3262
360271	Cllr Paul Timberlake		CSPS500
360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS3409

360302	Mrs Hilary Chittenden	Environment TAG (East Dorset)	CSPS3412
360692	Mrs Wendy Britton		CSPS679
619967	Mr James Stevens	Home Builders Federation (South West)	CSPS3686
654660	Ms Anne Mason	Transition Town Christchurch	CSPS971
656249	Ms Gemma Care	Barton Willmore LLP	CSPS1084

Summary of Responses

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

2.65 *Open Space*

- Transition Town Christchurch – consider that the policy as worded is too weak to protect valuable open spaces and leisure facilities
- Barton Wilmore for Stour Valley Properties – we broadly support however question the appropriateness of a 2007 evidence base
- Open Spaces Society (OSS) – there is no mention of the maintenance of existing rights of way and no commitment to extend the network of rights of way. Nowhere in this document is the phrase ‘right of way’ mentioned. This is a serious deficiency and amendments are required to remedy these deficiencies. OSS are also concerned that the new policy weakens the protection of open space compared to existing Local Plan policies and it is essential that the present open spaces are protected from future development.
- Home Builders Federation – The policy is unsound with regard to the requirement for new development to make contributions to open space. The requirement needs to be assessed for its potential impact on the viability of schemes in conjunction with other policy requirements of the Core Strategy as required by the NPPF (para 173).
- Woolf Bond Planning for clients - The policy is not justified as we consider the reference to recommended open space standards from the 2007 Open Space, Sport and Recreation Study is overly prescriptive in its requirements. It could lead to viability issues on developments.

2.66 *Leisure*

- ETAG – the needs of horse riders should be acknowledged. We welcome recognition of the benefits of natural open green space to people’s health and wellbeing.

2.67 *Green Infrastructure*

- RSPB – would welcome greater recognition of the opportunities for enhancing urban biodiversity, which could be achieved by a commitment within the Core Strategy to deliver a design guide Supplementary Planning Document. We support the recognition that large public open spaces and green infrastructure may divert pressure away from Dorset heathland, and that SANGs may be enhanced by green infrastructure connectivity.
- ETAG – support the commitment to protect and enhance biodiversity.

Councils' Response

2.68 The Open Space, Sport and Recreation Study for Christchurch Borough and East Dorset District (2007) is a thorough and robust assessment of the needs for open space, sports and recreation facilities and opportunities for new provision. It identifies specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. From this assessment, the additional requirements have been determined in the plan. This is in accordance with the provision of the NPPF (para 73).

2.69 Existing open spaces will continue to be protected under the NPPF guidance (para 74) subject to certain provisions.

2.70 During the plan period, new footpaths and cycleways will be created through planning applications, which will be accessible by the public and will be subject to a legal agreement. However, the plan is not in a position to create new 'Rights of Way', this comes under the jurisdiction of Dorset County Council. This is in accordance with para 75 of the NPPF.

2.71 In terms of development viability, the Infrastructure Delivery Plan will ensure schemes are viable, and officers will negotiate to deliver the best facilities for the community. A robust Community Infrastructure Levy charging schedule will be available and consistent with local needs and development viability. This will be referenced in the policy, as will the need to read the policy in conjunction with this and Appendix 1 - Open Space Provision.

2.72 Proposed Pre-Submission Change

2.73 Text amended to refer to the guidance in Appendix 1 and delivery through the Infrastructure Delivery Plan. Deleted paragraph has been superseded.

Proposed Changes to the Pre-Submission Core Strategy

Policy HE 4

Open Space Provision

The open space standards and Local Need Area boundaries provided by the 2007 Open Space, Sport and Recreation Studies will be applied throughout the Plan area (amended as necessary to take account of recent open space developments and new areas allocated for housing in the Core Strategy). Contributions will be directed towards meeting the quantity, quality and accessibility shortfalls for each of the Local Need Areas. The aim is to deliver a combination of new facilities and improvements to existing ones, depending on the unique needs of the Local Needs Areas and the availability of land.

Existing open spaces and leisure facilities identified on the Proposals Map will be protected and their loss will not be permitted unless their whole or partial redevelopment would result in greater benefits to the community than retaining that facility. On such occasions the replacement must be provided in close proximity, unless it can be shown that the open space, sport or recreational facility was not required.

Recommended Open Space Standards from the 2007 Open Space, Sport & Recreation Study:

Open space type	Recommended accessibility standard (straight line distance).	Recommended quantity standard (hectares per 1000 population)	Recommended quantity standard (square metres per person)	Total recommended provision
Recreation Grounds & Public Gardens (includes parks)	450m	0.5 ha	5.0 sq m	3.75 ha per 1000 population / 37.5 sq m per person
Amenity Green Space	450m	0.5 ha	5.0 sq m	
Natural & Semi-natural Green Space	600m	1.0 ha	10.0 sq m	
Active (outdoor) Sports Space	600m	1.25 ha	12.5 sq m	
Children & Young People's Space	450m	0.25 ha	2.5 sq m	
Allotments	600m	0.25ha	2.5 sq m	

Table 2.12

Children's play provision, which forms part of the children and young people's space category, must be provided on the basis of the **standards guidance** set out in Appendix 1. Where appropriate in terms of location and the nature of the development, and where a local need for small scale facilities has been identified, on site provision will be preferable. It may be appropriate for earlier developments to provide the land upon which later developments pay for structures or equipment. Financial contributions towards off site provision of open space may be acceptable where it is impractical for provision to be on site. In this instance contributions should be in line with the standards set out in this policy.

The policy will aim to deliver a combination of new facilities and improvements to existing ones, depending on the unique needs of the 'Local Need Areas' and the availability of land.

Delivering new and enhanced provision

The Councils will produce an 'implementation and delivery plan' which will include a list of the priority needs and objectives for each local Needs Area and specific opportunities for new or enhanced provision. It will identify opportunities to maximise the use of existing sites and potentially re-designate sites for alternative leisure uses, in line with local needs.

Location of new provision

When considering sites for new open space and leisure provision, priority will be given to sites which are easily accessible by a range of transport modes and which can be integrated into a network of green infrastructure. Sites for new open space provision will be identified through an implementation and delivery plan and considered for allocation through the forthcoming Site-Specific Allocations Development Plan Document.

Green Infrastructure

Where appropriate, the Community Infrastructure Levy will be used to ensure that elements of green infrastructure will be incorporated into their design such as 'permeability', with green foot and cycle paths running through the development, connecting with existing routes wherever possible.

This Policy should be read in conjunction with Appendix 1 Open Space Provision and the current Infrastructure Delivery Plan.

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					
0	0	0	0	0	0	0	0	0

Table 2.13

2.74 No responses were received to this proposed change.

Councils' Position

2.75 The Councils' position is as set out above in response to the Pre Submission Core Strategy.